PUBLIC DISCLOSURE

November 3, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citizens Bank, National Association

Charter Number: 24571

One Citizens Plaza
Providence, RI 02903

Office of the Comptroller of the Currency

Regional and Midsize Financial Institutions
Constitution Center
400 7th Street, S.W.
Washington, DC 20219

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

Contents

Overall CRA Rating

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

The following table indicates the performance level of Citizens Bank, NA with respect to the Lending, Investment, and Service Tests:

	Citizens Bank, NA Performance Tests		
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on performance across all rating areas. The overall conclusions are a weighted average, based on adjusted deposits, of the five multistate metropolitan statistical areas (MMSA) and ten state ratings. The bank's Outstanding Lending Test performance was driven by Outstanding ratings in 11 rating areas, including the three largest rating areas by deposit volume (Boston-Worcester-Providence, MA-RI-NH Combined Statistical Area (CSA), New York-Newark, NY-NJ-CT-PA CSA, and the Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA).

- The Investment Test rating is based on performance across all rating areas. Examiners weighted performance in the same manner as the Lending Test. The Outstanding Investment Test performance was driven by Outstanding ratings in all rating areas.

- The Service Test rating is based on performance across all rating areas. Examiners weighted performance in the same manner as the Lending Test. The Outstanding Service Test rating was driven by Outstanding ratings in 11 rating areas, including the three largest rating areas by deposit volume.

Lending in Assessment Area

An adequate percentage of the bank's loans were in its assessment areas (AAs).

The bank originated and purchased 65.8 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										**2022 - 2024**
Loan Category	**Number of Loans**				**Total #**	**Dollar Amount of Loans $(000s)**				**Total $(000s)**
	Inside		**Outside**			**Inside**		**Outside**		
	#	**%**	**#**	**%**		**$**	**%**	**$**	**%**	
Home Mortgage	181,313	63.66	103,509	36.34	284,822	44,093,425	60.47	28,824,193	39.53	72,917,618
Small Business	34,552	79.86	8,716	20.14	43,268	1,846,683	77.37	540,154	22.63	2,386,837
Total	215,865	65.79	112,225	34.2	328,090	45,940,108	61.01	29,364,347	38.99	75,304,455

Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

Citizens Bank, NA (CBNA, bank, or institution), headquartered in Providence, Rhode Island, is a full-service interstate bank that is a wholly owned subsidiary of Citizens Financial Group (CFG). CBNA is a full-service commercial bank providing a wide range of financial products and services to individuals, small businesses, middle-market companies, large corporations, and institutions.

CBNA had assets of $217.2 billion, deposits of $178.8 billion, and tier 1 capital of $20.2 billion as of December 31, 2024. Loans and leases totaled $140.2 billion as of December 31, 2024, and represented 64.5 percent of total assets. The loan portfolio was comprised of $49.8 billion in real estate loans (35.5 percent), $25.8 billion in commercial loans (18.4 percent), $19.6 billion in loans to individuals (14 percent), $13.5 billion in other loans and leases (9.6 percent).

As of December 31, 2024, CBNA had a network of 1,005 branch office locations and 1,808 Automated Teller Machines (ATMs), of which, 1,745 were deposit-taking in 15 states that included Connecticut, Delaware, Florida, Massachusetts, Maryland, Michigan, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Virginia, and Vermont as well as the Washington District of Columbia (DC). The bank entered into the state of California with new private bank branches opened in June and August of 2024. The state of California was not rated during this evaluation period due to CBNA's late entry into the market.

During the evaluation period, there were two acquisitions impacting the bank's CRA profile. On February 18, 2022, CBNA acquired a portion of HSBC's network, including 66 locations in the New York metro area, nine locations in the Mid-Atlantic/Washington DC area, and five locations in Southeast Florida. On April 6, 2022, CBNA acquired Investors Bank, building its physical presence in the northeast with the addition of branches located in greater New York City, Philadelphia metro areas, and across New Jersey.

There were no known legal, financial, or other factors impeding CBNA's ability to help meet the credit needs within its AAs during the evaluation period. The bank had no affiliates or subsidiaries that negatively affected the bank's capacity to lend, invest, or provide banking services within its communities.

CBNA received an overall Outstanding rating in its last CRA evaluation by the Office of the Comptroller of the Currency (OCC), dated September 26, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the large institution Lending, Investment, and Service Tests. The evaluation period is January 1, 2022, through December 31, 2024. In evaluating the bank's lending performance, examiners reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA), small loans to businesses and farms reported under the CRA, and Community Development (CD) loans. Examiners also evaluated retail services, qualified investments, and CD services from January 1, 2022, through December 31, 2024. At the request of the bank, CD investments made by Citizens One Community Development Corporation (COCDC), a CBNA subsidiary, were considered in the evaluation. Examiners did not consider consumer loans in this evaluation, as consumer lending did not constitute a substantial majority of the bank's business and management did not request consideration.

During the evaluation period, Metropolitan Statistical Area (MSA) boundary changes introduced in July 2023, effective January 1, 2024, by the United States Office of Management and Budget (OMB) resulted in the need for additional analysis for some AAs under the Lending Test. Both the geographic and borrower distribution for those AAs affected by the OMB changes received separate analyses based on 2022 through 2023 data and 2024 data, and the data are presented separately in the tables. The Boston-Worcester-Providence, MA-RI-NH CSA, New York-Newark, NY-NJ-CT-PA CSA, Youngstown-Warren-Salem, OH CSA, New Haven-Hartford-Waterbury, CT CSA, Salisbury, MD-DE MSA, Delaware Non-MSA, Lansing-East Lansing, MI MSA, Michigan Non-MSA, Cleveland-Akron-Canton, OH CSA, Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA, and Pennsylvania Non-MSA were affected. The rest of the bank's AAs were not affected.

Lending Test

Loan Products Evaluated

Examiners evaluated home mortgage loans and small loans to businesses in each AA. All home mortgage products were reviewed, and conclusions were reached in the aggregate. Small farm lending is not a primary product in any of the bank's AAs, and there was an insufficient number of small loans to farms for a meaningful analysis.

Examiners did not perform a statistical analysis or draw conclusions for a loan product if the bank originated or purchased fewer than 20 loans in an AA.

Lending Activity

For all rating areas, examiners evaluated the bank's lending activity by measuring the volume of the bank's lending compared to its size and resources in its AAs. For each applicable loan product in its AAs, examiners compared the bank's 2023 or 2024 lending market share and rank to its deposit market share and rank to approximate the bank's lending volume relative to its size, lending capacity, and competitive environment. Examiners divided the bank's market rank by the total number of depository institutions or lenders, respectively. This approach takes into consideration the differences between the number of insured depository institutions and the number of home mortgage, small business, and small farm lenders within the AA. Examiners leveraged the Federal Deposit Insurance Corporation (FDIC) Deposit Market

Share reports to determine the bank's deposit market share and rank for AAs in which the bank operated a licensed branch.

Loan Distribution Analysis

The loan distribution analyses compared home mortgage loans and small loans to businesses to demographic and aggregate data under the applicable Lending Test components. Borrower and geographic demographic comparators covered all years of the evaluation period where aggregate comparators included only data from 2023 and 2024. Aggregate data illustrates how the bank is performing relative to other lenders in the AA and provides context on the reasonableness of the bank's performance.

Geographic and Borrower Distribution

Examiners generally gave equal weighting to geographic and borrower distribution components of the Lending Test unless performance context factors indicated that examiners should consider one component more than the other.

For the analysis of the bank's geographic distribution of loans, examiners generally weighted the bank's performance between low- and moderate-income geographies equally, unless otherwise noted. In certain AAs, examiners placed more emphasis on the bank's performance in low- or moderate-income geographies if warranted by limited opportunities to lend or other performance context factors. Unless otherwise noted in a specific rating area, examiners placed more weight on the 2022-2023 analysis period as it covered more of the overall evaluation period. Examiners included narrative discussions and data in the tables in Appendix D for both analysis periods. Examiners described any variations within the narrative comments of each rating area.

For the home mortgage borrower distribution analysis, examiners considered the impact that income, poverty levels, and housing costs have on limiting homeownership opportunities of low- and moderate-income individuals and families. Additionally, examiners considered the impact of home affordability for low- and moderate-income borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics. In these higher cost markets, it is difficult for many low- and moderate-income borrowers to afford a home as the area's median housing value is typically too high for conventional mortgage loan qualifications.

CBNA's home mortgage portfolio consists primarily of open-end home equity lines of credit (HELOC). Over 70 percent of the bank's home mortgage lending in its AAs is open-end HELOC. When looking at aggregate home mortgage data, the product mix is nearly the inverse with open-end HELOC representing only 20 percent of aggregate loans. This variation is noteworthy as different mortgage products have varying capacities to reach low- and moderate-income borrowers and areas. Aggregate data indicates that banks have lower penetration of open-end HELOCs in low- and moderate-income areas. This trend is often attributed to the combination of lower median home values and the limited financial capacity of residents in those tracts, resulting in reduced demand for home-equity lines of credit. Given CBNA's unique product mix, the OCC conducted separate analyses for open-end HELOCs and closed-end mortgages for geographic and borrower distribution. Open-end HELOC is the bank's primary mortgage product; however, closed-end mortgage offers an entry point into homeownership. Therefore, we considered both open-end HELOCs and closed-end mortgages, with open-end HELOCs given marginally more weight.

Community Development Loans

The lending analysis also considered the number and dollar volume of CD loans, with emphasis placed on loans that were particularly complex, innovative, or responsive to AA needs. CD lending could have a positive, neutral, or negative impact on the performance rating, which examiners described within the narrative comments. To provide perspective, examiners compared the dollar amount of CD loans to the tier 1 capital allocated to the AAs. Tier 1 capital was allocated to the rating areas and AAs based on the pro rata share of bank deposits to that area.

Examiners also considered CD lending by the bank in the broader statewide or regional area (BSRA). This included lending in the BSRA that included the AA, where the entity or activity had a purpose, mandate, or function that included serving the AA. Examiners considered BSRA activities that did not serve an AA only if the bank was responsive to CD needs and opportunities in its AAs.

Innovative or Flexible Lending Products

CBNA used innovative and/or flexible lending programs to serve AA credit needs during the evaluation period. The bank's innovative and flexible loan product offerings include both bank-developed and government-sponsored loan programs that help to meet the credit needs of low- and moderate-income borrowers. Although products provided through the federal or state governments are not necessarily innovative, the loan products provide flexibility to consumers and businesses seeking financing. Innovative or flexible loan products specific to a rating area are discussed in the "Product Innovation and Flexibility" section of applicable rating areas.

A summary of CBNA's innovative and/or flexible loan products or programs offered throughout the bank's footprint are as follows:

<u>Citizens Goal Builder (HELOC)</u>

The program is designed to help low- and moderate-income borrowers and/or residents take advantage of equity that many traditional HELOC products may not. This variable rate product has no application fee, no closing costs, no prepayment penalty, no annual fee, and accommodates amounts from $5,000 to $25,000. Similar to the standalone HELOC, the borrower has 10 years to draw and an additional 15 years to repay. Credit score minimum requirements are reduced to 620 FICO and loan-to-value (LTV) requirement allow up to 97 percent. This product is available for customers whose properties are located in the bank's CRA AA. If the property is not located in a low- or moderate-income census tract, then customers must meet Federal Financial Institutions Examination Council income eligibility guidelines. CBNA originated 2,338 Citizens Goal Builder HELOCs totaling $57 million.

<u>Closing Cost/Down Payment Assistance Program (CCA)</u>

To help address affordability gaps in the bank's AAs, the bank provides first-time homebuyers, specifically low- and moderate-income borrowers and/or property located in a low- and moderate-income census tract, with standard grant funds of three percent or up to a maximum of $10,000 (no lien on property or repayment required) to be used towards down payment and/or closing costs. CBNA grant funds are eligible for use with Destination Home Loan Program, Fannie Mae HomeReady, and FHA eligible purchase loans, while Down Payment Assistance can be used in conjunction with Destination Home Loan Program and Massachusetts Housing Partnership product. CBNA provided $15.4 million in grants to 2,824 borrowers during the evaluation period.

- Destination Home + is a Special Purpose Credit Program (SPCP) designed to offer affordable homeownership opportunities to borrowers in majority-minority census tracts (MMCTs). The SPCP can increase access to affordable mortgage credit in the target markets by providing eligible homebuyers with up to $5,000 in down payment and/or closing cost assistance and lender-paid mortgage insurance. This program is available to first-time homebuyers who purchase a one-unit primary residence in MMCTs within designated markets.

- The HomeReady First (FNMA SPCP) program offers flexibilities for first-time homebuyers residing in specific geographic locations. The program provides the borrower(s) with grant funds that may be used towards down payment and closing costs based on the location of the primary residence at the time of application and the area median income (AMI) of the subject property.

Connecticut Housing Finance Authority (CHFA)

CHFA offers 30-year, fixed-rate mortgages with below-market interest rates to low- and moderate-income families and individuals in Connecticut. CHFA programs have features such as below-market interest rate, low down payment requirements, and down payment assistance loans. CHFA loans are financed through the sale of tax-exempt bonds and private investors; therefore, borrowers must meet CHFA income limit requirements, and the subject property must have a sales price that does not exceed CHFA purchase price limits. The bank did not originate any CHFA loans during the evaluation period.

- 406 CHFA Conventional (HFA Preferred & Uninsured) features below-market interest rates for first-time homebuyers with low mortgage insurance (PMI) costs. Borrowers who have owned homes before may also qualify for a loan under this program if they plan to purchase a home located in a targeted area.

- 407 CHFA FHA features below-market interest rates combined with FHA underwriting.

- 410 CHFA Down Payment Assistance Program provides financial assistance in the form of second mortgage loans to eligible first-time homebuyers based on their financial needs to assist in the purchase of a one-to-four family, condominium, or planned CD-eligible property.

Destination Home Loan Program (DHM)

This program offers eligible, prospective homeowners an opportunity to buy and sustain a home with a very minimal down payment and an affordable, low monthly mortgage payment. The flexible terms, absence of PMI and subsidized pricing allow various borrowers to qualify for a mortgage when they otherwise may not be able to. This product is considered innovative because it offers eligible borrowers above-market LTV financing at a low, long-term fixed interest rate. The flexible combination of higher LTV and low, long-term fixed interest rate allows the bank to keep down payment requirements low for homebuyers while keeping their monthly mortgage payments affordable. Eligible borrowers whose income does not exceed 80 percent of median income or borrowers who purchase their homes in low- or moderate-income census tracts, could receive between 95 percent and 97 percent, 30-year, low fixed-rate financing for home purchases and limited-cash out refinances of one-to-four-unit homes. Moreover, a higher combined LTV of 105 percent is permitted where borrowers leverage community second programs structured as deferred and/or forgivable loans that lowered overall home purchase prices. In addition, the absence of PMI allows these loans to be more affordable to low- and moderate-income borrowers. To help ensure responsible homeownership, the bank requires homebuyer education for first-time homebuyers.

CBNA partners with the U.S. Department of Housing and Urban Development (HUD) approved housing counseling agencies to provide this service. During the evaluation period, CBNA originated 1,141 Destination Home Loans totaling $249.7 million.

Fannie Mae HomeReady

The program is designed for low-to-moderate income borrowers, with expanded eligibility up to 97 percent LTV. HomeReady loans provide affordable conventional financing with low down payments, flexible sources of funds, and innovative underwriting flexibilities that expand access to credit. Additionally, reduced PMI coverage applies. CBNA originated 3,522 Fannie Mae HomeReady loans totaling $725.8 million.

Fannie Mae Loan Product

The product is used in support of ongoing efforts to expand access to credit and support sustainable Homeownership. Fannie Mae offered 95 to 97 percent LTV/ combined LTV/ home equity combined LTV financing to help homebuyers who would otherwise qualify for a mortgage but may not have the resources for a larger down payment, and to support refinance of existing Fannie Mae mortgage loans. CBNA originated 19,537 FNMA loans totaling $5.4 billion.

Federal Home Loan Bank Boston

Equity Builder Program (EBP) and Housing Our Workforce (HOW) programs provide eligible low- and moderate-income homebuyers with grant funds of up to $25,000 to be used towards down payment and/or closing costs. The program can only be used in Connecticut, Massachusetts, Maine, New Hampshire, Rhode Island, and Vermont. The bank did not provide any grants under these programs during the evaluation period.

State of New York Mortgage Agency (SONYMA)

SONYMA offers mortgage programs to assist with the purchase of a home in New York State. Each program features a below-market interest rate, low down payment requirements, no points, and no prepayment penalties. Each of these features is designed to make a borrower's home purchase more affordable. All SONYMA loans are financed through the sale of tax-exempt bonds and therefore borrowers must meet SONYMA Household Income Limit requirements, and the subject property must have a sales price that does not exceed SONYMA Purchase Price Limits. The bank did not originate any SONYMA loans during the evaluation period.

- 431 SONYMA Conventional Fixed Rate program offers a low interest rate with no points and financing of up to 97 percent of the value of the property for qualified borrowers and homes (three to four units maximum is 90 percent) with a low minimum borrower cash contribution requirement.

- 432 SONYMA Achieving the Dream Conventional Fixed Rate program offers a very low interest rate and low down payment on one-to-two-unit homes for low-income borrowers. Financing of up to 97 percent of the value of the property for qualified borrowers with a low minimum borrower cash contribution requirement of 1 percent of the value of the property.

- Homes for Veterans program is a supplemental option for the plan 431 SONYMA Low-Interest Rate product. It is available for eligible veterans who are currently serving or have served in the active military, naval, or air service. This option offers a reduced interest rate on the SONYMA Low-Interest Rate product.

The Federal Housing Administration (FHA)

The program allows high LTV purchase and refinance transactions. The program allows for low down payment options, flexible sources for down payment, low minimum credit score, and is aimed at borrowers who may not qualify for traditional financing. CBNA originated 5,123 FHA Loans totaling $1.2 billion.

The Freddie Mac Home Possible

This program is designed for low- and moderate-income borrowers, with expanded eligibility up to 97 percent LTV for financing homes in low-income communities. Home Possible loans provide affordable conventional financing with low down payments and flexible sources of funds in innovative underwriting flexibilities that expand access to credit responsibly. CBNA originated 1,027 Freddie Mac Home Possible Loans totaling $226.3 million.

The Freddie Mac Loan Product (FHLMC)

The product is used in ongoing efforts to expand access to credit and support sustainable homeownership, with the agency offering between 95 percent to 97 percent LTV/ combined LTV/ home equity combined LTV financing to help homebuyers who would otherwise qualify for a mortgage but may not have the resources for a larger down payment, and to support the refinance of existing mortgage loans. Freddie Mac's Positive Rent Pay History, and the credit score minimum of 620 allow for flexibility in making homeownership more accessible for those with limited credit backgrounds. In addition, for first-time homebuyers, prior to loan approval, CBNA requires completion of homebuyer financial education courses to help ensure applicants are well-prepared for successful homeownership. CBNA originated 2,777 FHLMC Loans totaling $932.7 million.

The Massachusetts Housing Partnership Program (MHP)

The objective of the program is to provide mortgage loans to low- and moderate-income first-time homebuyers by lowering the monthly costs of homeownership. The participating lender underwrites the mortgage loan for up to 97 percent of the purchase price (95 percent for three-family properties). The borrower does not pay PMI, and public funds provide a loan loss reserve for participating lenders. Public entities, including the Commonwealth of Massachusetts, acting through the Department of Housing and Community Development, the Massachusetts Housing Partnership, and individual cities and towns contribute to the pool of public funds for the interest subsidy and loan loss reserve payments. CBNA originated 446 MHP Loans totaling $148.8 million.

The Veterans Administration (VA)

This program is designed to offer long-term financing to eligible American veterans or their surviving spouses. VA Loans are often made without any upfront payment(s) and frequently offer lower interest rates than typically available with other types of loans. CBNA originated 1,755 VA Loans totaling $608.2 million.

Other Loan Data

Examiners also considered letters of credit with a CD purpose.

Investment Test

The OCC's analysis of qualified investments included the investment portfolio as well as donations and grants made during the evaluation period that had CD as their primary purpose. Qualified investments included investments that met the definition of CD that the bank made in the current evaluation period and those made prior to the current evaluation period that were still outstanding and continue to benefit the AA. Examiners considered prior period investments at the book value of the investment at the end of the current evaluation period and current period investments at their original investment amount. Evaluation of the bank's performance considers the number and dollar amount of investments. For full-scope areas, examiners also considered the complexity or innovation of the investments, the responsiveness of the investments to community needs, and the bank's demonstrated leadership. The bank utilized low-income housing tax credits (LIHTC), New Market Tax Credits (NMTC), and Historical Tax Credits (HTC) in many of its AAs.

To provide perspective regarding the relative level of qualified investments, examiners compared the dollar amount of current and prior period investments to tier 1 capital allocated to the AAs. Tier 1 capital was allocated to the rating areas and AAs based on the pro rata share of bank deposits from that area.

The OCC also considered any qualified investment activity that benefited a specific AA in the applicable state or multistate rating area. This included investments in the BSRA that included the AA, where the entity or activity had a purpose, mandate, or function that included serving the AA. Examiners considered BSRAs that did not serve an AA only if the bank was responsive to CD needs and opportunities in its AAs.

Service Test

Retail Services

For full-scope AAs, examiners evaluated the accessibility of CBNA's systems for delivering financial services to their AAs, the impact of branch openings and closings, and the range of services offered across geographies of different incomes. Examiners concluded on the accessibility of bank delivery systems by assessing the geographic distribution of the bank's branches and ATMs among low-, moderate-, middle-, and upper-income geographies as of December 31, 2024, the branches located in middle- and upper-income geographies that served and improved access for customers in low- and moderate-income geographies, and the availability and effectiveness of the bank's alternative delivery systems (ADS) for delivering financial services to low- and moderate-income individuals and geographies. Additionally, where the bank opened or closed branches within an AA during the evaluation period, the overall impact of the changes was evaluated. If no branches were opened or closed in an AA, examiners did not include that performance element in the analysis. For the limited-scope AAs, branch distribution and the impact of branch openings and closings were the only two factors considered in the Service Test.

Middle- and Upper-Income-Adjacent Branches

In the full-scope AAs, examiners considered branches located in middle- and upper-income geographies that served and improved access for LMI customers in LMI geographies. Examiners first considered middle- and upper-income branches that were within one-quarter mile of a low- or moderate-income geography. For every branch that met the one-quarter-mile radius, examiners considered if those branches served a larger population of LMI individuals, as determined by transactional data, than the population living in those geographies. Examiners gave positive consideration when the middle- and upper-income branch was within one-quarter mile of one or more LMI census tracts and opened demand deposit accounts at a rate higher than the overall LMI population in the rating area.

Alternative Delivery Systems

In the full-scope AAs, examiners considered the availability and effectiveness of ADS for delivering retail banking services. The bank offers multiple ADS including ATMs, telephone and online banking, electronic bill pay, remote deposit capture, and mobile banking options. Examiners evaluated the level of retail services provided to low- and moderate-income individuals through bank-prepared analysis by comparing the level of ADS usage by LMI households during the evaluation period. The analysis showed the number of CBNA retail households by tract within each examination (exam)-rated area, along with the percent by which each utilized the ADS. ADS usage had a positive impact on each full-scope assessment area when the ADS usage showed a strong increase from the start of the exam period when compared to the end of the exam period for LMI households.

Overall, across the bank's rating areas, the volume of households in low- and moderate-income census tracts utilizing online and mobile banking increased at a higher rate (39 percent and 31 percent, respectively) than the volume of households in middle- and upper-income census tracts (25 percent).

Branch Hours and Retail Products and Services

Examiners evaluated the range of services and products offered by all the bank's branches in the full-scope AAs. Examiners specifically focused on any differences in branch hours, products, and services provided in low- and moderate-income geographies compared to those provided in middle- and upper-income geographies.

Branch hours and retail products and services offered at branches are generally consistent throughout the bank's AAs based on the branch type. CBNA offered a variety of branch facilities. Of CBNA's branches, 852 were traditional retail branch facilities, 143 were in-store branches, four were special purpose branches, two were private bank branches, and one was a drive-thru location. Three of the four special purpose branches were limited-hour partnerships with assisted living facilities, and one special purpose branch was a limited-hour employee-only branch. The bank offered three temporary mobile unit branches that were set up after a store closure. CBNA placed mobile units at these sites to service customers while the bank built out traditional branch relocation sites. Traditional branch hours of operation are Monday through Friday, 9:00 am to 4:00 pm, and Saturdays 9:00 am to 12:00 pm. The bank's in-store branch hours of operation are Monday through Friday, 10:00 am to 5:00 pm, and Saturdays 10:00 am to 3:00 pm.

Community Development Services

The bank's record of providing CD services was evaluated in AAs that received full-scope reviews. The primary consideration was the extent of CD services provided with additional consideration given to the responsiveness of CBNA's CD services in meeting community needs within its AAs. Examiners also considered community needs identified through community contacts at the individual AA level.

Other Information and Definitions

Assessment Areas

Examiners determined that all AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that CBNA's branches service and did not arbitrarily exclude any low- and moderate-income areas.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. Examiners did not identify any unexplained, conspicuous gaps in the full-scope areas reviewed.

Deposit Adjustments and Allocation of Tier 1 Capital

As of June 30, 2024, CBNA had total deposits of $178.8 billion; however, for CRA analysis purposes, examiners excluded a total of $38.5 billion in non-retail deposits that were held in multiple AAs and the deposits allocated to California. The adjusted deposits were used to calculate the bank's total deposits and the bank's pro rata share in each AA and then used to allocate tier 1 capital to the rating areas and AAs.

Total deposits were adjusted for the following AAs: Boston-Worcester-Providence, MA-RI-NH CSA, Cleveland-Akron-Canton, OH CSA, New Haven-Hartford-Waterbury, CT CSA, New York-Newark, NY-NJ-CT-PA CSA, and the Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA.

The Youngstown-Warren, OH-PA CSA AA was evaluated from January 1, 2022, through December 31, 2023. For this AA, examiners used deposits as of June 30, 2023, and tier 1 capital as of December 31, 2023. The pro rata share for this area was then used to allocate tier 1 capital to the AA for analysis purposes.

Deposit Market Share

Examiners used summary deposit data reported to the FDIC as of June 30, 2024, unless otherwise noted. This was the most recent public data available during the evaluation period. Deposit market share data includes deposit data for FDIC-insured institutions such as banks and savings and loan associations but not credit unions.

Unemployment Rate

The unemployment rates referenced are the MSA non-seasonally adjusted rate as published monthly by the U.S. Bureau of Labor Statistics (BLS).

Community Contacts

Examiners reviewed and considered community contacts available to the OCC, FDIC, and Board of Governors of the Federal Reserve System made during the evaluation period with community groups, local government representatives, realtors, and business leaders within the various AAs. Community contacts were utilized to ascertain the AA's credit needs, demographics, and economic conditions. Applicable community contacts are referenced in each AA that received a full-scope review. The community contacts indicated that affordable housing, small business financing, and financial education continued to be the primary credit and CD needs in many AAs.

Selection of Areas for Full-Scope Review

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

Ratings

The bank's overall rating is a blend of the state and multistate CSA ratings. The PE is presented by multistate CSA rating areas followed by each state in alphabetical order.

The multistate CSA ratings are based on the bank's performance within that CSA. State ratings are based primarily on conclusions in the AAs reviewed using full-scope procedures while also considering performance in the limited-scope AAs.

Limited-scope procedures focused primarily on quantitative data, with consideration of qualitative data generally limited to demographic and competitive factors. Performance in limited-scope AAs was considered as stronger than, weaker than, or consistent with overall performance in full-scope AAs within the rating area. Based on these conclusions, there was a positive, negative, or neutral impact on the state rating.

In each AA, mortgage loans were weighted more heavily than small loans to businesses. The loan distribution analyses compared HMDA loans and loans to small businesses to demographic and aggregate data under the applicable lending test components. Aggregate data illustrates how the bank is performing relative to other lenders in the AA and provides context as to the reasonableness of the bank's performance. Examiners weighted demographic comparisons more heavily than aggregate performance.

In arriving at overall conclusions, the Boston CSA was most heavily weighted as this area accounted for 46 percent of the bank's total domestic deposits, and 26.4 percent of the bank's HMDA and small loans to businesses lending during the evaluation period. The New York CSA, which represented 14.9 percent of deposits and 18.9 percent of lending, was also given considerable weight based on the volume of deposits and lending. The Philadelphia CSA, which represented 14.3 percent of deposits and 21.1 percent of lending, was also given considerable weight based on the volume of deposits and lending.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

Multistate Metropolitan Statistical Area Rating

Boston-Worcester-Providence, MA-RI-NH CSA (Boston CSA)

CRA rating for the Boston CSA[1]: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending further supported the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income-adjacent branches and ADS.
- The bank was a leader in providing CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Boston CSA

The Boston CSA was the bank's largest rating area based on deposits. CBNA delineated 18 counties within the Boston CSA as its AA. The Boston CSA is comprised of counties in Barnstable Town, MA MSA, Boston-Cambridge-Newton, MA-NH MSA, Concord, NH Micropolitan Statistical Area, Laconia, NH Micropolitan Statistical Area, Manchester-Nashua, NH MSA, Providence-Warwick, RI-MA MSA, and Worcester, MA-CT MSA. Refer to appendix A for the list of counties reviewed.

CBNA had $54.5 billion in adjusted deposits in the Boston CSA, representing 38.9 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated 263 branches and 592 ATMs within the AA, representing 26.2 percent of total bank branches and 32.8 percent of total ATMs. The bank originated and purchased approximately $11.3 billion in home mortgage and small business loans within the Boston CSA during the review period.

[1] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

According to FDIC deposit data as of June 30, 2024, there were 140 FDIC-insured institutions operating 2,174 branches in the AA. CBNA ranked third in deposit market share with 13.4 percent. Other top banks by deposit market share are State Street Bank and Trust Company with 29.5 percent, Bank of America, NA with 17.5 percent, and Santander Bank, NA with 5.3 percent.

Boston CSA

The following tables provide a summary of the demographics, including housing, business, and economic information, for the Boston CSA AA for each period.

Assessment Area(s) - 2022-2023 Boston CSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	1,953	9.88	18.18	39.63	29.34	2.97
Population by Geography	8,466,186	9.02	18.36	40.38	31.45	0.79
Housing Units by Geography	3,504,382	8.43	18.78	41.98	30.16	0.66
Owner-Occupied Housing by Geography	2,020,711	3.13	14.01	45.40	37.15	0.31
Occupied Rental Units by Geography	1,170,296	17.78	26.71	34.84	19.45	1.23
Vacant Units by Geography	313,375	7.66	19.87	46.58	25.13	0.76
Businesses by Geography	363,438	6.89	15.61	39.84	36.76	0.89
Farms by Geography	10,934	3.14	12.10	46.04	38.39	0.33
Family Distribution by Income Level	2,032,450	22.08	16.81	20.51	40.60	0.00
Household Distribution by Income Level	3,191,007	25.88	14.85	17.06	42.21	0.00
Unemployment rate (%)	4.91	9.68	6.02	4.39	3.75	5.90
Households Below Poverty Level (%)	10.08	27.61	14.43	7.85	5.37	20.39
Median Family Income (12700 - Barnstable Town, MA MSA)		$99,410	**Median Housing Value**			$361,900
Median Family Income (14454 - Boston, MA MD)		$112,607	**Median Gross Rent**			$1,282
Median Family Income (15764 - Cambridge-Newton-Framingham, MA MD)		$121,481	**Families Below Poverty Level**			6.20
Median Family Income (31700 - Manchester-Nashua, NH MSA)		$103,238				
Median Family Income (39300 - Providence-Warwick, RI-MA MSA)		$89,555				
Median Family Income (40484 - Rockingham County-Strafford County, NH MD)		$107,377				
Median Family Income (49340 - Worcester, MA MSA)		$96,860				
Median Family Income (Non-MSAs - NH)		$85,473				
Median Family Income (12700 - Barnstable Town, MA MSA) for 2023		$124,300				
Median Family Income (14454 - Boston, MA MD) for 2023		$136,900				
Median Family Income (15764 - Cambridge-Newton-Framingham, MA MD) for 2023		$146,200				
Median Family Income (31700 - Manchester-Nashua, NH MSA) for 2023		$121,800				
Median Family Income (39300 - Providence-Warwick, RI-MA MSA) for 2023		$108,300				
Median Family Income (40484 - Rockingham County-Strafford County, NH MD) for 2023		$135,200				
Median Family Income (49340 - Worcester, MA MSA) for 2023		$115,600				
Median Family Income (Non-MSAs - NH) for 2023		$106,500				
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Boston CSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	1,923	9.93	18.15	39.37	29.54	3.02
Population by Geography	8,349,768	9.01	18.35	40.25	31.59	0.80
Housing Units by Geography	3,454,542	8.43	18.75	41.87	30.29	0.66
Owner-Occupied Housing by Geography	1,989,673	3.11	13.99	45.25	37.34	0.31
Occupied Rental Units by Geography	1,155,745	17.78	26.65	34.79	19.53	1.25
Vacant Units by Geography	309,124	7.71	19.79	46.52	25.21	0.77
Businesses by Geography	346,559	6.87	15.58	39.92	36.77	0.86
Farms by Geography	10,490	3.25	12.06	46.35	38.00	0.34
Family Distribution by Income Level	2,002,530	22.13	16.75	20.52	40.59	0.00
Household Distribution by Income Level	3,145,418	25.91	14.83	17.03	42.23	0.00
Unemployment rate (%)	4.88	9.68	6.02	4.35	3.74	5.90
Households Below Poverty Level (%)	10.05	27.50	14.41	7.82	5.38	20.39
Median Family Income (12700 - Barnstable Town, MA MSA)		$99,410			**Median Housing Value**	$366,200
Median Family Income (14454 - Boston, MA MD)		$112,607			**Median Gross Rent**	$1,288
Median Family Income (15764 - Cambridge-Newton-Framingham, MA MD)		$121,481			**Families Below Poverty Level**	6.18
Median Family Income (31700 - Manchester-Nashua, NH MSA)		$103,238				
Median Family Income (39300 - Providence-Warwick, RI-MA MSA)		$89,555				
Median Family Income (40484 - Rockingham County-Strafford County, NH MD)		$107,377				
Median Family Income (49340 - Worcester, MA MSA)		$99,320				
Median Family Income (Non-MSAs - NH)		$85,473				
Median Family Income (12700 - Barnstable Town, MA MSA) for 2024		$122,700				
Median Family Income (14454 - Boston, MA MD) for 2024		$136,200				
Median Family Income (15764 - Cambridge-Newton-Framingham, MA MD) for 2024		$146,600				
Median Family Income (31700 - Manchester-Nashua, NH MSA) for 2024		$126,000				
Median Family Income (39300 - Providence-Warwick, RI-MA MSA) for 2024		$113,200				
Median Family Income (40484 - Rockingham County-Strafford County, NH MD) for 2024		$138,600				
Median Family Income (49340 - Worcester, MA MSA) for 2024		$114,100				
Median Family Income (Non-MSAs - NH) for 2024		$104,500				

FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within each component MSA or Metropolitan Division (MD) of the Boston CSA for both analysis periods. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2022-2023 table above, the median housing value for the Boston CSA was $361,900, while according to Realtor.com the median sales price of a single-family home was $718,000 at the beginning of 2022 and $800,000 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment between $1,331 to $1,828 and moderate-income borrowers between $2,130 to $2,924, depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $4,796 at the end of 2023. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the Boston CSA during the 2022-2023 period.

Based on information in the 2024 table above, the median housing value for the Boston CSA was $366,200, while according to Realtor.com the median sales prices of a single-family home was $809,900 at the beginning of 2024 and $801,383 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment between $1,306 to $1,833 and moderate-income borrowers between $2,090 to $2,932 depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $4,804 at the end of 2024. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the Boston CSA during the 2024 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Boston CSA, 6.6 percent of families had income(s) below the federal poverty line in 2022-2023 and 6.2 percent of families had income(s) below the federal poverty line in 2024.

Economic Data

Boston-Cambridge-Newton, MA-NH MSA

According to the Moody's Analytics November 2024 reports, the Boston MSA's strengths include serving as the business capital of New England, access to a skilled labor force and venture capital for emerging companies, a highly educated workforce and world class universities that attract companies and facilitate new business formation, dynamic high-tech and biomedical research industries that bolster high-wage employment, and labor market stability due to education and healthcare. Weaknesses include high business and labor costs and high exposure to cyclical finance and technology. Major employment sectors include education and health services, professional and business services, and government. The top employers include Mass General Hospital, Beth Israel Lahey Health, University of Massachusetts, DeMoulas Supermarkets, Harvard University, and The Stop and Shop Supermarket Company.

According to the BLS, the non-seasonally adjusted unemployment rate for the Boston MSA was 4.4 percent in January 2022, decreased to 3.0 percent in December 2023 and increased slightly to 3.9 percent in December 2024. The non-seasonally adjusted unemployment rate for the state of Massachusetts was 3.2 percent in December 2023 and 4.2 percent in December 2024. The national unemployment rate was 3.8 percent in December 2024.

Barnstable, MA MSA

According to the Moody's Analytics January 2025 report, in 2024, the Barnstable MSA's strengths include being an attractive tourist destination with proximity to dynamic Greater Boston, and support to healthcare for a large retiree population. Weaknesses include a reliance on low-wage tourism and retail, above-average living and business costs, and secular population decline. Major employment sectors include leisure and hospitality services, education and health services, government, and retail trade. The top employers include Cape Cod Healthcare, Woods Hole Oceanographic Institution, Stop and Shop Supermarket, and the Steamship Authority.

According to the BLS, the non-seasonally adjusted unemployment rate for the Barnstable MSA was 7 percent in January 2022, decreased to 4.1 percent in December 2023 and increased to 4.9 percent in December 2024.

Manchester-Nashua, NH MSA

According to a May 2025 Moody's Analytics report, in 2024, the Manchester-Nashua NH MSA's strengths include a highly educated workforce and above-average incomes, no state sales, income, or capital gains tax, proximity to dynamic Boston metro area, and a high quality of life and friendly business climate that appeals to entrepreneurs. Weaknesses include slow population growth relative to the U.S. and high energy and housing costs relative to the nation. Major employment sectors include education and health services, professional and business services, and retail trade. The top employers include DeMoulas & Market Basket, Walmart, BAE Systems Electronic Solutions, and Fidelity Investments.

According to the BLS, the non-seasonally adjusted unemployment rate for the Manchester-Nashua, NH MSA was 3.3 percent in January 2022 and decreased to 2.6 percent in December 2023 and 2.7 percent in December 2024. The New Hampshire statewide unemployment rate was also 2.6 percent in December 2023 and 2.7 percent in December 2024.

Providence-Warwick, RI-MA MSA

According to the May 2025 Moody's Analytics report, in 2024, the Providence-Warwick, RI-MA MSA's strengths include strong links to Boston, a collection of colleges and universities, synergies among universities, hospitals, and research and development firms, and a strong housing market. Weaknesses include a heavy tax burden and an unequal distribution of wealth. Major employment sectors include education and health services, government, and professional and business services. The top employers include Brown University Health, Care New England, CVS Health Corporation, and General Dynamics Electric Boat.

According to the BLS, the non-seasonally adjusted unemployment rate for the Providence-Warwick, RI-MA MSA was 4.8 percent in January 2022, decreased to 3.5 percent in December 2023 and increased slightly to 4.3 percent in December 2024. The non-seasonally adjusted unemployment rate for the state of Rhode Island was 3.5 percent in December 2023 and 4.2 percent in December 2024.

Worcester, MA-CT MSA

According to Moody's Analytics January 2025 report, in 2024, the Worcester, MA-CT MSA's strengths include an outsize presence of colleges and universities, low living costs for New England, and low employment volatility. Weaknesses include an overdependence on manufacturing, and high business costs, especially energy. Major employment sectors include education and health services, government, and professional and business services. The top employers include UMass Memorial Healthcare, MSC Industrial Supply Co., University of Massachusetts Medical School, and Walmart, Inc.

According to the BLS, the non-seasonally adjusted unemployment rate for the Worcester, MA-CT MSA was 5 percent in January 2022, decreased to 3.4 percent in December 2023 and increased to 4.0 percent in December 2024.

Community Contacts

A review was conducted of nine community contacts completed during the evaluation period with organizations throughout the Boston CSA. Contacts included entities focused on affordable housing, small business, community and economic development, and community services. The most prevalent need identified by most contacts was affordable housing. Contacts noted the high cost of housing throughout much of the area and the need to develop more affordable rental and homeownership options. High housing costs and lack of inventory are discouraging and/or preventing many low- and moderate-income households from potential homeownership opportunities. Many locations in the CSA have significant numbers of unskilled workers in minimum wage jobs whose earnings are insufficient to cover the cost of housing. There is a need for workforce development training that will provide access to jobs that provide a living wage. In addition, high levels of student loan debt are preventing individuals from qualifying for mortgage credit. Contacts noted the need for commercial development financing to help spur economic development in the downtown or main street areas in several Worcester County localities. Many communities have growing elderly populations in need of affordable as well as accessible housing. Credit and CD needs identified include:

- Affordable housing (both owner-occupied and rental)
- Affordable childcare
- Access to transportation services
- Gap financing for CD projects
- Loans for commercial development to revitalize downtown and main street areas
- Bilingual financial services assistance
- Financial education programming, including budgeting for seasonal workers
- Small business loans, including smaller loans for start-up businesses
- Home rehab funding to help elders age in place

Scope of Evaluation in Boston CSA

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in Windham County, Massachusetts being moved to the New Haven CSA, and reclassified as the Northeastern Connecticut Planning Region in 2024. An analysis of the Boston-Worcester-Providence, MA-RI-NH-CT CSA was performed for 2022-2023 and the Boston-Worcester-Providence, MA-RI-NH CSA for 2024.

Examiners conducted a full-scope review of the Boston CSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN BOSTON CSA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the Boston CSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2024**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Boston CSA	46,537	10,517	0	72	57,126	100.0	100.0
Broader Statewide or Regional Area	0	0	0	2	2	0.0	0.0
Total	46,537	10,517	0	74	57,128	100.0	100.0
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Boston CSA	10,849,426	522,614	0	815,280	12,187,320	100.0	100.0
Broader Statewide or Regional Area	0	0	0	23,000	23,000	0.0	0.0
Total	10,849,426	522,614	0	838,280	12,210,320	100.0	100.0
Source: 1/1/2022-12/31/2024 Bank Data.							
Due to rounding, totals may not equal 100.0%							

*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<u>Boston CSA 2022-2023</u>

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, CBNA ranked third out of 130 FDIC-insured depository institutions (top 3 percent) with a 13.7 percent deposit market share.

For home mortgage loans, the bank's market share of 8.2 percent ranked first out of 750 lenders (top 1 percent). The other top lenders were JPMorgan Chase Bank, NA with 3.9 percent market share, Rocket Mortgage with 3.3 percent market share, and United Wholesale Mortgage with 2.7 percent market share.

For small loans to businesses, the bank's market share of 1.1 percent ranked 12th out of 213 lenders (top 6 percent). The top three lenders were American Express National Bank with 27.7 percent market share, JPMorgan Chase Bank, NA with 13.2 percent market share, and Bank of America, NA with 9.3 percent market share.

Boston CSA 2024

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked third out of 140 FDIC-insured depository institutions (top 3 percent) with a 13.4 percent deposit market share.

For home mortgage loans, the bank's market share of 7.0 percent ranked first out of 742 lenders (top 1 percent). The other top lenders were Rocket Mortgage with 3.8 percent market share, United Wholesale Mortgage with 3.0 percent market share, and Guaranteed Rate, Inc. with 3.0 percent market share.

For small loans to businesses, the bank's market share of 1.0 percent ranked 12th out of 206 lenders (top 6 percent). The top three lenders were American Express National Bank with 30.4 percent market share, JPMorgan Chase Bank, NA with 15.2 percent market share, and Bank of America, NA with 11 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good.

		Low-Income Tracts			**Moderate-Income Tracts**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	5,378	265	4.93	4.99%	852	15.84	16.55
2024	1,513	68	4.49	5.84%	269	17.78	19.78
HELOC							
2022-2023	28,961	671	2.32	2.12%	3,085	10.65	10.67
2024	10,685	312	2.92	2.49%	1,196	11.19	11.71

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

2022-2023

The geographic distribution of home mortgage loans was good.

The percentage of home mortgage loans originated or purchased in low-income geographies was near to the percentage of owner-occupied housing units located in those geographies and was well below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded the aggregate and the percentage of closed-end mortgages was near to the aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, both the percentage of open-end HELOCs originated or purchased and the percentage of closed-end mortgages were near to the aggregate.

2024

The geographic distribution of home mortgage loans was excellent.

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded the aggregate and the percentage of closed-end mortgages was below the aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, both the percentage of open-end HELOCs originated or purchased and the percentage of closed-end mortgages were near to the aggregate.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good.

2022-2023

The geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2024

The geographic distribution of small loans to businesses was good. The percentage of small loans to businesses originated or purchased in low-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies and approximated the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes. Examiners also considered any relevant performance context information.

Home Mortgage Loans

Refer to Table 8 in the Boston CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent.

Based on housing affordability calculations, discussed above, homeownership in the AA is not affordable for low- and moderate-income borrowers; therefore, more emphasis was given to the bank's performance compared to other lenders in the AA.

		Low-Income Borrowers			Moderate-Income Borrowers		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	5,378	642	11.94	6.58	1454	27.04	19.35
2024	1,513	135	8.92	4.69	350	23.13	16.93
HELOC							
2022-2023	28,961	2,900	10.01	8.56	6,351	21.93	18.08
2024	10,685	1,121	10.49	8.92	2,359	22.08	17.73

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

2022-2023

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

2024

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the Boston CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

2022-2023

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

2024

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. The bank's CD lending further supported the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. During the evaluation period, the bank originated 72 CD loans totaling $815.3 million or 10.4 percent of allocated tier 1 capital. By dollar volume, 76.5 percent funded affordable housing, 22.9 percent funded community services, and 0.6 percent funded revitalization and stabilization efforts. CD loans were responsive to identified community needs.

The following are examples of CD loans the bank originated or purchased in the CSA:

- The bank extended and annually renewed a $50 million line of credit, primarily used for warehousing mortgages for first-time homebuyers. This facility supported an organization in Rhode Island that originated and administered mortgages for low- and moderate-income first-time homebuyers.

- The bank originated a $17 million construction loan to support a low-income housing tax credit (LIHTC) project, in collaboration with a housing authority, for the development of 56 affordable housing units in Middlesex County, MA. LIHTC projects are considered complex due to the extensive administrative rules and regulations that owners and investors must follow.

- The bank originated two loans totaling $37.7 million that supported the creation of 141 units of affordable housing for low-income seniors and persons with disabilities. The project used land from the former state hospital to create affordable housing for the region.

Letters of Credit

Additionally, the bank originated a $4.3 million letter of credit that has a qualified CD purpose and benefited the Boston CSA. This letter of credit supported community services targeting low- and moderate-income individuals and was given positive consideration.

<u>Broader Statewide or Regional area</u>

In addition, CBNA made two CD loans totaling $23 million in the BSRA whose purpose, mandate, or function included serving the bank's AA. The BSRA lending further supported the Lending Test rating.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 4,798 loans under its flexible lending programs totaling $1.4 billion. Refer to the Scope of the Evaluation section for additional details regarding the programs. In addition, the bank provided 250 CCA down payment grants totaling $542,580 within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	119	$44,100
FHA	222	$90,551
FHLMC	404	$144,656
FHLMC Home Possible	29	$9,151
FNMA	3,195	$951,269
FNMA Home Ready	240	$57,866
Goal Builder HELOC	282	$8,423
MHP	262	$101,456
VA	45	$16,731
Total	4,798	$1,424,203

INVESTMENT TEST

The institution's performance under the Investment Test in the Boston CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Boston CSA AA was excellent.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	**Prior Period**		**Current Period**		**Total**				**Unfunded Commitments**	
	#	**$(000's)**	**#**	**$(000's)**	**#**	**% of Total #**	**$(000's)**	**% of Total $**	**#**	**$(000's)**
Boston CSA	783	564,601	382	613,957	1,165	100.0	1,178,558	100.0	80	379,667
Total	**783**	**564,601**	**382**	**613,957**	**1,165**	**100.0**	**1,178,558**	**100.0**	**80**	**379,667**

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 15 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and CD needs. The institution made extensive use of innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 97.2 percent of total investments and grants supported affordable housing, 0.8 percent supported community services to low- and moderate-income individuals, and 2.0 percent promoted economic development.

The following are examples of qualified investments in the CSA:

- The bank made a $42 million investment that supported the rehabilitation of a 535 unit mixed-income property, where 83 percent of the units were below 60 percent of the area median income. This investment was complex due to the use of a LIHTC and responsive by addressing the need for affordable housing in the area.

- The bank provided a $1 million grant to an affordable housing project to fund 2,500 square feet of community space to include a tech lounge, conference/training room, communal spaces, and high-speed Wi-Fi connectivity throughout. This activity was innovative through the use of the bank's self-developed Economic Opportunity Fund.

- The bank made an $11 million investment that supported the revitalization of 93,384 square feet of vacant space into a mixed-use community that included 55 units of affordable housing. This investment was complex due to the use of a LIHTC and responsive by addressing the need for affordable housing in the area.

SERVICE TEST

The institution's performance under the Service Test in the Boston CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Boston CSA AA was excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														**2024**
Assessment Area	**Deposits**	**Branches**								**Population**				
	% of Rated Area Deposits in AA	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income of Geographies (%)**						**% of Population within Each Geography**				
				Low	**Mod**	**Mid**	**Upp**	**NA**		**Low**	**Mod**	**Mid**	**Upp**	**NA**
Boston CSA	100.0	263	100.0	3.0	20.9	41.4	34.2	0.5		9.0	18.4	40.3	31.6	0.7
Total	100.0	263	100.0	3.0	20.9	41.4	34.2	0.5		9.0	18.4	40.3	31.6	0.7

Source: FFIEC File - 2024 Census
1/1/2022 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was well below, but in moderate-income geographies exceeded the percentage of the population living within those geographies.

Examiners further considered 32 middle- and upper-income branches located within one-quarter mile of an LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA. Of the 32 proximate branches, 12 served low-income geographies and 20 served moderate-income geographies. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 592 ATMs in the AA, 580 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, 75.2 percent of retail customer households in low-income geographies, and 75.9 percent of retail customer households in moderate-income geographies, used online and mobile banking services. This was an increase of 40 percent of retail customer households in low-income geographies, and an increase of 31.9 percent of retail customer households in moderate-income geographies, from the start of the evaluation period.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Boston CSA	5	33	-1	-6	-9	-12	0
Total	5	33	-1	-6	-9	-12	0
1/1/2022 - 12/31/2024 Bank Data.							

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, the bank closed 33 branches, one of which was in a low-income geography and seven of which were in moderate-income geographies. The branch closures were a result of network optimization, low productivity, and non-renewal of in-store leases. The bank also opened five branches during the evaluation period, one of which was located in a moderate-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all 199 traditional standalone branch locations in the AA. The 58 in-store branch locations have operational hours from 10:00 a.m. to 5:00 p.m. Monday through Friday and Saturdays from 10:00 a.m. to 3:00 p.m. CBNA also has one drive-thru located in a moderate-income census tract that is open 24 hours a day.

Community Development Services

The institution was a leader in providing CD services.

During the evaluation period, bank employees provided 11,042 hours of qualified CD services to 171 organizations through 2,930 activities within this AA. Leadership was evident through board or committee participation in 849 of these activities with 86 employees providing 2,938 service hours. Citizens provided 3,763 hours to conduct financial education sessions to individuals who are low- and moderate-income. The bank's assistance was responsive to identified needs in the AA, particularly with delivering financial education to LMI individuals and families and providing technical assistance to small businesses.

Service activity examples during the evaluation period include:

- A Director served on the board and finance committee that provided 25 hours of service over the evaluation period. The mission of the organization was to stop child abuse in Massachusetts. They are the only statewide child abuse prevention organization with a network of over one hundred of the most innovative local community initiatives.

- A Vice Chair served on the board of a local organization and provided 39 hours of service over the evaluation period. The organization's mission was to help vulnerable children and their families build permanent, positive change by delivering services throughout the community to bring stability and enduring hope to the lives of children.

- Bank employees provided 493 hours of technical assistance to a local organization. Furthermore, a Business Banking Market Manager was nominated to the organization's board. The organization focuses on boosting entrepreneurship in under-represented communities in Rhode Island through its accelerator program for small businesses and entrepreneurs.

- Bank employees provided 846 qualified hours of service to a local organization by hosting interns, supporting students through mentorship, and providing career development opportunities, and invested in the organization's digital inclusion program. The organization's mission is to end the opportunity divide and ensure that every young adult has the skills, experiences, and support to break through barriers and achieve their full potential in their careers.

Multistate Metropolitan Statistical Area Rating

New York-Newark, NY-NJ-CT-PA CSA (New York CSA)

CRA rating for the New York CSA[2]**:** Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income-adjacent branches and ADS.
- The bank was a leader in providing CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in New York CSA

The New York CSA was the bank's second largest rating area based on deposits. CBNA delineated counties in the New York-Newark-Jersey City, NY-NJ-PA, MSA, the Bridgeport-Stamford-Danbury, CT MSA, East Stroudsburg, PA MSA, Hemlock Farms, PA Micropolitan Statistical Area, Kingston NY MSA, New Haven-Milford, CT MSA, Poughkeepsie-Newburgh, NY MSA and Trenton-Princeton, NJ MSA as its AA. Refer to appendix A for the list of counties reviewed.

CBNA had $26.7 billion in deposits in the New York CSA representing 14.9 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated 192 branches and 276 ATMs within the AA, representing 19.1 percent of total bank branches and 15.3 percent of total ATMs. The bank originated and purchased approximately $15.1 billion in home mortgage and small business loans within the New York CSA.

[2] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

According to FDIC deposit data as of June 30, 2024, there were 181 FDIC-insured institutions operating 4,476 branches in the AA. CBNA ranked 16th in deposit market share with 1 percent. The top banks by deposit market share are JPMorgan Chase Bank, NA with 33.2 percent, Goldman Sachs Bank USA with 7.9 percent, and The Bank of New York Mellon with 7.6 percent.

New York CSA

The following tables provide a summary of the demographics, including housing, business, and economic information, for the New York CSA AA for each period.

Assessment Area(s) - 2022-2023 New York CSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	4,898	11.21	21.54	31.30	32.05	3.90
Population by Geography	20,038,437	12.16	22.29	30.85	33.85	0.85
Housing Units by Geography	7,799,434	11.50	21.36	30.82	35.49	0.83
Owner-Occupied Housing by Geography	3,582,362	3.47	14.44	35.45	46.26	0.37
Occupied Rental Units by Geography	3,545,182	19.86	28.23	26.27	24.42	1.22
Vacant Units by Geography	671,890	10.18	21.99	30.16	36.50	1.17
Businesses by Geography	1,035,988	8.53	17.31	28.27	43.46	2.43
Farms by Geography	17,709	6.05	15.22	31.06	46.86	0.81
Family Distribution by Income Level	4,627,399	24.87	15.66	17.52	41.95	0.00
Household Distribution by Income Level	7,127,544	27.37	14.27	15.49	42.87	0.00
Unemployment rate (%)	6.03	10.66	7.16	5.56	4.46	8.63
Households Below Poverty Level (%)	12.85	32.63	17.84	9.53	5.98	24.35
Median Family Income (14860 - Bridgeport-Stamford-Danbury, CT MSA)		$120,156	**Median Housing Value**			$462,700
Median Family Income (28740 - Kingston, NY MSA)		$87,034	**Median Gross Rent**			$1,491
Median Family Income (35004 - Nassau County-Suffolk County, NY MD)		$130,301	**Families Below Poverty Level**			9.54
Median Family Income (35084 - Newark, NJ MD)		$107,333				
Median Family Income (35154 - New Brunswick-Lakewood, NJ MD)		$113,495				
Median Family Income (35300 - New Haven, CT MSA)		$92,508				
Median Family Income (35614 - New York-Jersey City-White Plains, NY-NJ MD)		$85,483				
Median Family Income (14860 - Bridgeport-Stamford-Danbury, CT MSA) for 2023		$142,800				
Median Family Income (28740 - Kingston, NY MSA) for 2023		$112,400				
Median Family Income (35004 - Nassau County-Suffolk County, NY MD) for 2023		$156,300				
Median Family Income (35084 - Newark, NJ MD) for 2023		$126,100				
Median Family Income (35154 - New Brunswick-Lakewood, NJ MD) for 2023		$135,300				
Median Family Income (35300 - New Haven, CT MSA) for 2023		$110,800				
Median Family Income (35614 - New York-Jersey City-White Plains, NY-NJ MD) for 2023		$99,300				

FFIEC File - 2020 Census
2023 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

Assessment Area(s) - New York CSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	5,261	10.06	21.14	34.23	30.75	3.82
Population by Geography	21,447,213	11.03	21.97	33.87	32.23	0.90
Housing Units by Geography	8,289,584	10.38	20.93	33.91	33.96	0.83
Owner-Occupied Housing by Geography	3,948,077	3.07	14.52	39.23	42.79	0.39
Occupied Rental Units by Geography	3,594,667	18.79	28.07	27.84	24.08	1.23
Vacant Units by Geography	746,840	8.55	20.50	34.97	34.77	1.21
Businesses by Geography	1,126,552	7.73	17.48	31.45	41.09	2.24
Farms by Geography	20,681	4.83	16.34	36.80	41.26	0.77
Family Distribution by Income Level	4,949,989	24.41	15.88	18.02	41.69	0.00
Household Distribution by Income Level	7,542,744	27.11	14.31	15.82	42.76	0.00
Unemployment rate (%)	5.83	10.35	6.89	5.37	4.43	8.44
Households Below Poverty Level (%)	12.38	32.75	17.35	9.10	5.97	23.62
Median Family Income (14860 - Bridgeport-Stamford-Danbury, CT MSA)		$119,192	**Median Housing Value**			$459,200
Median Family Income (28740 - Kingston, NY MSA)		$87,034	**Median Gross Rent**			$1,513
Median Family Income (28880 - Kiryas Joel-Poughkeepsie-Newburgh, NY MSA)		$100,123	**Families Below Poverty Level**			9.12
Median Family Income (29484 - Lakewood-New Brunswick, NJ MD)		$113,495				
Median Family Income (35004 - Nassau County-Suffolk County, NY MD)		$130,301				
Median Family Income (35084 - Newark, NJ MD)		$107,827				
Median Family Income (35614 - New York-Jersey City-White Plains, NY-NJ MD)		$85,483				
Median Family Income (45940 - Trenton-Princeton, NJ MSA)		$108,756				
Median Family Income (Non-MSAs - PA)		$66,318				
Median Family Income (14860 - Bridgeport-Stamford-Danbury, CT MSA) for 2024		$146,500				
Median Family Income (28740 - Kingston, NY MSA) for 2024		$117,200				
Median Family Income (28880 - Kiryas Joel-Poughkeepsie-Newburgh, NY MSA) for 2024		$114,800				
Median Family Income (29484 - Lakewood-New Brunswick, NJ MD) for 2024		$135,900				
Median Family Income (35004 - Nassau County-Suffolk County, NY MD) for 2024		$156,200				
Median Family Income (35084 - Newark, NJ MD) for 2024		$133,300				
Median Family Income (35614 - New York-Jersey City-White Plains, NY-NJ MD) for 2024		$101,900				
Median Family Income (45940 - Trenton-Princeton, NJ MSA) for 2024		$125,900				
Median Family Income (Non-MSAs - PA) for 2024		$81,400				

FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within each component portion of the New York CSA for both analysis periods. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2022-2023 table above, the median housing value for the New York CSA AA was $462,700, while according to Realtor.com the median sales price of a single-family home was $625,000 at the beginning of 2022 and $748,000 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment between $1,241 to

$1,954 and moderate-income borrowers between $1,986 to $3,126, depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $4,484 at the end of 2023. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the New York CSA during the 2022-2023 period.

Based on the information in the 2024 table above, the median housing value for the New York CSA was $459,200, while according to Realtor.com the median sales price of a single-family home was $749,000 at the beginning of 2024 and $750,000 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment between $1,018 to $1,831 and moderate-income borrowers between $1,628 to $2,930 depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $4,496 at the end of 2024. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the New York CSA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the New York CSA, 9.6 percent of families had income(s) below the federal poverty line in 2022-2023 and 9.1 percent of families had income(s) below the federal poverty line in 2024.

Economic Data

New York-Newark-Jersey City, NY-NJ MSA

According to the Moody's Analytics February 2025 report, in 2024, the New York area's strengths include being the financial capital of the world; high per capita income and limited exposure to manufacturing; and strong international immigration. Weaknesses include high costs, including taxes, housing, office rents, and energy, rapidly aging infrastructure, and troubled fiscal health made worse by population losses. Major employment industries in the area include education and healthcare services; professional and business services; government; and financial activities. Major employers in the area include JPMorgan Chase, New York Presbyterian Healthcare System, Mount Sinai Health System, and NYC Health and Hospitals.

According to the Moody's Analytics January 2025 report on the Newark, NJ portion of the MSA, in 2024, strengths include an abundance of high-value industries, including financial services, pharmaceuticals, and high tech, a coastal location that allows the area to benefit from trade, and a well-educated workforce. Weaknesses include weak population growth, high business and living costs, and an unfavorable age structure. Major employment industries include professional and business services, education and health services, and government. Major employers in the area include Verizon, United Airlines, Public Service Enterprise Group, and RWJ Barnabas Health.

According to the BLS, the non-seasonally adjusted unemployment rate for the New York MSA was 5.5 percent in January 2022 and decreased to 4.5 percent in December 2023 and 4.3 percent in December

2024. In December 2024 the non-seasonally adjusted unemployment rate for the state of New York was 4.1 percent.

Bridgeport-Stamford-Danbury, CT MSA

According to the Moody's Analytics January 2025 report, in 2024, the Bridgeport MSA's strengths include being a global financial center, proximity to New York City, above-average exposure to high tech, and a highly educated workforce. Weaknesses include high living and business costs, skewed income distribution, especially in the Stamford corridor, and weak migration trends. Major employment industries include education and health services, professional and business services, government, and leisure and hospitality services. Major employers in the area include Sikorsky Aircraft Corp., Boehringer Ingelheim Corp, ASML US Inc., Ceci Brothers, and Deloitte.

According to the BLS, the non-seasonally adjusted unemployment rate for the Bridgeport-Stamford-Danbury, CT MSA was 5.0 percent in January 2022 and decreased to 4.2 percent in December 2023 and 2.8 percent in December 2024. In December 2024 the non-seasonally adjusted unemployment rate for the state of Connecticut was 2.7 percent.

Trenton-Princeton, NJ MSA

According to the Moody's Analytics May 2025 report, in 2024, the Trenton MSA's strengths include a highly educated workforce with a concentration of white collar and high-tech jobs, low business costs relative to the state, a commuter workforce with proximity to New York City and Philadelphia, and above average housing affordability. Weaknesses include weak domestic migration trends and exposure to New Jersey's troubled fiscal situation. Major employment industries in the area include government, professional and business services, and education and health services. Major employers in the area include Bank of America, Princeton University, Bristol-Myers Squibb, and Capital Health System.

According to the BLS, the non-seasonally adjusted unemployment rate for the Trenton-Princeton, NJ MSA was 3.8 percent in January 2022, increased slightly to 3.9 percent in December 2023 and decreased to 3.7 percent in December 2024. In December 2024 the non-seasonally adjusted unemployment rate for the state of New Jersey was 4.2 percent.

Kingston, NY MSA

According to the Moody's Analytics January 2025 report, in 2024, the Kingston MSA's strengths include proximity to New York City, low business costs for the Northeast, and below-average employment volatility. Weaknesses include a below-average share of high-wage jobs, overreliance on government coupled with few private-sector growth drivers, shrinking working-age population, and a reliance on seasonal tourism. Major employment industries in the area include government, education and health services, and leisure and hospitality services. Major employers in the area include Health Alliance of the Hudson Valley, State University of New York at New Paltz, Eastern New York Correctional Facility, and Northeast Center for Special Care.

According to the BLS, the non-seasonally adjusted unemployment rate for the Kingston, NY MSA was 3.7 percent in January 2022, increased slightly to 3.9 percent in December 2023 and decreased to 3.2 percent in December 2024.

Community Contacts

A review was conducted of ten community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as affordable housing, small business and economic development, and community and social services. Contacts noted the need for affordable housing for both rental housing and homeownership. Many households are either housing insecure, or housing stressed, where the cost of their housing is high compared to their income. Access to affordable housing has also been impacted by Airbnb and investor purchases taking many rental units off the market. Lack of affordable inventory, coupled with high taxes and utility costs, are keeping low- and moderate-income families as well as many lower-middle-income families from purchasing a home. It is also preventing older residents from downsizing to smaller residences. In addition, high student loan debt is an impediment to homeownership. Contacts noted that many lower-middle-class households are struggling to meet day to day living expenses and are living paycheck to paycheck. Despite the difficulties they endure, these households make too much money to qualify for state and federal subsidy programs. Contacts also noted the need for greater support for small businesses, particularly smaller minority-owned businesses. Credit and CD needs identified include:

- Technical assistance and financial education for small businesses
- Affordable rental and homeownership opportunities
- Affordable loans for first-time homebuyers
- More efficient and less cumbersome grant-making process from financial institutions
- Funding to help improve existing housing stock
- Support for funding of renewable energy

The area is served by numerous nonprofit organizations, community-based organizations, community development financial institutions (CDFIs), loans funds, economic development organizations, and CD organizations that provide opportunities to help meet community needs.

Scope of Evaluation in New York CSA

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in changes to the New York CSA. The New York-Newark, NY-NJ-CT-PA CSA resulted in Fairfield County, Connecticut being reclassified as the Western Connecticut Planning Region and Monroe County, Pennsylvania moved to the PA non-MSA. A new CSA was created for New Haven, resulting in New Haven County, Connecticut being reclassified as South Central Connecticut Planning Region. The New York-Newark-Jersey City, NY-NJ-PA MSA resulted in Pike County, Pennsylvania being reclassified to the Hemlock Farms, Pennsylvania Micropolitan Statistical Area. The Poughkeepsie-Newburgh-Middleton, NY MSA changed names to Kiryas Joel-Poughkeepsie-Newburgh, NY MSA.

Examiners conducted a full-scope review of the New York CSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK CSA

LENDING TEST

The bank's performance under the Lending Test in the New York CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the New York CSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2024**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
New York CSA	36,402	4,419	0	103	40,924	100	100
Broader Statewide or Regional Area	0	0	0	1	1	0	0
Total	36,402	4,419	0	104	40,925	100	100
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
New York CSA	14,670,096	384,802	0	403,768	15,458,666	99.91	100
Broader Statewide or Regional Area	0	0	0	14,350	14,350	0.09	0
Total	14,670,096	384,802	0	418,118	15,473,016	100	100
Source: 1/1/2022 - 12/31/2024 Bank Data. *Due to rounding, totals may not equal 100.0%*							

<u>New York CSA 2022-2023</u>

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, CBNA ranked 19th out of 185 FDIC-insured depository institutions (top 11 percent) with a 0.7 percent deposit market share.

For home mortgage loans, the bank's market share of 4.5 percent ranked second out of 958 lenders (top 1 percent). The other top lenders were JPMorgan Chase Bank, NA with 10.8 percent market share, TD Bank with 4.0 percent market share, and Rocket Mortgage with 3.7 percent market share.

For small loans to businesses, the bank's market share of 0.2 percent ranked 36th out of 344 lenders (top 11 percent). The top three lenders were America Express National Bank with 31.9 percent market share, JPMorgan Chase Bank, NA with 29.3 percent market share, and Bank of America, NA with 7.3 percent market share.

New York CSA 2024

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked 16th out of 181 FDIC-insured depository institutions (top 9 percent) with a 1.0 percent deposit market share.

For home mortgage loans, the bank's market share of 4.4 percent ranked 4th out of 866 lenders (top 1 percent). The top three lenders were Rocket Mortgage with 5.0 percent market share, United Wholesale Mortgage with 4.7 percent market share, and JPMorgan Chase Bank, NA with 4.5 percent market share.

For small loans to businesses, the bank's market share of 0.2 percent ranked 25th out of 309 lenders (top 9 percent). The top three lenders were American Express National Bank with 33.1 percent market share, JPMorgan Chase Bank, NA with 30.5 percent market share, and Bank of America, NA with 7.6 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. Examiners also considered any relevant performance context information.

Home Mortgage Loans

Refer to Table 7 in the New York CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good.

		Low-Income Tracts			Moderate-Income Tracts		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	8,861	366	4.4	5.7	1,233	15.1	16.9
2024	3,971	182	4.6	5.1	659	16.6	17.6
HELOC							
2022-2023	15,959	392	2.6	2.4	1,798	12.1	10.4
2024	7,611	242	3.2	2.4	909	11.9	11.7

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

2022-2023

The geographic distribution of home mortgage loans was good.

The percentage of home mortgage loans originated or purchased in low-income geographies was near to the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded the aggregate and the percentage of closed-end mortgages was below the aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded the aggregate and the percentage of closed-end mortgages was near to the aggregate.

2024

The geographic distribution of home mortgage loans was good.

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded the aggregate and the percentage of closed-end mortgages was near to the aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded the aggregate and the percentage of closed-end mortgages was near to the aggregate.

Small Loans to Businesses

Refer to Table 9 in the New York CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

2022-2023

The geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2024

The geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited good distribution of loans among individuals of different income levels and businesses of different sizes. Examiners also considered any relevant performance context information.

Home Mortgage Loans

Refer to Table 8 in the New York CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good.

Based on housing affordability calculations, discussed above, homeownership in the AA is not affordable for low- and moderate-income borrowers; therefore, more emphasis was given to the bank's performance compared to other lenders in the AA.

		Low-Income Borrowers			**Moderate-Income Borrowers**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	8,861	446	4.1	4.6	1,332	15.8	13.0
2024	3,971	99	2.5	4.6	475	12.0	11.9
HELOC							
2022-2023	15,959	753	5.0	6.6	2,004	13.4	13.5
2024	7,611	340	4.47	6.24	996	13.09	13.2

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

<u>2022-2023</u>

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA but was near to the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers was near to both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, both the percentage of open-end HELOCs originated or purchased and the percentage of closed-end mortgages exceeded the aggregate.

2024

The distribution of home mortgage loans among individuals of different income levels was good.

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA and was below the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance. Additionally, examiners considered the impact of home affordability for low-income borrowers in higher-cost areas, such as New York, when comparing the distribution of home mortgage loans to the demographics. More emphasis was given to the bank's performance compared to other lenders in the AA. In these higher cost markets, it is difficult for many low-income borrowers to afford a home as the area's median housing value is typically too high for conventional mortgage loan qualifications.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased was near to the aggregate and the percentage of closed-end mortgages exceeded the aggregate.

Small Loans to Businesses

Refer to Table 10 in the New York CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

2022-2023

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

2024

The distribution of loans to businesses of different sizes was adequate.

The percentage of loans to small businesses originated or purchased was well below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was leader in making CD loans. The bank's CD lending had a positive impact and elevated the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. During the evaluation period, the bank originated 103 CD loans totaling $403.8 million or 13.9 percent of allocated tier 1 capital. By dollar volume, 81.2 percent funded affordable housing, 13.3 funded revitalization and stabilization efforts, 4.3 percent funded community services, and 1.2 percent funded economic development. CD loans were responsive to identified community needs.

The following are examples of CD loans the bank originated or purchased in the CSA:

- The bank originated a $23.5 million construction loan to finance the construction of six three-story buildings containing 101 affordable housing units for families earning up to 60 percent of the area median income (AMI) in Monmouth County, NJ.

- The bank provided a $11.4 million LIHTC construction loan for a five-story apartment building in Newark, offering 40 affordable housing units. The project was situated in a redevelopment area and moderate-income tract and included five supportive units for homeless households.

- The bank issued a $5 million line of credit (LOC) to a nonprofit CDFI based in New York. This LOC supported the CDFI's lending and investment programs aimed at revitalizing low-to-moderate income communities and rural areas. The purpose of the LOC was to finance initiatives in housing, business, jobs, education, safety, and health.

<u>Broader Statewide or Regional area</u>

In addition, CBNA made a $14.4 million CD loan in the broader statewide and regional area whose purpose, mandate, or function included serving the bank's AA. The broader statewide and regional area lending further supported the Lending Test rating.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 4,750 loans under its flexible lending programs totaling $1.9 billion. Refer to the Scope of the Evaluation section for additional details regarding the programs. In addition, the bank provided 316 CCA down payment grants totaling $2.7 million within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	93	$34,844
FHA	164	$84,117
FHLMC	475	$231,842
FHLMC Home Possible	29	$9,250
FNMA	3,384	$1,406,999
FNMA Home Ready	356	$130,079
Goal Builder HELOC	196	$6,349
VA	53	$28,887
Total	4,750	$1,932,367

INVESTMENT TEST

The institution's performance under the Investment Test in the New York CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the New York CSA AA was excellent.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
New York CSA	112	50,357	586	282,176	698	100.0	332,533	100.0	24	150,574
Total	**112**	**50,357**	**586**	**282,176**	**698**	**100.0**	**332,533**	**100.0**	**24**	**150,574**

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 11.4 percent of allocated tier 1 capital.

The institution exhibited good responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 93.1 percent of total investments and grants supported affordable housing, 1.1 percent supported community services to low- and moderate-income individuals, and 5.8 percent promoted economic development.

The following are examples of qualified investments in the CSA:

- The bank made a $13 million investment that supported the creation of 40 units of affordable housing. This activity was innovative through the use of the bank's self-developed Economic Opportunity Fund.

- The bank made a $2 million investment in a CDFI that led to the creation of 58 small business loans. This activity was responsive by addressing the need for support of small businesses.

- The bank made a $200,000 grant to expand access to workforce development and financial literacy training. This activity was responsive by addressing the need for technical assistance and financial education.

SERVICE TEST

The institution's performance under the Service Test in the New York CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the New York CSA AA was excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2024
	Deposits	Branches							Population					
Assessment Area	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
New York CSA	100.0	192	100.0	8.3	17.7	30.7	42.2	1.0	11.0	22.0	33.9	32.2	0.9	
Total	100.0	192	100.0	8.3	17.7	30.7	42.2	1.0	11.0	22.0	33.9	32.2	0.9	

Source: FFIEC File - 2024 Census
1/1/2022 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in both low-income and moderate-income geographies was near to the percentage of the population living within those geographies.

Examiners further considered 16 middle- and upper-income branches located within one-quarter mile of an LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA. Of the 16 proximate branches, one served a low-income geography and 15 served moderate-income geographies. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 276 ATMs in the AA, 271 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, 62.3 percent of retail customer households in low-income geographies, and 61.4 percent of retail customer households in moderate-income geographies, used online and mobile banking services. This was an increase of 119.4 percent of retail customer households in low-income geographies, and an increase of 89.5 percent of retail customer households in moderate-income geographies, from the start of the evaluation period.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
New York CSA	3	29	-1	-2	-12	-11	0
Total	3	29	-1	-2	-12	-11	0

1/1/2022 - 12/31/2024 Bank Data.

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank closed 29 branches, one of which was in a low-income geography and three of which were in moderate-income geographies. The branch closures were a result of branch overlap from merger activity. The bank also opened three branches during the evaluation period, one of which was located in a moderate-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all 192 traditional standalone branch locations in the AA.

Community Development Services

The institution was a leader in providing CD services.

During the evaluation period, employees provided 5,270 hours of qualified CD service to 163 organizations through 1,493 activities within this AA. Leadership is evident through board or committee participation in 66 of these activities with 77 employees providing 1,639 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with affordable housing, workforce development, financial education, neighborhood revitalization, and small business technical assistance to the LMI population.

Service activity examples during the evaluation period include:

- Bank employees provided 576 hours of financial education through a nonprofit organization whose purpose was to inspire and prepare young people to succeed in a global economy. The organization brought corporate and community volunteers to classrooms located in low- and moderate-income areas to teach financial literacy, entrepreneurship, and work readiness skills.

- Bank employees provided 516 hours to a local organization that provided workforce development and supportive training to low-income individuals. The participants of the program completed a two-year job skills training program to obtain jobs in the tech industry.

- Bank employees provided 106 hours of technical assistance to a local nonprofit social services organization. One bank employee served on the Board and Finance Committee. The organization provided assistance to the LMI population in the AA through a food pantry, thrift store, youth services, and case management services.

- An Assistant Vice President provided 102 hours of service by serving on the board of a local organization that worked to ensure all children have the opportunity to pursue higher education, fulfill their potential, and achieve their dreams. The organization sponsored an entire class or school in under-served and under-resourced communities. The organization supported these students through college by providing academic and personal support through comprehensive programming.

Multistate Metropolitan Statistical Area Rating

Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA (Philadelphia CSA)

CRA rating for the Philadelphia CSA[3]: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending further supported the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, which were responsive in addressing community needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.
- The bank provided an excellent level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Philadelphia CSA

The Philadelphia CSA was the bank's third-largest rating area based on deposits. CBNA delineated counties within the Philadelphia-Camden-Wilmington, PA-NJ-DE MD and the Dover, DE MSA as its AA. Refer to appendix A for the list of counties reviewed.

CBNA had $25.6 billion in deposits in the Philadelphia CSA representing 14.3 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated 157 branches and 259 ATMs within the AA, representing 15.6 percent of total bank branches and 14.4 percent of total ATMs. The bank originated and purchased approximately $5.2 billion in home mortgage and small business loans within the Philadelphia CSA during the review period.

According to FDIC deposit data as of June 30, 2024, there were 95 FDIC-insured institutions operating 1,482 branches in the AA. CBNA ranked seventh in deposit market share with 4.1 percent. Other top

[3] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

banks by deposit market share are Capital One, NA with 40.0 percent, TD Bank, NA with 15.2 percent, and Wells Fargo Bank, NA with 5.6 percent.

Philadelphia CSA

The following tables provide a summary of the demographics, including housing, business, and economic information, for the Philadelphia CSA for each period.

Assessment Area(s) - 2022 - 2023 Philadelphia CSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	1,659	6.75	22.12	37.43	30.50	3.19
Population by Geography	6,687,189	6.51	21.73	39.32	31.32	1.11
Housing Units by Geography	2,668,120	6.79	22.39	39.30	30.64	0.88
Owner-Occupied Housing by Geography	1,665,887	3.82	17.95	42.61	35.03	0.59
Occupied Rental Units by Geography	807,546	11.56	29.75	34.29	23.13	1.27
Vacant Units by Geography	194,687	12.31	29.83	31.81	24.27	1.78
Businesses by Geography	336,749	4.79	19.24	36.74	37.29	1.93
Farms by Geography	8,770	2.59	15.32	45.85	35.61	0.63
Family Distribution by Income Level	1,602,155	21.61	17.32	20.25	40.83	0.00
Household Distribution by Income Level	2,473,433	24.96	15.68	17.31	42.06	0.00
Unemployment rate (%)	6.05	12.43	8.18	5.52	4.20	10.59
Households Below Poverty Level (%)	11.72	35.03	17.99	8.55	6.10	32.26
Median Family Income (15804 - Camden, NJ MD)		$100,987	**Median Housing Value**			$234,300
Median Family Income (20100 - Dover, DE MSA)		$70,383	**Median Gross Rent**			$1,145
Median Family Income (33874 - Montgomery County-Bucks County-Chester County, PA MD)		$117,345	**Families Below Poverty Level**			8.24
Median Family Income (37964 - Philadelphia, PA MD)		$68,458				
Median Family Income (39740 - Reading, PA MSA)		$81,425				
Median Family Income (48864 - Wilmington, DE-MD-NJ MD)		$93,347				
Median Family Income (15804 - Camden, NJ MD) for 2023		$119,800				
Median Family Income (20100 - Dover, DE MSA) for 2023		$85,300				
Median Family Income (33874 - Montgomery County-Bucks County-Chester County, PA MD) for 2023		$142,100				
Median Family Income (37964 - Philadelphia, PA MD) for 2023		$83,100				
Median Family Income (39740 - Reading, PA MSA) for 2023		$95,300				
Median Family Income (48864 - Wilmington, DE-MD-NJ MD) for 2023		$105,700				
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Philadelphia CSA						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,659	6.75	22.12	37.43	30.50	3.19
Population by Geography	6,687,189	6.51	21.73	39.32	31.32	1.11
Housing Units by Geography	2,668,120	6.79	22.39	39.30	30.64	0.88
Owner-Occupied Housing by Geography	1,665,887	3.82	17.95	42.61	35.03	0.59
Occupied Rental Units by Geography	807,546	11.56	29.75	34.29	23.13	1.27
Vacant Units by Geography	194,687	12.31	29.83	31.81	24.27	1.78
Businesses by Geography	346,893	4.95	19.71	36.71	36.68	1.95
Farms by Geography	9,021	2.75	15.67	45.88	35.06	0.63
Family Distribution by Income Level	1,602,155	21.61	17.32	20.25	40.83	0.00
Household Distribution by Income Level	2,473,433	24.96	15.68	17.31	42.06	0.00
Unemployment rate (%)	6.05	12.43	8.18	5.52	4.20	10.59
Households Below Poverty Level (%)	11.72	35.03	17.99	8.55	6.10	32.26
Median Family Income (15804 - Camden, NJ MD)		$100,987	**Median Housing Value**			$234,300
Median Family Income (20100 - Dover, DE MSA)		$70,383	**Median Gross Rent**			$1,145
Median Family Income (33874 - Montgomery County-Bucks County-Chester County, PA MD)		$117,345	**Families Below Poverty Level**			8.24
Median Family Income (37964 - Philadelphia, PA MD)		$68,458				
Median Family Income (39740 - Reading, PA MSA)		$81,425				
Median Family Income (48864 - Wilmington, DE-MD-NJ MD)		$93,347				
Median Family Income (15804 - Camden, NJ MD) for 2024		$117,400				
Median Family Income (20100 - Dover, DE MSA) for 2024		$91,300				
Median Family Income (33874 - Montgomery County-Bucks County-Chester County, PA MD) for 2024		$143,700				
Median Family Income (37964 - Philadelphia, PA MD) for 2024		$84,300				
Median Family Income (39740 - Reading, PA MSA) for 2024		$93,700				
Median Family Income (48864 - Wilmington, DE-MD-NJ MD) for 2024		$111,300				
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within each component MSA or MD of the Philadelphia CSA for both analysis periods. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2022-2023 table above, the median housing value for the Philadelphia CSA was $234,300, while according to Realtor.com the median sales price of a single-family home was $299,900 at the beginning of 2022 and $340,000 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment between $1,039 to $1,776 and moderate-income borrowers between $1,662 to $2,842, depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $2,038 at the end of 2023. Based on these calculations, low-income and some moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the Philadelphia CSA during the 2022-2023 period.

Based on information in the 2024 table above, the median housing value for the Philadelphia CSA was also $234,300, while according to Realtor.com the median sales prices of a single-family home was $337,313 at the beginning of 2024 and $358,075 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment between $1,054 to $1,796 and moderate-income borrowers between $1,686 to $2,874 depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $2,146 at the end of 2024. Based on these calculations, low-income and some moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the Philadelphia CSA during the 2024 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Philadelphia CSA, 8.2 percent of families had income(s) below the federal poverty line for both the 2022-2023 and 2024 analysis period.

Economic Data

Philadelphia-Camden-Wilmington-PA-NJ-DE MD

According to the Moody's Analytics May 2025 report, in 2024, the Philadelphia MD's strengths include world class educational institutions, being a center for healthcare and medical research, and having a well-developed port and international airport. Weaknesses include subpar population growth, prohibitive business taxes that push firms to suburbs or nearby states, and significant fiscal problems. Major employment sectors include education and health services, professional and business services, and government. The top employers include University of Pennsylvania and Health System, Thomas Jefferson University and Jefferson Health, Children's Hospital of Philadelphia, and Temple University Health System.

According to the May 2025 Moody's Analytics report, in 2024, the strengths of the Camden, NJ portion of the MD include high industrial diversity and low costs, proximity to highways and waterways essential to trade, above-average educational attainment, and high housing affordability. Weaknesses include low birthrate and rising death rate, high crime rates, and underrepresentation of prime age workers. Major employment industries in the area include education and health services, professional and business services, and government. Major employers in the area include Virtus Health, McGuire-Dix Air Force Base, Cooper Health System, and TD Bank Corp.

According to the BLS, the non-seasonally adjusted unemployment rate for the Philadelphia MSA was 5.3 percent in January 2022 and slightly increased to 3.3 percent in December 2023 and 3.5 percent in December 2024. The non-seasonally adjusted unemployment rate for the state of Pennsylvania was 2.9 percent in December 2023 and 3.3 percent in December 2024. In December 2024 the national unemployment rate was 3.8 percent.

Dover, DE MSA

According to Moody's Analytics January 2025 report, in 2024, the Dover, DE MSA's strengths include above-average population growth, stability from Dover Air Force Base and state government employment, and low business costs including office rents, taxes, and labor. Weaknesses include below-average per capita income and few jobs in high-tech and higher-value-added services. Major employment industries in the area include government, education and health services, and retail trade. Major employers in the area include Dover Air Force Base, Bayhealth Medical Center, Walmart, Inc., and Perdue Farms.

According to the BLS, the non-seasonally adjusted unemployment rate for the Dover, DE MSA 5.8 percent in January 2022 and decreased to 4.1 percent in December 2023 and 3.6 percent in December 2024. The non-seasonally adjusted unemployment rate for the state of Delaware was 3.7 percent in December 2023 and 3.2 percent in December 2024.

Community Contacts

A review was conducted of ten community contacts conducted during the evaluation period with organizations throughout the Philadelphia CSA. Contacts included entities focused on affordable housing, small business, community, and economic development, and community services. Contacts noted that there are a lot of businesses that are starting to climb out of pandemic losses. While there is some strong recovery, there were still losses happening in 2023 and 2024. Recovery was expected sooner. There is a need for affordable housing in the area, particularly after the Covid-19 Pandemic. The price of housing and the price of rental housing in Bucks County has grown too expensive for many people, including working class households. Many individuals struggle to meet basic living expenses such as housing and food costs and need assistance to cover the gap. Many entrepreneurs and business owners need financing for their operations. In some parts of the AA the elderly population struggles with mobile and digital banking services. Limited physical branching presence in the city of Chester in Pennsylvania makes it difficult for low-income residents to meet their banking needs. There is a high demand and low supply of homes for purchase and potential homebuyers who are low- and moderate-income cannot compete with investors and cash buyers when bidding for homes. Other identified needs include:

- Access to affordable childcare
- Access to public transportation
- Financial education and technical assistance for small businesses
- Unrestricted grant funding for nonprofit organizations
- Small business loans
- Low-cost checking accounts
- Flexible mortgage products for first-time homebuyers
- Home rehabilitation loans, particularly for low- and moderate-income senior homeowners
- Affordable housing (both rental and owner-occupied)
- Funding for housing counseling, budgeting, and credit counseling programs
- Equity capital for small businesses
- Start-up capital and funding for early-stage companies
- Unrestricted grant funding for nonprofit organizations

Scope of Evaluation in Philadelphia CSA

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in changes to the Philadelphia CSA. The Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA consisted of the Atlantic City-Hammonton, NJ MSA, the Dover, DE MSA, the Ocean City, NJ MSA, the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA, the Reading, PA MSA, and the Vineland-Bridgeton, NJ MSA prior to OMB changes. The Ocean City, New Jersey MSA, the Reading, Pennsylvania MSA, and the Vineland-Bridgton, New Jersey MSA were removed from the Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA in 2024.

Examiners conducted a full-scope review of the Philadelphia CSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PHILADELPHIA CSA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the Philadelphia CSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2024**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Philadelphia CSA	25,188	5,246	0	41	30,475	100	100
Broader Statewide or Regional Area	0	0	0	0	0	0	0
Total	25,188	5,246	0	41	30,475	100	100
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Philadelphia CSA	5,095,041	275,348	0	473,899	5,844,288		100
Broader Statewide or Regional Area	0	0	0	0	0	0	0
Total	5,095,041	275,348	0	473,899	5,844,288	100	100
Source: 1/1/2022 - 12/31/2024 Bank Data.							
Due to rounding, totals may not equal 100.0%							

<u>Philadelphia CSA 2022-2023</u>

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, CBNA ranked seventh out of 99 FDIC-insured depository institutions (top 8 percent) with a 4.3 percent deposit market share.

For home mortgage loans, the bank's market share of 5.2 percent ranked first out of 822 lenders (top 1 percent). The other top lenders were PennyMac Loan Services LLC with 4.4 percent market share, Police and Fire Federal Credit Union with 4.1 percent market share, and Rocket Mortgage with 3.9 percent market share.

For small loans to businesses, the bank's market share of 0.7 percent ranked 18th out of 263 lenders (top 7 percent). The top three lenders were American Express National Bank with 29 percent market share, JPMorgan Chase Bank, NA with 15.9 percent market share, and Capital One, NA with 6.7 percent market share.

Philadelphia CSA 2024

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked seventh out of 95 FDIC-insured depository institutions (top 8 percent) with a 4.1 percent deposit market share.

For home mortgage loans, the bank's market share of 4.1 percent ranked third out of 822 lenders (top 1 percent). The other top lenders were PennyMac Loan Services LLC with 4.5 percent market share, Rocket Mortgage with 4.5 percent market share, and Police and Fire Federal Credit with 3.9 percent market share.

For small loans to businesses, the bank's market share of 0.8 percent ranked 17th out of 230 lenders (top 8 percent). The top three lenders were American Express National Bank with 30.3 percent market share, JPMorgan Chase Bank, NA with 16.6 percent market share, and Capital One, NA with 6.9 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good.

		Low-Income Tracts			**Moderate-Income Tracts**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	4,432	134	3.02	3.90	833	18.80	20.73
2024	994	57	5.73	4.40	246	24.75	21.76
HELOC							
2022-2023	14,412	318	2.21	1.82	1973	13.69	12.63
2024	5,350	108	2.02	1.93	727	13.59	13.52

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

2022-2023

The geographic distribution of home mortgage loans was good.

The percentage of home mortgage loans originated or purchased in low-income geographies was well below the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separate from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded aggregate and the percentage of closed-end mortgages was below aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, both the percentage of open-end HELOCs originated or purchased and the percentage of closed-end mortgages exceeded aggregate.

2024

The geographic distribution of home mortgage loans was good.

The percentage of home mortgage loans originated or purchased in low-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separate from closed-end mortgages, both the percentage of open-end HELOCs originated or purchased and the percentage of closed-end mortgages exceeded aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separate from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded aggregate and the percentage of closed-end mortgages was near to aggregate.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

2022-2023

The geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2024

The geographic distribution of small loans to businesses was good.

The percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies was near to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes. Examiners also considered any relevant performance context information.

Home Mortgage Loans

Refer to Table 8 in the Philadelphia CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution’s home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent.

Based on housing affordability calculations, discussed above, homeownership in the AA is not affordable for low-income borrowers and some moderate-income borrowers; therefore, more emphasis was given to the bank’s performance compared to other lenders in the AA.

		Low-Income Borrowers			Moderate-Income Borrowers		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	4,432	614	13.85	9.00	1,150	25.95	20.60
2024	994	153	15.39	7.65	278	27.97	18.96
HELOC							
2022-2023	14,412	1,852	12.85	9.55	3,230	22.41	18.15
2024	5,350	737	13.78	9.35	1,180	22.06	18.16

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

<u>2022-2023</u>

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

<u>2024</u>

The distribution of home mortgage loans among individuals of different income levels was excellent. Based on housing affordability calculations discussed above, housing in the AA is not affordable for low-income borrowers; therefore, more emphasis was given to the bank's performance compared to other lenders in the AA.

The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the Philadelphia CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

2022-2023

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

2024

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. The bank's CD lending further supported the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. During the evaluation period, the bank originated 41 CD loans totaling $473.9 million or 13.9 percent of allocated tier 1 capital. By dollar volume, 48.8 percent funded revitalization and stabilization efforts, 43.1 percent funded affordable housing, and 8.1 percent funded community services. CD loans were responsive to identified community needs.

The following are examples of CD loans the bank originated or purchased in the CSA:

- The bank originated a $62.4 million loan to finance the creation of 327 housing units in a moderate-income tract within a historically underutilized business (HUB) zone in Philadelphia. The project was situated in the "Meds and Eds" district and includes 33 affordable housing units contributing to the community's stabilization and development.

- The bank originated a $32.8 million LIHTC construction bridge loan to rehabilitate a 21-story apartment building in Camden, NJ. The project renovates 320 affordable housing units within low-income, HUB, and opportunity zones, and creates 6,600 square feet of commercial space.

- The bank originated two loans totaling $6.6 million to a nonprofit organization dedicated to supporting children, youth, and adolescents from low- and moderate-income families. The organization offered after-school and career development programs to enhance their opportunities and growth.

Letters of Credit

Additionally, the bank originated a $15,362 letter of credit that has a qualified CD purpose and benefited the Philadelphia CSA. This letter of credit supported revitalization and stabilization efforts.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 3,418 loans under its flexible lending programs totaling $777.8 million. Refer to the Scope of the Evaluation section for additional details regarding the programs. In addition, the bank provided 323 CCA down payment grants totaling $2 million within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	182	$43,620
FHA	382	$95,716
FHLMC	238	$74,610
FHLMC Home Possible	137	$35,778
FNMA	1,676	$408,334
FNMA Home Ready	405	$83,304
Goal Builder HELOC	319	$7,322
VA	79	$29,089
Total	3,418	$777,773

INVESTMENT TEST

The institution's performance under the Investment Test in the Philadelphia CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Philadelphia CSA AA was excellent.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Philadelphia CSA	202	118,285	251	178,107	453	100.0	296,392	100.0	19	118,980
Total	**202**	**118,285**	**251**	**178,107**	**453**	**100.0**	**296,392**	**100.0**	**19**	**118,980**

The institution had excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 9.5 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and CD needs. The institution made significant use of innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 94.2 percent of total investments and grants supported affordable housing, 1.0 percent supported community services to low- and moderate-income individuals, 1.9 percent promoted economic development, and 2.8 percent funded revitalization and stabilization efforts.

The following are examples of qualified investments in the CSA:

- The bank made a $40 million investment that supported the renovation and rehabilitation of 320 affordable housing units. This investment was complex due to the use of a LIHTC and responsive by addressing the need for affordable housing in the area.

- The bank made a $200,000 investment to support a work fund that provides funds to small businesses. These funds created 10 new low- and moderate-income jobs. This activity was responsive by providing funds to small businesses.

- The bank made a $50,000 grant to a local food bank to help address food insecurity in the community. This activity was responsive by helping to provide food to those in need due to high food costs in the area.

SERVICE TEST

The institution's performance under the Service Test in the Philadelphia CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Philadelphia CSA AA was excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														**2024**
Assessment Area	**Deposits**	**Branches**								**Population**				
	% of Rated Area Deposits in AA	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income of Geographies (%)**						**% of Population within Each Geography**				
				Low	**Mod**	**Mid**	**Upp**	**NA**		**Low**	**Mod**	**Mid**	**Upp**	**NA**
Philadelphia CSA	100.0	157	100.0	5.1	16.6	39.5	36.9	1.9		6.5	21.7	39.3	31.3	1.1
Total	100.0	157	100.0	5.1	16.6	39.5	36.9	1.9		6.5	21.7	39.3	31.3	1.1

Source: FFIEC File - 2024 Census
1/1/2022 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in both low-income and moderate-income geographies was near to the percentage of the population living within those geographies.

Examiners further considered 19 middle- and upper-income branches located within one-quarter mile of an LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA. Of the 19 proximate branches, two served low-income geographies and 17 served moderate-income geographies. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 259 ATMs in the AA, 246 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, 67.8 percent of retail customer households in low-income geographies, and 69.5 percent of retail customer households in moderate-income geographies used online and mobile banking services. This was an increase of 24.8 percent of retail customer households in low-income geographies, and an increase of 24.9 percent of retail customer households in moderate-income geographies, from the start of the evaluation period.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Philadelphia CSA	6	29	1	-5	-10	-9	0
Total	6	29	1	-5	-10	-9	0
1/1/2022-12/31/2024 Bank Data.							

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, the bank closed 29 branches, none of which were in low-income geographies and six of which were in moderate-income geographies. The branch closures were a result of in-store partnership with Tops not being renewed and low productivity. The bank also opened six branches during the evaluation period, one of which was located in a low-income geography and one of which was located in a moderate-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all 127 traditional standalone branch locations in the AA. The 27 in-store branch locations and one limited-service branch operated from 10:00 a.m. to 5:00 p.m. Monday through Friday and Saturdays from 10:00 a.m. to 3:00 p.m. CBNA also has three special purpose branches with limited hours, located in retirement communities.

Community Development Services

The institution was a leader in providing CD services.

During the evaluation period, bank employees provided 3,828 hours of qualified CD services to 95 organizations through 1,188 activities within this AA. Leadership is evident through board or committee participation in 29 of these activities with 26 employees providing 795 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with providing financial education to LMI individuals.

Service activity examples during the evaluation period include:

- Two bank employees served on a board as well as several committees, which totaled 72 hours. The organization served LMI individuals by uniting government, business, neighborhoods, and individual initiatives to improve the quality of life in the region, build wealth in urban communities, and solve emerging issues.

- A Vice President provided 26 hours by serving on the board of a local organization. In addition, several bank employes provided 289 hours of financial education to the organization's participants. The organization provided workforce training and life skills education, which created pathways to employment and financial independence for under-served communities and formerly incarcerated individuals.

- A bank employee provided 15 hours serving on the Loan Committee Review Board of an organization that supported small businesses, focused on women-owned and minority-owned businesses. The organization offered low-interest loans with flexible terms, pre- and post-financial counseling, and equity capital for start-up businesses.

- A Vice President served on the board of a local organization and provided 26 hours of service. In addition, several bank employees provided 35 hours in the form of first-time homebuyer workshops. The organization targeted communities that were historically excluded from conventional banking and financial services. The organization‘s mission was to increase and preserve homeownership opportunities for LMI residents of Pennsylvania.

Multistate Metropolitan Statistical Area Rating

Washington-Arlington-Alexandria, DC-VA-MD-WV MMSA (Washington DC MMSA)

CRA rating for the Washington DC MMSA[4]: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank had made few, if any, CD loans. CD lending had a negative impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, which were responsive in addressing community needs.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution’s AAs.
- The bank provided an adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution’s Operations in Washington DC MMSA

CBNA delineated counties within the Washington DC-MD MD, the Arlington-Alexandria-Reston, VA-WV MD, and the Frederick-Gaithersburg-Bethesda, MD MD as its AA. Refer to appendix A for the list of counties reviewed.

CBNA had $504.1 million in deposits in the Washington, DC MMSA representing 0.3 percent of the bank’s total deposits as of June 30, 2024. As of December 31, 2024, the bank operated eight branches and 10 ATMs within the AA, representing 0.8 percent of total bank branches and 0.5 percent of total ATMs. The bank originated and purchased approximately $1.2 billion in home mortgage and small business loans within the Washington, DC CSA during the review period.

[4] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

According to FDIC deposit data as of June 30, 2024, there were 56 FDIC-insured institutions operating 734 branches in the AA. CBNA ranked 29th in deposit market share with 0.2 percent. Other top banks by deposit market share are Capital One, NA with 23.3 percent, Bank of America, NA with 17.7 percent, and Wells Fargo Bank, NA with 11.7 percent.

Washington DC MMSA

The following tables provide a summary of the demographics, including housing, business, and economic information for the Washington DC CSA for each period.

Assessment Area(s) - 2022 - 2023 Washington DC MSA						
2022 - 2023						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	831	9.63	15.88	28.76	43.56	2.17
Population by Geography	3,300,025	9.36	17.26	30.03	42.40	0.96
Housing Units by Geography	1,317,425	9.67	17.13	30.21	42.25	0.74
Owner-Occupied Housing by Geography	717,825	4.32	13.52	30.30	51.57	0.30
Occupied Rental Units by Geography	521,853	16.47	21.77	30.65	29.89	1.21
Vacant Units by Geography	77,747	13.41	19.39	26.47	39.08	1.65
Businesses by Geography	184,698	5.15	15.46	30.20	48.02	1.18
Farms by Geography	2,873	4.46	16.19	31.43	47.75	0.17
Family Distribution by Income Level	749,629	20.89	14.71	18.28	46.13	0.00
Household Distribution by Income Level	1,239,678	22.94	15.03	17.99	44.04	0.00
Unemployment rate (%)	4.70	10.97	5.75	4.27	3.29	5.42
Households Below Poverty Level (%)	7.85	21.70	10.46	6.64	4.47	16.08
Median Family Income (23224 - Frederick-Gaithersburg-Bethesda, MD MD)		$129,092	**Median Housing Value**			$532,100
Median Family Income (47894 - Washington-Arlington-Alexandria, DC-VA-MD-WV MD)		$126,224	**Median Gross Rent**			$1,883
Median Family Income (23224 - Frederick-Gaithersburg-Bethesda, MD MD) for 2023		$151,400	**Families Below Poverty Level**			5.49
Median Family Income (47894 - Washington-Arlington-Alexandria, DC-VA-MD-WV MD) for 2023		$150,100				
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Washington DC MSA						
2024						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	831	9.51	17.09	29.48	41.76	2.17
Population by Geography	3,300,025	9.43	18.81	30.66	40.14	0.96
Housing Units by Geography	1,317,425	9.72	18.61	30.82	40.12	0.74
Owner-Occupied Housing by Geography	717,825	4.51	14.62	31.86	48.71	0.30
Occupied Rental Units by Geography	521,853	16.40	23.84	29.93	28.61	1.21
Vacant Units by Geography	77,747	12.90	20.32	27.15	37.98	1.65
Businesses by Geography	189,239	5.66	14.93	32.89	45.44	1.08
Farms by Geography	2,788	4.99	17.54	32.35	45.05	0.07
Family Distribution by Income Level	749,629	21.06	15.04	18.66	45.25	0.00
Household Distribution by Income Level	1,239,678	23.02	15.34	18.02	43.63	0.00
Unemployment rate (%)	4.70	10.06	5.63	4.30	3.38	5.42
Households Below Poverty Level (%)	7.85	21.08	9.98	6.44	4.70	16.08
Median Family Income (11694 - Arlington-Alexandria-Reston, VA-WV MD)		$135,790	**Median Housing Value**			$532,100
Median Family Income (23224 - Frederick-Gaithersburg-Bethesda, MD MD)		$129,092	**Median Gross Rent**			$1,883

Assessment Area(s) - Washington DC MSA						
2024						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Median Family Income (47764 - Washington, DC-MD MD)		$106,818			**Families Below Poverty Level**	5.49
Median Family Income (11694 - Arlington-Alexandria-Reston, VA-WV MD) for 2024		$164,200				
Median Family Income (23224 - Frederick-Gaithersburg-Bethesda, MD MD) for 2024		$155,800				
Median Family Income (47764 - Washington, DC-MD MD) for 2024		$128,300				
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within each component MSA or MD of the Washington DC CSA for both analysis periods. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2022-2023 table above, the median housing value for the Washington DC CSA AA was $532,100, while according to Realtor.com the median sales price of a single-family home was $505,000 at the beginning of 2022 and $564,990 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment between $1,876 to $1,893 and moderate-income borrowers between $3,002 and $3,028 depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $3,387 at the end of 2023. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the Washington DC CSA during the 2022-2023 period.

Based on information in the 2024 table above, the median housing value for the Washington DC CSA was also $532,100, while according to Realtor.com the median sales prices of a single-family home was $593,950 at the beginning of 2024 and $577,400 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment between $1,604 to $2,053 and moderate-income borrowers between $2,566 to $3,284 depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $3,461 at the end of 2024. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the Washington DC CSA during the 2024 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Washington DC CSA, 5.49 percent of families had income(s) below the federal poverty line for the entire evaluation period.

Economic Data

According to the Moody's Analytics February 2025 report, in 2024, the Washington DC CSA's strengths include high per capita income and educated workforce, major center for computer design systems and tech-related professional services, and a popular tourist destination. Weaknesses include exposure to downturn in tourism, above-average living costs, high exposure to federal government, and high business and regulatory costs. Major employment sectors include professional and business services, government, education and health services. The top employers include the federal government, Inova Health System, MedStar Health, and Marriott International, Inc.

According to the BLS, the non-seasonally adjusted unemployment rate for the Washington DC MSA was 3.9 percent in January 2022 and decreased to 2.8 percent in December 2024. In December 2024 the unemployment rate in the District of Columbia was 5.0 percent and the statewide unemployment rate in Virginia and Maryland was 2.5 percent and 2.7 percent respectively, while the national unemployment was 3.8 percent.

Community Contacts

A review was conducted of four community contacts completed during the evaluation period with organizations throughout the Washington DC CSA. Contacts included entities focused on affordable housing, economic development, and community services. Contacts noted that low-income areas in Washington DC continue to be plagued by high levels of vacant housing units. Many low- and moderate-income families cannot afford the cost of housing in the Washington DC area and with a median housing value of over $500,000, most low- and moderate-income individuals cannot obtain safe and affordable housing. Like many cities across the country, DC saw a decline in total population during the COVID-19 Pandemic. According to American Community Survey data an estimated 20,000 individuals left DC from 2020 to 2022. Many of the people who left were small wealthy families who fled towards perceived safety of the suburbs. Despite the decline in population, access to affordable housing is a significant need in DC. The majority of the housing is rental housing and the demand for housing is high. There is a housing supply shortage, and DC struggles with connecting low-income residents to affordable housing units. Many low-income households are rent burdened. There is a significant need for affordable housing. There is a need to support wrap-around services to help low-income individuals overcome barriers to reaching economic security. The types of services needed include financial literacy and capability training, workforce development training, and educational services. Other identified needs include:

- Foreclosure and eviction prevention and assistance services
- Workforce development training
- Access to safe and affordable childcare
- Support services and programing for at-risk youth

Scope of Evaluation in Washington DC MMSA

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in the Arlington-Alexandia-Reston, VA-WV added to the Washington DC MD AA in 2024. This change resulted in the need for two separate analyses for this AA. Prior to OMB changes, the AA consisted of the Fredrick-Gaithersburg-Rockville, MD and the Washington-Arlington-Alexandria, DC-VA-MD-WV MD. After the changes, the AA consisted of the Arlington-Alexandria, VA-WV MD, the Fredrick-Gaithersburg-Bethesda, MD MD and the Washington DC-MD MD.

Examiners conducted a full-scope review of the Washington DC MMSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON DC MMSA

LENDING TEST

The bank's performance under the Lending Test in the Washington DC MMSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Washington DC MMSA AA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2024**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Washington DC MMSA	2,748	243	0	0	2,991	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	0	0	0
Total	2,748	243	0	0	2,991	100.00	100.00
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Washington DC MMSA	1,250,909	13,736	0	0	1,264,645	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	0	0	0
Total	1,250,909	13,736	0	0	1,264,645	100.00	100.00
Source: 1/1/2022 - 12/31/2024 Bank Data. *Due to rounding, totals may not equal 100.0%*							

Washington DC MMSA 2022-2023

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, CBNA ranked 34th out of 57 FDIC-insured depository institutions (top 60 percent) with a 0.1 percent deposit market share.

For home mortgage loans, the bank's market share of 1.6 percent ranked 17th out of 666 lenders (top 3 percent). The top three lenders were Truist Bank with 5.2 percent market share, PennyMac Loan Services LLC with 4.1 percent market share, and Navy Federal Credit Union with 3.8 percent market share.

For small loans to businesses, the bank's market share of 0.05 percent ranked 47th out of 195 lenders (top 25 percent). The top three lenders were American Express National Bank with 30.8 percent market share, JPMorgan Chase Bank, NA with 23.4 percent market share, and Bank of America, NANA with 13.4 percent market share.

Washington DC MMSA 2024

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked 29th out of 56 FDIC-insured depository institutions (top 52 percent) with a 0.2 percent deposit market share.

For home mortgage loans, the bank's market share of 1.3 percent ranked 23rd out of 666 lenders (top 4 percent). The top three lenders were Rocket Mortgage with 4.4 percent market share, PennyMac Loan Services LLC with 4.1 percent market share, and Truist Bank with 4.1 percent market share.

For small loans to businesses, the bank's market share of 0.05 percent ranked 47th out of 195 lenders (top 25 percent). The top three lenders were American Express National Bank with 30.8 percent market share, JPMorgan Chase Bank, NA with 23.4 percent market share, and Bank of America, NA with 13.4 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. Examiners also considered any relevant performance context information.

Home Mortgage Loans

Refer to Table 7 in the Washington DC MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good.

		Low-Income Tracts			Moderate-Income Tracts		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	883	46	5.21	5.46	105	11.89	15.08
2024	391	27	6.91	5.96	80	20.46	16.23
HELOC							
2022-2023	1,127	27	2.40	2.85	88	7.81	10.06
2024	347	14	4.03	2.89	30	8.65	12.31

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

2022-2023

The geographic distribution of home mortgage loans was adequate.

The percentage of home mortgage loans originated or purchased in low-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

2024

The geographic distribution of home mortgage loans was excellent.

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and was near to the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, both the percentage of open-end HELOCs originated or purchased and the percentage of closed-end mortgages exceeded aggregate.

Small Loans to Businesses

Refer to Table 9 in the Washington DC MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

<u>2022-2023</u>

The geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

<u>2024</u>

The geographic distribution of small loans to businesses was poor. While the bank's performance was poor, examiners took into consideration the number of loans originated in 2024 and the limited presence in this market. The bank's market share for small loans to businesses was 0.05 percent.

The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies was well below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did not identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes. Examiners also considered any relevant performance context information.

Home Mortgage Loans

Refer to Table 8 in the Washington DC MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

Based on housing affordability calculations, discussed above, homeownership in the AA is not affordable for low- and moderate-income borrowers; therefore, more emphasis was given to the bank's performance compared to other lenders in the AA.

The distribution of home mortgage loans among individuals of different income levels was excellent.

		Low-Income Borrowers			Moderate-Income Borrowers		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	883	81	9.17	7.45	172	19.48	17.58
2024	391	25	6.39	6.79	89	22.76	15.75
HELOC							
2022-2023	1,127	66	5.86	6.31	152	13.49	13.56
2024	347	31	8.93	7.09	55	15.85	14.43

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

2022-2023

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separate from closed-end mortgages, the percentage of open-end HELOCs originated or purchased was near to the aggregate and the percentage of closed-end mortgages exceeded the aggregate.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA and was near to the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased was near to the aggregate and the percentage of closed-end mortgages exceeded the aggregate.

2024

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the Washington DC MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

2022-2023

The distribution of loans to businesses of different sizes was excellent.

The percentage of loans to small businesses originated or purchased exceeded both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders.

2024

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution had made few, if any, CD loans.

The bank did not originate or purchase any CD loans during the evaluation period. The bank's lack of CD lending had a negative impact and lowered the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 424 loans under its flexible lending programs totaling $202.3 million. Refer to the Scope of the Evaluation section for additional details regarding the programs. In addition, the bank provided 68 CCA down payment grants totaling $366,641 within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	13	$5,070
FHA	16	$7,718
FHLMC	68	$37,447
FHLMC Home Possible	4	$ 1,503
FNMA	219	$105,719
FNMA Home Ready	77	$30,988
Goal Builder HELOC	9	$209
VA	18	$13,647
Total	424	$202,301

INVESTMENT TEST

The institution's performance under the Investment Test in the Washington DC MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Washington DC MMSA AA was excellent.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Washington DC MMSA	0	0	25	7,585	25	100.00	7,585	100.00	0	0
Total	**0**	**0**	**25**	**7,585**	**25**	**100.00**	**7,585**	**100.00**	**0**	**0**

The institution had an excellent level of qualified investments, including grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 10.4 percent of allocated tier 1 capital.

The institution exhibited good responsiveness to credit and CD needs. The institution did not use innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 92.8 percent of total investments and grants supported affordable housing, 1.7 percent supported community services to low- and moderate-income individuals, and 5.5 percent promoted economic development.

The following are examples of qualified investments in the MMSA:

- The bank made a $5 million investment to a CDFI that provided funding for affordable housing and CD loans. This activity was responsive by helping to address the need for affordable housing in the area.

- The bank made a $400,000 grant that provided learning and employment education to 800 low- and moderate-income individuals. This activity was responsive by helping to provide workforce development training.

- The bank made two grants totaling $30,000 that provided funding to an organization that provided food to low- and moderate-income individuals through food pantries. This activity was responsive by helping to provide food in areas with affordability issues.

SERVICE TEST

The institution's performance under the Service Test in the Washington DC MMSA is rated Low Satisfactory.

Based on a full-scope review, the institution's performance in the Washington DC MMSA AA was adequate.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2024
	Deposits	**Branches**							**Population**					
Assessment Area	**% of Rated Area Deposits in AA**	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income of Geographies (%)**					**% of Population within Each Geography**					
				Low	**Mod**	**Mid**	**Upp**	**NA**	**Low**	**Mod**	**Mid**	**Upp**	**NA**	
Washington DC MMSA	100.00.0	8	100.00.0	0.0	0.0	37.5	62.5	0.0	9.4	18.8	30.7	40.1	1.0	
Total	100.00.0	8	100.00.0	0.0	0.0	37.5	62.5	0.0	9.4	18.8	30.7	40.1	1.0	
Source: FFIEC File - 2024 Census 1/1/2022 - 12/31/2024 Bank Data Due to rounding, totals may not equal 100.0%														

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in both low-income and moderate-income geographies was significantly below the percentage of the population living within those geographies. No data was provided for middle- and upper-income branches within one-quarter mile of an LMI geography.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 10 ATMs in the AA, all of which were deposit-taking. No data was provided on usage of online and mobile banking as of the end of the evaluation period for this AA.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Washington DC MMSA	2	2	0	0	1	-1	0
Total	2	2	0	0	1	-1	0
1/1/2022 – 12/31/2024 Bank Data.							

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, the bank closed two branches, both in upper-income geographies. The branch closures were a result of network optimization. The bank also opened two branches during the evaluation period, one of which was located in a middle-income geography and one of which was located in an upper-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all eight traditional standalone branch locations in the AA.

Community Development Services

The institution provided an adequate level of CD services.

During the evaluation period, bank employees provided 223 hours of qualified CD services to eight organizations through 39 activities within this AA. Leadership is evident through board or committee participation in three of these activities with three employees providing 22 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with community services related to financial education, affordable housing, and workforce development.

Service activity examples during the evaluation period include:

- Bank employees contributed 117 hours of financial literacy and career guidance to a nonprofit organization that provides financial literacy and career exploration programs to schools in underserved communities.

- A bank employee partnered with a local nonprofit organization and provided 50 hours of financial education and job training over multiple sessions in the DC market. The organization paired volunteers with mentees who are unemployed or underemployed to provide them with the skills, resources, and access to networks they need to secure and maintain employment.

- Bank employees provided 27 hours to a nonprofit that provided technical financial assistance. The organization brings the power of entrepreneurship to young people in under-resourced communities through various courses. The students attending schools impacted by the organization received 100 percent free lunches. The capstone for every student is the creation of an original business plan.

Multistate Metropolitan Statistical Area Rating

Youngstown-Warren, OH-PA CSA (Youngstown CSA)

CRA rating for the Youngstown CSA[5]: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank had made few, if any, CD loans. CD lending had a negative impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA.
- The bank provided an adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Youngstown CSA

The Youngstown CSA was an MMSA for the 2022-2023 portion of the exam and therefore received a separate analysis for this period. CBNA delineated counties within the Youngstown-Warren-Boardman, OH-PA MSA and the Salem, OH Micropolitan Statistical Area as its AA. Refer to appendix A for the list of counties reviewed.

CBNA had $371.1 million in deposits in the Youngstown CSA, representing two percent of the bank's total deposits as of June 30, 2023. As of December 31, 2023, the bank operated three branches and four ATMs within the AA, representing 0.3 percent of total bank branches and total ATMs. The bank originated and purchased approximately $96.4 million in home mortgage and small business loans within the Youngstown CSA during the 2022-2023 review period.

According to FDIC deposit data as of June 30, 2023, there were 17 FDIC-insured institutions operating 150 branches in the AA. CBNA ranked seventh in deposit market share with 2.4 percent. Other top banks

[5] MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

by deposit market share are The Huntington National Bank with 27.4 percent, The Farmers National Bank of Canfield with 16.8 percent, and Premier Bank with 14.0 percent.

Youngstown CSA 2022-2023

The following table provides a summary of the demographics, including housing, business, and economic information for the Youngstown CSA for the 2022 to 2023 period.

Assessment Area(s) - 2022-2023 Youngstown CSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	189	8.47	21.16	50.26	19.05	1.06
Population by Geography	643,120	5.40	16.50	54.46	23.03	0.62
Housing Units by Geography	306,066	6.37	17.47	54.14	21.50	0.53
Owner-Occupied Housing by Geography	193,452	3.25	14.48	56.67	25.26	0.34
Occupied Rental Units by Geography	79,787	11.01	22.61	50.61	14.67	1.10
Vacant Units by Geography	32,827	13.42	22.57	47.78	15.94	0.30
Businesses by Geography	23,290	5.70	14.65	48.94	30.39	0.33
Farms by Geography	1,187	1.85	10.95	61.25	25.95	0.00
Family Distribution by Income Level	168,273	22.05	17.00	21.29	39.66	0.00
Household Distribution by Income Level	273,239	24.67	16.52	17.55	41.27	0.00
Unemployment rate (%)	6.32	16.14	9.66	5.14	4.90	26.94
Households Below Poverty Level (%)	15.65	44.73	26.04	12.18	8.28	49.02
Median Family Income (49660 - Youngstown-Warren, OH MSA)		$63,220			**Median Housing Value**	$99,600
Median Family Income (Non-MSAs - OH)		$66,684			**Median Gross Rent**	$693
Median Family Income (49660 - Youngstown-Warren, OH MSA) for 2023		$77,100			**Families Below Poverty Level**	12.46
Median Family Income (Non-MSAs - OH) for 2023		$79,500				
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within each component MSA or MD of the Youngstown CSA for the analysis period. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2022-2023 table above, the median housing value for the Youngstown CSA AA was $99,600, while according to Realtor.com the median sales price of a single-family home was $119,900 at the beginning of 2022 and $164,500 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment between $964 to $994 and moderate-income borrowers between $1,542 and $1,590 depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $986 at the end of 2023. Based on these calculations, most low- and moderate-income borrowers would be able to afford home mortgage financing within the Youngstown CSA during the 2022-2023 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such

are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Youngstown CSA, 12.5 percent of families had income(s) below the federal poverty line for the 2022-2023 evaluation period.

Economic Data

According to the Moody's Analytics February 2025 report, in 2024, the Youngstown CSA's strengths include a large healthcare industry, advantageous location above the Utica and Marcellus Shale reserves, and affordable housing. Weaknesses include a heavy reliance on manufacturing that exposes the metro area to job losses, declining population that constrains long-term growth of basic services, and low educational attainment. Major employment sectors include education and health services, manufacturing, and retail trade. The top employers include Mercy Medical Center, Youngstown Air Reserve Station (910th Airlift Wing AFRC), Windsor House, and Steward ValleyCare Health System (Trumball/Hillside).

According to the BLS, the non-seasonally adjusted unemployment rate for the Youngstown CSA was 6.0 percent in January 2022, decreased to 3.7 percent in December 2023 and increased to 5.0 percent in December 2024. This compares to the Ohio statewide 2023 and 2024 unemployment rates of 3.1 percent and 4.2 percent and the national 2023 and 2024 unemployment rates of 3.7 percent and 3.8 percent respectively.

Community Contacts

A review was conducted of two housing and community needs assessment reports completed during the evaluation period by organizations serving the Youngstown CSA. These assessments noted that the population in the area is decreasing and aging. There are fewer people working in the area than state and national averages and there are a higher number of people with less than and/or no more than a high school diploma than state or national averages. The poverty level is high and there are more people in the area receiving food assistance than state and national averages. Although housing costs are generally affordable, there is still a need for safe and affordable housing particularly for low- and very low-income households. There is a shortage of high-quality housing units attainable to households with an income at or below 30 percent of the area median income. One out of every four households in the Mahoning Valley suffers from severe housing problems such as incomplete kitchen facilities, incomplete plumbing facilities, overcrowding, or paying more than 30 percent of their income to housing costs. Other identified needs in the area include:

- Technical assistance training for entrepreneurs
- Workforce development training, including improving basic soft skills such as communication and time management
- Accessible internet services/digital literacy
- Utility Assistance
- Access to safe and affordable childcare
- Access to reliable transportation

Scope of Evaluation in Youngstown CSA

Examiners conducted a full-scope review of the Youngstown CSA AA for 2022-2023. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represent the majority of lending in the AA.

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in the removal of the state of Pennsylvania from the Youngstown-Warren, OH-PA CSA. The Youngstown-Warren, OH-PA CSA included the Salem, OH Micropolitan Statistical Area and the Youngstown-Warren-Boardman, OH-PA MSA. For 2024, the Youngstown-Warren-Salem, OH CSA included the Salem, OH Micropolitan Statistical Area and the Youngstown-Warren, OH MSA. An analysis of the Youngstown-Warren, OH-PA CSA was performed for 2022-2023. As of 2024, the analysis was completed under the Youngstown-Warren-Salem, OH CSA in the state of Ohio under a limited-scope review. The Investment Test for the Youngstown CSA AA does not consider prior period investments, as they are considered as part of the Youngstown MSA AA, which covers the 2024 time period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN YOUNGSTOWN CSA

LENDING TEST

The bank's performance under the Lending Test in the Youngstown CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Youngstown CSA AA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2023**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Youngstown CSA 2022-2023	814	77	0	0	891	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	0	0	0
Total	814	77	0	0	891	100.00	100.00
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Youngstown CSA 2022-2023	90,258	6,838	0	0	97,096	100.00	100.00
Broader Statewide or Regional Area	0	0	0	0	0	0	0
Total	90,258	6,838	0	0	97,096	100.00	100.00
Source: 1/1/2022 - 12/31/2023 Bank Data. *Due to rounding, totals may not equal 100.0%*							

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, CBNA ranked seventh out of 17 FDIC-insured depository institutions (top 42 percent) with a 2.4 percent deposit market share.

For home mortgage loans, the bank's market share of 2.4 percent ranked 12th out of 344 lenders (top 4 percent). The top three lenders were Huntington National Bank with 14.9 percent market share, Seven Seventeen Credit Union with 8.1 percent market share, and Ixonia Bank with 5.7 percent market share.

For small loans to businesses, the bank's market share of 0.3 percent ranked 25th out of 88 lenders (top 29 percent). The top three lenders were American Express National Bank with 19.9 percent market share, JP Morgan Chase Bank, NA with 17.2 percent market share, and Citibank, NA with 9.4 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good.

		Low-Income Tracts			Moderate-Income Tracts		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	341	6	1.76	1.85	34	9.97	13.77
HELOC							
2022-2023	473	7	1.48	0.87	39	8.25	9.38

Source: 1/1/2022-12/31/2023 Bank Data and HMDA Aggregate Data

The percentage of home mortgage loans originated or purchased in low-income geographies was significantly below the percentage of owner-occupied housing units located in those geographies but exceeded the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded the aggregate and the percentage of closed-end mortgages was near to the aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was well below the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased was near to the aggregate and the percentage of closed-end mortgages was below the aggregate.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good.

The percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies was below the percentage of businesses located in those geographies but exceeded the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AA. Examiners did identify any unexplained conspicuous gaps in the full-scope area reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes. Examiners also considered any relevant performance context information.

Home Mortgage Loans

Refer to Table 8 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent.

		Low-Income Borrowers			**Moderate-Income Borrowers**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	341	54	15.84	10.66	100	29.33	23.47
HELOC							
2022-2023	473	85	17.97	9.68	103	21.78	22.22

Source: 1/1/2022-12/31/2023 Bank Data and HMDA Aggregate Data

The percentage of home mortgage loans originated or purchased to low-income borrowers was near to the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

The percentage of loans to small businesses originated or purchased approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution had made few, if any, CD loans.

The bank did not originate or purchase any CD loans during the 2022-2023 evaluation period. This lack of CD lending had a negative impact and lowered the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 205 loans under its flexible lending programs totaling $24.8 million. Refer to the Scope of the Evaluation section for additional details regarding the programs. In addition, the bank provided 29 CCA down payment grants totaling $133,248 within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	8	1,015
FHA	34	4,531
FHLMC	19	2,715
FHLMC Home Possible	1	109
FNMA	104	13,527
FNMA Home Ready	18	1,733
Goal Builder HELOC	15	329
VA	6	878
Total	205	24,836

INVESTMENT TEST

The institution's performance under the Investment Test in the Youngstown CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Youngstown CSA AA was excellent.

Number and Amount of Qualified Investments

Table 4: Qualified Investments

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Youngstown CSA 2022-2023	0	0	10	11,820	10	100.00	11,820	100.00	0	0
Broader Statewide or Regional Area	0	0	0	0	0	0.0	0	0.0	0	0
Total	0	0	10	11,820	10	100.00	11,820	100.00	0	0

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, CBNA originated 10 investments totaling $11.8 million or 34 percent of allocated tier 1 capital as of December 31, 2023.

The institution exhibited excellent responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, all of total investments and grants supported affordable housing.

The following are examples of qualified investments in the CSA:

- The bank made a $3.3 million LIHTC investment that supported the rehabilitation of an existing 123 unit senior rental community. All the units will be rented to senior households (62 and older), where income does not exceed 60 percent of the AMI. This investment was responsive due to the project supporting affordable housing and complex due to the nature of the LIHTC funding.

- The bank made a $8 million LIHTC investment that supported the rehabilitation of a 127 unit affordable housing project that serves senior households (55 and older), where income does not exceed 60 percent of the AMI. This investment was responsive due to the project supporting affordable housing and complex due to the nature of the LIHTC funding.

SERVICE TEST

The institution's performance under the Service Test in the Youngstown CSA is rated Low Satisfactory.

Based on a full-scope review, the institution's performance in the Youngstown CSA AA was adequate.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2023
	Deposits	Branches								Population				
Assessment Area	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA
Youngstown CSA	100.0	5	100.0	0.0	0.0	66.7	33.3	0.0	5.0	18.1	53.0	23.2	0.75
Total	100.0	5	100.0	0.0	0.0	66.7	33.3	0.0	5.0	18.1	53.0	23.2	0.75
Source: FFIEC File - 2024 Census 1/1/2022 - 12/31/2024 Bank Data Due to rounding, totals may not equal 100.0%													

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in both low-income geographies and moderate-income geographies was significantly below the percentage of the population living within those geographies. However, we considered the relatively low populations within low- and moderate-income geographies and low total number of branches in making our determination.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had four ATMs in the AA, all of which were deposit-taking. Per data provided by the bank, as of December 31, 2023, 68 percent of retail customer households in low-income geographies, and 64.8 percent of retail customer households in moderate-income geographies used online and mobile banking services. This was an increase of 33.3 percent of retail customer households in low-income geographies, and an increase of 21.9 percent of retail customer households in moderate-income geographies, from the start of the evaluation period.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Youngstown CSA	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0
1/1/2022 – 12/31/2023 Bank Data.							

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services at three branch locations in the AA. All branches had the same lobby hours of 9:00 a.m. to 4:00 p.m. Monday through Friday, and all branches were open from 9:00 a.m. to 12:00 pm on Saturdays.

Community Development Services

The institution provided a low level of CD services.

During the evaluation period, bank employees provided 80 hours of qualified CD services to four organizations through 15 activities within this AA. The bank's assistance was responsive to identified needs in the AA, particularly with providing financial education to LMI individuals.

Service activity examples during the evaluation period include:

- A bank employee provided 38 hours of financial education/mentoring to an organization that serves LMI youth. The organization offers free after-school and summer enrichment programs where approximately 70 percent of participants are from LMI households.

- Bank employees provided 14 hours of financial advice and technical assistance to a nonprofit organization that builds community advisory boards to provide support to small businesses for two to four years. The organization's emphasis is on connecting small businesses with experienced professionals in a confidential setting, which aligns with the current demand for mentorship and support in the entrepreneur community.

State Rating

State of Connecticut

CRA rating for the State of Connecticut: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank made an adequate level of CD loans. CD lending further supported the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, which were responsive in addressing community needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AAs.
- The bank provided a relatively high level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Connecticut

As of June 30, 2024, the bank had approximately $3.2 billion in deposits in the rating area. As of December 31, 2024, the bank operated 28 branches and 38 ATMs in the rating area, representing 2.8 percent of total branches and 2.1 percent of total ATMs.

According to FDIC deposit market share data, as of June 30, 2024, there were 51 FDIC-insured institutions operating 932 branches in the rating area. CBNA ranked ninth in deposit market share with 2.2 percent. The top banks by deposit market share are Bank of America, NA with 23 percent, Webster Bank, NA with 22.8 percent, and Manufacturers and Traders Trust Company with 11.0 percent.

CBNA delineated two AAs in the state of Connecticut as follows: Hartford-East Hartford, CT CSA (Hartford CSA) for the 2022-2023 analysis period and New Haven-Hartford-Waterbury, CT CSA (New Haven CSA) for the 2024 analysis period. Each AA received a full-scope review. Refer to appendix A for a complete description of the AAs.

Hartford CSA

CBNA delineated counties within the Hartford-East Hartford-Middletown, CT MSA and the Norwich-New London, CT MSA as its AA for the 2022 to 2023 period. Refer to appendix A for the list of counties reviewed.

CBNA had $1.1 billion in deposits in the Hartford CSA representing 0.6 percent of the bank's total deposits as of June 30, 2023. The bank originated and purchased approximately $602.3 million in home mortgage and small business loans within the Hartford CSA during the 2022-2023 review period.

According to FDIC deposit data as of June 30, 2023, there were 27 FDIC-insured institutions operating 289 branches in the AA. CBNA ranked eighth in deposit market share with 2.1 percent. The top banks by deposit market share are Bank of America, NA with 45.7 percent, Manufacturers and Traders Trust Company with 12.2 percent, and Webster Bank, NA with 9.2 percent.

The evaluation period considers demographic information from the 2020 U.S. Census. The following table provides a summary of the demographics, including housing, business, and economic information for the Hartford CSA for the 2022 to 2023 period.

Assessment Area(s) - 2022-2023 Hartford CSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	343	13.12	17.49	39.65	26.82	2.92
Population by Geography	1,332,298	10.84	17.83	41.51	29.16	0.65
Housing Units by Geography	580,681	11.26	18.49	42.33	27.70	0.22
Owner-Occupied Housing by Geography	350,254	3.39	13.00	47.56	36.02	0.03
Occupied Rental Units by Geography	180,780	24.96	28.54	33.92	12.23	0.35
Vacant Units by Geography	49,647	16.83	20.66	36.08	25.37	1.05
Businesses by Geography	66,662	9.20	15.42	44.63	29.93	0.81
Farms by Geography	2,553	4.58	9.28	47.87	38.23	0.04
Family Distribution by Income Level	339,928	22.74	17.28	20.60	39.38	0.00
Household Distribution by Income Level	531,034	25.35	15.68	17.34	41.64	0.00
Unemployment rate (%)	5.45	11.11	7.24	4.43	4.04	3.24
Households Below Poverty Level (%)	10.26	30.88	14.18	7.02	4.57	43.79
Median Family Income (25540 - Hartford-West Hartford-East Hartford, CT MSA)		$101,543			**Median Housing Value**	$228,500
Median Family Income (35980 - Norwich-New London-Willimantic, CT MSA)		$94,894			**Median Gross Rent**	$1,150
Median Family Income (25540 - Hartford-West Hartford-East Hartford, CT MSA) for 2023		$118,700			**Families Below Poverty Level**	6.77
Median Family Income (35980 - Norwich-New London-Willimantic, CT MSA) for 2023		$114,400				
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within each component MSA of the Hartford CSA. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the table above, the median housing value for the Hartford CSA was $228,500, while according to Realtor.com the median sales price of a single-family home was $359,900 at the beginning of 2022 and $399,900 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment between $1,430 and $1,484 and moderate-income borrowers between $2,288 and $2,374 depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $2,397 at the end of 2023. Based on these calculations, all low-income and some moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the Hartford CSA during the 2022-2023 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Hartford CSA, 6.77 percent of families had income(s) below the federal poverty line for the 2022-2023 evaluation period.

Economic Data

According to Moody's Analytics January 2025 report, in 2024, the Hartford MSA's strengths include a well-educated workforce and above-average wages, lower living and business costs than in Boston and New York, and housing that is affordable. The area's weaknesses include exposure to job losses in state government, negative net migration and flat population, and high energy costs. Major employment industries include education and health services, government, and professional and business services. Major employers include Hartford Healthcare, RTX Corp, University of Connecticut, and CVS Health Corp.

According to the BLS, the non-seasonally adjusted unemployment rate for the Hartford CSA was 5.0 percent in January 2022 and decreased to 4.0 percent in December 2023. The non-seasonally adjusted unemployment rate for the state of Connecticut was 4.0 percent in December 2023. The national unemployment rate was 3.8 percent in December 2024.

Community Contacts

A review was conducted of three community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as community development, affordable housing, and social service needs. Contacts noted that Hartford is one of the poorest cities in the United States. There has been an increasing number of homeless individuals living outdoors. Contacts noted that it is difficult for those without education beyond high school to obtain a job that pays a living wage. While the unemployment rate is low, wages are still too low relative to living expenses. While there are some jobs available beyond the service industry, such as government contract work, potential employees must be able to pass a criminal background check which includes a review of juvenile records. This makes it difficult for some people to qualify for higher paying jobs. Many lower-income households are struggling to meet day to day expenses and there has been an uptick in the number of people facing eviction for non-payment of rent. Contacts noted that many low-income individuals need hands-on financial coaching and access to affordable bank accounts. Other identified needs in the area include:

- Financial literacy programming for low-income individuals
- Grant funding for nonprofit organizations
- Affordable housing
- Funding for homelessness prevention services
- Workforce development training
- Funding to support credit repair and credit building programs
- Access to affordable bank accounts
- Access to affordable and reliable transportation options

New Haven CSA

CBNA delineated counties within the Hartford-West Hartford-East Hartford, CT MSA, the New Haven, CT MSA, the Norwich-New London-Willimantic, CT MSA, and the Putnam, CT Micropolitan Statistical Area as its AA for the 2024 review period. Refer to appendix A for the list of counties reviewed.

CBNA had $3.2 billion in deposits in the New Haven CSA, representing 1.8 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated 28 branches and 38 ATMs within the AA, representing 2.8 percent of total bank branches and 2.1 percent of total ATMs. The bank originated and purchased approximately $304 million in home mortgage and small business loans within the New Haven CSA during the 2024 review period.

According to FDIC deposit data as of June 30, 2024, there were 37 FDIC-insured institutions operating 514 branches in the AA. CBNA ranked sixth in deposit market share with 5.8 percent. The top banks by deposit market share are Bank of America, NA with 34.7 percent market share, Manufacturers and Traders Trust Company with 11.7 percent market share, and Webster Bank, NA with 9.1 percent market share.

The following table provides a summary of the demographics, including housing, business, and economic information for the New Haven CSA for the 2024 period.

Assessment Area(s) – New Haven CSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	524	12.40	18.13	37.40	29.77	2.29
Population by Geography	2,096,738	10.78	18.39	38.50	31.86	0.48
Housing Units by Geography	902,809	10.94	18.70	39.36	30.87	0.14
Owner-Occupied Housing by Geography	535,170	3.37	12.69	44.83	39.08	0.02
Occupied Rental Units by Geography	288,951	23.54	29.13	30.97	16.14	0.22
Vacant Units by Geography	78,688	16.08	21.27	32.91	29.08	0.66
Businesses by Geography	104,217	8.79	16.09	40.19	34.41	0.52
Farms by Geography	4,054	4.66	9.50	44.57	41.24	0.02
Family Distribution by Income Level	523,695	22.06	17.09	20.27	40.58	0.00
Household Distribution by Income Level	824,121	24.94	15.43	17.28	42.35	0.00
Unemployment rate (%)	5.70	11.64	7.44	4.73	4.23	3.24
Households Below Poverty Level (%)	10.58	31.21	15.28	7.30	4.96	43.79
Median Family Income (25540 - Hartford-West Hartford-East Hartford, CT MSA)		$102,081			**Median Housing Value**	$231,800
Median Family Income (35300 - New Haven, CT MSA)		$93,218			**Median Gross Rent**	$1,168

Assessment Area(s) – New Haven CSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Median Family Income (35980 - Norwich-New London-Willimantic, CT MSA)		$87,992			**Families Below Poverty Level**	6.83
Median Family Income (Non-MSAs - CT)		$94,529				
Median Family Income (25540 - Hartford-West Hartford-East Hartford, CT MSA) for 2024		$123,800				
Median Family Income (35300 - New Haven, CT MSA) for 2024		$116,200				
Median Family Income (35980 - Norwich-New London-Willimantic, CT MSA) for 2024		$105,900				
Median Family Income (Non-MSAs - CT) for 2024		$105,400				

FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within each component MSA of the New Haven CSA. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the table above, the median housing value for the New Haven CSA was $231,800, while according to Realtor.com the median sales price of a single-family home was $409,725 at the beginning of 2024 and $448,975 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment between $1,318 and $1,548 and moderate-income borrowers between $2,108 and $2,476 depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $2,691 at the end of 2024. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify and afford home mortgage financing within the New Haven CSA during the 2024 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the New Haven CSA, 6.83 percent of families had income(s) below the federal poverty line for the 2024 evaluation period.

Economic Data

According to the Moody's Analytics January 2025 report, in 2024, the New Haven CSA's strengths included a large, stable university concentration, commitment to development from Yale University, and lower business costs than in New York and Boston. Weaknesses included higher structural unemployment than in neighboring metro areas, lack of a high-tech manufacturing base, and little development outside healthcare. Major employment sectors include education and health services, government, and professional and business services. Major employers in the area include Yale New Haven Health System, Yale University, Grandview Adult Behavioral, and Griffin Hospital.

According to the BLS, the non-seasonally adjusted unemployment rate for the New Haven CSA was 4.4 percent in January 2024 and decreased to 2.5 percent in December 2024.

Community Contacts

A review was conducted of four community contacts with organizations located throughout the area and a community needs assessment completed during the evaluation period. The organizations contacted focus on areas such as community development, affordable housing, social service needs, and economic wellbeing. Contacts noted that greater New Haven along with the state of Connecticut is still recovering from the impact of the Covid-19 Pandemic. Many lower-income households continue to struggle with access to affordable housing and reliable transportation. Increasing prices have led to an increase in food insecurity among low-income and working-class families. About 25 percent of households making less than $50,000 per year lack a broadband connection. Home prices and rents have been increasing, as have evictions. More households are on the brink of homelessness. The supply of new housing is limited due to zoning laws and the low rate of housing construction. There is a need for subsidies to support the development of affordable housing. Other identified needs in the area include:

- Financial literacy programming for low-income individuals
- Grant funding for nonprofit organizations
- Affordable housing, including options for elders looking to downsize
- Funding for homelessness prevention services
- Workforce development training
- Academic support services for youth
- Access to affordable and reliable transportation options
- Bank support for Individual Development Accounts (IDAs)
- Small business financing
- Purchase/Rehab loans

Scope of Evaluation in Connecticut

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in a transition from its previous division of eight legacy counties to nine county equivalents, now referred to as Planning Regions. A full-scope analysis of the Hartford-East Hartford, Connecticut CSA was performed for 2022-2023. As of 2024, a full-scope analysis was performed for the New Haven-Hartford-Waterbury, Connecticut CSA, which is a new CSA in Connecticut.

Examiners conducted a full-scope review of the New Haven-Hartford-Waterbury, CT CSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represent the majority of lending in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the New Haven CSA AA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2024**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Hartford CSA 2022-2023	2,863	399	0	1	3,263	59.6	0
New Haven 2024	1,542	665	0	3	2,210	40.4	100.0
Broader Statewide or Regional Area	0	0	0	0	0	0	0
Total	4,405	1,064	0	4	5,473	100.0	100.0
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Hartford CSA 2022-2023	570,781	31,517	0	5,000	607,298	64.8	0
New Haven 2024	304,139	17,428	0	9,000	330,567	35.2	100.0
Broader Statewide or Regional Area	0	0	0	0	0	0	0
Total	874,920	48,945	0	14,000	937,865	100.0	100.0
Source: 1/1/2022 - 12/31/2024 Bank Data. *Due to rounding, totals may not equal 100.0%*							

*The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<u>Hartford CSA AA</u>

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, CBNA ranked seventh out of 31 FDIC-insured depository institutions (top 23 percent) with a 3.0 percent deposit market share.

For home mortgage loans, the bank's market share of 4.1 percent ranked fourth out of 480 lenders (top 1 percent). The top three lenders were Liberty Bank with 6 percent market share, First World Mortgage Corporation with 5.6 percent market share, and Rocket Mortgage with 4.1 percent market share.

For small loans to businesses, the bank's market share of 0.5 percent ranked 21st out of 141 lenders (top 15 percent). The top three lenders were American Express National Bank with 24.7 percent market share, JP Morgan Chase Bank, NA with 14.1 percent market share, and Bank of America, NA with 8.8 percent market share.

New Haven CSA AA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked sixth out of 37 FDIC-insured depository institutions (top 17 percent) with a 5.8 percent deposit market share.

For home mortgage loans, the bank's market share of 3.4 percent ranked fifth out of 526 lenders (top 1 percent). The top three lenders were Rocket Mortgage with 4.6 percent market share, Liberty Bank with 4.4 percent market share, and United Wholesale Mortgage with 4.1 percent market share.

For small loans to businesses, the bank's market share of 1.2 percent ranked 14 out of 156 lenders (top 9 percent). The top three lenders were American Express National Bank with 25.4 percent market share, JPMorgan Chase Bank, NA with 17.2 percent market share, and Bank of America, NA with 7.3 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

		Low-Income Tracts			**Moderate-Income Tracts**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	972	38	3.91	5.64	125	12.86	16.00
2024	319	9	2.82	25.14	47	14.73	73.15
HELOC							
2022-2023	1,891	42	2.22	1.69	132	6.98	7.62
2024	1,223	25	2.04	1.73	109	8.91	8.92

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

Hartford CSA AA

The geographic distribution of home mortgage loans was adequate.

2022-2023

The percentage of home mortgage loans originated or purchased in low-income geographies was below the percentage of owner-occupied housing units located in those geographies and was well below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded the aggregate and the percentage of closed-end mortgages was well below the aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies and was well below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased was near to the aggregate and the percentage of closed-end mortgages was below the aggregate.

New Haven CSA AA

The geographic distribution of home mortgage loans was adequate.

2024

The percentage of home mortgage loans originated or purchased in low-income geographies was below the percentage of owner-occupied housing units located in those geographies and was significantly below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded the aggregate and the percentage of closed-end mortgages was significantly below the aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies and was well below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased was near to the aggregate and the percentage of closed-end mortgages was significantly below the aggregate.

Small Loans to Businesses

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

Hartford CSA AA

The geographic distribution of small loans to businesses was good.

2022-2023

The geographic distribution of small loans to businesses was good.

The percentage of small loans to businesses originated or purchased in low-income geographies was below the percentage of businesses located in those geographies but was near to the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies was near to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

<u>New Haven CSA AA</u>

The geographic distribution of small loans to businesses was good.

<u>2024</u>

The percentage of small loans to businesses originated or purchased in low-income geographies was significantly below the percentage of businesses located in those geographies and was well below the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies approximated the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on housing affordability calculations, discussed above, homeownership in the AA is not affordable for low- and moderate-income borrowers; therefore, more emphasis was given to the bank's performance compared to other lenders in the AA.

		Low-Income Borrowers			Moderate-Income Borrowers		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	972	146	15.02	11.40	316	32.51	28.15
2024	319	18	5.64	9.87	74	23.20	21.60
HELOC							
2022-2023	1,891	241	12.74	10.59	445	23.53	20.99
2024	1,223	141	11.53	9.87	298	24.37	21.60

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

Hartford CSA

The distribution of home mortgage loans among individuals of different income levels was excellent.

2022-2023

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA and approximated the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

New Haven CSA

The distribution of home mortgage loans among individuals of different income levels was good.

2024

The distribution of home mortgage loans among individuals of different income levels was good.

The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA and approximated the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.
Hartford CSA

The distribution of loans to businesses of different sizes was good.

2022-2023

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased approximated the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

New Haven CSA

The distribution of loans to businesses of different sizes was good.

2024

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution had made a good level of CD loans. CD lending further supported the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

New Haven CSA

The level of CD lending was good. During the evaluation period, the bank originated four CD loans totaling $14 million or 5.1 percent of allocated tier 1 capital. By dollar volume, 60.7 percent funded revitalization and stabilization efforts, 35.7 percent funded economic development, and 3.6 percent funded community services. CD loans were responsive to identified community needs.

The following are examples of CD loans the bank originated or purchased in the AA:

- The bank originated a $10.6 million loan to support the construction financing for a 44-unit affordable housing LIHTC project located in a low-income census tract. All units were available to individuals or families earning up to 60 percent of the AMI. This transaction is considered complex due to its inclusion of both equity and debt components to complete the LIHTC project.

- The bank contributed a $5 million loan to the state-sponsored loan fund. The loan fund was created to address the capital needs of the small business and nonprofit organizations in the state of Connecticut. The funding is targeted towards the smallest, community-based businesses, which supported minority, women, disabled, and veteran-owned businesses. These efforts also targeted under-resourced and under-served communities.

- The bank originated a $500,000 loan to a nonprofit organization dedicated to supporting low- and moderate-income individuals with mental and physical disabilities. The organization provided housing, skill-building programs, and job placement assistance.

Letters of Credit

Additionally, the bank originated one letter of credit totaling $1.9 million that has a qualified CD purpose and benefited the New Haven CSA. This letter of credit supported the community services targeted at low- and moderate-income individuals and were given positive consideration.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs.

New Haven CSA

As shown in the table below, the bank originated or purchased 1,157 loans under its flexible lending programs totaling $268.5 million. Refer to the Scope of Evaluation section for additional details regarding the programs. In addition, the bank provided 72 CCA down payment grants totaling $469,978 within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	48	9,604
FHA	222	59,477
FHLMC	72	24,582
FHLMC Home Possible	88	19,416
FNMA	479	155,792
FNMA Home Ready	118	26,134
Goal Builder HELOC	101	2,650
VA	29	10,813
Total	1,157	268,467

INVESTMENT TEST

The bank's performance under the Investment Test in Connecticut is rated Outstanding.

Based on a full-scope review, the institution's performance in the New Haven AA was excellent.

Number and Amount of Qualified Investments

Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
New Haven CSA	64	38,842	65	38,106	129	100.0	76,948	100.0	13	20,150
Total	**64**	**38,842**	**65**	**38,106**	**129**	**100.0**	**76,948**	**100.0**	**13**	**20,150**

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 17.3 percent of allocated tier 1 capital.

The institution exhibited good responsiveness to credit and CD needs. The institution made significant use of innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 97.1 percent of total investments and grants supported affordable housing, 0.9 percent supported community services to low- and moderate-income individuals, and 2.0 percent promoted economic development.

The following are examples of qualified investments in the AA:

- The bank made a $2 million LIHTC investment that supported the rehabilitation of 33 units of affordable housing reserved for individuals making less that 60 percent of the AMI. This activity was complex due to the use of a LIHTC and responsive by addressing the need for affordable housing in the area.

- The bank made a $2 million LIHTC investment that supported the new construction of 556 mixed income housing units. The housing initiative includes 44 units of affordable housing for individuals earning less than 60 percent AMI. This activity was complex due to the use of a LIHTC and responsive by addressing the need for affordable housing in the area.

- The bank made a $105,000 grant that provided funding to support a local food pantry that serves 100 percent low- and moderate-income individuals. This activity was responsive as it helped to address food insecurity in the area.

SERVICE TEST

The bank's performance under the Service Test in Connecticut is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the New Haven CSA was good.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2024
	Deposits	Branches								Population				
Assessment Area	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)						% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA		Low	Mod	Mid	Upp	NA
New Haven CSA	100.00	28	100.00	3.6	17.9	42.9	35.7	0.0		10.8	18.4	38.5	31.9	0.5
Total	100.00	28	100.00	3.6	17.9	42.9	35.7	0.0		10.8	18.4	38.5	31.9	0.5
Source: FFIEC File - 2024 Census *1/1/2022 - 12/31/2024 Bank Data* *Due to rounding, totals may not equal 100.0%*														

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

New Haven CSA AA

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was well below, and in moderate-income geographies, approximated the percentage of the population living within those geographies.

Examiners further considered one upper-income branch located within one-quarter mile of a low-income geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA. This branch improved accessibility and further supported the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 38 ATMs in the AA, all of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, 71.4 percent of retail customer households in low-income geographies, and 70.4 percent of retail customer households in moderate-income geographies used online and mobile banking services. This was an increase of 38.3 percent of retail customer households in low-income geographies, and an increase of 31.3 percent of retail customer households in moderate-income geographies, from the start of the evaluation period.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
New Haven 2024	0	3	0	0	0	-3	0
Total	0	3	0	0	0	-3	0
1/1/2022 - 12/31/2024 Bank Data.							

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

New Haven CSA AA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, the bank closed three branches, all in upper-income geographies. The branch closures were a result of network optimization and low productivity. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all 28 traditional standalone branch locations in the AA.

Community Development Services

The institution provided a relatively high level of CD services.

During the evaluation period, bank employees provided 754 hours of qualified CD services to 23 organizations through 277 activities within this AA. Leadership is evident through board or committee participation in eight of these activities providing 142 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with delivering financial education to LMI individuals.

Service activity examples during the evaluation period include:

- Bank employees provided 186 hours of financial education to a nonprofit organization that serves a local school where 51 percent of the student population receive free or reduced lunch. The organization gives young people the knowledge and skills they need to own their economic success, plan for their future, and make smart academic and economic choices.

- A bank employee provided 59 service hours by serving as a board member for a nonprofit organization that promotes literacy and early childhood development in low-income and underserved communities. The organization's mission is to promote language skills and literacy for children, beginning at birth, and to support families as their babies' first teachers.

- A bank employee provided ten service hours by serving on the board of an organization that provides business loans in disadvantaged communities defined by the state. The organization strengthens neighborhood economies by providing flexible financing and technical support to businesses, community organizations, and initiatives in communities throughout the AA.

- A bank employee provided eight service hours to an affordable housing organization by serving on the board and providing technical assistance. The organization provides homebuyer education and financial coaching, making homes safe, energy efficient, and working to improve the perception of the neighborhoods in which they work by helping residents take charge of their communities.

State Rating

State of Delaware

CRA rating for the State of Delaware: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AAs.
- The bank provided few, if any, CD services. CD services had a negative impact on the Service Test rating.

Description of Institution's Operations in Delaware

As of June 30, 2024, the bank had approximately $270 million in deposits in the rating area. As of December 31, 2024, the bank operated two branches and four ATMs in the rating area, representing 0.2 percent of total branches and 0.2 percent of total ATMs.

According to FDIC deposit market share data, as of June 30, 2024, there were 36 FDIC-insured institutions operating 247 branches in the rating area. CBNA ranked 11th in deposit market share with 0.3 percent. The top banks by deposit market share are Capital One, NA with 67.8 percent, TD Bank, NA with 12.6 percent, and Barclays Bank Delaware with 6.5 percent.

CBNA's delineated AA in the state of Delaware consists of Sussex County. For the 2022-2023 portion of the exam Sussex County was part of the Salisbury, MD-DE MSA. For the 2024 portion of the exam Sussex County was part of the Delaware Non-MSA. Sussex County received a full-scope review for the entire review period. Refer to appendix A for a complete description of the AAs.

Salisbury MSA 2022-2023

As of June 30, 2023, the bank had approximately $239.8 million in deposits in the AA. The bank originated and purchased approximately $163 million in home mortgage and small business loans within the AA during the review period.

According to FDIC deposit data as of June 30, 2023, there were 19 FDIC-insured institutions operating 62 branches in the AA. CBNA ranked 10th in deposit market share with 0.2 percent. The top banks by deposit market share are Discover Bank with 94.4 percent, Manufacturers and Traders Trust Company with 1.4 percent, and PNC Bank, NA with 1.1 percent.

DE Non-MSA 2024

As of June 30, 2024, the bank had approximately $270.3 million in deposits in the AA. As of December 31, 2024, the bank operated two branches and four ATMs in the AA, representing 0.2 percent of total bank branches and 0.2 percent of total ATMs. The bank originated and purchased approximately $42.7 million in home mortgage and small business loans within the AA during the review period.

According to FDIC deposit data as of June 30, 2024, there were 21 FDIC-insured institutions operating 70 branches in the AA. CBNA ranked eighth in deposit market share with 0.3 percent. The top banks by deposit market share are Capital One, NA with 92.9 percent, Manufacturers and Traders Trust Company with 1.8 percent, and PNC Bank, NA with 1.4 percent.

The following tables provide a summary of the demographics, including housing, business, and economic information for the Salisbury MSA for the 2022-2023 portion of the exam and the Delaware Non-MSA for the 2024 portion of the exam.

Assessment Area(s) - 2022 - 2023 Salisbury MSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	75	0.00	14.67	49.33	32.00	4.00
Population by Geography	237,378	0.00	17.63	61.64	19.94	0.79
Housing Units by Geography	141,123	0.00	14.17	50.44	34.48	0.91
Owner-Occupied Housing by Geography	76,401	0.00	13.65	60.09	25.57	0.69
Occupied Rental Units by Geography	17,822	0.00	30.28	53.62	14.34	1.76
Vacant Units by Geography	46,900	0.00	8.91	33.52	56.64	0.93
Businesses by Geography	8,241	0.00	16.83	57.02	25.71	0.44
Farms by Geography	467	0.00	10.06	76.02	13.70	0.21
Family Distribution by Income Level	64,499	18.26	19.79	20.50	41.45	0.00
Household Distribution by Income Level	94,223	21.68	16.43	19.26	42.63	0.00
Unemployment rate (%)	4.83	0.00	4.67	4.95	3.60	26.91
Households Below Poverty Level (%)	10.52	0.00	13.68	11.32	6.10	14.71
Median Family Income (41540 - Salisbury, MD MSA)		$76,095			**Median Housing Value**	$279,400
Median Family Income (41540 - Salisbury, MD MSA) for 2023		$93,300			**Median Gross Rent**	$1,042
					Families Below Poverty Level	7.62

FFIEC File - 2020 Census
2023 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%

Assessment Area(s) - 2022 - 2023 Salisbury MSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - DE Non-MSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	75	0.00	14.67	50.67	30.67	4.00
Population by Geography	237,378	0.00	17.63	62.27	19.32	0.79
Housing Units by Geography	141,123	0.00	14.17	52.21	32.71	0.91
Owner-Occupied Housing by Geography	76,401	0.00	13.65	60.89	24.77	0.69
Occupied Rental Units by Geography	17,822	0.00	30.28	53.84	14.12	1.76
Vacant Units by Geography	46,900	0.00	8.91	37.46	52.71	0.93
Businesses by Geography	7,915	0.00	17.02	57.88	24.70	0.40
Farms by Geography	451	0.00	9.53	77.16	12.86	0.44
Family Distribution by Income Level	64,499	18.84	20.02	20.76	40.38	0.00
Household Distribution by Income Level	94,223	22.67	16.93	19.14	41.26	0.00
Unemployment rate (%)	4.83	0.00	4.67	4.99	3.43	26.91
Households Below Poverty Level (%)	10.52	0.00	13.68	11.28	6.05	14.71
Median Family Income (Non-MSAs - DE)		$77,499			**Median Housing Value**	$279,400
Median Family Income (Non-MSAs - DE) for 2024		$106,000			**Median Gross Rent**	$1,042
					Families Below Poverty Level	7.62
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within each component MSA or Non-MSA for both analysis periods. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2022-2023 table above, the median housing value for the Salisbury MSA was $279,400, while according to Realtor.com the median sales price of a single-family home was $457,040 at the beginning of 2022 and $484,900 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment of $1,166 and moderate-income borrowers $1,866. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $2,907 at the end of 2023. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the AA during the 2022-2023 period.

Based on the information in the 2024 table above, the median housing value for the Delaware Non-MSA (Sussex County) was $279,400, while according to Realtor.com the median sales prices of a single-family home was $529,999 at the beginning of 2024 and $545,300 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment of $1,325 and moderate-income $2,120. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $3,269 at the end of 2024. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the AA during the 2024 period.

Economic Data

According to Moody's Analytics May 2025 report, in 2024, the state of Delaware's strengths include a business-friendly climate with no sales tax, favorable migration patterns, attractive to retires, and a magnet for well-qualified workers from Pennsylvania, New Jersey, and Maryland. Weaknesses include below-average share of mid-wage jobs and reliance on highly cyclical industries such as finance and tourism. Major employment industries include education and health services, government, and professional and business services. Major employers in the state include Christiana Care Health System, JPMorgan Chase & Co., and Bank of America Corp. According to Sussex County Economic Development, major employers in Sussex County include Mountaire Farms, Perdue Farms, and Bayhealth.

According to the BLS, the non-seasonally adjusted unemployment rate for the Salisbury MSA was 6.0 percent in January 2022 and decreased to 3.5 percent in December 2023. The non-seasonally adjusted unemployment rate for the state of Delaware was 3.7 percent in December 2023 and 3.2 percent in December 2024. The national unemployment rate was 3.8 percent in December 2024.

Community Contacts

A review was conducted of four community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as community development and affordable housing. Contacts noted that Delaware is a big retirement state with many retirees looking to obtain homes near beaches. This has impacted the cost and availability of housing, particularly for low-income households. There are very few affordable housing opportunities in eastern Sussex County, which contains many retirement and resort communities. Most low- and moderate-income individuals that work in the healthcare and service industries in eastern Sussex County commute in as there are no available affordable housing options. The local government has a hard time with creating affordable housing due to county zoning laws (no more than two properties per acre), and laws relating to disbursement of affordable housing projects (can only support owner-occupied projects). There is a compact rental housing market for LMI individuals that is not being served due to local government rules. The area economy is becoming increasingly dependent on the healthcare industry due to the increasing elderly population. Wages have not kept up with the cost of living. Other identified needs in the area include:

- Capital to support local nonprofit organizations
- Affordable housing
- Affordable rental housing
- Financing to support mixed-income housing developments

Scope of Evaluation in Delaware

Examiners conducted a full-scope review of the DE Non-MSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represent the majority of lending in the AA.

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in Sussex County moving from the Salisbury, MD-DE MSA to the

DE Non-MSA AA. A full-scope analysis of the Salisbury, MD-DE MSA was performed for 2022-2023. As of 2024, a full-scope analysis was performed for the DE Non-MSA. CD activities, including CD loans, qualified investments, and CD services were evaluated on a combined level and captured under the DE Non-MSA AA.

During the evaluation period, Sussex County, consisting of 75 census tracts, had no low-income geographies and 11 moderate-income geographies, representing 14.7 percent of the area. Our analysis for Salisbury MSA AA (2022-2023 analysis period) and DE Non-MSA (2024 analysis period) focused on the bank's performance in these moderate-income geographies.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DELAWARE

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope review, the bank's performance in the DE Non-MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2024**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Salisbury MSA 2022-2023	619	79	0	0	698	71.6	0
DE Non-MSA 2024	222	54	0	1	277	28.4	100
Total	841	133	0	1	975	100.0	100
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Salisbury MSA 2022-2023	159,431	3,662	0	0	163,093	77.9	0
DE Non-MSA	41,695	1,052	0	3,400	46,147	22.1	100
Total	201,126	4,714	0	3,400	209,240	100.0	100
Source: 1/1/2022 - 12/31/2024 Bank Data.							
Due to rounding, totals may not equal 100.0%							

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Salisbury MSA AA 2022-2023

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, CBNA ranked 10th out of 19 FDIC-insured depository institutions (top 53 percent) with a 0.2 percent deposit market share.

For home mortgage loans, the bank's market share of 2.7 percent ranked ninth out of 360 lenders (top 3 percent). The top three lenders were NVR Mortgage Finance with 6.1 percent market share, Pennymac Loan Services LLC with 5.8 percent market share, and Rocket Mortgage with 3.5 percent market share.

For small loans to businesses, the bank's market share of 0.4 percent ranked 22nd out of 77 lenders (top 29 percent). The top three lenders were American Express National Bank with 24.6 percent market share, JP Morgan Chase Bank, NA with 14.2 percent market share, and Synchrony Bank with 9.1 percent market share.

DE Non-MSA AA 2024

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked ninth out of 20 FDIC-insured depository institutions (top 45 percent) with a 0.2 percent deposit market share.

For home mortgage loans, the bank's market share of 2.1 percent ranked 13th out of 371 lenders (top 4 percent). The top three lenders were NVR Mortgage Finance with 7.0 percent market share, Pennymac Loan Services LLC with 5.3 percent market share, and Rocket Mortgage with 4.5 percent market share.

For small loans to businesses, the bank's market share of 0.4 percent ranked 20th out of 60 lenders (top 34 percent). The top three lenders American Express National Bank with 26.5 percent market share, JP Morgan Chase Bank, NA with 15.3 percent market share, and Synchrony Bank with 9.9 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

		Low-Income Tracts			Moderate-Income Tracts		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	134	0	0.00	0.00	21	15.67	11.35
2024	18	0	0.00	0.00	5	27.78	14.62
HELOC							
2022-2023	485	0	0.00	0.00	55	11.34	10.10
2024	204	0	0.00	0.00	25	12.25	11.60

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

Salisbury MSA

The geographic distribution of home mortgage loans was good.

2022-2023

The geographic distribution of home mortgage loans was good.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies and exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

DE Non-MSA

The geographic distribution of home mortgage loans was excellent.

2024

The geographic distribution of home mortgage loans was excellent.

The percentage of home mortgage loans originated or purchased in moderate-income geographies approximated the percentage of owner-occupied housing units located in those geographies and near to the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

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

Salisbury MSA

The geographic distribution of small loans to businesses was adequate.

2022-2023

The geographic distribution of small loans to businesses was poor. While the bank's performance was poor, examiners took into consideration the bank's limited presence in this market. The bank's market share for small loans to businesses was 0.4 percent.

The percentage of small loans to businesses originated or purchased in moderate-income geographies was well below the percentage of businesses located in those geographies and was below the aggregate percentage of all reporting lenders.

DE Non-MSA

The geographic distribution of small loans to businesses was good.

2024

The geographic distribution of small loans to businesses was good.

The percentage of small loans to businesses originated or purchased in moderate-income geographies was near to the percentage of businesses located in those geographies exceeded the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on housing affordability calculations, discussed above, homeownership in the AA is not affordable for low- and moderate-income borrowers; therefore, more emphasis was given to the bank's performance compared to other lenders in the AA.

		Low-Income Borrowers			Moderate-Income Borrowers		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	134	12	8.96	4.69	19	14.18	13.88
2024	18	5	27.78	5.61	1	5.56	16.29
HELOC							
2022-2023	485	50	10.31	9.73	91	18.76	15.57
2024	204	18	8.82	11.53	48	23.53	20.25

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

<u>Salisbury MSA AA</u>

The distribution of home mortgage loans among individuals of different income levels was good.

<u>2022-2023</u>

The distribution of home mortgage loans among individuals of different income levels was good.

The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income was near to the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

<u>DE Non-MSA</u>

The distribution of home mortgage loans among individuals of different income levels was good.

<u>2024</u>

The distribution of home mortgage loans among individuals of different income levels was good.

The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the state of Delaware section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Salisbury MSA

The distribution of loans to businesses of different sizes was excellent.

2022-2023

The distribution of loans to businesses of different sizes was excellent.
The percentage of loans to small businesses originated or purchased exceeded both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders.

DE Non-MSA

The distribution of loans to businesses of different sizes was good.

2024

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending had a positive impact and elevated the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent.

During the evaluation period, CBNA made one loan, totaling $3.4 million and representing 14.1 percent of allocated Tier 1 capital. This loan funded affordable housing. This CD loan was particularly impactful as it addressed identified community needs.

The following is the CD loan the bank originated or purchased in the AA:

- The construction loan facilitated the substantial rehabilitation of three buildings, comprising 24 units of affordable housing. All units were available to individuals or families earning up to 80 percent of the AMI. This transaction is considered complex due to its inclusion of both equity and debt components to complete the LIHTC project.

Letters of Credit

Additionally, the bank originated a $200,000 letter of credit that has a qualified CD purpose and benefited the DE Non-MSA AA. This letter of credit supported the development and preservation of affordable housing and was given positive consideration.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 74 loans under its flexible lending programs totaling $15.6 million. Refer to the Scope of Evaluation section for additional details regarding the programs. In addition, the bank provided three CCA down payment grants totaling $9,000 within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	2	462
FHA	2	540
FHLMC	4	778
FHLMC Home Possible	1	310
FNMA	49	11,936
FNMA Home Ready	7	1,385
Goal Builder HELOC	9	218
Total	74	15,628

INVESTMENT TEST

The bank's performance under the Investment Test in Delaware is rated Outstanding.

Based on a full-scope review, the institution's performance in the DE Non-MSA AA was excellent.

Table 4: Qualified Investments*

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
DE Non-MSA	17	3,098	4	8,853	21	100.00	11,951	100.00	1	6,195
Total	**17**	**3,098**	**4**	**8,853**	**21**	**100.00**	**11,951**	**100.00**	**1**	**6,195**

The institution had excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 30.6 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By number and dollar volume during the relevant period, all investments and grants supported affordable housing.

The following are examples of qualified investments in the AA:

- The bank made an $8 million investment that supported the rehabilitation of 24 units of affordable housing for seniors over 62 and with incomes at or below 60 percent of AMI. This project was subsidized under Section 8 housing vouchers. This activity was complex due to the use of a LIHTC and responsive by addressing the need for affordable housing in the area.

- The bank invested $852,922 in mortgage-backed securities that focused on affordable housing with the underlying loans originated to low-and moderate-income individuals. These investments were responsive to helping address affordable housing needs in the area.

SERVICE TEST

The bank's performance under the Service Test in Delaware is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the DE Non-MSA AA was good.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														**2024**
	Deposits	**Branches**								**Population**				
Assessment Area	**% of Rated Area Deposits in AA**	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income of Geographies (%)**						**% of Population within Each Geography**				
				Low	**Mod**	**Mid**	**Upp**	**NA**		**Low**	**Mod**	**Mid**	**Upp**	**NA**
DE Non-MSA	100.0	2	100.0	0.0	50.0	0.0	50.0	0.0		0.0	17.6	62.3	19.3	0.8
Total	100.0	2	100.0	0.0	50.0	0.0	50.0	0.0		0.0	17.6	62.3	19.3	0.8

Source: FFIEC File - 2024 Census
1/1/2022 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA when considering the limited number of branches within the AA. There were no low-income geographies within the AA. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had four ATMs in the AA, all of which were deposit-taking. Two of the ATMs are in moderate-income geographies. Per data provided by the bank, as of the end of the evaluation period, 72.1 percent of retail customer households in moderate-income geographies used online and mobile banking services. This was an increase of 39.3 percent of retail customer households in moderate-income geographies, from the start of the evaluation period. ADS usage had a positive impact on the Service Test rating.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
DE Non-MSA	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0
1/1/2022 – 12/31/2024 Bank Data.							

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for the two traditional standalone branch locations in the AA.

Community Development Services

The institution provided few, if any, CD services. CBNA did not provide any CD Services in the AA during the evaluation. The bank's lack of CD services had a negative impact and lowered the Service Test rating.

State Rating

State of Florida

CRA rating for the State of Florida: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an adequate geographic distribution of loans in its AA.
- The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AAs with consideration for an upper-income adjacent branch.
- The bank provided an adequate level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Florida

CBNA delineated two new AAs in the state of Florida as follows: Fort Lauderdale-West Palm Beach, FL MSA (Miami MSA) and Naples-Marco Island, FL MSA (Naples MSA). The Miami MSA accounts for 100 percent of the bank's deposits in the rating area and received a full-scope review. Refer to Appendix A for a complete description of the AAs.

On February 18, 2022, CBNA acquired branches from HSBC Bank, U.S.A., NA expanding the bank's physical presence to Southeast Florida.

As of June 30, 2024, the bank had approximately $558 million in deposits in the rating area. As of December 31, 2024, the bank operated six branches and 10 ATMs in the rating area, representing 0.5 percent of total branches and 0.5 percent of total ATMs.

According to FDIC deposit market share data, as of June 30, 2024, there were 188 FDIC-insured institutions operating 4,242 branches in the rating area. CBNA ranked 81st in deposit market share with

0.07 percent. The top banks by deposit market share are Bank of America, NA with 19.3 percent, Wells Fargo Bank, NA with 11.0 percent, and JPMorgan Chase Bank, NA with 9.2 percent.

Miami MSA

CBNA had $558 million in deposits in the Miami CSA representing 0.3 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated six branches and nine ATMs within the AA, representing 0.5 percent of total bank branches and 0.5 percent of total ATMs. The bank originated and purchased approximately $1.6 billion in home mortgage and small business loans within the Miami CSA during the review period.

According to FDIC deposit data as of June 30, 2024, there were 84 FDIC-insured institutions operating 1,330 branches in the AA. CBNA ranked 44th in deposit market share with 0.2 percent. The top banks by deposit market share are Bank of America, NA with 16.5 percent, JPMorgan Chase Bank, NA with 12.8 percent, and Wells Fargo Bank, NA with 11.7 percent.

The following tables provide a summary of the demographics, including housing, business, and economic information for the Miami CSA for each period.

Assessment Area(s) - 2022 - 2023 Miami MSA						
2022 - 2023						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	1,497	5.28	26.32	30.46	34.20	3.74
Population by Geography	6,138,333	4.71	27.97	31.44	34.36	1.51
Housing Units by Geography	2,548,767	4.81	27.39	30.86	35.48	1.46
Owner-Occupied Housing by Geography	1,299,739	2.91	21.81	32.09	42.16	1.02
Occupied Rental Units by Geography	873,001	7.80	37.38	30.98	22.05	1.80
Vacant Units by Geography	376,027	4.45	23.50	26.32	43.56	2.18
Businesses by Geography	649,378	3.01	22.92	29.27	42.22	2.58
Farms by Geography	12,204	3.92	24.83	30.50	39.56	1.20
Family Distribution by Income Level	1,418,815	22.46	17.65	18.02	41.88	0.00
Household Distribution by Income Level	2,172,740	24.75	16.01	16.75	42.49	0.00
Unemployment rate (%)	5.56	8.53	7.17	5.09	4.24	8.25
Households Below Poverty Level (%)	14.24	32.13	20.63	12.46	7.84	19.95
Median Family Income (22744 - Fort Lauderdale-Pompano Beach-Sunrise, FL MD)		$73,430			**Median Housing Value**	$275,800
Median Family Income (33124 - Miami-Miami Beach-Kendall, FL MD)		$60,666			**Median Gross Rent**	$1,439
Median Family Income (48424 - West Palm Beach-Boca Raton-Delray Beach, FL MD)		$79,785			**Families Below Poverty Level**	10.59
Median Family Income (22744 - Fort Lauderdale-Pompano Beach-Sunrise, FL MD) for 2023		$88,500				
Median Family Income (33124 - Miami-Miami Beach-Kendall, FL MD) for 2023		$74,700				
Median Family Income (48424 - West Palm Beach-Boca Raton-Delray Beach, FL MD) for 2023		$98,300				

FFIEC File - 2020 Census
2023 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

Assessment Area(s) - Miami MSA						
2024						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	1,497	5.28	26.32	30.46	34.20	3.74
Population by Geography	6,138,333	4.71	27.97	31.44	34.36	1.51
Housing Units by Geography	2,548,767	4.81	27.39	30.86	35.48	1.46
Owner-Occupied Housing by Geography	1,299,739	2.91	21.81	32.09	42.16	1.02
Occupied Rental Units by Geography	873,001	7.80	37.38	30.98	22.05	1.80
Vacant Units by Geography	376,027	4.45	23.50	26.32	43.56	2.18
Businesses by Geography	524,568	2.75	23.17	28.59	43.21	2.29
Farms by Geography	9,692	3.45	25.66	30.28	39.63	0.98
Family Distribution by Income Level	1,418,815	22.46	17.65	18.02	41.88	0.00
Household Distribution by Income Level	2,172,740	24.75	16.01	16.75	42.49	0.00
Unemployment rate (%)	5.56	8.53	7.17	5.09	4.24	8.25
Households Below Poverty Level (%)	14.24	32.13	20.63	12.46	7.84	19.95
Median Family Income (22744 - Fort Lauderdale-Pompano Beach-Sunrise, FL MD)	$73,430			**Median Housing Value**		$275,800
Median Family Income (33124 - Miami-Miami Beach-Kendall, FL MD)	$60,666			**Median Gross Rent**		$1,439
Median Family Income (48424 - West Palm Beach-Boca Raton-Delray Beach, FL MD)	$79,785			**Families Below Poverty Level**		10.59
Median Family Income (22744 - Fort Lauderdale-Pompano Beach-Sunrise, FL MD) for 2024	$89,100					
Median Family Income (33124 - Miami-Miami Beach-Kendall, FL MD) for 2024	$79,400					
Median Family Income (48424 - West Palm Beach-Boca Raton-Delray Beach, FL MD) for 2024	$104,000					
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within each component MD of the Miami MSA for both analysis periods. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2022-2023 table above, the median housing value for the Miami MSA was $275,800, while according to Realtor.com the median sales price of a single-family home was $495,000 at the beginning of 2022 and $579,900 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment between $934 to $1,229 and moderate-income borrowers between $1,494 to $1,966, depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $3,476 at the end of 2023. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the Miami MSA during the 2022-2023 period.

Based on the information in the 2024 table above, the median housing value for the Miami MSA was also $275,800, while according to Realtor.com the median sales prices of a single-family home was $564,500 at the beginning of 2024 and $522,500 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment between $993 to $1,300 and moderate-income borrowers between $1,588 to $2,080 depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $3,132 at the end of 2024. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the Miami MSA during the 2024 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Miami MSA, 10.59 percent of families had income(s) below the federal poverty line in both the 2022-2023 and 2024 analysis periods.

Economic Data

Miami-Miami Beach-Kendall, FL

According to Moody's Analytics May 2025 report, in 2024, the Miami area's strengths include strong ties to Latin America, luxury status that attracts international capital, world's second busiest cruise port, and well-developed shipping and distribution infrastructure. Weaknesses include high household debt burden, congested roads and airport, and industrial structure that leaves economy susceptible to business cycle downturns. Major employment industries include education and health services, professional and business services, and leisure and hospitality services. Major employers include Publix Super Markets, University of Miami, Jackson Health Systems, and American Airlines.

Fort Lauderdale-Pompano Beach-Sunrise, FL

According to the April 2025 Moody's Analytics report, in 2024, the Fort Lauderdale area's strengths include strong ties to international trade via Latin America, spillover from Miami tourism and trade, and an attractive tourist destination. Weaknesses include eastward expansion limited by Atlantic Ocean and westward expansion limited by Everglades, and a highly volatile employment base. Major employment industries include professional and business services, education and health services, and government. Major employers include First Service Residential, HEICO, Nova Southeastern University, and American Express.

West Palm Beach-Boca Raton-Delray Beach FL

According to Mody's Analytics April 2025 report, in 2024, the West Palm Beach area's strengths include vibrant professional/business services, well positioned to expand logistics and international trade, and high per capita income. Weaknesses include high cost of living primarily due to high house prices, and high employment volatility. Major employment industries include professional and business services, education and health services, and leisure and hospitality services. Major employers include Tenet Healthcare Corp., NextEra Energy/Florida Power & Light Co., Florida Atlantic University, and Boca Raton Regional Hospital.

According to the BLS, the non-seasonally adjusted unemployment rate for the Miami MSA was 3.4 percent in January 2022, decreased to 2.4 percent in December 2023 and rose slightly to 2.8 percent in December 2024. The non-seasonally adjusted unemployment rates for the state of Florida were 2.9 percent in December 2023 and 3.1 percent in December 2024. The national unemployment rate was 3.8 percent in December 2024.

Community Contacts

A review was conducted of nine community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as affordable housing, small business and economic development, community development, and community services. Contacts noted that low- and moderate-income individuals and households are having a difficult time qualifying for mortgages and other consumer credit products. The cost of living in the area is high, particularly housing and insurance costs, and salaries have not kept pace with inflation. High interest rates and high construction costs make it difficult to develop affordable housing. Some areas, such as parts of Broward County, have unemployment rates as high as 20 percent. There is a need for wrap around support services, such as childcare and transportation, that will allow low-income individuals to participate in workforce development programs and other educational training that can provide access to higher paying jobs and careers. Rising commercial rents and insurance costs are a concern for small businesses. In addition, some small businesses face challenges in attracting and retaining skilled labor. Other identified needs in the area include:

- Financial education and credit counseling services, particularly for low- and moderate-income individuals
- Workforce development training
- Financing for small businesses, including working capital loans for start-up and early-stage small businesses and small dollar/micro loans
- Access to transportation
- Access to affordable childcare
- Flexible credit products for borrowers that do not qualify for traditional loan products
- Technical assistance for small businesses, including financial education
- Access to healthy food options in low-income communities
- Grant funding for nonprofit organizations
- Affordable housing

Scope of Evaluation in Florida

CBNA’s delineated AA did not change during the evaluation period; however, the Miami MSA name changed, which resulted in a need for two separate analyses for this AA. During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in the Miami-Fort Lauderdale-Pompano Beach, Florida MSA being changed to Miami-Fort Lauderdale-West Palm Beach, Florida MSA. Within the MSAs, the West Palm Beach-Boca Raton-Boynton Beach, Florida MD changed to West Palm Beach-Boca Raton-Delray Beach, Florida MD.

Examiners selected one AA for a full-scope review. Examiners conducted a full-scope review of the Miami MSA AA. The Miami MSA accounted for 100 percent of the deposits and branches within the state during the evaluation period. On January 1, 2022, CBNA opened a deposit-taking ATM in Collier County, creating the Naples-Marco Island, Florida MSA.

Examiners based their ratings primarily on the results of the areas that received the full-scope reviews and the bank’s performance in the limited-scope areas, as applicable. The Miami MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Florida.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in all AAs in this rating area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami MSA AA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2024**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Miami MSA	4,176	740	0	3	4,919	90	100
Naples MSA	528	18	0	1	547	10	0
Broader Statewide or Regional Area	0	0	0	1	1	0	0
Total	4,704	758	0	5	5,467	100	100
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Miami MSA	1,552,132	39,221	0	11,837	1,603,190	85.2	100
Naples MSA	271,655	1,600	0	3,579	276,834	14.7	0
Broader Statewide or Regional Area	0	0	0	2,232	2,232	0.1	0
Total	1,823,787	40,821	0	17,648	1,882,256	100	100
Source: 1/1/2022 - 12/31/2024 Bank Data. *Due to rounding, totals may not equal 100.0%*							

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<u>Miami MSA 2022-2023</u>

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, CBNA ranked 52nd out of 85 FDIC-insured depository institutions (top 62 percent) with a 0.1 percent deposit market share.

For home mortgage loans, the bank's market share of 1.24 percent ranked 18th out of 997 lenders (top 2 percent). The other top three lenders were United Wholesale Mortgage with 10.6 percent market share, JPMorgan Chase Bank, NA with 4.6 percent market share, and Rocket Mortgage with 4.4 percent market share.

For small loans to businesses, the bank's market share of less than 0.1 percent ranked 36th out of 245 lenders (top 15 percent). The top three lenders were American Express National Bank with 33 percent market share, JPMorgan Chase Bank, NA with 20 percent market share, and Bank of America, NA with 16.2 percent market share.

Miami MSA 2024

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked 44th out of 84 FDIC-insured depository institutions (top 53 percent) with a 0.2 percent deposit market share.

For home mortgage loans, the bank's market share of 1.0 percent ranked 20th out of 968 lenders (top 3 percent). The top three lenders were United Wholesale Mortgage with 11.6 percent market share, Rocket Mortgage with 5.3 percent market share, and Lakeview Loan Servicing, LLC with 4.1 percent market share.

For small loans to businesses, the bank's market share of less than 0.1 percent ranked 52nd out of 262 lenders (top 20 percent). The top three lenders were American Express National Bank with 31.3 percent market share, JPMorgan Chase Bank, NA with 22.9 percent market share, and Bank of America, NA with 12.3 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an adequate geographic distribution of loans in its AAs. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was adequate.

		Low-Income Tracts			**Moderate-Income Tracts**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	976	23	2.36	2.91	200	20.49	22.54
2024	424	17	4.01	3.12	114	26.89	22.67
HELOC							
2022-2023	2,021	25	1.24	1.20	246	12.17	12.97
2024	755	2	0.26	1.14	103	13.64	14.41

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

2022-2023

The geographic distribution of home mortgage loans was adequate.

The percentage of home mortgage loans originated or purchased in low-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separate from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded the aggregate and the percentage of closed-end mortgages was below the aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

2024

The geographic distribution of home mortgage loans was adequate.

The percentage of home mortgage loans originated or purchased in low-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased was near to the aggregate and the percentage of closed-end mortgages exceeded the aggregate.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

2022-2023

The geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies was near to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2024

The geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in those geographies and was below the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was adequate.

		Low-Income Borrowers			**Moderate-Income Borrowers**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	976	11	1.13%	3.63%	100	10.25%	8.61%
2024	424	13	3.07%	3.05%	38	8.96%	6.68%
HELOC							
2022-2023	2,021	66	3.27%	4.88%	153	7.57%	7.16%
2024	755	35	4.64%	5.13%	65	8.61%	7.47%

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

2022-2023

The distribution of home mortgage loans among individuals of different income levels was adequate.

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA and was below the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers was significantly below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

<u>2024</u>

The distribution of home mortgage loans among individuals of different income levels was adequate.

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA and was below the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers was significantly below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

<u>2022-2023</u>

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

<u>2024</u>

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. The bank's CD lending had a positive impact and elevated the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. During the evaluation period, CBNA originated three CD loans totaling $11.8 million or 23.7 percent of allocated tier 1 capital. By number and dollar volume, 100 percent funded affordable housing. CD loans were responsive to identified community needs.

The following are examples of CD loans the bank originated or purchased in the AA:

- The bank originated a $3.4 million LIHTC bridge loan to support investment in affordable housing development projects across multiple communities within the AA.

- The bank originated a $7.8 million LIHTC bridge loan to facilitate the renovation and rehabilitation of 172 affordable housing units. These units are available to low- and moderate-income individuals and families earning up to 60 percent of the AMI. This loan is considered complex as it contains both debt and equity components and was issued in partnership with Freddie Mac.

- The bank originated a $650,000 loan to support a LIHTC project within the AA resulting in the creation of 113 affordable housing units. These units are available to low- and moderate-income individuals and families earning up to 80 percent of the AMI.

<u>Broader Statewide or Regional area</u>

In addition, CBNA made one $2.2 million loan in the broader statewide and regional area whose purpose, mandate, or function included serving the bank's AA. The loan facilitated the preservation of 18 affordable housing units within a low-income tract. The broader statewide and regional area lending further supported the Lending Test rating.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 263 loans under its flexible lending programs totaling $85 million. Refer to the Scope of Evaluation section for additional detail regarding the programs. In addition, the bank provided 11 CCA down payment grants totaling $108,431 within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	4	680
FHA	38	13,174
FHLMC	19	7,006
FHLMC Home Possible	1	240
FNMA	164	55,875
FNMA Home Ready	22	5,533
Goal Builder HELOC	9	217
VA	6	2,249
Total	263	84,976

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 14 in the state of Florida section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Naples MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. The weaker performance in the Naples MSA AA was due to weaker geographic and borrower distribution of loans. Performance in the limited-scope AA had minimal impact on the overall state rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Florida is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami MSA AA was excellent.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Miami MSA	0	0	27	11,395	27	96.4	11,395	1	1	10,000
Naples MSA	0	0	1	6	1	3.6	6	0	0	0
Total	0	0	28	11,401	28	100.0	100.0	1	1	10,000

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 14.1 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 98.45 percent of total investments and grants supported affordable housing, 1.37 percent supported community services to low- and moderate-income individuals, and 0.18 percent promoted economic efforts.

The following are examples of qualified investments in the AA:

- The bank made a $10 million investment that supported the new construction of 57 mixed-use affordable housing units, all for households earning below 80 percent of the AMI. This investment was responsive since it addressed local housing shortages, provided affordable housing, and was located near public transportation.

- The bank provided nine grants totaling $42,000 that supported workforce development and financial empowerment programs for underserved students.

- The bank provided a $30,000 grant that supported mobile food pantry programs serving food-insecure individuals. This activity was responsive and addressed a critical community need.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Naples MSA was weaker than its overall performance under the Investment Test in the full-scope AAs. The weaker performance was primarily due to a lower level of investments. During the review period, the bank made one qualifying CD grant that supported educational and community service programs for low- and moderate-income families. Performance in the limited-scope area had minimal effect on the overall investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in Florida is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami MSA AA was adequate.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														**2024**
Assessment Area	**Deposits**	**Branches**								**Population**				
	% of Rated Area Deposits in AA	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income of Geographies (%)**						**% of Population within Each Geography**				
				Low	**Mod**	**Mid**	**Upp**	**NA**	**Low**	**Mod**	**Mid**	**Upp**	**NA**	
Miami MSA	100.0	6	100.0	0.0	0.0	0.0	100.0	0.0	4.7	28.0	31.4	34.4	1.5	
Naples MSA	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	7.1	21.8	40.2	29.8	1.2	
Total	100.0	6	100.0	0.0	0.0	0.0	100.0	0.0	4.9	27.6	32.0	34.1	1.5	

Source: FFIEC File - 2024 Census
1/1/2022 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Service delivery systems were reasonably accessible geographies and individuals of different income levels in the institution's AAs. The bank had no branches in low- or moderate-income geographies. The bank's distribution of branches in both low-income geographies and in moderate-income geographies was significantly below the percentage of the population living within those geographies. The branches located in this AA are wealth management branches located in the Miami area.

Examiners further considered one upper-income branch located within one-quarter mile of a moderate-income geography, where the percentage of usage by LMI individuals exceeded the percentage of the LMI population in the AA. This branch improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had nine ATMs in the AA, all of which were deposit-taking. None of the ATMs were in low- or moderate-income geographies, but one adjacent branch with an ATM was within one-quarter mile of a moderate-income geography. No data was provided on usage of online and mobile banking as of the end of the evaluation period for this AA.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Miami MSA	1	0	0	0	0	1	0
Naples MSA	0	0	0	0	0	0	0
Total	1	0	0	0	0	1	0
1/1/2022-12/31/2024 Bank Data.							

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, the bank did not close any branches. The bank opened one branch during the evaluation period, which was located in an upper-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday.

Community Development Services

The institution provided an adequate level of CD services.

During the evaluation period, 26 bank employees provided 342 hours of qualified CD services to six organizations through 77 activities within this AA. The bank's assistance was responsive to identified needs in the AA, particularly with financial education.

Service activity examples during the evaluation period include:

- Bank employees collaborated with a local organization and provided 265 hours of financial literacy classes to middle school students from underserved communities. The organization provided financial planning and career exploration through both a curriculum- and simulation-based model.

- A bank employee provided 16 hours of homebuyer workshops for a local organization whose mission was to address the needs of low- and moderate-income individuals and families. The organization aims to strengthen the relationship between homeowners, potential homeowners, and the community by partnering with public and private organizations.

- Bank employees provided 45 hours of financial education to small businesses through programs hosted by a local organization. The organization supported small business owners with access to small business loans, working capital, business planning and credit readiness, and financial foundations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Naples MSA was weaker than with the bank's overall performance under the Service Test in the full-scope areas. There are no branches in the Naples MSA and one deposit-taking ATM in an upper-income census tract. Performance in the limited-scope area had minimal effect on the overall Service Test rating.

State Rating

State of Massachusetts

CRA rating for the State of Massachusetts: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.

- The bank exhibited an excellent geographic distribution of loans in its AA.

- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

- The bank was a leader in making CD loans. CD lending further supported the Lending Test conclusion.

- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.

- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income adjacent branches and ADS.

- The bank was a leader in providing CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Massachusetts

As of June 30, 2024, the bank had approximately $787 million in deposits in the rating area. As of December 31, 2024, the bank operated 14 branches and 23 ATMs in the rating area, representing 1.4 percent of total branches and 1.3 percent of total ATMs.

According to FDIC deposit market share data, as of June 30, 2024, there were 128 FDIC-insured institutions operating 1,912 branches in the rating area. CBNA ranked third in deposit market share with 10.6 percent. Other top banks by deposit market share are State Street Bank and Trust Company with 31.9 percent, Bank of America, NA with 17.2 percent, and Santander Bank with 5.1 percent.

CBNA delineated three AAs in the state of Massachusetts as follows: Springfield-Amherst Town-Northampton, MA CSA (Springfield CSA), Pittsfield, MA MSA (Pittsfield MSA), and Massachusetts Non-MSA (MA Non-MSA). The Springfield CSA accounts for 93.0 percent of the bank's deposits in the rating area and received a full-scope review. Refer to Appendix A for a complete description of the AAs.

CBNA had $731 million in deposits in the Springfield CSA representing 4.0 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated 13 branches and 20 ATMs within the AA, representing 1.3 percent of total bank branches and 1.1 percent of total ATMs. The bank originated and purchased approximately $325.7 million in home mortgage and small business loans within the Springfield CSA during the review period.

According to FDIC deposit data as of June 30, 2024, there were 20 FDIC-insured institutions operating 184 branches in the AA. CBNA ranked 12th in deposit market share with 3.34 percent. The top banks by deposit market share are Peoples Bank with 14.7 percent, TD Bank, NA with 12.2 percent, and Bank of America, NA with 11.1 percent.

The following tables provide a summary of the demographics, including housing, business, and economic information for the Springfield CSA for each period.

Assessment Area(s) - 2022-2023 Springfield CSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	158	10.76	20.89	36.71	28.48	3.16
Population by Geography	699,162	8.20	20.71	35.91	32.50	2.68
Housing Units by Geography	291,991	7.84	21.93	38.06	31.87	0.30
Owner-Occupied Housing by Geography	172,968	2.02	14.77	42.20	41.01	0.01
Occupied Rental Units by Geography	97,921	17.23	34.05	30.10	17.96	0.66
Vacant Units by Geography	21,102	12.02	24.43	41.08	21.56	0.91
Businesses by Geography	23,392	8.80	20.80	33.53	35.79	1.07
Farms by Geography	1,013	1.28	8.09	44.52	45.61	0.49
Family Distribution by Income Level	169,001	23.60	16.30	18.67	41.43	0.00
Household Distribution by Income Level	270,889	25.95	15.30	16.34	42.41	0.00
Unemployment rate (%)	5.96	12.99	7.68	5.60	3.63	15.75
Households Below Poverty Level (%)	14.27	44.79	19.68	10.70	7.64	31.75
Median Family Income (44140 - Springfield, MA MSA)		$79,907			**Median Housing Value**	$212,900
Median Family Income (44140 - Springfield, MA MSA) for 2023		$94,600			**Median Gross Rent**	$929
					Families Below Poverty Level	9.70
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Springfield CSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	158	11.39	18.35	44.30	22.78	3.16
Population by Geography	699,162	8.41	18.64	44.33	25.94	2.68
Housing Units by Geography	291,991	8.53	19.21	46.72	25.24	0.30
Owner-Occupied Housing by Geography	172,968	2.47	13.14	50.78	33.60	0.01
Occupied Rental Units by Geography	97,921	18.37	29.56	39.54	11.87	0.66
Vacant Units by Geography	21,102	12.56	21.01	46.82	18.70	0.91
Businesses by Geography	22,395	9.01	18.19	45.19	26.57	1.04
Farms by Geography	962	1.77	7.48	56.34	33.89	0.52
Family Distribution by Income Level	169,001	23.50	16.58	19.17	40.76	0.00

Assessment Area(s) - Springfield CSA						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Household Distribution by Income Level	270,889	26.29	15.12	16.34	42.25	0.00
Unemployment rate (%)	5.96	11.94	7.94	5.12	4.05	15.75
Households Below Poverty Level (%)	14.27	40.67	20.63	10.91	7.05	31.75
Median Family Income (11200 - Amherst Town-Northampton, MA MSA)		$97,581			**Median Housing Value**	$212,900
Median Family Income (44140 - Springfield, MA MSA)		$74,547			**Median Gross Rent**	$929
Median Family Income (Non-MSAs - MA)		$86,053			**Families Below Poverty Level**	9.70
Median Family Income (11200 - Amherst Town-Northampton, MA MSA) for 2024		$119,700				
Median Family Income (44140 - Springfield, MA MSA) for 2024		$89,100				
Median Family Income (Non-MSAs - MA) for 2024		$106,700				
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within each component MD of the Springfield MSA for both analysis periods. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2022-2023 table above, the median housing value for the Springfield CSA was $212,900, while according to Realtor.com the median sales price of a single-family home was $275,000 at the beginning of 2022 and $316,950 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment of $1,183 and moderate-income borrowers $1,892. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $1,900 at the end of 2023. Based on these calculations, low-income and most moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the Springfield CSA during the 2022-2023 period.

Based on information in the 2024 table above, the median housing value for the Springfield MSA was also $212,900 while according to Realtor.com the median sales prices of a single-family home was $320,925 at the beginning of 2024 and $330,000 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment between $1,114 to $1,496 and moderate-income borrowers between $1,782 to $2,394 depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $1,978 at the end of 2024. Based on these calculations, low-income and some moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the Springfield CSA during the 2024 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such

are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Springfield CSA, 9.70 percent of families had income(s) below the federal poverty line in both the 2022-2023 and 2024 analysis periods.

Economic Data

According to Moody's Analytics January 2025 report, Springfield's economy had slowed. Employment remained below its pre-pandemic level, lagging national growth and trailing both Massachusetts and the Northeast. Home prices had increased faster than nationally, partly because limited homebuilding constrained supply. Major employment industries include education and health services, government, and leisure and hospitality services. Major employers include Baystate Health, MassMutual Financial Group, General Dynamics Advanced Info Systems, and MGM Springfield.

According to the BLS, the non-seasonally adjusted unemployment rate for the Springfield MSA was 5.7 percent in January 2022, decreased to 3.7 percent in December 2023 and increased to 4.3 percent in December 2024. The non-seasonally adjusted unemployment rates for the state of Massachusetts were 3.2 percent in December 2023 and 4.2 percent in December 2024. The national unemployment rate was 3.8 percent in December 2024.

Community Contacts

A review was conducted of three community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as affordable housing and economic development. Contacts noted that western Massachusetts is not walkable. There is a need for better access to transportation services and more development around so-called downtown or commercial centers. While housing costs in the area may be deemed affordable compared to other parts of the state, the housing is not necessarily affordable to everyone. There is still a need to develop affordable housing for low- and moderate-income households. Many of these households struggle to meet day-to-day living expenses and rely upon a side job or other income just to get by. Contacts noted that the city of Springfield has a high overall poverty rate with higher-than-average unemployment. A lot of the existing housing stock in the city is in poor condition and there are a significant number of distressed multi-family properties. Investors have been purchasing the properties for rentals. There is a need for financing to repair and rehab distressed properties. Other identified needs in the area include:

- Flexible credit products for new small businesses and businesses with lower credit scores
- Small-dollar loan products for small businesses/entrepreneurs
- Down payment assistance for first-time homebuyers
- Grant funding for nonprofit organizations
- Low-cost bank accounts
- Financial education, particularly using online banking and mobile apps

Scope of Evaluation in Massachusetts

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in the counties in the Springfield, MA MSA moving into the Springfield-Amherst Town-Northampton, MA CSA. CBNA's delineated AA did not change during the evaluation period; however, the Springfield MSA number and name changed, which resulted in the need for two separate analyses for this AA.

Examiners selected one AA for a full-scope review. Examiners conducted a full-scope review of the Springfield CSA AA as it is the largest AA in the state of Massachusetts in terms of deposits, branches, and lending activity. The Pittsfield MSA and MA Non-MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the areas that received the full-scope reviews and the bank's performance in the limited-scope areas. The Springfield CSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Massachusetts.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion for all AAs in the rating area as they represented the majority of lending in all AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Springfield CSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2024**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Springfield CSA	2,025	346		1	2,372	89.37	92.8
Pittsfield MSA	166	34		2	202	7.61	7.2
MA Non-MSA	67	13		0	80	3.01	0.0
Total	2,258	393		3	2,654	100	100
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Springfield CSA	317,484	12,567		14,750	344,801	68.37	92.8
Pittsfield MSA	27,149	982		23,037	51,168	10.15	7.2
MA Non-MSA	107,608	726		0	108,334	21.48	0.0
Total	452,241	14,275		37,787	504,303	100	100
Source: 1/1/2022 - 12/31/2024 Bank Data. Due to rounding, totals may not equal 100.0%							

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

2022-2023

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, CBNA ranked 12th out of 19 FDIC-insured depository institutions (top 64 percent) with a 3.3 percent deposit market share.

For home mortgage loans, the bank's market share of 5.1 percent ranked first out of 366 lenders (top 1 percent). The other lenders were Florence Bank with 4.7 percent market share, Westfield Bank with 4.4 percent market share, and Peoples Bank with 4.3 percent market share.

For small loans to businesses, the bank's market share of 0.6 percent ranked 17th out of 83 lenders (top 21 percent). The top three lenders were American Express National Bank with 23.7 percent market share, JPMorgan Chase Bank, NA with 13.8 percent market share, and Citibank, NA with 11.9 percent market share.

2024

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked 12th out of 20 FDIC-insured depository institutions (top 60 percent) with a 3.3 percent deposit market share.

For home mortgage loans, the bank's market share of 3.8 percent ranked fourth out of 355 lenders (top 2 percent). The top three lenders were Westfield Bank with 4.8 percent market share, Peoples Bank with 3.9 percent market share, and Rocket Mortgage with 3.9 percent market share.

For small loans to businesses, the bank's market share of 1.2 percent ranked 13th out of 103 lenders (top 13 percent). The top three lenders were American Express National Bank with 22.8 percent market share, JPMorgan Chase Bank, NA with 15.5 percent market share, and Citibank, NA with 11.9 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was excellent.

		Low-Income Tracts			Moderate-Income Tracts		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	498	51	10.24	4.36	165	33.13	20.90
2024	131	13	9.92	5.06	44	33.59	18.54
HELOC							
2022-2023	1,017	40	3.93	1.79	200	19.67	12.26
2024	379	16	4.22	2.25	71	18.73	11.84

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

2022-2023

The geographic distribution of home mortgage loans was excellent.

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

2024

The geographic distribution of home mortgage loans was excellent.

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was good.

2022-2023

The geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses originated or purchased in low-income geographies approximated the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.
The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2024

The geographic distribution of small loans to businesses was adequate.

The percentage of small loans to businesses originated or purchased in low-income geographies was well below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Based on housing affordability calculations, discussed above, homeownership in the AA is not affordable for low-income borrowers and some moderate-income borrowers; therefore, more emphasis was given to the bank's performance compared to other lenders in the AA.

The distribution of home mortgage loans among individuals of different income levels was excellent.

		Low-Income Borrowers			Moderate-Income Borrowers		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	498	56	11.24	7.22	242	48.59	26.01
2024	131	8	6.11	5.30	55	41.98	19.88
HELOC							
2022-2023	1,017	130	12.78	10.30	273	26.84	22.01
2024	379	38	10.03	9.50	108	28.50	22.68

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

<u>2022-2023</u>

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

<u>2024</u>

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the state of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

2022-2023

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

2024

The distribution of loans to businesses of different sizes was excellent.

The percentage of loans to small businesses originated or purchased was below the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. CD lending further supported the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. During the evaluation period, the bank originated one $14.8 million CD loan or 14 percent of allocated tier 1 capital. By dollar volume, all of the loans funded affordable housing. The CD loan was responsive to identified community needs.

The following CD loan was originated or purchased in the AA:

- The bank originated a $14.8 million loan for the construction and renovation of a historic building with 60 units of affordable housing in a low-income tract. The units are income restricted to households with 30 percent of income.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 591 loans under its flexible lending programs totaling $134.6 million. Refer to the Scope of the Evaluation section for additional details regarding the programs. In addition, the bank provided 172 CCA down payment grants totaling $396,475 within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	43	$10,278
FHA	90	$23,943
FHLMC	24	$6,522
FHLMC Home Possible	1	$276
FNMA	174	$37,234
FNMA Home Ready	35	$7,482
Goal Builder HELOC	41	$910
MHP	181	$46,835
VA	2	$1,123
Total	591	$134,603

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 14 in the state of Massachusetts section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Pittsfield MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in MA Non-MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. The weaker performance was due to weaker lending activity, geographic distribution of loans, borrower distribution of loans, and a lack of CD lending in this AA. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Massachusetts is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Springfield CSA AA was excellent.

Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Springfield CSA	15	7,609	25	6,275	40	76.9	13,883	87.1	5	3,391
Pittsfield MSA	9	1,552	3	502	12	23.1	2,055	12.9	0	0
MA Non-MSA	0	0	0	0	0	0.0	0.0	0.0	0	0
Total	24	9,161	28	6,777	52	100.00	15,938	100.00	5	3,391

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 13.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 97.52 percent of total investments and grants supported affordable housing, 1.76 percent supported community services to low- and moderate-income individuals, 0.72 percent promoted economic development efforts.

The following are examples of qualified CD investments and grants in the AA:

- The bank made a $1.8 million LIHTC investment that supported the creation of 22 new affordable housing units across three properties, all for households earning below 80 percent of AMI. This investment was complex due to the use of LIHTCs and responsive by addressing local housing shortages and provided supportive amenities to low- and moderate-income residents.

- The bank made a $2.5 million LIHTC investment that supported 11 affordable housing units across two properties, all for households earning below 80 percent of AMI. This investment was complex due to the use of LIHTCs and is responsive to an identified need for affordable rental housing.

- The bank awarded a $150,000 grant to an organization providing workforce development, financial education, and first-time-homebuyer services. This activity was responsive by equipping LMI individuals with skills and resources to achieve sustainable employment and homeownership and demonstrated leadership by supporting a broad range of educational workshops and foreclosure prevention services for over 900 participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Pittsfield MSA was consistent with the bank's overall performance under the Investment Test in the full-scope area. Investment Test performance in the MA Non-MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope area due to a lower volume of qualified CD investments. Performance in the limited-scope areas had minimal effect on the overall Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in Massachusetts is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Springfield CSA AA was good.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2024
	Deposits	**Branches**								**Population**				
Assessment Area	**% of Rated Area Deposits in AA**	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income of Geographies (%)**						**% of Population within Each Geography**				
				Low	**Mod**	**Mid**	**Upp**	**NA**		**Low**	**Mod**	**Mid**	**Upp**	**NA**
Springfield CSA	92.8	13	92.9	0.0	23.1	53.9	15.4	7.7		8.4	18.6	44.3	26.0	2.7
Pittsfield MSA	7.2	1	7.1	0.0	0.0	0.0	100.0	0.0		2.6	19.5	52.8	25.0	0.0
MA Non-MSA	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0		0.0	0.0	3.7	96.3	0.0
Total	100.0	14	100.0	0.0	21.4	50.0	21.4	7.1		7.4	18.5	45.0	27.0	2.2

Source: FFIEC File - 2024 Census
1/1/2022 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AAs. The bank's distribution of branches in low-income geographies was significantly below, and in moderate-income geographies exceeded the percentages of the population living within those geographies.

Examiners further considered four middle- and upper-income branches located within one-quarter mile of an LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA. Of the four proximate branches, one served a low-income geography and three served moderate-income geographies. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 20 ATMs in the AA, all of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, 73.6 percent of retail customer households in low-income geographies, and 75.6 percent of retail customer households in moderate-income geographies used online and mobile banking services. This was an increase of 16 percent of retail customer households in low-income geographies, and an increase of 17.4 percent of retail customer households in moderate-income geographies, from the start of the evaluation period.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Springfield CSA	0	3	0	0	-2	-1	0
Pittsfield MSA	0	0	0	0	0	0	0
MA Non-MSA	0	0	0	0	0	0	0
Total	0	3	0	0	-2	-1	0

1/1/2022-12/31/2024 Bank Data

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, the bank closed three branches, none of which were in low- or moderate-income geographies. The branch closures were a result of network optimization and low productivity. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all three traditional standalone branch locations in the AA. The four in-store branch locations operated from 10:00 a.m. to 5:00 p.m. Monday through Friday and Saturdays from 10:00 a.m. to 3:00 p.m.

Community Development Services

The institution was a leader in providing CD services.

During the evaluation period, bank employees provided 1,128 hours of qualified CD services to eight organizations through 188 activities within this AA. Leadership is evident through board or committee participation in four of these activities with six employees providing 810 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with delivering financial education to LMI individuals.

Service activity examples during the evaluation period include:

- Bank employees provided 784 hours to a local organization through a combination of conducting financial education classes and serving on the board and as volunteer Chief Operating Officer of the organization.

- Bank employees provided 79 hours by conducting first-time homebuyer workshops. In addition, another employee provided 111 hours to the organization by serving on the board and the finance committee. The organization provided critical housing services, which include basic social service counseling, rental housing assistance, issuing rental vouchers, and first-time-homebuyer training to support the community with a large population of underserved individuals.

- A bank employee provided 124 hours to a local organization by serving on the board. The organization provided low cost medical, dental and supportive services to low income individuals in an underserved area. The organization provided a wide variety of services and support to individuals from health care to financial advice.

- A bank employee provided 11 hours to a local organization by serving on the board and a revitalization committee. The organization performed critical repairs, modifications, and rehabilitations on homes of low-income families with children, the elderly, military veterans, and people with special needs. The organization offered help bridging food insecurity gaps through delivery of fresh goods to low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Pittsfield MSA was weaker than the bank's overall performance under the Service Test in the full-scope area. The weaker performance was due to weaker branch distribution. Evaluation under the Service Test in the MA Non-MSA was not applicable as the bank did not operate any branches in the AA. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

State Rating

State of Michigan

CRA rating for the State of Michigan: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending further supported the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income adjacent branches and ADS.
- The bank was a leader in providing CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Michigan

As of June 30, 2024, the bank had approximately $6.6 billion in deposits in the rating area. As of December 31, 2024, the bank operated 67 branches and 109 ATMs in the rating area, representing 6.7 percent of total branches and 6.0 percent of total ATMs.

According to FDIC deposit market share data, as of June 30, 2024, there were 103 FDIC-insured institutions operating 1,966 branches in the rating area. CBNA ranked eighth in deposit market share with 2.1 percent. Top banks by deposit market share are JPMorgan Chase Bank, NA with 19.5 percent, Comerica Bank with 12. 5 percent, and The Huntington National Bank with 12.0 percent.

CBNA delineated four AAs in the state of Michigan as follows: Detroit-Warren-Ann Arbor, MI CSA (Detroit CSA), Saginaw, MI MSA (Saginaw MSA), Lansing-East Lansing, MI MSA (Lansing MSA), Michigan Non-MSA (MI Non-MSA). The Detroit CSA accounts for 98.0 percent of the bank's deposits in the rating area and received a full-scope review. Refer to Appendix A for a complete description of the AAs.

Detroit CSA

CBNA had $6.4 billion in deposits in the Detroit CSA representing 3.6 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated 65 branches and 106 ATMs within the AA, representing 6.5 percent of total bank branches and 5.9 percent of total ATMs. The bank originated and purchased approximately $1.6 billion in home mortgage and small business loans within the Detroit CSA during the review period.

According to FDIC deposit data as of June 30, 2024, there were 43 FDIC-insured institutions operating 789 branches in the AA. CBNA ranked eighth in deposit market share with 3.1 percent. The top banks by deposit market share are JPMorgan Chase Bank, NA with 24.8 percent, Comerica Bank with 17.6 percent, and Flagstar Bank, NA with 14.9 percent.

The following tables provide a summary of the demographics, including housing, business, and economic information for the Detroit CSA for each period.

Assessment Area(s) - 2022 - 2023 Detroit CSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	1,388	9.58	23.99	29.83	29.83	6.77
Population by Geography	4,515,297	8.01	23.38	32.59	34.55	1.47
Housing Units by Geography	1,953,505	9.34	24.93	32.17	32.14	1.42
Owner-Occupied Housing by Geography	1,206,210	4.41	19.67	34.95	40.49	0.47
Occupied Rental Units by Geography	563,522	16.39	32.37	29.63	18.94	2.67
Vacant Units by Geography	183,773	20.10	36.61	21.66	17.82	3.81
Businesses by Geography	166,070	6.69	19.86	30.91	39.88	2.66
Farms by Geography	4,292	4.50	17.08	40.87	36.67	0.89
Family Distribution by Income Level	1,096,488	21.43	16.85	19.93	41.79	0.00
Household Distribution by Income Level	1,769,732	24.71	15.57	17.02	42.70	0.00
Unemployment rate (%)	6.34	12.98	9.06	5.44	4.03	13.50
Households Below Poverty Level (%)	13.34	35.05	20.05	9.90	5.68	42.44
Median Family Income (11460 - Ann Arbor, MI MSA)		$105,224	**Median Housing Value**			$155,250
Median Family Income (19804 - Detroit-Dearborn-Livonia, MI MD)		$63,896	**Median Gross Rent**			$970
Median Family Income (47664 - Warren-Troy-Farmington Hills, MI MD)		$92,419	**Families Below Poverty Level**			9.66
Median Family Income (11460 - Ann Arbor, MI MSA) for 2023		$124,000				
Median Family Income (19804 - Detroit-Dearborn-Livonia, MI MD) for 2023		$77,100				
Median Family Income (47664 - Warren-Troy-Farmington Hills, MI MD) for 2023		$108,200				
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Detroit CSA						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,388	9.58	23.99	29.83	29.83	6.77
Population by Geography	4,515,297	8.01	23.38	32.59	34.55	1.47
Housing Units by Geography	1,953,505	9.34	24.93	32.17	32.14	1.42
Owner-Occupied Housing by Geography	1,206,210	4.41	19.67	34.95	40.49	0.47
Occupied Rental Units by Geography	563,522	16.39	32.37	29.63	18.94	2.67
Vacant Units by Geography	183,773	20.10	36.61	21.66	17.82	3.81
Businesses by Geography	218,876	6.98	21.21	30.54	39.04	2.23
Farms by Geography	5,960	6.04	19.55	38.99	34.50	0.92
Family Distribution by Income Level	1,096,488	21.43	16.85	19.93	41.79	0.00
Household Distribution by Income Level	1,769,732	24.71	15.57	17.02	42.70	0.00
Unemployment rate (%)	6.34	12.98	9.06	5.44	4.03	13.50
Households Below Poverty Level (%)	13.34	35.05	20.05	9.90	5.68	42.44
Median Family Income (11460 - Ann Arbor, MI MSA)		$105,224			Median Housing Value	$155,250
Median Family Income (19804 - Detroit-Dearborn-Livonia, MI MD)		$63,896			Median Gross Rent	$970
Median Family Income (47664 - Warren-Troy-Farmington Hills, MI MD)		$92,419			Families Below Poverty Level	9.66
Median Family Income (11460 - Ann Arbor, MI MSA) for 2024		$119,500				
Median Family Income (19804 - Detroit-Dearborn-Livonia, MI MD) for 2024		$77,800				
Median Family Income (47664 - Warren-Troy-Farmington Hills, MI MD) for 2024		$109,700				
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within each component MSA or MD of the Detroit CSA for both analysis periods. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2022-2023 table above, the median housing value for the Detroit CSA was $155,250 while according to Realtor.com the median sales price of a single-family home was $205,000 at the beginning of 2022 and $235,900 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment between $964 to $1,550 and moderate-income borrowers between $1,542 to $2,480 depending on their location in the CSA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $1,414 at the end of 2023. Based on these calculations, some low- income borrowers would be challenged to qualify for and afford home mortgage financing within the Detroit CSA during the 2022-2023 period.

Based on the information in the 2024 table above, the median housing value for the Detroit CSA was also $155,250 while according to Realtor.com the median sales price of a single-family home was $229,575 at the beginning of 2024 and $249,900 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment between $973 to $1,494 and moderate-income borrowers between $1,556 to $2,390 depending on their location in the AA. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $1,498 at the end of 2024. Based on these calculations, some low- income borrowers would be challenged to qualify for and afford home mortgage financing within the Detroit CSA during the 2024 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Detroit CSA, 9.66 percent of families had income(s) below the federal poverty line in both the 2022-2023 and 2024 analysis periods.

Economic Data

According to Moody's Analytics October 2024 report, the Detroit metro economy is slowing down. The size of the labor force was lower than at the beginning of 2024, and the jobless rate edged higher. Auto manufacturing remains a critical sector, and over half of the metro's factory jobs are concentrated in transportation equipment manufacturing. The Detroit area's strengths include high concentration of auto industry headquarters, production and research and development, low cost of living, and a low cost of doing business. Weaknesses include a high crime rate, eroding infrastructure and a below-average working-age cohort. Major employment industries include education and health services, professional and business services, and manufacturing. Major employers include Ford Motor Co., Rocket Cos. Inc., Henry Ford Health, and Corewell Health.

According to the BLS, the non-seasonally adjusted unemployment rate for the Detroit CSA was 5.2 percent in January 2022, decreased to 3.3 percent in December 2023 and increased to 4.7 percent in December 2024. The non-seasonally adjusted unemployment rates for the state of Michigan were 3.5 percent in 2023 and 5.0 percent in 2024. The national unemployment rate was 3.8 percent in December 2024.

Community Contacts

A review was conducted of three community contacts as well as a community needs assessment completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as affordable housing, economic development, and community services. Contacts noted that affordable housing is a big need in the area. In some parts of the Detroit CSA the average house for sale is priced around $300,000. This price combined with high interest rates makes it difficult for low- and moderate-income borrowers to qualify for a mortgage loan. In Wayne County a lot of the housing stock needs significant repair. There are extensive waitlists for subsidized housing. Another primary credit need in the area is small business loans. There is a large need for more working capital loans for businesses to support growth. Contacts also noted that transportation access is a barrier for individuals seeking to gain employment and access resources necessary for their families to be mobile and self-sufficient. Other identified needs include:

- Home improvement/rehab loans, particularly for properties in low-income neighborhoods
- Access to safe and affordable housing

- Support for financial capability programs for low-income individuals
- Workforce and career development training
- Access to quality early childcare and education

Scope of Evaluation in Michigan

Examiners selected one AA for a full-scope review. Examiners conducted a full-scope review of the Detroit CSA AA as it is the largest AA in the state of Michigan in terms of deposits, branches, and lending activity. The 2022-2023 Lansing MSA, Saginaw MSA, and MI Non-MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the area that received the full-scope review and the bank's performance in the limited-scope areas. The Detroit CSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Michigan.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion for all AAs in the rating area as they represented the majority of lending in all AAs.

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in the removal of Shiawassee County from the Lansing MSA AA and the reclassification of Shiawassee County to a Non-MSA county. For 2022-2023, Shiawassee County is included in the Lansing MSA AA and for 2024, Shiawassee County is included in the MI Non-MSA AA.

Bank-delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Similarly, bank-delineated Non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Detroit CSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2024**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Detroit CSA	9,940	2,939	0	11	12,890	96.68	98
Saginaw MSA	167	62	0	0	229	1.72	1
Lansing MSA 2022-2023	128	11	0	0	139	1.04	0
MI Non-MSA 2024	56	18	0	0	74	0.56	1
Total	10,291	3,030	0	11	13,332	100	100
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Detroit CSA	1,522,788	163,613	0	83,271	1,769,672	97.75	98
Saginaw MSA	19,208	1,605	0	0	20,813	1.15	1
Lansing MSA 2022-2023	12,995	286	0	0	13,281	0.73	0
MI Non-MSA 2024	6,261	308	0	0	6,569	0.36	1
Total	1,561,252	165,812	0	83,271	1,810,335	100	100
Source: 1/1/2022 - 12/31/2024 Bank Data. *Due to rounding, totals may not equal 100.0%*							

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked eighth out of 43 FDIC-insured depository institutions (top 19 percent) with a 3.1 percent deposit market share.

For home mortgage loans, the bank's market share of 2.5 percent ranked fifth out of 623 lenders (top 1.0 percent). The top three lenders were United Wholesale Mortgage with 12.6 percent market share, Rocket Mortgage with 10.9 percent market share, and Huntington National Bank with 3.8 percent market share.

For small loans to businesses, the bank's market share of 0.7 percent ranked 13th out of 155 lenders (top 9 percent). The top three lenders were American Express National Bank with 30 percent market share, JPMorgan Chase Bank, NA with 23.7 percent market share, and Bank of America, NA with 7.7 percent market share. The top five small business lenders were institutions with large business credit card portfolios with average loan sizes of $25,000 or less. CBNA's average small business loan size was $66,960.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans was good.

		Low-Income Tracts			Moderate-Income Tracts		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2024	2,246	94	4.19	3.99	434	19.32	19.65
HELOC							
2022-2024	7,694	167	2.17	1.80	1118	14.53	12.62

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

The percentage of home mortgage loans originated or purchased in low-income geographies was well below the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separate from closed-end mortgages, both the percentage of open-end HELOCs originated or purchased and the percentage of closed-end mortgages exceeded the aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separate from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded the aggregate and the percentage of closed-end mortgages was near to the aggregate.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

The distribution of home mortgage loans among individuals of different income levels was excellent.

		Low-Income Borrowers			**Moderate-Income Borrowers**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2024	2,246	395	17.6	11.35	584	26.0	22.42
HELOC							
2022-2024	7,694	988	12.8	10.04	1,649	21.4	18.93

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased near to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. The bank's CD lending further supported the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. During the evaluation period, the bank originated eleven CD loans totaling $83.3 million or 8.9 percent of allocated tier 1 capital. By dollar volume, 77.2 percent funded affordable housing, 18.0 percent funded revitalization efforts, and 4.8 percent funded community services. CD loans were responsive to identified community needs.

The following are examples of CD loans the bank originated or purchased in the AA:

- The bank originated a $12.5 million construction loan for a LIHTC project in collaboration with a nonprofit organization. This development supported the creation of 30 affordable housing units in Wayne County, north of Detroit. Rents for these units are affordable for households earning up to 60 percent of the AMI.

- The bank originated a $11.7 million construction bridge loan to develop 220 affordable housing units in Livingston County, MI. These units are designated for households earning up to 60 percent of the AMI.

- The bank originated a $10 million loan to develop 50 one-bedroom affordable units in Wayne County, prioritizing homeless individuals, especially veterans. Section 8 contracts cover all units, with 25 through Michigan State Housing Development Authority and 25 through the Detroit Housing Commission.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 1,727 loans under its flexible lending programs totaling $292.9 million. Refer to the Scope of the Evaluation section for additional details regarding the programs. In addition, the bank provided 244 CCA down payment grants totaling $1.6 million within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	65	$10,602
FHA	159	$26,798
FHLMC	120	$28,764
FHLMC Home Possible	5	$1,004
FNMA	921	$179,672
FNMA Home Ready	242	$37,424
Goal Builder HELOC	199	$4,502
VA	16	$4,112
Total	1,727	$292,878

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 14 in the state of Michigan section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Lansing MSA, Saginaw MSA, and MI Non-MSA was weaker than the bank's overall performance under the Lending Test in the full-scope area. In the Lansing MSA (2022-2023), the bank's performance was weaker due to weaker geographic distribution of loans. In the Saginaw MSA, the weaker performance was due to weaker lending activity, geographic and borrower distribution of loans, and a lack of CD lending in this AA. In the MI Non-MSA (2024), the bank's performance was weaker than the bank's overall performance due to weaker geographic distribution of loans and a lack of CD lending in this AA. Performance in the limited-scope areas had minimal effect on the overall Lending Test rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Michigan is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Detroit CSA MSA AA was excellent.

Table 4: Qualified Investments*

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Detroit CSA	110	56,270	63	57,539	173	86.9	113,890	93.5	9	40,377
Saginaw MSA	7	566	7	629	14	7.0	1,195	1.0	0	0
MI Non-MSA 2024	8	6,267	4	499	12	6.0	6,766	5.6	0	0
Total	125	63,103	74	58,667	199	100.00	121,770	100.0	9	40,377

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 12.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 94.0 percent of total investments and grants supported affordable housing, 1.0 percent supported community services to low- and moderate-income individuals, 5.3 percent promoted economic development efforts.

The following are examples of qualified investments in the AA:

- The bank made a $4.9 million investment that supported the rehabilitation of 53 senior affordable housing units, all for households earning below 80 percent of AMI. This investment was complex due to its combination of debt and equity financing, incorporation of LIHTCs, and the provision of supportive amenities that enhance independent living.

- The bank made a $5 million investment in a CDFI to provide lending capital for real estate and business projects in low- to moderate-income neighborhoods. This investment was responsive by fostering economic development and job creation, complex due to the equity-equivalent structure, and demonstrated leadership by supporting neighborhood stabilization and affordable housing initiatives.

- The bank awarded $312,100 in grants to support mobile food pantries that distributed nutritious food to low- to moderate-income families in areas with limited food access. This activity was responsive by addressing high food insecurity.

- The bank awarded $110,000 in grants to support women- and minority-owned small businesses through mentorship, technical assistance, and access to capital. This activity was responsive by strengthening economic opportunities for underserved entrepreneurs, complex due to combining funding with volunteer support, and demonstrated leadership by expanding business growth and job creation in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Saginaw MSA and MI Non-MSA was consistent with the bank's performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in Michigan is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Detroit CSA AA was excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														**2024**
Assessment Area	**Deposits**	**Branches**								**Population**				
	% of Rated Area Deposits in AA	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income of Geographies (%)**						**% of Population within Each Geography**				
				Low	**Mod**	**Mid**	**Upp**	**NA**		**Low**	**Mod**	**Mid**	**Upp**	**NA**
Detroit CSA	98.0	65	97.0	4.6	21.5	26.2	41.5	6.2		8.0	23.4	32.6	34.6	1.5
Saginaw MSA	1.0	1	1.5	0.0	0.0	100.0	0.0	0.0		5.2	25.9	31.5	37.5	0.0
MI Non-MSA	1.0	1	1.5	0.0	0.0	100.0	0.0	0.0		0.0	7.5	53.9	38.6	0.0
Total	100.0	67	100.0	4.5	25.4	25.4	38.8	6.0		7.8	23.3	32.9	34.7	1.4
Source: FFIEC File - 2024 Census *1/1/2022-12/31/2024 Bank Data* *Due to rounding, totals may not equal 100.0%*														

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below, and in moderate-income geographies approximated the percentage of the population living within those geographies.

Examiners further considered four middle- and upper-income branches located within one-quarter mile of an LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA. All of the proximate branches served moderate-income geographies. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 106 ATMs in the AA, 92 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, 71.7 percent of retail customer households in low-income geographies, and 73.8 percent of retail customer households in moderate-income geographies used online and mobile banking services. This was an increase of 22.7 percent of retail customer households in low-income geographies, and an increase of 21.9 percent of retail customer households in moderate-income geographies, from the start of the evaluation period.

Table 6: Distribution of Branch Openings/Closings

Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Detroit CSA	2	5	0	0	-3	-1	1
Saginaw MSA	0	0	0	0	0	0	0
MI non-MSA	0	0	0	0	0	0	0
Total	2	5	0	0	-3	-1	1

1/1/2022-12/31/2024 Bank Data.

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, the bank closed five branches, none of which were in low- or moderate-income geographies. The branch closures were a result of network optimization, low productivity, and non-renewal of in-store leases. The bank also opened two branches during the evaluation period, none of which were located in low- or moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all 56 traditional standalone branch locations in the AA. The nine in-store branch locations and one limited-service branch operated from 10:00 a.m. to 5:00 p.m. Monday through Friday and Saturdays from 10:00 a.m. to 3:00 p.m.

Community Development Services

The institution was a leader in providing CD services.

During the evaluation period, bank employees provided 1,467 hours of qualified CD services to 25 organizations through 334 activities within this AA. Leadership is evident through board or committee participation in six of these activities with six employees providing 60 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with delivering financial education to LMI individuals.

Service activity examples during the evaluation period include:

- Bank employees provided 420 hours of assistance with income tax preparation. The organization provided tax assistance, financial coaching and education, and financial management practices and counseling for small businesses.

- Bank employees provided 285 hours of financial education and technical assistance to a local organization. The mission of the organization was to help youth and adults build skills through workforce development programs. Other programs engaged local residents in the promotion of nutrition, health, and wellness.

- Bank employees provided 188 hours of service to a local organization providing financial education to students from low- and moderate-income households. The organization focuses on providing high-impact programs that drive long-term outcomes in areas of financial literacy, career readiness, and fostering entrepreneurship.

- Bank employees provided 70 hours of service to a local organization by providing financial advice, technical assistance, and teaching succession planning workshops. The organization empowers women and minorities economically through business-development training, supplier certification, business-to-business networking, and accessible capital assistance programs. The majority of the businesses certified have annual revenues under $1 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Saginaw MSA, Lansing MSA (2022-2023), and MI Non-MSA (2024) was weaker than the bank's overall performance under the Service Test in the full-scope area. The bank's branch distribution is considered adequate due to the low number of branches in the limited-scope AAs. There were no branch openings or closings in the limited scope AAs during the evaluation period. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

State Rating

State of New Hampshire

CRA rating for the State of New Hampshire: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AAs.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank had made few, if any CD loans. However, based on other Lending Test factors, the lack of CD lending did not impact the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA.
- The bank provided few, if any, CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in New Hampshire

As of June 30, 2024, the bank had approximately $765 million in deposits in the rating area. As of December 31, 2024, the bank operated eight branches and 13 ATMs in the rating area, representing 0.7 percent of total branches and 0.6 percent of total ATMs.

According to FDIC deposit market share data, as of June 30, 2024, there were 44 FDIC-insured institutions operating 389 branches in the rating area. CBNA ranked second in deposit market share with 18.4 percent. Other top banks by deposit market share are TD Bank, NA with 23.6 percent, Bank of America, NA with 11.6 percent, and Bank of New Hampshire with 4.4 percent.

CBNA delineated one AA in the state of New Hampshire consisting of the New Hampshire Non-MSA (NH Non-MSA). The NH Non-MSA accounts for 100 percent of the bank's deposits in the rating area and received a full-scope review. Refer to appendix A for a complete description of the AA.

NH Non-MSA

CBNA had $765 million in deposits in the NH Non-MSA representing 0.4 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated eight branches and 13 ATMs within the AA, representing 0.7 percent of total bank branches and 0.6 percent of total ATMs. The bank originated and purchased approximately $231 million in home mortgage and small business loans within the NH Non-MSA during the review period.

According to FDIC deposit data as of June 30, 2024, there were 20 FDIC-insured institutions operating 113 branches in the AA. CBNA ranked third in deposit market share with 8.7 percent market share. The top banks by deposit market share are Mascoma Bank with 14.9 percent and TD Bank, NA with 12.5 percent market share.

The following tables provide a summary of the demographics, including housing, business, and economic information for the NH Non-MSA for each period.

Assessment Area(s) - NH Non-MSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	87	1.15	25.29	65.52	8.05	0.00
Population by Geography	292,014	0.75	23.28	66.54	9.43	0.00
Housing Units by Geography	174,699	0.84	25.15	66.78	7.24	0.00
Owner-Occupied Housing by Geography	85,628	0.79	22.68	69.00	7.53	0.00
Occupied Rental Units by Geography	33,509	1.61	27.99	62.48	7.91	0.00
Vacant Units by Geography	55,562	0.45	27.25	65.94	6.37	0.00
Businesses by Geography	13,814	0.94	22.43	67.54	9.09	0.00
Farms by Geography	777	0.13	18.92	74.39	6.56	0.00
Family Distribution by Income Level	73,327	21.78	19.58	24.04	34.60	0.00
Household Distribution by Income Level	119,137	26.40	16.39	19.13	38.08	0.00
Unemployment rate (%)	3.76	4.15	4.01	3.90	1.90	0.00
Households Below Poverty Level (%)	10.20	19.88	12.88	9.07	10.41	0.00
Median Family Income (Non-MSAs - NH)		$85,473			**Median Housing Value**	$204,500
Median Family Income (Non-MSAs - NH) for 2024		$104,500			**Median Gross Rent**	$970
					Families Below Poverty Level	5.98

FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within the NH Non-MSA. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on information in the 2024 table above, the median housing value for the NH Non-MSA was $205,600 while according to Realtor.com the median sales prices of a single-family home ranged from $327,450 to $499,325 at the beginning of 2024 and $309,950 to $556,950 at the end of 2024 depending on the location of the property in the AA. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment of $1,306 and moderate-income borrowers $2,090. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have ranged from $1,855 to $3,339 at the end of 2024. Based on these calculations, low and moderate- income borrowers would be challenged to qualify for and afford home mortgage financing within the NH Non-MSA during the 2024 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the NH Non-MSA, 5.98 percent of families had income(s) below the federal poverty line in the 2022-2023 and 6.26 percent of families had income(s) below the federal poverty line in the 2024 analysis period.

Economic Data

According to Moody's Analytics May 2025 report, the state of New Hampshire's strengths include low taxes with stable property tax base, highly skilled workforce, strong migration trends for the region, high per capita income, low poverty rate, and being a year-round tourist destination. Weaknesses include high energy costs and a weak public sector. Major employment industries include education and health services, professional and business services, and retail trade. Major employers in the state include Dartmouth Hitchcock Medical Center, BAE Systems Employment Solutions, Hannaford Bros. Co., and Fidelity Investments.

According to the BLS, the New Hampshire statewide non-seasonally adjusted unemployment rate was 2.6 percent in December 2023 and 2.7 percent in December 2024. The national unemployment rate was 3.8 percent in December 2024.

Community Contacts

A review was conducted of one community contact, and two community needs assessments completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as affordable housing, economic development, and community services. Part of the AA is in the Upper Valley of New Hampshire. Contacts noted that the Upper Valley is known for Dartmouth College and Dartmouth Hitchcock Medical Center. The region has the highest housing costs in the area, with Grafton County having the highest housing cost in the state of NH. Wages in the area are generally lower, which means there is high demand for affordable housing. The average purchase price for a home in the North Country portion of the AA, which includes Coos, Grafton, and Carroll Counties, has doubled recently, making it more difficult for low- and moderate-income individuals and households to purchase a home. This in turn has led to increases in the cost of rental housing as demand for affordable rentals has increased but the supply is limited. In addition, many individuals are housing-cost burdened. Lower-income homeowners also face difficulty maintaining their homes. Some local businesses, particularly small businesses, face difficulties attracting and retaining employees due to the lack of available affordable housing options. There are few options for public transportation within and between municipalities in the region. The area has an aging population and there are gaps in services to support these residents. Other identified needs include:

- Rehab loans for low-income homeowners
- Access to safe and affordable rental housing
- Affordable housing for elderly residents
- Access to adequate and affordable broadband
- Access to public transportation

- Mental health and substance use support services
- Access to affordable and expanded childcare services

Scope of Evaluation in New Hampshire

Examiners conducted a full-scope review of the NH Non-MSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW HAMPSHIRE

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the NH Non-MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2024**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
NH Non-MSA	1,207	283		0	1,490	100	100
Total	1,207	283		0	1,490	100	100
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
NH Non-MSA	232,507	8,085		0	240,592	100	100
Total	232,507	8,085		0	240,592	100	100
Source: 1/1/2022 - 12/31/2024 Bank Data. *Due to rounding, totals may not equal 100.0%*							

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked third out of 20 FDIC-insured depository institutions (top 15 percent) with an 8.7 percent deposit market share.

For home mortgage loans, the bank's market share of 5.4 percent ranked third out of 336 lenders (top 1 percent). The other top lenders were Rocket Mortgage with 6.3 percent market share, CMG Mortgage Inc. with 5.5 percent market share, and Mascoma Bank with 5.2 percent market share.

For small loans to businesses, the bank's market share of 0.7 percent ranked 16th out of 86 lenders (top 19 percent). The top three lenders were American Express National Bank with 22.9 percent market share, JPMorgan Chase Bank, NA with 13.9 percent market share, and Citibank, NA with 12.2 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. Examiners also considered any relevant performance context information.

During the evaluation period, NH Non-MSA, consisting of 69 census tracts, had only one low-income geography, representing 1.45 percent of the area with approximately 675 owner-occupied units and 130 businesses. There were 19 moderate-income geographies, representing 27.54 percent of the area. Our analysis for NH Non-MSA focused on the bank's performance in these moderate-income geographies.

Home Mortgage Loans

Refer to Table 7 in the state of New Hampshire section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

NH Non-MSA AA

The geographic distribution of home mortgage loans was excellent.

		Low-Income Tracts			**Moderate-Income Tracts**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2024	221	0	0.00	0.95	70	31.67	24.13
HELOC							
2022-2024	986	0	0.00	0.17	265	26.88	18.08

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

The bank did not originate any home mortgage loans in low-income geographies.

The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 9 in the state of New Hampshire section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

NH Non-MSA AA

The geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. Examiners also considered any relevant performance context information.

Home Mortgage Loans

Refer to Table 8 in the state of New Hampshire section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

NH Non-MSA AA

The distribution of home mortgage loans among individuals of different income levels was excellent.

Based on housing affordability calculations, discussed above, homeownership in the AA is not affordable for low- and moderate-income borrowers; therefore, more emphasis was given to the bank's performance compared to other lenders in the AA.

		Low-Income Borrowers			**Moderate-Income Borrowers**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2024	221	35	15.84	7.34	46	20.81	19.08
HELOC							
2022-2024	986	125	12.68	11.65	228	23.12	20.17

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the state of New Hampshire section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

NH Non-MSA AA

The distribution of loans to businesses of different sizes was excellent.

The percentage of loans to small businesses originated or purchased exceeded both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders.

Community Development Lending

The institution had made few, if any, CD loans. The bank did not originate or purchase any CD loans during the evaluation period. While the lack of CD lending was considered, other performance was strong enough that CD lending did not have an overall impact on the Lending Test conclusion.

Product Innovation and Flexibility

NH Non-MSA

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 164 loans under its flexible lending programs totaling $34.9 million. Refer to the Scope of the Evaluation section for additional details regarding the programs. In addition, The bank provided three CCA down payment grants totaling $7,950 within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	2	$403
FHA	7	$1,164
FHLMC	20	$5,599
FHLMC Home Possible	1	$150
FNMA	113	$24,499
FNMA Home Ready	9	$1,497
Goal Builder HELOC	7	$150
VA	5	$1,425
Total	164	$34,887

INVESTMENT TEST

The bank's performance under the Investment Test in New Hampshire is rated Outstanding.

Based on full-scope reviews, the bank's performance in the NH Non-MSA AA was excellent.

Table 4: Qualified Investments*

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
NH Non-MSA	19	7,180	4	11,765	23	100.0	18,945	100.0	2	4,433
Total	19	7, 180	4	11,765	23	100.0	18,945	100.0	2	4,433

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The institution had excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 15.4 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 99.7 percent of total investments and grants supported affordable housing and less than one percent supported community services to low- and moderate-income individuals.

The following are examples of qualified investments in the AA:

- The bank made a $1.2 million investment that supported the development of seven affordable housing units, all for households earning below 80 percent of the AMI. This investment was responsive because it addressed the need for deeply affordable, accessible, and energy-efficient housing in Non-Metro New Hampshire, including units for people with disabilities.

- The bank provided a $50,000 grant that supported a workforce development program, primarily serving low- and moderate-income individuals. This grant was responsive because it expanded access to training, mentorship, and scholarships for underserved populations, strengthening local economic opportunities.

SERVICE TEST

The bank's performance under the Service Test in New Hampshire is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the NH Non-MSA AA was good.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2024
	Deposits	Branches							Population					
Assessment Area	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography					
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp	NA	
NH non-MSA	100.0	8	100.0	0.0	62.5	37.5	0.0	0.0	1.0	26.1	60.1	12.8	0.0	
Total	100.0	8	100.0	0.0	62.5	37.5	0.0	0.0	1.0	26.1	60.1	12.8	0.0	
Source: FFIEC File - 2024 Census														
1/1/2022 - 12/31/2024 Bank Data														
Due to rounding, totals may not equal 100.0%														

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was significantly below, and in moderate-income geographies exceeded the percentage of the populations living within those geographies. Examiners took into consideration the percentage of the population within low-income geographies was less than one percent and placed more weight on the bank's performance in moderate-income geographies.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. The bank had 13 ATMs in the AA, all of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, 53 percent of retail customer households in low-income geographies, and 72.3 percent of retail customer households in moderate-income geographies used online and mobile banking services. This was a decrease of 26.4 percent of retail customer households in low-income geographies, and an increase of 20 percent of retail customer households in moderate-income geographies, from the start of the evaluation period.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
NH Non-MSA	0	1	0	0	0	-1	0
Total	0	1	0	0	0	-1	0
1/1/2022-12/31/2024 Bank Data.							

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, the bank closed one branch in an upper-income geography. The branch closure was a result of network optimization and low productivity. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all eight traditional standalone branch locations in the AA.

Community Development Services

The institution provided few, if any, CD services.

During the evaluation period, bank employees provided five hours of qualified CD services to one organization through two activities within this AA. The bank's assistance was responsive to identified needs in the AA, particularly with technical assistance.

Service activity examples during the evaluation period include:

- A bank employee provided five hours by serving as a board member for a local organization that supports programs and services that help low-income individuals. Programs include Head Start, support for the again, fuel and electric assistance, homeless services, and workforce development.

State Rating

State of New York

CRA rating for the State of New York: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited an excellent geographic distribution of loans in its AAs.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending further supported the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, which were responsive in addressing community needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income-adjacent branches and ADS.
- The bank provided a relatively high level of CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in New York

As of June 30, 2024, the bank had approximately $7 billion in deposits in the rating area. As of December 31, 2024, the bank operated 70 branches and 123 ATMs in the rating area, representing 7 percent of total branches and 6.8 percent of total ATMs.

According to FDIC deposit market share data, as of June 30, 2024, there were 188 FDIC-insured institutions operating 4,087 branches in the rating area. CBNA ranked 15th in deposit market share with 1.1 percent. The top banks by deposit market share are JPMorgan Chase Bank, NA with 34.9 percent, Goldman Sachs Bank USA with 8.6 percent, and The Bank of New York Mellon with 8.3 percent.

CBNA delineated seven AAs in the state of New York as follows: Albany-Schenectady, NY CSA (Albany CSA), Rochester, NY MSA (Rochester MSA), Binghamton, NY MSA (Binghamton MSA), Buffalo-Cheektowaga, NY MSA (Buffalo MSA), Ithaca, NY MSA (Ithaca MSA), Syracuse, NY MSA (Syracuse MSA), and Utica-Rome, NY MSA (Utica MSA). The Albany CSA and Rochester CSA combined account for 53 percent of the bank's deposits in the rating area and received full-scope reviews. Refer to Appendix A for a complete description of the AAs.

Albany CSA

CBNA had $1.9 billion in deposits in the Albany CSA representing 1.1 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated 17 branches and 29 ATMs within the AA, representing 1.7 percent of total bank branches and 1.6 percent of total ATMs. The bank originated and purchased approximately $432 million in home mortgage and small business loans within the Albany CSA during the review period.

According to FDIC deposit data as of June 30, 2024, there were 23 FDIC-insured institutions operating 292 branches in the AA. CBNA ranked sixth in deposit market share with 5.9 percent. The top banks by deposit market share are KeyBank, NA with 26.7 percent, TrustCo Bank with 10.5 percent, and Bank of America, NA with 9.4 percent.

The following tables provide a summary of the demographics, including housing, business, and economic information for the Albany CSA for each period.

Assessment Area(s) - 2022 - 2023 Albany CSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	283	8.83	15.90	48.41	24.38	2.47
Population by Geography	988,609	8.28	13.88	49.03	27.18	1.62
Housing Units by Geography	461,841	8.76	15.16	49.82	25.19	1.06
Owner-Occupied Housing by Geography	255,060	3.45	10.13	53.48	32.72	0.23
Occupied Rental Units by Geography	143,334	16.42	21.83	42.87	16.45	2.43
Vacant Units by Geography	63,447	12.84	20.37	50.81	14.65	1.33
Businesses by Geography	40,322	6.79	9.76	47.76	25.94	9.75
Farms by Geography	1,427	1.89	6.52	61.39	27.61	2.59
Family Distribution by Income Level	238,270	20.89	17.29	21.52	40.30	0.00
Household Distribution by Income Level	398,394	23.79	16.27	17.75	42.19	0.00
Unemployment rate (%)	4.62	10.80	6.05	4.22	2.70	11.09
Households Below Poverty Level (%)	10.03	28.89	16.52	7.93	4.18	24.61
Median Family Income (10580 - Albany-Schenectady-Troy, NY MSA)		$95,438			**Median Housing Value**	$203,700
Median Family Income (24020 - Glens Falls, NY MSA)		$77,435			**Median Gross Rent**	$1,003
Median Family Income (Non-MSAs - NY)		$69,021			**Families Below Poverty Level**	6.29
Median Family Income (10580 - Albany-Schenectady-Troy, NY MSA) for 2023		$113,300				
Median Family Income (24020 - Glens Falls, NY MSA) for 2023		$90,600				
Median Family Income (Non-MSAs - NY) for 2023		$83,700				
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Albany CSA						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	283	8.83	15.90	48.41	24.38	2.47
Population by Geography	988,609	8.28	13.88	49.03	27.18	1.62
Housing Units by Geography	461,841	8.76	15.16	49.82	25.19	1.06
Owner-Occupied Housing by Geography	255,060	3.45	10.13	53.48	32.72	0.23
Occupied Rental Units by Geography	143,334	16.42	21.83	42.87	16.45	2.43
Vacant Units by Geography	63,447	12.84	20.37	50.81	14.65	1.33
Businesses by Geography	42,440	6.11	9.59	45.37	24.76	14.17
Farms by Geography	1,462	2.12	6.77	59.99	27.02	4.10
Family Distribution by Income Level	238,270	20.88	17.29	21.52	40.32	0.00
Household Distribution by Income Level	398,394	23.79	16.27	17.76	42.19	0.00
Unemployment rate (%)	4.62	10.80	6.05	4.22	2.70	11.09
Households Below Poverty Level (%)	10.03	28.89	16.52	7.93	4.18	24.61
Median Family Income (10580 - Albany-Schenectady-Troy, NY MSA)		$95,438			**Median Housing Value**	$203,700
Median Family Income (24020 - Glens Falls, NY MSA)		$77,435			**Median Gross Rent**	$1,003
Median Family Income (Non-MSAs - NY)		$68,606			**Families Below Poverty Level**	6.29
Median Family Income (10580 - Albany-Schenectady-Troy, NY MSA) for 2024		$117,800				
Median Family Income (24020 - Glens Falls, NY MSA) for 2024		$92,400				
Median Family Income (Non-MSAs - NY) for 2024		$83,800				
FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within the Albany CSA for both analysis periods. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2022-2023 table above, the median housing value for the Albany CSA was $203,700, while according to Realtor.com the median sales price of a single-family home was $349,900 at the beginning of 2022 and $398,300 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment between $1,046 to $1,416 and moderate-income borrowers between $1,674 to $2,266 depending on their location in the area. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $2,388 at the end of 2023. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the Albany CSA during the 2022-2023 period.

Based on the information in the 2024 table above, the median housing value for the Albany CSA was also $203,700 while according to Realtor.com the median sales prices of a single-family home was $423,188 at the beginning of 2024 and $415,000 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment between $1,048 to $1,473 and moderate-income borrowers between $1,676 to $2,356 depending on their location in the area. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $2,488 at the end of 2024. Based on these calculations, low- and moderate- income borrowers would be challenged to qualify for and afford home mortgage financing within the Albany CSA during the 2024 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Albany CSA 6.29 percent of families had income(s) below the federal poverty line in both the 2022-2023 and the 2024 analysis periods.

Economic Data

According to Moody's Analytics May 2025 report the Albany area's strengths include a central location relative to New York City and New England, being a semiconductor production hub, low business costs and affordable housing, below-average employment volatility, and an even distribution of income and wealth. Weaknesses include an elevated reliance on state government, worsening population trends, and an outsized dependence on low-wage jobs. Major employment industries include education and health services, government, and professional and business services. Major employers in the area include Albany Medical Center, St. Peter's Health Partners, Golub Corp., and Northeast Grocery Inc.

According to the BLS, the non-seasonally adjusted unemployment rate for the Albany CSA was 3.4 percent in January 2022, increased slightly to 3.7 percent in December 2023 and decreased to 3.1 percent in December 2024. The non-seasonally adjusted unemployment rate for New York state was 4.4 percent in December 2023 and 4.1 percent in December 2024. The national unemployment rate was 3.8 percent in December 2024.

Community Contacts

A review was conducted of three community contacts, and a community needs assessment completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as affordable housing and community services. Contacts noted that there is a lot of tourism in the Saratoga and Warren County portions of the AA, although Warren County is more depressed, and Saratoga is more affluent. Housing costs are higher in Saratoga County, which makes it more of a challenge for low- and moderate-income households seeking affordable housing. Low-income families struggle with meeting day-to-day living expenses. Contacts indicated that there is a need for wrap around services like childcare to help people get and keep jobs. There has been an increase in the number of individuals seeking assistance from food pantries. Other identified needs include:

- Affordable housing
- Access to affordable childcare
- Grant funding for operational support for nonprofit organizations
- Low-cost bank accounts
- Credit counseling and financial education
- Access to mental health and substance abuse programs
- Youth programing
- Vocational and job training programs
- Access to affordable and nutritional food

- Affordable internet access

Rochester MSA

CBNA had $1.8 billion in deposits in the Rochester MSA representing 1.0 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated 19 branches and 34 ATMs within the AA, representing 1.9 percent of total bank branches and 1.9 percent of total ATMs. The bank originated and purchased approximately $615 million in home mortgage and small business loans within the Rochester MSA during the review period.

According to FDIC deposit data as of June 30, 2024, there were 18 FDIC-insured institutions operating 190 branches in the AA. CBNA ranked fifth in deposit market share with 7.7 percent. The top banks by deposit market share Manufacturers and Traders Trust Company with 17.2 percent, The Canandaigua National Bank and Trust Company with 16.0 percent, and JPMorgan Chase Bank, NA with 14.8 percent.

The following tables provide a summary of the demographics, including housing, business, and economic information for the Rochester MSA for each period.

Assessment Area(s) - 2022-2023 Rochester MSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	295	13.22	17.97	39.32	25.08	4.41
Population by Geography	1,025,018	9.85	17.07	42.53	29.33	1.22
Housing Units by Geography	449,711	9.72	18.56	43.93	27.11	0.69
Owner-Occupied Housing by Geography	274,353	4.16	14.77	47.18	33.72	0.16
Occupied Rental Units by Geography	138,345	18.61	25.17	38.11	16.53	1.58
Vacant Units by Geography	37,013	17.65	21.92	41.56	17.65	1.23
Businesses by Geography	35,493	6.45	16.10	42.06	32.52	2.87
Farms by Geography	1,461	1.98	13.48	54.76	29.09	0.68
Family Distribution by Income Level	252,310	20.86	17.62	20.49	41.02	0.00
Household Distribution by Income Level	412,698	24.55	15.44	17.72	42.29	0.00
Unemployment rate (%)	4.88	11.99	6.52	4.10	3.11	10.05
Households Below Poverty Level (%)	12.42	37.40	16.19	9.63	5.65	41.40
Median Family Income (40380 - Rochester, NY MSA)		$80,423			**Median Housing Value**	$139,000
Median Family Income (40380 - Rochester, NY MSA) for 2023		$97,300			**Median Gross Rent**	$897
					Families Below Poverty Level	8.84
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0%						

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

Assessment Area(s) - 2022-2023 Rochester MSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Assessment Area(s) - Rochester MSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	295	13.22	17.29	39.66	25.42	4.41
Population by Geography	1,025,018	9.85	16.38	42.73	29.82	1.22
Housing Units by Geography	449,711	9.72	17.89	44.09	27.61	0.69
Owner-Occupied Housing by Geography	274,353	4.16	14.02	47.32	34.34	0.16
Occupied Rental Units by Geography	138,345	18.61	24.59	38.44	16.77	1.58
Vacant Units by Geography	37,013	17.65	21.53	41.27	18.32	1.23
Businesses by Geography	35,917	6.61	15.81	41.85	33.03	2.69
Farms by Geography	1,493	2.34	13.33	55.12	28.47	0.74
Family Distribution by Income Level	252,310	20.52	17.39	20.35	41.74	0.00
Household Distribution by Income Level	412,698	24.62	15.47	17.75	42.16	0.00
Unemployment rate (%)	4.88	11.99	6.63	4.08	3.15	10.05
Households Below Poverty Level (%)	12.42	37.40	16.51	9.67	5.63	41.40
Median Family Income (40380 - Rochester, NY MSA)		$79,424			**Median Housing Value**	$139,000
Median Family Income (40380 - Rochester, NY MSA) for 2024		$98,700			**Median Gross Rent**	$897
					Families Below Poverty Level	8.84

FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within the Rochester MSA for both analysis periods. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2022-2023 table above, the median housing value for the Rochester MSA was $139,000 while according to Realtor.com the median sales price of a single-family home was $199,900 at the beginning of 2022 and $249,900 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment of $1,216 and moderate-income borrowers $1,946. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $1,498 at the end of 2023. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing within the Rochester MSA during the 2022-2023 period.

Based on the information in the 2024 table above, the median housing value for the Rochester MSA was also $139,000 while according to Realtor.com the median sales prices of a single-family home was $244,900 at the beginning of 2024 and $249,950 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment of $1,234 and moderate-income borrowers $1,974. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $1,498 at the end of 2024. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing within the Rochester MSA during the 2024 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Rochester MSA 8.84 percent of families had income(s) below the federal poverty line in both the 2022-2023 and the 2024 analysis periods.

Economic Data

According to Moody's Analytics January 2025 report the Rochester area's strengths include stability and support to high-wage jobs from educational institutions and hospitals, affordable housing, and solid educational attainment relative to upstate and western New York peers. Weaknesses include a cold climate and relative isolation that detract from quality of life, persistent out-migration, and an overdependence on legacy manufacturers. Major employment industries include education and health services, government, and professional and business services. Major employers in the area include University of Rochester, Rochester Regional Health, Wegmans Food Markets Inc., and Paychex.

According to the BLS, the non-seasonally adjusted unemployment rate for the Rochester MSA was 3.9 percent in January 2022, which increased slightly to 4.1 percent in December 2023 and decreased to 3.4 percent in December 2024.

Community Contacts

A review was conducted of five community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as affordable housing, community and economic development, and community services. Contacts noted that Rochester continues to be a tale of two cities. There are some with stable housing and jobs that offer a living wage who benefit from economic growth. However, there are still areas of the city with extreme concentrations of poverty. Poor neighborhoods lack direct access to bank branches and banking services. Although housing in general is affordable there is a housing crisis in the city. There has been an increase in foreclosure and eviction activity. Low and moderate-income first-time homebuyers must compete with investors and other cash-buyers for properties. There are many Real Estate Investment Trusts (REITs) purchasing properties. Childcare costs have increased, making it difficult for single parents to work. Other identified needs include:

- Affordable housing
- Down payment assistance programs for first-time homebuyers
- Affordable purchase-rehab loans
- Access to affordable childcare
- Low-cost bank accounts
- Small dollar consumer loans
- Credit counseling and financial education, including post-purchase homeownership counseling
- Foreclosure prevention assistance
- Access to affordable and nutritional food

Scope of Evaluation in New York

Examiners selected two AAs for full-scope reviews. Examiners conducted a full-scope review of the Albany CSA AA and the Rochester MSA AA.

The Albany CSA AA accounted for 27.9 percent of deposits, 24.3 percent of branches, and 18.7 percent of lending within the state during the evaluation period. Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked sixth with a 5.2 percent deposit market share.

The Rochester MSA AA accounted for 25.3 percent of deposits, 27.3 percent of branches, and 27 percent of lending within the state during the evaluation period. Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked fifth with a 7.7 percent deposit market share.

The Binghamton MSA, Buffalo MSA, Ithaca MSA, Syracuse MSA and the Utica MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the areas that received the full-scope reviews and the bank's performance in the limited-scope areas. The Albany CSA AA was the most heavily weighted when arriving at the overall conclusion for the state of New York.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion for all AAs in the rating area as they represented the majority of lending in all AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Albany CSA AA and Rochester MSA AA were excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2024**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Albany CSA	2,543	533	0	3	3,079	18.7	27.9
Rochester MSA	3,857	582	0	3	4,442	27.0	25.3
Binghamton MSA	434	105	0	1	520	3.2	3.6
Buffalo MSA	5,811	844	0	4	6,659	40.5	33.9
Ithaca MSA	60	12	0	0	72	0.4	0.2
Syracuse MSA	1,016	215	0	0	1,231	7.5	6.2
Utica MSA	372	64	0	0	436	2.7	3.0
Total	14,073	2,355	0	11	16,439	100	100
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Albany CSA	417,407	21,400	0	16,250	455,057	19.7	27.9
Rochester MSA	606,562	12,994	0	44,445	664,001	28.7	25.3
Binghamton MSA	49,237	3,643	0	1,757	54,637	2.4	3.6
Buffalo MSA	854,413	24,502	0	32,636	911,551	39.4	33.9
Ithaca MSA	9,962	343	0	0	10,305	0.4	0.2
Syracuse MSA	154,041	7,208	0	0	161,249	7.0	6.2
Utica MSA	51,890	2,361	0	0	54,251	2.3	3.0
Total	2,143,512	72,451	0	95,088	2,311,051	100	100
Source: 1/1/2022 - 12/31/2024 Bank Data. *Due to rounding, totals may not equal 100.0%*							

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Albany CSA AA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked sixth out of 23 FDIC-insured depository institutions (top 27 percent) with a 5.9 percent deposit market share.

For home mortgage loans, the bank's market share of 3.6 percent ranked seventh out of 276 lenders (top 3 percent). The top three lenders were Broadview Federal Credit Union with 14.5 percent market share, SEFCU Services LLC with 10.2 percent market share, and Homestead Funding Corp. with 8.0 percent market share.

For small loans to businesses, the bank's market share of 0.4 percent ranked 26th out of 93 lenders (top 28 percent). The top three lenders were American Express National Bank with 28.6 percent market share, JPMorgan Chase Bank, NA with 19.5 percent market share, and Capital One, NA with 8.0 percent market share.

Rochester MSA AA

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked fifth out of 18 FDIC-insured depository institutions (top 28 percent) with a 7.7 percent deposit market share.

For home mortgage loans, the bank's market share of 4.8 percent ranked fourth out of 238 lenders (top 2 percent). The top three lenders were ESL Federal Credit Union with 21.6 percent market share, Premium Mortgage Corporation with 9.9 percent market share, and The Canandaigua National Bank with 5.5 percent market share.

For small loans to businesses, the bank's market share of 0.5 percent ranked 21st out of 79 lenders (top 27 percent). The top three lenders were American Express National Bank with 25.4 percent market share, JPMorgan Chase Bank, NA with 21.7 percent market share, and Capital One, NA with 7.4 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs. The geographic distribution of loans in Albany CSA and Rochester MSA were excellent. Examiners also considered any relevant performance context information.

Home Mortgage Loans

Refer to Table 7 in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Albany CSA AA

The geographic distribution of home mortgage loans was excellent.

		Low-Income Tracts			**Moderate-Income Tracts**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2024	949	53	5.58	6.08	147	15.49	13.76
HELOC							
2022-2024	1,594	48	3.01	2.46	151	9.47	7.62

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies but was below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded the aggregate and the percentage of closed-end mortgages was near to the aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and approximated the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, both the percentage of open-end HELOCs originated or purchased and the percentage of closed-end mortgages exceeded aggregate.

Rochester MSA AA

The geographic distribution of home mortgage loans was excellent.

		Low-Income Tracts			Moderate-Income Tracts		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2024	1,787	103	5.76	6.91	221	12.37	16.68
HELOC							
2022-2024	2,126	122	5.74	3.06	326	15.33	12.07

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and was near to the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separate from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded aggregate and the percentage of closed-end mortgages was below aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and was near to the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separate from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded aggregate and the percentage of closed-end mortgages was below aggregate.

Small Loans to Businesses

Refer to Table 9 in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Albany CSA AA

The geographic distribution of small loans to businesses was adequate.

The percentage of small loans to businesses originated or purchased in low-income geographies was below the percentage of businesses located in those geographies and was below the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies was below the percentage of businesses located in those geographies and was near to the aggregate percentage of all reporting lenders.

Rochester MSA AA

The geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. The borrower distribution of loans in Albany CSA and Rochester MSA were excellent. Examiners also considered any relevant performance context information.

Home Mortgage Loans

Refer to Table 8 in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Albany CSA AA

The distribution of home mortgage loans among individuals of different income levels was excellent.

Based on housing affordability calculations, discussed above, homeownership in the AA is not affordable for low and moderate-income borrowers; therefore, more emphasis was given to the bank's performance compared to other lenders in the AA.

		Low-Income Borrowers			**Moderate-Income Borrowers**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2024	949	145	15.28	9.80	269	28.35	24.40
HELOC							
2022-2024	1,594	239	14.99	9.82	412	25.85	22.43

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Rochester MSA AA

The distribution of home mortgage loans among individuals of different income levels was excellent.

Based on housing affordability calculations discussed above, homeownership in the AA is not affordable for low-income borrowers; therefore, more emphasis was given to the bank's performance compared to other lenders in the AA for low-income borrowers.

		Low-Income Borrowers			Moderate-Income Borrowers		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2024	1,787	196	10.97	9.79	355	19.87	21.24
HELOC							
2022-2024	2,126	390	18.34	10.88	599	28.17	23.09

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Albany CSA AA

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

Rochester MSA AA

The distribution of loans to businesses of different sizes was excellent.

The percentage of loans to small businesses originated or purchased exceeded both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. The bank's CD lending further supported the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Albany CSA AA

The level of CD lending was good. During the evaluation period, the bank originated three CD loans totaling $16.3 million or 5.8 percent of allocated tier 1 capital. By dollar volume, 87.7 percent funded affordable housing and 12.3 percent funded economic development. CD loans were responsive to identified community needs.

The following are examples of CD loans the bank originated or purchased in the AA:

- The bank originated two loans totaling $14.3 million to support the development of 60 affordable housing units located in a moderate-income census tract in Saratoga County. All units were for households earning up to 60% of the AMI, with 30 units benefiting from rental assistance contracts.

- The bank issued a $2 million working line of capital to a CDFI to support its mission of small business lending and workforce development. The organization offers various loans, including SBA 7a, SBA 504, SBA microloans, and impact loans with fixed rates and flexible terms.

Rochester MSA AA

The level of CD lending was excellent. During the evaluation period, the bank originated three CD loans totaling $44.4 million or 8.3 percent of allocated tier 1 capital. By dollar volume, 100 percent funded affordable housing. CD loans were responsive to identified community needs.

The following are examples of CD loans the bank originated or purchased in the AA:

- The bank originated two loans totaling $34.6 million to develop 76 affordable housing units in Monroe County, all of which were accessible to households earning up to 60% of the AMI. Out of the total number of units, 46 received rental assistance contracts.

- The bank originated a $9.8 million loan for the construction of 40 affordable housing units in Monroe County. Of the total, 25 units served as permanent supportive housing for homeless seniors aged 55 and older.

Letters of Credit

Additionally, the bank originated two letters of credit totaling $26.7 million that have a qualified CD purpose and benefited the Albany CSA. In the Rochester MSA, the bank originated a $29.2 million letter of credit that has a qualified CD purpose. These letters of credit supported the development and preservation of affording housing and were given positive consideration.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

Albany CSA AA

As shown in the table below, the bank originated or purchased 341 loans under its flexible lending programs totaling $62.9 million. Refer to the Scope of Evaluation section for additional details regarding the programs. In addition, the bank provided 12 CCA down payment grants totaling $51,000 within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	6	1,086
FHA	27	6,373
FHLMC	35	7,379
FNMA	228	44,400
FNMA Home Ready	17	2,768
Goal Builder HELOC	27	603
VA	1	316
Total	341	62,926

Rochester MSA AA

As shown in the table below, the bank originated or purchased 452 loans under its flexible lending programs totaling $57.3 million. Refer to the Scope of Evaluation section for additional details regarding the programs. In addition, the bank provided 49 CCA down payment grants totaling $230,006 within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	25	2,981
FHA	57	7,959
FHLMC	33	5,645
FNMA	237	32,809
FNMA Home Ready	38	4,085
Goal Builder HELOC	49	1,064
VA	13	2,799
Total	452	57,343

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 14 in the state of New York section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Binghamton MSA, Buffalo MSA, Ithaca MSA, and Utica MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in Syracuse MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. The weaker performance in the Syracuse MSA was due to a weaker geographic and borrower distribution of loans and no CD lending. Performance in the limited-scope areas had minimal effect on Lending Test rating.

INVESTMENT TEST

The bank's performance under the Investment Test in New York is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Albany CSA and Rochester MSA AAs was excellent.

Table 4: Qualified Investments*

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Albany CSA	117	46,197	45	20,107	162	33.47	66,305	33.66	2	7,142
Rochester MSA	23	30,129	63	34,105	86	17.77	64,233	32.61	3	16,717
Binghamton MSA	26	1,836	11	1,036	37	7.64	2,872	1.46	0	0
Buffalo MSA	84	21,633	47	16,344	131	27.07	37,977	19.28	2	7,709
Ithaca MSA	5	307	2	333	7	1.45	640	0.32	0	0
Syracuse MSA	33	5,513	19	4,473	52	10.47	9,986	5.07	1	0
Utica MSA	6	12,564	3	2,386	9	1.86	14,950	7.59	1	684
Broader Statewide or Regional Area	0	0	0	0	0	0	0	0	0	0
Total	294	118,179	190	78,784	484	100.00	196,963	100.00	9	32,252

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Albany CSA

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 23.5 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 99.7 percent of total investments and grants supported affordable housing, and less than one percent supported community services to low- and moderate-income individuals.

The following are examples of qualified investments in the AA:

- The bank made a $6 million investment that supported the development of new affordable housing units, all for households earning below 80 percent of the area median income. This investment was responsive because it addressed the shortage of deeply affordable housing and provided supportive services for vulnerable residents, including formerly homeless individuals and persons with serious mental illness.

- The bank made a $12 million LIHTC investment that supported the redevelopment of a distressed affordable housing community into newly constructed units, all for households earning below 80 percent of the area median income. This investment was complex due to layered LIHTC financing, project-based rental assistance, and the coordination required to demolish and reconstruct multiple buildings across several parcels.

- The bank provided three grants totaling $15,000 that supported a small-business training program serving Black, Indigenous, and People of Color (BIPOC), women, and low-income entrepreneurs. This grant activity was responsive, complex, and demonstrated leadership because it expanded access to entrepreneurial training for underserved individuals, required customized curriculum and scholarship support, and strengthened economic mobility within the community.

Rochester MSA

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 25.1 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 98.7 percent of total investments and grants supported affordable housing, less than one percent supported community services to low- and moderate-income individuals, and one percent promoted economic development efforts.

The following are examples of qualified investments in the AA:

- The bank made a $12.2 million LIHTC investment that supported the development of 76 new affordable senior housing units, all for households earning below 80 percent of the AMI. This investment was responsive because it addressed the need for deeply affordable and supportive housing for seniors and individuals with special needs, offering on-site services and energy-efficient design features.

- The bank made an $8.7 million LIHTC investment that supported the development of new affordable housing units, all for households earning below 80 percent of the AMI. This investment was complex because it combined debt and equity, utilized LIHTCs, and incorporated permanent supportive housing for homeless seniors as well as specialized units for residents with disabilities.

- The bank provided three grants totaling $22,500 that supported a small-business entrepreneurial training program primarily serving low- and moderate-income women and minority entrepreneurs. This grant activity was responsive because it expanded access to business development resources, offered tailored virtual training, and strengthened economic mobility for underserved participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Binghamton MSA, Buffalo MSA, Ithaca MSA, Syracuse MSA, and Utica MSA was consistent with the bank’s overall performance under the Investment Test in the full-scope areas.

SERVICE TEST

The bank’s performance under the Service Test in New York is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Albany CSA AA and the Rochester MSA AA was excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2024
	Deposits	Branches								Population				
Assessment Area	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)						% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA		Low	Mod	Mid	Upp	NA
Albany CSA	27.9	17	24.3	5.9	17.7	29.4	41.1	5.9		8.3	13.9	49.0	27.2	1.6
Rochester MSA	25.3	19	27.1	5.3	21.1	31.6	42.1	0.0		9.9	16.4	42.7	29.8	1.2
Binghamton MSA	3.6	3	4.3	33.3	33.3	0.0	33.3	0.0		4.8	20.6	42.5	30.6	1.5
Buffalo MSA	33.9	23	32.9	0.0	17.4	43.5	34.8	4.4		11.2	16.8	42.1	28.3	1.6
Ithaca MSA	0.2	1	1.4	0.0	0.0	0.0	100.0	0.0		0.0	11.0	55.5	22.6	10.9
Syracuse MSA	6.2	5	7.1	0.0	0.0.	40.0	60.0	0.0		8.6	14.7	40.0	32.7	4.1
Utica MSA	3.0	2	2.9	0.0	50.0	0.0	0.0	50.0		9.5	17.5	41.6	25.2	6.3
Total	100.0	70	100.0	4.2	18.3	33.8	38.0	5.9		9.2	15.8	43.9	28.8	2.3

Source: FFIEC File - 2024 Census
1/1/2022 - 12/31/2024 Bank Data
Due to rounding, totals may not equal 100.0%

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Albany CSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was near to, and in moderate-income geographies exceeded the percentage of the population living within those geographies.

Examiners further considered two middle- and upper-income branches located within one-quarter mile of an LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA. Of the two proximate branches, one served a low-income geography, and one served a moderate-income geography. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 29 ATMs in the AA, 28 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, 69.1 percent of retail customer households in low-income geographies, and 70.5 percent of retail customer households in moderate-income geographies, used online and mobile banking services. This was an increase of 25.2 percent of retail customer households in low-income geographies, and an increase of 21.6 percent of retail customer households in moderate-income geographies, from the start of the evaluation period.

Rochester MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was below, and in moderate-income geographies exceeded the percentage of the population living within those geographies.

Examiners further considered one upper-income branch located within one-quarter mile of a low-income geography, where the percentage of usage exceeded the percentage of the population in the AA. The branch improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 34 ATMs in the AA, all of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, 66.3 percent of retail customer households in low-income geographies, and 68.8 percent of retail customer households in moderate-income geographies, used online and mobile banking services. This was an increase of 20.7 percent of retail customer households in low-income geographies, and an increase of 14.2 percent of retail customer households in moderate-income geographies, from the start of the evaluation period.

Table 6: Distribution of Branch Openings/Closings

Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Albany CSA	**0**	**5**	**0**	**0**	**-2**	**-2**	**-1**
Rochester MSA	0	5	0	0	-5	0	0
Binghamton MSA	0	0	0	0	0	0	0
Buffalo MSA	1	16	0	-1	-11	-3	0
Ithaca MSA	1	1	0	-1	0	1	0
Syracuse MSA	0	0	0	0	0	0	0
Utica MSA	0	1	0	0	-1	0	0
Total	2	28	0	-2	-19	-4	-1

1/1/2022-12/31/2024 Bank Data.

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Albany CSA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, the bank closed five branches, none of which were in low- or moderate-income geographies. The branch closures were a result of network optimization. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for 14 traditional standalone branch locations in the AA. The three in-store branch locations operated from 10:00 a.m. to 5:00 p.m. Monday through Friday and Saturdays from 10:00 a.m. to 3:00 p.m.

Rochester MSA

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, the bank closed five branches, none of which were in low- or moderate-income geographies. The branch closures were a result of network optimization and non-renewal of in-store leases. The bank did not open any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for 16 traditional standalone branch locations in the AA. The three in-store branch locations operated from 10:00 a.m. to 5:00 p.m. Monday through Friday and Saturdays from 10:00 a.m. to 3:00 p.m.

Community Development Services

The institution provided a relatively high level of CD services.

Albany CSA

The bank provided a relatively high level of CD services.

During the evaluation period, bank employees provided 555 hours of qualified CD services to ten organizations through 200 activities within this AA. Leadership is evident through board or committee participation in three of these activities with three employees providing 72 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with providing financial education to LMI individuals. Specifically, employees administered 417 hours of financial education hours to seven key community partners.

Service activity examples during the evaluation period include:

- Bank employees provided a total of 406 hours of service to a local organization through a combination of board participation and providing financial education to low- and moderate-income youth. The organization provided volunteer-delivered mentorship in financial literacy, entrepreneurship, and work readiness. The majority of students came from high-need, underserved schools and LMI communities.

- Bank employees provided 66 hours of service to a local housing counseling agency that served low- and moderate-income individuals. One employee provided 25 hours serving on the agency's board and executive committee. Along with homebuyer counseling, the agency assisted with foreclosure prevention and landlord rental education.

- A Senior Vice President provided 20 hours as a board member to a local organization supporting homelessness in Albany. The organization provided community services such as a providing daily meals, a homeless shelter, women's recovery clinic, free medical clinic, and transitional living.

Rochester MSA

The bank provided a relatively high level of CD services.

During the evaluation period, bank employees provided 684 hours of qualified CD service activities to nine organizations within this AA. Leadership is evident through board or committee participation in seven of these activities with eight employees providing 81 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with delivering financial education to low- and moderate-income individuals.

Service activity examples during the evaluation period include:

- Bank employees provided 345 hours through a combination of financial education and technical assistance to a local organization that primarily serves students from LMI households and/or come from high-need, underserved schools. The organization partners with volunteers to deliver entrepreneurship, workforce readiness, and financial literacy programs to students in grades k-12.

- Bank employees provided 162 hours of financial education, workforce development support, and board participation for a local social services organization. Employees taught a financial workshop as part of a workforce development program for LMI youths. The organization offered programs for those living in poverty, for youth services, for employment services, and for homeownership.

- Bank employees provided 55 hours to a local organization by delivering financial training and small business workshops. The organization offered a variety of services including workforce development, educational and health, community development, small business, and housing services. The organization's mission is to promote economic growth and enhance community wealth building of underserved populations by supporting the creation and expansion of small businesses, and home ownership.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Binghamton MSA and Utica MSA AAs were consistent with the bank's overall retail service delivery systems performance in the full-scope areas. The Buffalo MSA, Ithaca MSA, and Syracuse MSA were weaker than the bank's overall retail service delivery systems due to weaker branch distributions. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

State Rating

State of Ohio

CRA rating for the State of Ohio: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected an excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending further supported the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, which were responsive in addressing community needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income adjacent branches and ADS.
- The bank was a leader in providing CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Ohio

As of June 30, 2024, the bank had approximately $9.9 billion in deposits in the rating area. As of December 31, 2024, the bank operated 75 branches and 122 ATMs in the rating area, representing 7.5 percent of total branches and 6.8 percent of total ATMs.

According to FDIC deposit market share data, as of June 30, 2024, there were 195 FDIC-insured institutions operating 3,064 branches in the rating area. CBNA ranked seventh in deposit market share with 1.8 percent. The top banks by deposit market share are U.S. Bank, NA with 18.8 percent, The Huntington National Bank with 16.5 percent, and KeyBank, NA with 12.8 percent.

CBNA delineated four AAs in the state of Ohio as follows: Cleveland-Akron-Canton, OH CSA (Cleveland CSA), Toledo, OH MSA (Toledo MSA), the Ohio Non-MSA (OH Non-MSA) and the Youngstown-Warren-Salem, OH CSA (Youngstown CSA), which was designated for the 2024 portion of the analysis period under the state of Ohio. The Cleveland CSA accounts for 90 percent of the bank's deposits in the rating area and received a full-scope review. Refer to Appendix A for a complete description of the AAs.

CBNA had $8.8 billion in deposits in the Cleveland CSA representing 4.5 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated 62 branches and 100 ATMs within the AA, representing 6.2 percent of total bank branches and 5.5 percent of total ATMs. The bank originated and purchased approximately $1.3 billion in home mortgage and small business loans within the Cleveland CSA during the review period.

According to FDIC deposit data as of June 30, 2024, there were 42 FDIC-insured institutions operating 732 branches in the AA. CBNA ranked fifth in deposit market share with 5.8 percent. The top banks by deposit market share are KeyBank, NA with 40.1 percent, The Huntington National Bank with 15.4 percent, and PNC Bank, NA with 9.5 percent.

The following tables provide a summary of the demographics, including housing, business, and economic information for the Cleveland CSA for each period.

Assessment Area(s) - 2022-2023 Cleveland CSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	859	13.85	20.84	34.69	27.36	3.26
Population by Geography	3,003,532	9.68	18.10	37.52	33.51	1.18
Housing Units by Geography	1,376,367	11.55	20.39	36.71	29.77	1.58
Owner-Occupied Housing by Geography	818,828	5.58	15.06	41.03	37.68	0.66
Occupied Rental Units by Geography	433,347	19.49	28.41	31.18	18.05	2.86
Vacant Units by Geography	124,192	23.24	27.57	27.49	18.46	3.24
Businesses by Geography	143,722	8.90	15.91	31.78	41.60	1.81
Farms by Geography	4,519	6.11	13.74	39.01	40.74	0.40
Family Distribution by Income Level	751,212	21.76	17.39	20.04	40.80	0.00
Household Distribution by Income Level	1,252,175	24.82	15.87	17.15	42.16	0.00
Unemployment rate (%)	5.95	14.68	8.93	4.61	3.40	14.99
Households Below Poverty Level (%)	13.88	36.35	20.56	9.44	6.01	45.33
Median Family Income (10420 - Akron, OH MSA)		$76,842			**Median Housing Value**	$130,600
Median Family Income (15940 - Canton-Massillon, OH MSA)		$70,028			**Median Gross Rent**	$834
Median Family Income (17460 - Cleveland-Elyria-Mentor, OH MSA)		$76,766			**Families Below Poverty Level**	9.74
Median Family Income (10420 - Akron, OH MSA) for 2023		$95,500				
Median Family Income (15940 - Canton-Massillon, OH MSA) for 2023		$83,800				
Median Family Income (17460 - Cleveland-Elyria-Mentor, OH MSA) for 2023		$94,000				
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Cleveland CSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	859	13.50	20.84	33.99	28.41	3.26
Population by Geography	3,003,532	9.40	18.11	36.73	34.58	1.18
Housing Units by Geography	1,376,367	11.20	20.44	36.06	30.72	1.58
Owner-Occupied Housing by Geography	818,828	5.40	14.92	40.08	38.94	0.66
Occupied Rental Units by Geography	433,347	18.93	28.67	31.04	18.51	2.86
Vacant Units by Geography	124,192	22.49	28.14	27.05	19.09	3.24
Businesses by Geography	147,949	9.11	15.72	31.00	42.35	1.82
Farms by Geography	4,719	6.61	13.56	37.95	41.45	0.42
Family Distribution by Income Level	751,212	21.45	17.25	19.91	41.39	0.00
Household Distribution by Income Level	1,252,175	24.63	15.80	17.08	42.48	0.00
Unemployment rate (%)	5.95	14.77	9.01	4.61	3.46	14.99
Households Below Poverty Level (%)	13.88	36.82	20.65	9.58	6.03	45.33
Median Family Income (10420 - Akron, OH MSA)		$76,842			**Median Housing Value**	$130,600
Median Family Income (15940 - Canton-Massillon, OH MSA)		$70,028			**Median Gross Rent**	$834
Median Family Income (17410 - Cleveland, OH MSA)		$75,548			**Families Below Poverty Level**	9.74
Median Family Income (10420 - Akron, OH MSA) for 2024		$95,800				
Median Family Income (15940 - Canton-Massillon, OH MSA) for 2024		$85,500				
Median Family Income (17410 - Cleveland, OH MSA) for 2024		$94,100				

FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within the Cleveland CSA for both analysis periods. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2022-2023 table above, the median housing value for the Cleveland CSA was $130,600 while according to Realtor.com the median sales price of a single-family home was $175,000 at the beginning of 2022 and $219,900 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment between $1,048 to $1,194 and moderate-income borrowers between $1,674 to $2,266 depending on their location in the area. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $1,318 at the end of 2023. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing within the Cleveland CSA during the 2022-2023 period.

Based on information in the 2024 table above, the median housing value for the Cleveland CSA was also $130,600 while according to Realtor.com the median sales prices of a single-family home was $211,000 at the beginning of 2024 and $239,450 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment between $1,069 to $1,198 and moderate-income borrowers between $1,710 to $1,916 depending on their location in the area. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $1,435 at the end of 2024. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing within the Cleveland CSA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Cleveland CSA, 9.74 percent of families had income(s) below the federal poverty line in both the 2022-2023 and the 2024 analysis periods.

Economic Data

According to the February 2025 Moody's Analytics report the Cleveland area's strengths include manufacturing infrastructure and specialized factory labor and world-class clinical and research healthcare institutions. Weaknesses include below-average concentrations of young residents and prime-age workers and persistent out-migration. Major employment industries include education and health services, professional and business services, and government. Major employers in the area include Cleveland Clinic Foundation, University Hospitals, U.S. Office of Personnel Management, and Minute Men HR Management Services.

According to June 2025 Moody's Analytics report, the Akron portion of the AA has strengths that include relatively low business and living costs, and a prime location for staffing business outsourcing and HR support roles. Weaknesses include few jobs in high-value-added services, below average per capita income, and weak migration trends. Major employment industries include education and health services, professional and business services, and government. Major employers in the area include Summa Health System, Akron Children's Hospital, Cleveland Clinic, and Minute Men HR Management Services.

According to the BLS, the non-seasonally adjusted unemployment rate for the Cleveland CSA was 6.0 percent in January 2022, decreased to 3.0 percent in December 2023 and increased slightly to 3.4 percent in December 2024. The non-seasonally adjusted unemployment rate for the state of Ohio was 3.1 percent in December 2023 and 4.2 percent in December 2024. The national unemployment rate was 3.8 percent in December 2024.

Community Contacts

A review was conducted of six community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as affordable housing, economic development, and community services. Contacts noted that Cuyahoga County has some of the highest concentrations of poverty in the country. There are a significant number of low- and moderate-income census tracts. Although the economy has improved and is stabilizing since the COVID-19 pandemic, access to safe affordable housing continues to be one of the highest needs in the area. Much of the affordable housing that is available is in poor condition. There is also a need for home improvement loans to fix up existing but dilapidated housing stock. Many low-income working households struggle to afford basic living expenses and risk facing homelessness if an unexpected expense such as a car repair or medical bill comes up. Many low-income neighborhoods lack access to nutritious and affordable food options such as supermarkets. Many neighborhoods are considered food deserts. Other identified needs include:

- Affordable housing
- Access to healthcare services
- Low-cost small-dollar loans
- Financial education and credit counseling
- Workforce development training
- Small business lending

Scope of Evaluation in Ohio

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in the reclassification of the Youngstown-Warren-Salem, OH MSA. For 2024, the Youngstown-Warren-Salem, OH CSA included the Salem, OH Micropolitan Statistical Area, and the Youngstown-Warren, OH MSA. An analysis of the Youngstown-Warren, OH-PA CSA was performed for 2022-2023. As of 2024, the analysis was completed under the Youngstown-Warren-Salem, OH CSA in the state of Ohio. For the Cleveland MSA AA, CBNA's delineated AA did not change during the evaluation period; however, the Cleveland MSA number and name changed, which resulted in the need for two separate analyses for this AA.

Examiners selected one AA for a full-scope review. Examiners conducted a full-scope review of the Cleveland CSA AA.

The Toledo MSA, Youngstown CSA, and OH Non-MSA AAs received limited-scope reviews. Refer to the table in appendix A for more information.

Examiners based their ratings primarily on the results of the area that received the full-scope review and the bank's performance in the limited-scope areas. The Cleveland MSA AA was the most heavily weighted when arriving at the overall conclusion for the state of Ohio.

Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion for all AAs in the rating area as they represented the majority of lending in all AAs.

Bank-delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Similarly, bank-delineated Non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Cleveland CSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							2022-2024
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Cleveland CSA	9,750	2,046	0	14	11,810	84.45	90.9
Toledo MSA	1,451	277	0	1	1,729	12.36	7.5
Youngstown CSA	235	46	0	0	281	2.01	0.7
OH Non-MSA	138	25	0	0	163	1.17	0.9
Broader Statewide or Regional Area	0	0	0	1	1	0.01	0
Total	11,574	2,394	0	16	13,984	100	100
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Cleveland CSA	1,269,745	80,180	0	118,901	1,468,826	86.21	90.9
Toledo MSA	160,301	8,162	0	12,200	180,663	10.60	7.5
Youngstown CSA	29,511	750	0	0	30,261	1.78	0.7
OH Non-MSA	13,096	1,566	0	0	14,662	0.86	0.9
Broader Statewide or Regional Area	0	0	0	9,400	9,400	0.55	0
Total	1,472,653	90,658	0	140,501	1,703,812	100	100
Source: 1/1/2022 - 12/31/2024 Bank Data. *Due to rounding, totals may not equal 100.0%*							

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

<u>Cleveland CSA 2022-2023</u>

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, CBNA ranked fourth out of 42 FDIC-insured depository institutions (top 10 percent) with a 6.8 percent deposit market share.

For home mortgage loans, the bank's market share of 4.2 percent ranked fifth out of 628 lenders (top 1 percent). The other top lenders were Huntington National Bank with 12.1 percent market share, Third Federal Savings and Loan with 7.7 percent market share, and Crosscountry Mortgage, LLC with 6 percent market share.

For small loans to businesses, the bank's market share of 0.6 percent ranked 17th out of 131 lenders (top 13 percent). The top three lenders were American Express National Bank with 27.8 percent market share, JP Morgan Chase Bank, NA with 22.2 percent market share, and Capital One, NA with 8 percent market share.

<u>Cleveland CSA 2024</u>

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked fifth out of 42 FDIC-insured depository institutions (top 12 percent) with a 5.8 percent deposit market share.

For home mortgage loans, the bank's market share of 3.5 percent ranked sixth out of 616 lenders (top 1 percent). The top three lenders were Huntington National Bank with 11.6 percent market share, Crosscountry Mortgage, LLC with 6.4 percent market share, and Third Federal Savings and Loan with 5.9 percent market share.

For small loans to businesses, the bank's market share of 0.6 percent ranked 17th out of 131 lenders (top 13 percent). The top three lenders were American Express National Bank with 27.8 percent market share, JP Morgan Chase Bank, NA with 22.2 percent market share, and Capital One, NA with 8 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

<u>Cleveland CSA</u>

The geographic distribution of home mortgage loans was good.

		Low-Income Tracts			Moderate-Income Tracts		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	2,057	120	5.83	5.62	366	17.79	16.71
2024	712	51	7.16	6.98	141	19.80	18.14
HELOC							
2022-2023	5,054	157	3.11	2.30	514	10.17	8.84
2024	1,927	80	4.15	2.57	211	10.95	10.40

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

<u>2022-2023</u>

The geographic distribution of home mortgage loans was good.

The percentage of home mortgage loans originated or purchased in low-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, both the percentage of open-end HELOCs originated or purchased and the percentage of closed-end mortgages exceeded the aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, both the percentage of open-end HELOCs originated or purchased and the percentage of closed-end mortgages exceeded the aggregate.

2024

The geographic distribution of home mortgage loans was good.

The percentage of home mortgage loans originated or purchased in low-income geographies was near to the percentage of owner-occupied housing units located in those geographies but was below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, both the percentage of open-end HELOCs originated or purchased and the percentage of closed-end mortgages exceeded the aggregate.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies but was below the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, both the percentage of open-end HELOCs originated or purchased and the percentage of closed-end mortgages exceeded the aggregate.

Small Loans to Businesses

Refer to Table 9 in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

Cleveland CSA

The geographic distribution of small loans to businesses was excellent.

2022-2023

The geographic distribution of small loans to businesses was excellent.

The percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2024

The geographic distribution of small loans to businesses was good.

The percentage of small loans to businesses originated or purchased in low-income geographies was below the percentage of businesses located in those geographies but exceeded the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

<u>Cleveland CSA</u>

The distribution of home mortgage loans among individuals of different income levels was excellent.

		Low-Income Borrowers			**Moderate-Income Borrowers**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	2,057	420	20.42	11.22	697	33.88	22.63
2024	712	152	21.35	10.70	241	33.85	21.55
HELOC							
2022-2023	5,054	741	14.66	10.89	1,271	25.15	20.70
2024	1,927	322	16.71	11.29	479	24.86	21.14

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

<u>2022-2023</u>

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

<u>2024</u>

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

<u>Cleveland CSA</u>

The distribution of loans to businesses of different sizes was excellent.

<u>2022-2023</u>

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

<u>2024</u>

The distribution of loans to businesses of different sizes was excellent.

The percentage of loans to small businesses originated or purchased exceeded both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. The bank's CD lending further supported the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. During the evaluation period, CBNA originated 14 CD loans totaling $118.9 million or 15.2 percent of allocated tier 1 capital. By dollar volume, 98.3 percent funded affordable housing and 1.7 percent funded community services. CD loans were responsive to identified community needs.

The following are examples of CD loans the bank originated or purchased in the AA:

- The bank originated a $22 million construction loan to finance the adaptive reuse of a vacant apartment building, converting it into 116 affordable housing units. These units were designated for individuals and families earning up to 60 percent of the AMI.

- The bank originated a $18.6 million construction loan to develop a 60-unit, multi-family affordable housing project. All units were designated for low- and moderate-income individuals and families earning up to 60 percent of the area AMI.

- The bank originated a $17 million construction loan to develop a 106-unit multi-family affordable housing project. This development comprises a newly constructed building with 54 units and the renovation of 52 existing units. The project offered affordable living arrangements specifically for low-income seniors.

<u>Broader Statewide or Regional area</u>

In addition, CBNA made a $9.4 million construction loan in the broader statewide and regional area whose purpose, mandate, or function included serving the bank's AA. The loan financed the construction of a 50-unit multifamily affordable housing development, catering to low- and moderate-income families and seniors. The broader statewide and regional area lending had a positive impact on the Lending Test rating.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 2,293 loans under its flexible lending programs totaling $333.4 million. Refer to the Scope of Evaluation section for additional details regarding the programs. In addition, the bank provided 496 CCA down payment grants totaling $2.7 million within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	163	24,423
FHA	322	47,950
FHLMC	136	27,947
FHLMC Home Possible	13	2,090
FNMA	1,078	172,276
FNMA Home Ready	369	49,656
Goal Builder HELOC	185	3,825
VA	27	5,208
Total	2,293	333,376

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 14 in the state of Ohio section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Toledo MSA was consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance under the Lending Test in Youngstown CSA (2024) was weaker than the bank's overall performance under the Lending Test in the full-scope area. The weaker performance was due to weaker lending activity and a lack of CD lending in this AA. The bank's performance under the Lending Test in OH Non-MSA was weaker than the bank's overall performance under the Lending Test in the full-scope area. The weaker performance was due to weaker geographic distribution of loans and a lack of CD lending in this AA. Performance in the limited-scope areas had minimal impact on the overall Lending Test rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Ohio is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Cleveland CSA AA was excellent.

Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Cleveland CSA	331	87,019	147	107,290	478	84.9	194,309	89.5	10	53,625
Toledo MSA	53	8,230	9	11,073	62	11.0	19,303	8.9	1	8,131
Youngstown CSA	13	2,661	3	379	16	2.8	3,040	1.4	0	0
OH Non-MSA	2	89	5	371	7	1.2	460	0.2	0	0
Total	399	97,999	164	119,113	563	100.0	217,112	100.0	11	61,396

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 15.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 96.5 percent of total investments and grants supported affordable housing, 3.3 percent supported community services to low- and moderate-income individuals, and less than one percent promoted economic development efforts.

The following are examples of qualified investments in the AA:

- The bank made a $9 million investment that supported the substantial rehabilitation of affordable housing units, all for households earning below 80 percent of the area's median income. This investment was responsive because it preserved deeply affordable housing supported by long-term project-based rental assistance.

- The bank made a $16.6 million investment that supported the creation of new affordable senior housing units, all for households earning below 80 percent of the area median income. This investment was complex because it utilized both debt and equity financing and incorporated a comprehensive senior-services platform offering independent living, assisted living, rehabilitative care, long-term care options, and enrichment programming tailored to support aging in place.

- The bank provided four grants totaling $215,000 that supported regional hunger-relief programs serving low- and moderate-income individuals and families. This grant activity was responsive; it strengthened a large multi-county food-security network, supported emergency feeding operations serving hundreds of thousands of vulnerable residents, and addressed persistently high levels of food insecurity among children and adults.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Toledo MSA was consistent with the bank's overall performance under the Investment Test in the full-scope area. The bank's performance under the Investment Test in the Youngstown CSA and Ohio Non-MSA AA was weaker than the bank's overall performance due to a lower volume of qualified CD investments. Performance in the limited-scope areas had minimal effect on the overall Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in Ohio is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Cleveland CSA AA was good.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														2024
	Deposits	Branches								Population				
Assessment Area	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)						% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA		Low	Mod	Mid	Upp	NA
Cleveland CSA	89.6	62	82.7	3.2	19.4	40.3	33.9	3.2		9.4	18.1	36.7	34.6	1.2
Toledo MSA	7.4	9	12.0	11.1	0.0	66.7	22.2	0.0		9.1	19.0	30.3	36.5	5.1
Youngstown CSA 2024	2.1	3	4.0	0.0	0.0	66.7	33.3	0.0		5.0	18.1	53.0	23.2	0.8
OH Non-MSA	0.9	1	1.3	0.0	0.0	0.0	100.0	0.0		9.5	33.2	53.9	3.4	0.0
Total	100.0	75	100.0	4.0	0.0	0.0	33.3	2.7		8.8	18.5	38.2	32.8	1.6
Source: FFIEC File - 2024 Census *1/1/2022 - 12/31/2024 Bank Data* *Due to rounding, totals may not equal 100.0%*														

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies was well below, and in moderate-income geographies exceeded the percentage of the population living within those geographies.

Examiners further considered four middle- and upper-income branches located within one-quarter mile of an LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA. Of the four proximate branches, two served low-income geographies and two served moderate-income geographies. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 100 ATMs in the AA, all of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, 68.7 percent of retail customer households in low-income geographies, and 70.8 percent of retail customer households in moderate-income geographies used online and mobile banking services. This was an increase of 14.7 percent of retail customer households in low-income geographies, and an increase of 15.5 percent of retail customer households in moderate-income geographies, from the start of the evaluation period.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Cleveland CSA	5	17	-1	-1	-6	-4	0
Toledo MSA	0	0	0	0	0	0	0
Youngstown CSA	0	0	0	0	0	0	0
OH Non-MSA	0	0	0	0	0	0	0
Total	5	17	-1	-1	-6	-4	0
1/1/2022-12/31/2024 Bank Data.							

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, the bank closed 17 branches, one of which was in a low-income geography and three of which were in moderate-income geographies. The branch closures were a result of network optimization, low productivity, and branch overlap. The bank also opened five branches during the evaluation period, two of which were located in moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all 59 traditional standalone branch locations in the AA. The three in-store branch locations are operated from 10:00 a.m. to 5:00 p.m. Monday through Friday and Saturdays from 10:00 a.m. to 3:00 p.m.

Community Development Services

The institution was a leader in providing CD services.

During the evaluation period, bank employees provided 1,588 hours of qualified CD services to 31 organizations through 427 activities within this AA. Leadership is evident through board or committee participation in 13 of these activities with 13 employees providing 368 service hours. The bank's assistance was responsive to identified needs in the AA, particularly with delivering financial education to LMI individuals.

Service activity examples during the evaluation period include:

- Bank employees provided 173 hours to a CDFI through a combination of board participation and conducting financial education classes. The CDFI provided coaching assistance and lending to small businesses unable to secure funds through traditional banking sources. The CDFI provided technical assistance and capital funding to small businesses located in low- and moderate-income communities and created wage jobs for low-income individuals.

- Bank employees provided 312 hours to a local organization through a combination of workforce readiness and financial education classes to students from LMI households. The mission of the organization is to empower young people to own their economic success through lessons that promote financial capability, work and career readiness, and business ownership.

- Bank employees provided 132 hours of service to a local organization through a combination of board participation and teaching first-time homebuyers workshops. The Latino nonprofit organization supported the local LMI communities by providing essential social, educational, cultural and community development services.

- Bank employees provided 132 hours of financial education to a local organization. The organization provided residential programs for men and women who are homeless or in crisis. The programs provided a variety of services including mental health services, adult basic literacy, vocational training, anger management, soft-skill development, and employment readiness.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Toledo MSA, Youngstown CSA (2024), and OH Non-MSA was weaker than the bank's overall performance under the Service Test in the full-scope areas. Retail service delivery system performance was weaker due to weaker branch distributions. Performance in the limited-scope areas had minimal effect on the Service Test rating.

State Rating

State of Pennsylvania

CRA rating for the State of Pennsylvania: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels reflected an excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AA.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans. CD lending further supported the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants, which were responsive in addressing community needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income adjacent branches and ADS.
- The bank was a leader in providing CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Pennsylvania

As of June 30, 2024, the bank had approximately $13.6 billion in deposits in the rating area. As of December 31, 2024, the bank operated 104 branches and 212 ATMs in the rating area, representing 10.3 percent of total branches and 11.8 percent of total ATMs.

According to FDIC deposit market share data, as of June 30, 2024, there were 162 FDIC-insured institutions operating 3,378 branches in the rating area. CBNA ranked third in deposit market share with 6.5 percent. Other top banks by deposit market share are PNC Bank, NA with 27.8 percent, Wells Fargo Bank, NA with 6.9 percent, and BNY Mellon, NA with 4.6 percent.

CBNA delineated eight AAs in the state of Pennsylvania as follows: Altoona, PA MSA (Altoona MSA), Erie-Meadville, PA CSA (Erie CSA), Harrisburg-York-Lebanon, PA CSA (Harrisburg CSA), Lancaster, PA MSA (Lancaster MSA), Scranton-Wilkes Barre, PA MSA (Scranton MSA), State College, PA MSA (State College MSA), PA Non-MSA, and the Pittsburgh CSA consisting of the Pittsburgh-New Castle-Weirton, PA-OH-WV CSA for 2022-2023 and the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA for 2024. The Pittsburgh CSA accounts for 77.2 percent of the bank's deposits in the rating area and received a full-scope review. Refer to Appendix A for a complete description of the AAs.

Pittsburgh CSA

CBNA had $10.5 billion in deposits in the Pittsburgh CSA, representing 5.9 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated 71 branches and 159 ATMs within the AA, representing 7.1 percent of total bank branches and 8.8 percent of total ATMs. The bank originated and purchased approximately $2.2 billion in home mortgage and small business loans within the Pittsburgh CSA during the review period.

According to FDIC deposit data as of June 30, 2024, there were 51 FDIC-insured institutions operating 674 branches in the AA. CBNA ranked fourth in deposit market share with 4.8 percent. The top banks by deposit market share are PNC Bank, NA with 53.5 percent, BNY Mellon, NA with 11.9 percent, and TriState Capital Bank with 8.3 percent.

The following tables provide a summary of the demographics, including housing, business, and economic information for the Pittsburgh CSA for each period.

Assessment Area(s) - 2022-2023 Pittsburgh CSA						
						2022 - 2023
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	740	7.16	21.49	44.05	24.05	3.24
Population by Geography	2,411,442	4.95	17.74	44.88	31.35	1.08
Housing Units by Geography	1,146,295	5.67	20.24	45.78	27.66	0.66
Owner-Occupied Housing by Geography	719,033	2.52	16.51	48.89	31.90	0.18
Occupied Rental Units by Geography	314,636	10.91	25.83	40.15	21.54	1.57
Vacant Units by Geography	112,626	11.18	28.38	41.64	17.63	1.17
Businesses by Geography	109,107	5.41	14.90	40.38	37.57	1.73
Farms by Geography	3,346	2.12	13.36	55.08	28.90	0.54
Family Distribution by Income Level	616,496	19.56	17.98	21.15	41.31	0.00
Household Distribution by Income Level	1,033,669	24.47	15.64	17.49	42.40	0.00
Unemployment rate (%)	5.00	10.59	7.02	4.72	3.35	11.96
Households Below Poverty Level (%)	11.22	34.05	17.32	9.15	5.91	34.89
Median Family Income (38300 - Pittsburgh, PA MSA)		$82,642			**Median Housing Value**	$141,300
Median Family Income (Non-MSAs - PA)		$65,202			**Median Gross Rent**	$811
Median Family Income (38300 - Pittsburgh, PA MSA) for 2023		$101,900			**Families Below Poverty Level**	6.65
Median Family Income (Non-MSAs - PA) for 2023		$77,800				

FFIEC File - 2020 Census
2023 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

Assessment Area(s) - Pittsburgh CSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	775	6.84	20.65	44.90	24.52	3.10
Population by Geography	2,522,094	4.75	17.02	45.59	31.61	1.03
Housing Units by Geography	1,198,598	5.49	19.45	46.43	28.01	0.63
Owner-Occupied Housing by Geography	752,653	2.41	15.76	49.33	32.33	0.17
Occupied Rental Units by Geography	327,837	10.62	25.04	41.02	21.81	1.51
Vacant Units by Geography	118,108	10.84	27.39	42.95	17.70	1.12
Businesses by Geography	116,389	5.37	14.46	40.50	38.01	1.65
Farms by Geography	3,743	2.08	12.37	57.07	27.97	0.51
Family Distribution by Income Level	646,337	19.51	17.75	20.99	41.74	0.00
Household Distribution by Income Level	1,080,490	24.54	15.68	17.41	42.37	0.00
Unemployment rate (%)	5.04	11.22	7.17	4.75	3.38	11.96
Households Below Poverty Level (%)	11.30	35.47	17.55	9.27	6.06	34.89
Median Family Income (38300 - Pittsburgh, PA MSA)		$81,197			**Median Housing Value**	$140,000
Median Family Income (Non-MSAs - PA)		$66,318			**Median Gross Rent**	$803
Median Family Income (38300 - Pittsburgh, PA MSA) for 2024		$99,100			**Families Below Poverty Level**	6.87
Median Family Income (Non-MSAs - PA) for 2024		$81,400				

FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within the Pittsburgh CSA for both analysis periods. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2022-2023 table above, the median housing value for the Pittsburgh CSA was $141,300 while according to Realtor.com the median sales price of a single-family home was $200,000 at the beginning of 2022 and $230,000 at the end of 2023. Based on the median family income for 2020, low-income borrowers could afford a maximum monthly mortgage payment between $973 to $1,274 and moderate-income borrowers between $1,556 to $2,038 depending on their location in the area. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $1,378 at the end of 2023. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing within the Pittsburgh CSA during the 2022-2023 period.

Based on the information in the 2024 table above, the Pittsburgh CSA was also $140,000 while according to Realtor.com the median sales prices of a single-family home was $229,900 at the beginning of 2024 and $229,925 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment between $1,018 to $1,239 and moderate-income borrowers between $1,628 to $1,982 depending on their location in the area. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have been $1,378 at the end of 2024. Based on these calculations, low-income borrowers would be challenged to qualify for and afford home mortgage financing within the Pittsburgh CSA during the 2024 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the Pittsburgh CSA 6.7 percent of families had income(s) below the federal poverty line in 2022-2023 and 6.9 percent of families had income(s) below the federal poverty line in 2024.

Economic Data

According to Moody's Analytics January 2025 report, in 2024, the Pittsburgh area's strengths are top education and research institutions, low cost of living relative to other large Northeast areas, and low employment volatility. Weaknesses include negative net migration and contracting population, aging infrastructure, and subpar population trends. Major employment industries include education and health services, professional and business services, and leisure and hospitalities services. Major employers in the area include UPMC Health System, Highmark Health, University of Pittsburgh, and PNC Bank.

According to the BLS, the non-seasonally adjusted unemployment rate for the Pittsburgh CSA was 5.8 percent in January 2022, decreased to 2.9 percent in December 2023 and increased slightly to 3.4 percent in December 2024. The non-seasonally adjusted unemployment rate for the state of Pennsylvania was 2.9 percent in December 2023 and 3.3 percent in December 2024. The national unemployment rate was 3.8 percent in December 2024.

Community Contacts

A review was conducted of five community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on areas such as affordable housing, economic development, and community development. Contacts noted that there are worsening economic conditions in some parts of the AA. Many low and moderate-income individuals are migrating out of Pittsburgh and into Beaver and Washington counties due to increasing costs associated with living in Pittsburgh and Allegheny County. While the area might be more affordable, poor employment opportunities and a lack of public transportation around Beaver and Washington counties make things challenging for low- and moderate-income households. Consumer and housing costs are increasing. Smaller towns within the AA need better access to grocery stores. The area has an older housing stock that needs repair. There is a need for rehab loans. Other identified needs include:

- Affordable housing
- Small business financing
- Mortgage loan products targeted to LMI borrowers
- Workforce development training
- Financial literacy training

Scope of Evaluation in Pennsylvania

During the evaluation period, MSA boundary changes introduced in July 2023, effective January 1, 2024, by the United States OMB, resulted in Mercer County and Lawerence County being added to the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA. An analysis of the Pittsburgh-New Castle-Weirton, PA-OH-WV CSA was performed for 2022-2023 and the Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA for 2024.

Examiners conducted a full-scope review of the Pittsburgh CSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Pittsburgh CSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2024**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Pittsburgh CSA	12,828	2,222	0	12	15,062	66.65	77.8
Altoona MSA	379	60	0	0	439	1.94	1.7
Erie CSA	726	140	0	1	867	3.84	2.8
Harrisburg CSA	2,060	306	0	3	2,369	10.48	6.1
Lancaster MSA	1,006	165	0	1	1,172	5.19	2.5
Scranton MSA	973	235	0	0	1,208	5.35	4.5
State College MSA	617	65	0	0	682	3.02	2.3
PA Non-MSA	679	121	0	0	800	3.54	2.4
Total	19,268	3,314	0	17	22,599	100	100
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
Pittsburgh CSA	2,100,720	136,613	0	116,811	2,354,144	67.35	77.8
Altoona MSA	47,008	2,070	0	0	49,078	1.40	1.7
Erie CSA	85,331	6,758	0	1,614	92,703	2.68	2.8
Harrisburg CSA	391,156	16,622	0	20,947	428,725	12.27	6.1
Lancaster MSA	180,479	7,624	0	3,088	191,191	5.47	2.5
Scranton MSA	122,820	8,679	0	0	131,499	3.76	4.5
State College MSA	146,568	2,195	0	0	148,763	4.26	2.3
PA Non-MSA	94,519	3,723	0	0	98,242	2.81	2.4
Total	3,168,601	184,284	0	142,460	3,494,345	100	100
Source: 1/1/2022 - 12/31/2024 Bank Data. *Due to rounding, totals may not equal 100.0%*							

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Pittsburgh CSA AA 2022-2023

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2023, FDIC Summary of Deposit Market Share Report, CBNA ranked fourth out of 53 FDIC-insured depository institutions (top 8 percent) with a 5.1 percent deposit market share.

For home mortgage loans, the bank's market share of 7.3 percent ranked second out of 609 lenders (top 1 percent). The other top three lenders were PNC Bank NA with 7.8 percent market share, Dollar Bank, FSB with 7.3 percent market share, and First National Bank of PA with 4.1 percent market share.

For small loans to businesses, the bank's market share of 1.0 percent ranked 14th out of 156 lenders (top 9 percent). The top three lenders were American Express National Bank with 24.6 percent market share, JPMorgan Chase Bank, NA with 16.5 percent market share, and PNC Bank, NA with 8.4 percent market share.

Pittsburgh CSA AA 2024

Lending levels reflected excellent responsiveness to AA credit needs.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked fourth out of 51 FDIC-insured depository institutions (top 8 percent) with a 4.8 percent deposit market share.

For home mortgage loans, the bank's market share of 5.5 percent ranked second out of 599 lenders (top 1 percent). The other top three lenders were PNC Bank, NA with 8.3 percent market share, Rocket Mortgage with 5.2 percent market share, and Dollar Bank, FSB with 4.5 percent market share.

For small loans to businesses, the bank's market share of 1.1 percent ranked 13th out of 130 lenders (top 10 percent). The top three lenders were American Express National Bank with 25.6 percent market share, JPMorgan Chase Bank, NA with 17.2 percent market share, and PNC Bank, NA with 8.6 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Pittsburgh CSA

The geographic distribution of home mortgage loans was good.

		Low-Income Tracts			Moderate-Income Tracts		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	4,061	113	2.78	2.32	617	15.19	15.37
2024	950	28	2.95	2.44	156	16.42	15.67
HELOC							
2022-2023	5,690	115	2.02	1.35	698	12.27	10.75
2024	2,127	47	2.21	1.51	258	12.13	11.68

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

2022-2023

The geographic distribution of home mortgage loans was good.

The percentage of home mortgage loans originated or purchased in low-income geographies was near to the percentage of owner-occupied housing units located in those geographies and exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was below the percentage of owner-occupied housing units located in those geographies but was near to the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, the percentage of open-end HELOCs originated or purchased exceeded the aggregate and the percentage of closed-end mortgages was near to the aggregate.

2024

The geographic distribution of home mortgage loans was excellent.

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased in moderate-income geographies was near to both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. However, when open-end HELOCs are analyzed separately from closed-end mortgages, both the percentage of open-end HELOCs originated or purchased and the percentage of closed-end mortgages exceeded the aggregate.

Small Loans to Businesses

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

Pittsburgh CSA

The geographic distribution of small loans to businesses was good.

2022-2023

The geographic distribution of small loans to businesses was good.

The percentage of small loans to businesses originated or purchased in low-income geographies was below the percentage of businesses located in those geographies but was near to the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies approximated both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

2024

The geographic distribution of small loans to businesses was good.

The percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in those geographies and exceeded the aggregate percentage of all reporting lenders.

The percentage of small loans to businesses originated or purchased in moderate-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

Pittsburgh CSA

The distribution of home mortgage loans among individuals of different income levels was excellent.

Based on housing affordability calculations discussed above, homeownership in the AA is not affordable for low-income borrowers; therefore, more emphasis was given to the bank's performance compared to other lenders in the AA for low-income borrowers.

		Low-Income Borrowers			Moderate-Income Borrowers		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2023	4,061	728	17.93	11.95	1,231	30.31	21.39
2024	950	150	15.79	10.49	233	24.53	20.39
HELOC							
2022-2023	5,690	993	17.45	13.08	1,390	24.43	19.78
2024	2,127	340	15.98	11.58	519	24.40	19.78

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

2022-2023

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans originated or purchased to low-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

2024

The distribution of home mortgage loans among individuals of different income levels was excellent.

The percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Pittsburgh CSA

The distribution of loans to businesses of different sizes was good.

2022-2023

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

2024

The distribution of loans to businesses of different sizes was good.

The percentage of loans to small businesses originated or purchased was near to the percentage of small businesses in the AA but exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution was a leader in making CD loans. The bank's CD lending further supported the Lending Test rating.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. During the evaluation period, the bank originated 12 CD loans totaling $116.8 million or 8.9 percent of allocated tier 1 capital. By dollar volume, all loans supported affordable housing. CD loans were responsive to identified community needs.

The following are examples of CD loans the bank originated or purchased in the AA:

- The bank originated two loans totaling $30.3 million to support the construction of 72-unit and 38-unit LIHTC affordable housing developments in Allegheny County, PA. Both developments leveraged the LIHTC program and offered units for households earning up to 60% of the AMI.

- The bank originated a $17 million construction loan to fund the creation of 62 affordable housing units, leveraging LIHTC. This project will completely overhaul and replace the oldest public housing complex in Pennsylvania, transforming public housing in Allegheny County.

- The bank originated a $12.3 million construction loan to bridge the tax credit equity investment and cover construction costs for developing 57 affordable housing units in Butler County, PA. These units served households with incomes ranging from 20 percent to 60 percent of the AMI.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 3,074 loans under its flexible lending programs totaling $567.3 million. Refer to the Scope of Evaluation section for additional details regarding the programs. In addition, the bank provided 377 CCA down payment grants totaling $2.2 million within the AA.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
DHM	233	40,430
FHA	560	97,746
FHLMC	217	58,967
FHLMC Home Possible	163	27,137
FNMA	1,115	237,741
FNMA Home Ready	449	68,107
Goal Builder HELOC	229	5,007
VA	108	32,131
Total	3,074	567,266

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 14 in the state of Pennsylvania section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Erie CSA, Harrisburg CSA, and PA Non-MSA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in Altoona MSA, Lancaster MSA, Scranton MSA, and State College MSA was weaker than the bank's overall performance under the Lending Test in the full-scope areas. The weaker performance in the Altoona MSA, Lancaster MSA, and State College MSA was due to a weaker geographic distribution and little if any CD lending. The weaker performance in the Scranton MSA was due to a weaker borrower distribution of loans and no CD lending. Performance in the limited-scope areas had minimal impact on the overall Lending Test rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Pennsylvania is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Pittsburgh CSA AA was excellent.

Table 4: Qualified Investments*										
Assessment Area	**Prior Period**		**Current Period**		**Total**				**Unfunded Commitments**	
	#	**$(000's)**	**#**	**$(000's)**	**#**	**% of Total #**	**$(000's)**	**% of Total $**	**#**	**$(000's)**
Pittsburgh CSA	42	70,881	119	100,393	161	32.6	171,274	70.2	15	55,136
Altoona MSA	12	663	16	1,653	28	5.7	2,316	1.0	0	0
Erie CSA	22	12,254	5	8,867	27	5.5	21,121	8.7	1	2,578
Harrisburg CSA	64	7,395	41	7,126	105	21.3	14,520	6.0	0	0
Lancaster MSA	40	4,035	14	2,866	54	10.9	6,901	2.8	1	0
Scranton MSA	34	14,371	34	5,099	68	13.8	19,470	8.1	0	0
State College MSA	28	3475	4	2,766	32	6.5	6,241	2.6	1	822
PA Non-MSA	13	1,239	6	728	19	3.9	1,967	0.8	0	0
Total	255	114,313	239	129,498	494	100.0	243,811	100.0	18	58,536

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The institution had excellent level of qualified investments, including grants often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 11.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 95.8 percent of total investments and grants supported affordable housing, less than one percent supported community services to low- and moderate-income individuals, and 3.6 percent funded revitalization and stabilization efforts.

The following are examples of qualified investments in the AA:

- The bank made a $12.4 million investment that supported the development of newly constructed affordable housing units, all for households earning below 80 percent of the AMI. This investment was responsive and complex because it addressed the need for affordable housing in an area of opportunity, incorporated comprehensive supportive services for residents, and included advanced energy-efficient design standards.

- The bank made a $13.1 million investment that supported the new construction and adaptive reuse of senior housing, all for households earning below 80 percent of the AMI. This investment was complex because it utilized LIHTC, included layered debt and equity financing, and coordinated on-site supportive services for residents.

- The bank made a $3.3 million investment that supported the substantial rehabilitation of an existing senior rental community, where all households earned below 80 percent of the AMI. This investment was responsive and complex because it utilized LIHTC, provided a full-time resident services coordinator, and offered programs to support resident health, transportation, and financial wellness.

- The bank provided six grants totaling $159,000 that supported workforce-development programs serving exclusively low- and moderate-income individuals. This grant activity was responsive because it expanded access to free job-skills training, interview preparation, job placement assistance, and youth employment opportunities, strengthening economic mobility for underserved community members.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Altoona MSA, Erie CSA, Harrisburg CSA, Lancaster MSA, Scranton MSA, State College MSA, and PA Non-MSA was consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in Pennsylvania is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Pittsburgh CSA AA was excellent.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														**2024**
Assessment Area	**Deposits**	**Branches**								**Population**				
	% of Rated Area Deposits in AA	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income of Geographies (%)**						**% of Population within Each Geography**				
				Low	**Mod**	**Mid**	**Upp**	**NA**		**Low**	**Mod**	**Mid**	**Upp**	**NA**
Pittsburgh CSA	77.8	71	68.3	8.5	9.9	35.2	43.7	2.8		4.8	17.0	45.6	31.6	1.0
Altoona MSA	1.7	3	2.9	0.0	33.3	66.7	0.0	0.0		1.9	20.1	58.0	20.0	0.0
Erie CSA	2.8	6	5.8	33.3	0.0	0.0	66.7	0.0		7.2	18.0	48.0	25.4	1.4
Harrisburg CSA	6.1	8	7.7	0.0	12.5	62.5	25.0	0.0		6.6	12.4	55.7	24.8	0.57
Lancaster MSA	2.5	4	3.8	0.0	0.0	75.0	25.0	0.0		2.9	12.8	71.4	12.9	0.0
Scranton MSA	4.5	6	5.8	0.0	50.0	0.0	50.0	0.0		3.1	27.3	43.0	26.0	0.53
State College MSA	2.3	3	2.9	0.0	0.0	33.3	33.3	33.3		3.6	14.8	49.2	20.8	11.6
PA Non-MSA	2.4	3	2.9	0.0	33.3	33.3	33.3	0.0		1.0	4.4	54.1	39.6	1.0
Total	100.0	104	100.0	7.1	13.1	34.3	41.4	4.0		4.6	16.3	50.7	27.3	1.1
Source: FFIEC File - 2024 Census *1/1/2022-12-31-2024 Bank Data* *Due to rounding, totals may not equal 100.0%*														

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in low-income geographies exceeded, and in moderate-income geographies was below the percentage of the population living within those geographies.

Examiners further considered 11 middle- and upper-income branches located within one-quarter mile of an LMI geography, where the percentage of usage by LMI individuals exceeded the percentage of LMI populations in the AA. Of the 11 proximate branches, one served low-income geographies and 10 served moderate-income geographies. These branches improved accessibility and had a positive impact on the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had 159

ATMs in the AA, 151 of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, 67.8 percent of retail customer households in low-income geographies, and 70 percent of retail customer households in moderate-income geographies used online and mobile banking services. This was an increase of 16 percent of retail customer households in low-income geographies, and an increase of 15.4 percent of retail customer households in moderate-income geographies, from the start of the evaluation period.

Table 6: Distribution of Branch Openings/Closings

Branch Openings/Closings							
Assessment Area	**# of Branch Openings**	**# of Branch Closings**	**Net change in Location of Branches (+ or -)**				
			Low	**Mod**	**Mid**	**Upp**	**NA**
Pittsburgh CSA	0	35	-1	-7	-15	-11	-1
Altoona MSA	0	0	0	0	0	0	0
Erie CSA	0	2	0	0	-2	0	0
Harrisburg CSA	0	2	-1	0	-1	0	0
Lancaster MSA	0	1	0	0	-1	0	0
Scranton MSA	0	2	0	-1	-1	0	0
State College MSA	0	0	0	0	0	0	0
PA non-MSA	0	2	0	0	-1	-1	0
Total	0	44	-2	-8	-21	-12	-1

1/1/2022-12/31/2024 Bank Data.

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

To the extent changes have been made, the institution’s opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, the bank closed 35 branches, one of which was in a low-income geography and seven of which were in moderate-income geographies. The branch closures were a result of network optimization. There were no branches opened during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for 52 traditional standalone branch locations in the AA. The 19 in-store branch locations operated from 10:00 a.m. to 5:00 p.m. Monday through Friday and Saturdays from 10:00 a.m. to 3:00 p.m. CBNA also has two drive-thrus located in a moderate-income geography, which are open 24 hours a day.

Community Development Services

The institution was a leader in providing CD services.

During the evaluation period, bank employees provided 2,034 hours of qualified CD services to 48 organizations through 403 activities within this AA. Leadership is evident through board or committee participation in 24 of these activities with 27 employees providing 816 service hours. The bank’s assistance was responsive to identified needs in the AA, particularly with participating in a variety of community building activities including helping individuals find affordable housing, workforce development, financial education, neighborhood revitalization, and small business technical assistance.

Service activity examples during the evaluation period include:

- A bank employee provided 129 hours of service to a local organization serving as a loan committee member. The organization supported financial stability and advancing opportunities for people in the region by providing interest-free loans to those who otherwise could not afford them.

- A bank employee provided 112 hours by serving as a board member for a local organization that provides a variety of services like workforce development, employment services, and housing assistance programs.

- Bank employees partnered with a local organization and provided 41 hours of financial education and first-time homebuyers sessions. The organization promotes stable, vibrant communities by supporting the entire spectrum of homeownership, from preparing homebuyers to preserving homeownership and preventing foreclosures.

- Bank employees provided 72 hours of service to a local organization that provides a range of services and resources to help revitalize neighborhoods, foster economic opportunity, build capacity, and advance equity across Pittsburgh. The organization's mission is to engage residents and organizations with innovative tools that expand opportunity for transformative change.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Altoona MSA, Erie CSA, Harrisburg CSA, Lancaster MSA, Scranton MSA, State College MSA, and PA Non-MSA was weaker than the bank's overall performance under the Service Test in the full-scope area. Retail service delivery system performance was weaker due to weaker branch distributions. Performance in the limited-scope areas had minimal effect on the overall Service Test rating.

State Rating

State of Vermont

CRA rating for the State of Vermont: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs.
- The bank exhibited a good geographic distribution of loans in its AAs.
- The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank made few, if any, CD loans. CD lending in the full-scope AA had a negative impact on the Lending Test conclusion. CD lending in the limited-scope AA, however, had a significantly positive impact on the Lending Test conclusion.
- The bank had an excellent level of qualified CD investments and grants which were responsive in addressing community needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AAs with consideration for middle- and upper-income adjacent branches and ADS.
- The bank provided few, if any, CD services. CD services were responsive in addressing community needs.

Description of Institution's Operations in Vermont

As of June 30, 2024, the bank had approximately $794 million in deposits in the rating area. As of December 31, 2024, the bank operated 11 branches and 12 ATMs in the rating area, representing 1.0 percent of total branches and 0.6 percent of total ATMs.

According to FDIC deposit market share data, as of June 30, 2024, there were 12 FDIC-insured institutions operating 61 branches in the rating area. CBNA ranked fourth in deposit market share with 10.8 percent. The top banks by deposit market share are Manufacturers and Traders Trust Company with 18.4 percent market share, TD Bank, NA with 18.0 percent market share, and The National Bank of Middlebury with 11.0 percent market share.

CBNA delineated two AAs in the state of Vermont as follows: Vermont Non-MSA (VT Non-MSA) and Burlington-South Burlington-Barre, VT CSA (Burlington CSA). The VT Non-MSA accounts for 48.4

percent of the bank's deposits in the rating area and received a full-scope review. Refer to appendix A for a complete description of the AAs.

CBNA had $316 million in deposits in the VT Non-MSA representing 0.2 percent of the bank's total deposits as of June 30, 2024. As of December 31, 2024, the bank operated five branches and six ATMs within the AA, representing 0.4 percent of total bank branches and 0.3 percent of total ATMs. The bank originated and purchased approximately $63 million in home mortgage and small business loans within the VT Non-MSA during the review period.

The following table provides a summary of the demographics, including housing, business, and economic information for the VT Non-MSA.

Assessment Area(s) - VT Non-MSA						
						2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	60	0.00	10.00	68.33	20.00	1.67
Population by Geography	181,187	0.00	11.21	66.60	21.20	0.99
Housing Units by Geography	104,096	0.00	10.11	68.82	18.09	2.97
Owner-Occupied Housing by Geography	52,866	0.00	9.45	67.97	21.92	0.65
Occupied Rental Units by Geography	20,930	0.00	19.44	62.17	17.49	0.90
Vacant Units by Geography	30,300	0.00	4.83	74.91	11.83	8.44
Businesses by Geography	9,891	0.00	12.86	62.91	22.74	1.50
Farms by Geography	832	0.00	7.33	63.34	28.73	0.60
Family Distribution by Income Level	43,287	19.27	17.44	22.64	40.65	0.00
Household Distribution by Income Level	73,796	25.06	16.10	17.73	41.11	0.00
Unemployment rate (%)	3.93	0.00	4.96	4.11	2.83	8.04
Households Below Poverty Level (%)	11.37	0.00	17.66	11.38	7.50	14.23
Median Family Income (Non-MSAs - VT)		$77,189			**Median Housing Value**	$221,000
Median Family Income (Non-MSAs - VT) for 2024		$95,000			**Median Gross Rent**	$901
					Families Below Poverty Level	7.01

FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

To assess the affordability of housing, examiners compared an estimated mortgage payment for a median-priced home to the expected incomes for low- and moderate-income households within the VT Non-MSA for the analysis period. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income.

Based on the information in the 2024 table above, the median housing value for the VT Non-MSA was also $221,000 while according to Realtor.com the median sales prices of a single-family home ranged from $396,600 to $699,000 at the beginning of 2024 and $$464,950 to $571,225 at the end of 2024. Based on the median family income for 2024, low-income borrowers could afford a maximum monthly mortgage payment of $1,188 and moderate-income borrowers $1,900. Assuming a 30-year mortgage with a 6 percent fixed interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the median sales price would have ranged from $2,787 to $3,424 at the end of 2024. Based on these calculations, low- and moderate-income borrowers would be challenged to qualify for and afford home mortgage financing within the VT Non-MSA during the 2024 period.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the stated poverty rate are identified as having difficulty meeting basic financial needs and as such

are less likely to have the financial resources to qualify for a home loan than those with income above poverty. In the VT Non-MSA 7.0 percent of families had income(s) below the federal poverty line in both the 2022-2023 and 2024 analysis periods.

Economic Data

According to Moody's Analytics May 2025 report Vermont's strengths include a highly educated population, solid drive-in tourism served by locally owned establishments, low crime and high social capital, and a highly industrial structure. Weaknesses include land-use laws that hinder development, high business costs, and lack of population growth. Major employment industries include education and health services, government, and retail trade. Major employers in the area include The University of Vermont Medical Center, University of Vermont, Vermont Wood Manufacturers Association, and Global Foundries.

According to the BLS, the non-seasonally adjusted unemployment rate for Vermont was 3.5 percent in January 2022, decreased to 2.2 percent in December 2023 and increased slightly to 2.5 percent in December 2024. The national unemployment rate was 3.8 percent in December 2024.

Community Contacts

A review was conducted of one community contact and three community and housing needs assessments completed during the evaluation period with organizations located throughout the area. The contacts focus on areas such as affordable housing, community and economic development, and community services. Contacts noted that Bennington is the largest town in southern Vermont and has the greatest concentration of businesses and employment opportunities in the region. Southwestern Vermont Medical Center is the town's largest employer. The area is also home to several higher education institutions including Vermont Technical College, Vermont Community College, and Bennington College. Many of the towns in the region have seen population declines in recent years. This has led to workforce shortages and in many cases has impacted the continued vitality of some communities. Many communities lack public water and/or wastewater systems. Bennington's housing stock is dated, and many properties need some degree of rehabilitation, including extensive weatherization improvements. However, many homeowners lack the resources to undertake significant improvements. There is some demand for new housing, but the pace of development has been slow. Bennington is seeing growth in seasonal housing, which reduces availability for year-round housing. Housing affordability is a significant concern and many households are housing-cost burdened. Quality rental units are in short supply. There is a need for both independent as well as assisted living facilities for seniors. Other identified needs include:

- Affordable housing
- Access to transportation services
- Access to healthy food
- Funding to assist low-income households with energy costs
- Programs for households facing homelessness
- Education and training programs for skilled trades
- Technical assistance for small and micro-businesses

Scope of Evaluation in Vermont

Examiners conducted a full-scope review of the VT Non-MSA AA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at the overall conclusion as they represented the majority of lending in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VERMONT

LENDING TEST

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

The bank's performance in the limited-scope AA had a significantly positive impact and elevated the overall state of Vermont rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the VT Non-MSA was good.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							**2022-2024**
Number of Loans							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
VT Non-MSA	466	131	0	0	597	43.17	48.4
Burlington CSA	538	246	0	2	786	56.83	51.6
Total	1004	377	0	2	1,383	100	100
Dollar Volume of Loans ($000s)							
Assessment Area	**Home Mortgage**	**Small Business**	**Small Farm**	**Community Development**	**Total**	**% Rating Area Loans**	**% Rating Area Deposits**
VT Non-MSA	87,505	3,212	0	0	90,717	39.00	48.4
Burlington CSA	119,655	10,288	0	12,000	141,943	61.00	51.6
Total	207,160	13,500	0	12,000	232,660	100	100
Source: 1/1/2022 - 12/31/2024 Bank Data. *Due to rounding, totals may not equal 100.0%*							

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, CBNA ranked fourth out of 12 FDIC-insured depository institutions (top 34 percent) with a 10.8 percent deposit market share.

For home mortgage loans, the bank's market share of 3.8 percent ranked sixth out of 174 lenders (top 4 percent). The top three lenders were Eastrise Federal Credit Union with 9.3 percent market share, Rocket Mortgage with 8.3 percent market share, and 802 Credit Union with 6.0 percent market share.

For small loans to businesses, the bank's market share of .05 percent ranked 26th out of 74 lenders (top 36 percent). The top three lenders were American Express National Bank with 24.1 percent market share, JPMorgan Chase Bank, NA with 18.1 percent market share, and Citibank, NA with 11.2 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. Examiners also considered any relevant performance context information.

During the evaluation period, the VT Non-MSA, consisting of 42 census tracts, had no low-income geographies and four moderate-income geographies, representing 9.52 percent of the area. Our analysis for VT Non-MSA focused on the bank's performance in these moderate-income geographies.

Home Mortgage Loans

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

<u>VT Non-MSA AA</u>

The geographic distribution of home mortgage loans was excellent.

		Low-Income Tracts			**Moderate-Income Tracts**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2024	115	0	0.00	0.00	9	7.83	8.56
HELOC							
2022-2024	302	0	0.00	0.00	29	9.60	6.47

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

There are no low-income geographies in the VT Non-MSA.

The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

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

<u>VT Non-MSA AA</u>

The geographic distribution of small loans to businesses was poor.

There are no low-income geographies in VT Non-MSA.

The percentage of small loans to businesses originated or purchased in moderate-income geographies was well below the percentage of businesses located in those geographies and was below the aggregate percentage of all reporting lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in the full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in the full-scope AAs reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. Examiners also considered any relevant performance context information.

Home Mortgage Loans

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

VT Non-MSA

The distribution of home mortgage loans among individuals of different income levels was excellent.

Based on housing affordability calculations, discussed above, homeownership in the AA is not affordable for low- and moderate-income borrowers; therefore, more emphasis was given to the bank's performance compared to other lenders in the AA.

		Low-Income Borrowers			**Moderate-Income Borrowers**		
	Total Bank Loans	# of Bank Loans	% Bank Loans	% Aggregate	# of Bank Loans	% Bank Loans	% Aggregate
Closed-End Loans							
2022-2024	115	8	6.96	6.06%	22	19.13	17.67
HELOC							
2022-2024	302	36	11.92	10.84	56	18.54	17.80

Source: 1/1/2022-12/31/2024 Bank Data and HMDA Aggregate Data

The percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA but exceeded the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders. The bank's performance with open-end HELOCs was consistent with its overall home mortgage lending performance.

Small Loans to Businesses

Refer to Table 10 in the state of Vermont section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

VT Non-MSA

The distribution of loans to businesses of different sizes was excellent.

The percentage of loans to small businesses originated or purchased exceeded both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders.

Community Development Lending

The institution had made few, if any CD loans. The bank did not originate or purchase any CD loans in the VT Non-MSA during the evaluation period. This had a negative impact on the Lending Test. CD lending in the limited-scope AA, however, had a significantly positive impact on the Lending Test conclusion.

Refer to Table 3 in the Lending Activity section for the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

As shown in the table below, the bank originated or purchased 70 loans under its flexible lending programs totaling $14.3 million. Refer to the Scope of the Evaluation section for additional details regarding the programs.

Flexible Loan Program	Number of Loans	Dollar Amount ($000s)
FHA	3	$754
FHLMC	10	$2,129
FNMA	51	$10,761
FNMA Home Ready	2	$229
Goal Builder HELOC	2	$50
VA	2	$354
Total	70	$14,277

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 7 through 14 in the state of Vermont section of appendix D for the facts and data that support the limited-scope conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Burlington CSA was stronger than the bank's overall performance under the Lending Test in the full-scope area. The stronger performance of the Burlington CSA was due to the bank being a leader in CD lending. The bank's performance in the limited-scope AA had a significantly positive impact and elevated the overall state of Vermont rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Vermont is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the VT Non-MSA AA was excellent.

Table 4: Qualified Investments*

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
VT Non-MSA	17	4,737	3	8,231	20	44.4	12,968	31.8	3	3132
Burlington CSA	8	6,748	17	21,062	25	55.6	27,810	68.2	7	10,102
Total	25	11,485	20	29,263	45	100	40,778	100.0	10	13,234

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The institution had an excellent level of qualified investments, including grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The dollar volume of current and prior period investments (excluding unfunded commitments) represented 20.1 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to credit and CD needs. The institution occasionally used innovative and/or complex investments to support CD initiatives. By dollar volume during the current period, 100 percent of total investments and grants supported affordable housing efforts.

The following are examples of qualified investments in the AA:

- The bank made a $4.9 million LIHTC investment that supported the new construction of 36 affordable housing units in Vermont, all for households earning below 80 percent of the AMI. This investment was responsive because it provided deeply affordable units, including eight units supported by project-based vouchers for individuals experiencing homelessness, and it utilized LIHTCs.

- The bank made a $3.4 million LIHTC investment that supported the new construction of an 18-unit affordable housing development in Vermont, all for households earning below 80 percent of the AMI.

This investment was complex because it utilized a LIHTC and incorporated project-based vouchers to assist formerly homeless individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Burlington CSA was consistent with the bank's overall performance in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in Vermont is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the VT Non-MSA AA was good.

Retail Banking Services

Table 5: Distribution of Branch Delivery Systems														**2024**
	Deposits	**Branches**							**Population**					
Assessment Area	**% of Rated Area Deposits in AA**	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income of Geographies (%)**					**% of Population within Each Geography**					
				Low	**Mod**	**Mid**	**Upp**	**NA**	**Low**	**Mod**	**Mid**	**Upp**	**NA**	
VT Non-MSA	48.4	5	45.5	0.0	20.0	60.0	20.0	0.0	0.0	11.2	69.8	22.4	0.0	
Burlington CSA	51.6	6	54.5	0.0	16.7	50.0	33.3	0.0	1.9	16.5	57.0	23.8	0.8	
Total	100.0	11	100.0	0.0	18.2	54.6	27.3	0.0	1.2	14.4	60.8	22.8	0.9	
Source: FFIEC File - 2020 Census 1/1/2022-12/31/2024 Bank Data Due to rounding, totals may not equal 100.0%														

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. There were no low-income census tracts in the AA.

Examiners further considered one middle-income branch located within one-quarter mile of a moderate-income geography, where the percentage of usage exceeded the percentage of the populations in the AA. This branch improved accessibility and further supported the retail Service Test conclusion.

The bank had several ADS including ATMs, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and were positively considered in the service delivery systems conclusion. The bank had six ATMs in the AA, all of which were deposit-taking. Per data provided by the bank, as of the end of the evaluation period, 68.7 percent of retail customer households in moderate-income geographies used online and mobile banking services. This was an increase of 19.4 percent of retail customer households in moderate-income geographies, from the start of the evaluation period.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
VT Non-MSA	0	0	0	0	0	0	0
Burlington CSA	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0
1/1/2022-12/31/2024 Bank Data.							

* The table presents the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank maintained standard business hours and offered traditional banking products and services for all traditional branch locations in the AA. CBNA maintained standard branch hours from 9:00 a.m. to 4:00 p.m. Monday through Friday and Saturdays from 9:00 a.m. to 12:00 p.m. for all five traditional standalone branch locations in the AA. The one in-store branch location operated from 10:00 a.m. to 5:00 p.m. Monday through Friday and Saturdays from 10:00 a.m. to 3:00 p.m.

Community Development Services

The institution provided few, if any, CD services.

During the evaluation period, a bank employee provided two hours of qualified CD service activities to one organization within this AA.

Service activity examples during the evaluation period include:

- A bank employee provided two hours teaching a first-time homebuyer workshop at an organization that supports LMI individuals. The organization strengthens the communities of Southeast Vermont through the development and stewardship of permanent affordable housing and through ongoing support and advocacy for its residents.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Service Test in the Burlington CSA was consistent with the bank’s overall performance under the Service Test in the full-scope area.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 through 12/31/2024			
Bank Products Reviewed:	Home mortgage, small business loans, community development loans, qualified investments, and community development services			
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**		
CitizensOne Community Development Corporation	Subsidiary	CD Investments		
Citizens Charitable Foundation	Subsidiary	CD Donations and Grants		
List of Assessment Areas and Type of Examination				
Rating and Assessment Areas	**Type of Exam**	**Other Information**		
MMSA				
2022-2023: Boston-Worcester-Providence, MA-RI-NH-CT CSA	Full-Scope	Barnstable Town, MA MSA	MA	Barnstable
		Boston-Cambridge-Newtown, MA-NH MSA	MA-NH	**MA**: Norfolk, Plymouth, Suffolk, Essex, Middlesex. **NH**: Rockingham, Strafford
		Concord, NH Micropolitan Statistical Area	NH	Merrimack
		Laconia, NH Micropolitan Statistical Area	NH	Belknap
		Manchester-Nashua, NH MSA	NH	Hillsborough
		Providence-Warwick, RI-MA MSA	RI-MA	**MA**: Bristol **RI**: Bristol, Kent, Newport, Providence, Washington
		Worcester, MA-CT MSA	MA-CT	**CT**: Windham **MA**: Worcester
2024: Boston-Worcester-Providence, MA-RI-NH CSA	Full-Scope	Barnstable Town, MA MSA	MA	Barnstable

		Boston-Cambridge-Newtown, MA-NH MSA	MA-NH	**MA**: Norfolk, Plymouth, Suffolk, Essex, Middlesex. **NH**: Rockingham, Strafford
		Concord, NH Micropolitan Statistical Area	NH	Merrimack
		Laconia, NH Micropolitan Statistical Area	NH	Belknap
		Manchester-Nashua, NH MSA	NH	Hillsborough
		Providence-Warwick, RI-MA MSA	RI-MA	**MA**: Bristol **RI**: Bristol, Kent, Newport, Providence, Washington
		Worcester, MA-CT MSA	MA	Worcester
2022-2023: New York-Newark, NY-NJ-CT-PA CSA	Full-Scope	Bridgeport-Stamford-Norwalk, CT MSA	CT	Fairfield
		East Stroudsburg, PA MSA	PA	Monroe
		Kingston, NY MSA	NY	Ulster
		New Haven-Milford, CT MSA	CT	New Haven
		New York-Newark-Jersey City, NY-NJ-PA MSA	NY-NJ-PA	**NY**: Bronx, Nassau, New York, Suffolk, Kings, Queens, Richmond, Westchester **NJ**: Bergen, Essex, Hudson, Hunterdon, Middlesex, Monmouth, Morris, Ocean, Passaic, Somerset, Union **PA**: Pike
		Poughkeepsie-Newburgh-Middletown, NY MSA	NY	Dutchess, Orange
		Trenton-Princeton, NJ MSA	NJ	Mercer
2024: New York-Newark, NY-NJ-CT-PA CSA	Full-Scope	Bridgeport-Stamford-Danbury, CT MSA	CT	Western Connecticut Planning Region
		Hemlock Farms, PA Micropolitan Statistical Area	PA	Pike
		Kingston, NY MSA	NY	Ulster
		Kiryas Joel-Poughkeepsie-Newburgh, NY MSA	NY	Dutchess, Orange
		New York-Newark-Jersey City, NY-NJ MSA	NY-NJ	**NY**: Bronx, Nassau, New York, Suffolk, Kings,

				Queens, Richmond, Westchester **NJ**: Bergen, Essex, Hudson, Hunterdon, Middlesex, Monmouth, Morris, Ocean, Passaic, Somerset, Union
		Trenton-Princeton, NJ MSA	NJ	Mercer
Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA	Full-Scope	Dover, DE MSA	DE	Kent
		Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Metropolitan Statistical	NJ-PA-DE	**DE:** New Castle **NJ**: Burlington, Camden, Gloucester **PA**: Berks, Bucks, Chester, Delaware, Montgomery, Philadelphia
Washington-Arlington-Alexandria, DC-VA-MD-WV MMSA	Full-Scope	Arlington-Alexandria-Reston, VA-WV Metropolitan Division	VA	Arlington, Fairfax, Alexandria City
		Frederick-Gaithersburg-Bethesda, MD Metropolitan Division	MD	Montgomery
		Washington, DC-MD Metropolitan Division	DC	District of Columbia
2022-2023: Youngstown-Warren, OH-PA CSA	Full-Scope	Salem, OH Micropolitan Statistical Area	OH	Columbiana
		Youngstown-Warren-Boardman, OH-PA MSA	OH-PA	**OH**: Mahoning, Trumbull **PA**: Mercer
States				
State of Connecticut				
2022-2023: Hartford-East Hartford, CT CSA	Full-Scope	Hartford-East Hartford-Middletown, CT MSA	CT	Hartford, Middlesex
		Norwich-New London, CT MSA	CT	New London
2024: New Haven-Hartford-Waterbury, CT CSA	Full-Scope	Hartford-West Hartford-East Hartford, CT MSA	CT	Capitol Planning Region and Lower Connecticut River Valley Planning Region
		New Haven, CT MSA	CT	South Central Connecticut Planning Region
		Norwich-New London-Willimantic, CT MSA	CT	Southeastern Connecticut Planning Region
		Putnam, CT Micropolitan Statistical Area	CT	Northeastern Connecticut Planning Regions
State of Delaware				

2022-2023: Salisbury, MD-DE MSA	Full-Scope	Salisbury, MD-DE MSA	DE	Sussex
2024: DE Non-MSA AA	Full-Scope	DE Non-MSA	DE	Sussex
State of Florida				
Miami-Fort Lauderdale-West Palm Beach, FL MSA	Full-Scope	Fort Lauderdale-Pompano Beach-Sunrise, FL Metropolitan Division	FL	Broward
		Miami-Miami Beach-Kendall, FL Metropolitan Division	FL	Miami-Dade
		West Palm Beach-Boca Raton-Delray Beach, FL Metropolitan Division	FL	Palm Beach
Naples-Marco Island, FL MSA	Limited-Scope	Naples-Marco Island, FL MSA	FL	Collier
State of Massachusetts				
2022-2023: Springfield, MA MSA	Full-Scope	Springfield, MA Metropolitan Statistical Area	MA	Franklin, Hampden, Hampshire
2024: Springfield-Amherst Town-Northampton, MA CSA	Full-Scope	Amherst Town-Northampton, MA MSA	MA	Hampshire
		Greenfield, MA Micropolitan Statistical Area	MA	Franklin
		Springfield, MA Metropolitan Statistical Area	MA	Hampden
Pittsfield, MA MSA	Limited-Scope	Pittsfield, MA MSA	MA	Berkshire
MA Non-MSA	Limited-Scope	MA Non-MSA	MA	Nantucket
State of Michigan				
Detroit-Warren-Ann Arbor, MI CSA	Full-Scope	Ann Arbor, MI MSA	MI	Washtenaw
		Detroit-Warren-Dearborn, MI Metropolitan Statistical Area	MI	Livingston, Macomb, Oakland, Wayne
Saginaw MI MSA	Limited-Scope	Saginaw MI MSA	MI	Saginaw
2022-2023: Lansing-East Lansing, MI MSA	Limited-Scope	Lansing-East Lansing, MI MSA	MI	Shiawassee
2024: MI Non-MSA	Limited-Scope	MI Non-MSA	MI	Shiawassee
State of New Hampshire				
NH Non-MSA	Ful-Scope	NH Non-MSA	NH	Carroll, Cheshire, Coos, Grafton, Sullivan
State of New York				
Albany-Schenectady, NY CSA	Full-Scope	Albany-Schenectady-Troy, NY MSA	NY	Albany, Rensselaer, Saratoga, Schenectady
		Glens Falls, NY MSA	NY	Warren
		Gloversville, NY Micropolitan Statistical Area	NY	Fulton
Rochester, NY MSA	Full-Scope	Rochester, NY MSA	NY	Livingston, Monroe, Ontario, Wayne

Binghamton, NY MSA	Limited-Scope	Binghamton, NY MSA	NY	Broome
Buffalo-Cheektowaga, NY MSA	Limited-Scope	Buffalo-Cheektowaga, NY MSA	NY	Erie, Niagara
Ithaca, NY MSA	Limited-Scope	Ithaca, NY MSA	NY	Tompkins
Syracuse, NY MSA	Limited-Scope	Syracuse, NY MSA	NY	Madison, Onondaga
Utica-Rome, NY MSA	Limited-Scope	Utica-Rome, NY MSA	NY	Oneida
State of Ohio				
Cleveland-Akron-Canton, OH CSA	Full-Scope	Akron, OH MSA	OH	Summit
		Canton-Massillon, OH MSA	OH	Stark
		Cleveland, OH MSA	OH	Cuyahoga, Geauga, Lake, Lorain, Medina
Toledo, OH MSA	Limited-Scope	Toledo, OH MSA	OH	Lucas, Wood
2024: Youngstown-Warren-Salem, OH CSA	Limited-Scope	Salem, OH Micropolitan Statistical Area	OH	Columbiana
		Youngstown-Warren, OH-PA MSA	OH	Mahoning, Trumbull
OH Non-MSA	Limited-Scope	OH Non-MSA	OH	Scioto
State of PA				
2022-2023: Pittsburgh-New Castle-Weirton, PA-OH-WV CSA	Full-Scope	Indiana, PA Micropolitan Statistical Area	PA	Indiana
		New Castle, PA Micropolitan Statistical Area	PA	Lawrence
		Pittsburgh, PA MSA	PA	Allegheny, Armstrong, Beaver, Butler, Washington, Westmoreland
2024: Pittsburgh-Weirton-Steubenville, PA-OH-WV CSA	Full-Scope	Hermitage, PA Micropolitan Statistical Area	PA	Mercer
		Indiana, PA Micropolitan Statistical Area	PA	Indiana
		Pittsburgh, PA Metropolitan Statistical Area	PA	Allegheny, Armstrong, Beaver, Butler, Lawrence, Washington, Westmoreland
Altoona, PA MSA	Limited-Scope	Altoona, PA MSA	PA	Blair
Erie-Meadville, PA CSA	Limited-Scope	Erie, PA MSA	PA	Erie
		Meadville, PA Micropolitan Statistical Area	PA	Crawford
Harrisburg-York-Lebanon, PA CSA	Limited-Scope	Harrisburg-Carlisle, PA MSA	PA	Cumberland, Dauphin
		York-Hanover, PA MSA	PA	York

Lancaster, PA MSA	Limited-Scope	Lancaster, PA MSA	PA	Lancaster
Scranton--Wilkes-Barre, PA MSA	Limited-Scope	Scranton-Wilkes-Barre, PA MSA	PA	Lackawanna, Luzerne
State College, PA MSA	Limited-Scope	State College, PA MSA	PA	Centre
PA Non-MSA	Limited-Scope	PA Non-MSA	PA	Monroe, Venango
State of Vermont				
VT Non-MSA	Full-Scope	VT Non-MSA	VT	Addison, Bennington, Rutland, Windham
Burlington-South Burlington-Barre, VT CSA	Limited-Scope	Barre, VT Micropolitan Statistical Area	VT	Washington
		Burlington-South Burlington, VT MSA	VT	Chittenden, Franklin,

Appendix B: Summary of MMSA and State Ratings

RATINGS				
Overall Bank	**Lending Test Rating***	**Investment Test Rating**	**Service Test Rating**	**Overall Bank/State/ Multistate Rating**
Citizens Bank, NA	Outstanding	Outstanding	Outstanding	Outstanding
MMSA or State:				
Boston CSA	Outstanding	Outstanding	Outstanding	Outstanding
New York CSA	Outstanding	Outstanding	Outstanding	Outstanding
Philadelphia CSA	Outstanding	Outstanding	Outstanding	Outstanding
Washington DC MMSA	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Youngstown CSA	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Connecticut	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Delaware	Outstanding	Outstanding	High Satisfactory	Outstanding
Florida	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Massachusetts	Outstanding	Outstanding	High Satisfactory	Outstanding
Michigan	Outstanding	Outstanding	Outstanding	Outstanding
New Hampshire	Outstanding	Outstanding	High Satisfactory	Outstanding
New York	Outstanding	Outstanding	Outstanding	Outstanding
Ohio	Outstanding	Outstanding	High Satisfactory	Outstanding
Pennsylvania	Outstanding	Outstanding	Outstanding	Outstanding
Vermont	Outstanding	Outstanding	High Satisfactory	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

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

Boston CSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts	
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
2022-2023 Boston CSA	34,339	7,703,706	100.00	429,458	3.13	2.73	4.29	14.01	11.47	15.09	45.40	44.50	44.03	37.15	41.10	36.16	0.31	0.21	0.43
Total	**34,339**	**7,703,706**	**100.00**	**429,458**	**3.13**	**2.73**	**4.29**	**14.01**	**11.47**	**15.09**	**45.40**	**44.50**	**44.03**	**37.15**	**41.10**	**36.16**	**0.31**	**0.21**	**0.43**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts	
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Boston CSA	12,198	3,145,720	100.00	173,848	3.11	3.12	4.38	13.99	12.01	15.56	45.25	43.42	45.14	37.34	41.25	34.56	0.31	0.20	0.35
Total	**12,198**	**3,145,720**	**100.00**	**173,848**	**3.11**	**3.12**	**4.38**	**13.99**	**12.01**	**15.56**	**45.25**	**43.42**	**45.14**	**37.34**	**41.25**	**34.56**	**0.31**	**0.20**	**0.35**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers	
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022-2023 Boston CSA	34,339	7,703,706	100.00	429,458	22.08	10.31	7.05	16.81	22.73	18.91	20.51	26.59	23.63	40.60	39.83	36.35	--	0.54	14.06
Total	**34,339**	**7,703,706**	**100.00**	**429,458**	**22.08**	**10.31**	**7.05**	**16.81**	**22.73**	**18.91**	**20.51**	**26.59**	**23.63**	**40.60**	**39.83**	**36.35**	**--**	**0.54**	**14.06**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Boston CSA	12,198	3,145,720	100.00	173,848	22.13	10.30	5.71	16.75	22.21	16.61	20.52	25.96	23.90	40.59	41.00	38.77	--	0.54	15.02
Total	**12,198**	**3,145,720**	**100.00**	**173,848**	**22.13**	**10.30**	**5.71**	**16.75**	**22.21**	**16.61**	**20.52**	**25.96**	**23.90**	**40.59**	**41.00**	**38.77**	**--**	**0.54**	**15.02**

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 Boston CSA	4,871	378,309	100.00	439,588	6.89	6.45	6.26	15.61	17.51	15.87	39.84	41.72	40.77	36.76	33.57	36.26	0.89	0.76	0.84
Total	**4,871**	**378,309**	**100.00**	**439,588**	**6.89**	**6.45**	**6.26**	**15.61**	**17.51**	**15.87**	**39.84**	**41.72**	**40.77**	**36.76**	**33.57**	**36.26**	**0.89**	**0.76**	**0.84**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Boston CSA	5,646	143,711	100.00	234,787	6.87	5.01	6.16	15.58	15.80	15.90	39.92	43.64	40.30	36.77	34.86	36.79	0.86	0.69	0.85
Total	**5,646**	**143,711**	**100.00**	**234,787**	**6.87**	**5.01**	**6.16**	**15.58**	**15.80**	**15.90**	**39.92**	**43.64**	**40.30**	**36.77**	**34.86**	**36.79**	**0.86**	**0.69**	**0.85**

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022-2023 Boston CSA	4,871	378,309	100.00	439,588	86.51	70.91	51.06	4.87	27.59	8.62	1.50
Total	**4,871**	**378,309**	**100.00**	**439,588**	**86.51**	**70.91**	**51.06**	**4.87**	**27.59**	**8.62**	**1.50**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Boston CSA	5,646	143,711	100.00	234,787	85.98	84.22	52.36	4.81	14.74	9.21	1.04
Total	**5,646**	**143,711**	**100.00**	**234,787**	**85.98**	**84.22**	**52.36**	**4.81**	**14.74**	**9.21**	**1.04**

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

New York CSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
2022-2023 New York CSA	24,820	9,594,229	100.00	589,319	3.47	3.05	4.67	14.44	12.21	15.60	35.45	30.14	33.51	46.26	54.15	45.80	0.37	0.44	0.39
Total	**24,820**	**9,594,229**	**100.00**	**589,319**	**3.47**	**3.05**	**4.67**	**14.44**	**12.21**	**15.60**	**35.45**	**30.14**	**33.51**	**46.26**	**54.15**	**45.80**	**0.37**	**0.44**	**0.39**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
New York CSA	11,582	5,075,867	100.00	261,961	3.07	3.66	4.59	14.52	13.54	16.46	39.23	33.34	38.20	42.79	49.02	40.34	0.39	0.45	0.38
Total	**11,582**	**5,075,867**	**100.00**	**261,961**	**3.07**	**3.66**	**4.59**	**14.52**	**13.54**	**16.46**	**39.23**	**33.34**	**38.20**	**42.79**	**49.02**	**40.34**	**0.39**	**0.45**	**0.38**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022-2023 New York CSA	24,820	9,594,229	100.00	589,319	24.87	4.91	4.97	15.66	13.44	13.80	17.52	19.11	19.72	41.95	61.91	43.71	--	0.62	17.80
Total	**24,820**	**9,594,229**	**100.00**	**589,319**	**24.87**	**4.91**	**4.97**	**15.66**	**13.44**	**13.80**	**17.52**	**19.11**	**19.72**	**41.95**	**61.91**	**43.71**	**--**	**0.62**	**17.80**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
New York CSA	11,582	5,075,867	100.00	261,961	24.41	3.79	4.86	15.88	12.70	12.14	18.02	20.18	20.42	41.69	62.80	45.86	--	0.53	16.72
Total	**11,582**	**5,075,867**	**100.00**	**261,961**	**24.41**	**3.79**	**4.86**	**15.88**	**12.70**	**12.14**	**18.02**	**20.18**	**20.42**	**41.69**	**62.80**	**45.86**	**--**	**0.53**	**16.72**

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022 - 2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 New York CSA	2,784	262,699	100.00	1,436,120	8.53	9.16	8.02	17.31	17.92	17.36	28.27	32.51	29.30	43.46	37.72	43.12	2.43	2.69	2.20
Total	**2,784**	**262,699**	**100.00**	**1,436,120**	**8.53**	**9.16**	**8.02**	**17.31**	**17.92**	**17.36**	**28.27**	**32.51**	**29.30**	**43.46**	**37.72**	**43.12**	**2.43**	**2.69**	**2.20**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2024**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
New York CSA	1,635	122,103	100.00	849,352	7.73	9.85	8.13	17.48	19.20	17.25	31.45	35.23	31.51	41.09	34.01	41.08	2.24	1.71	2.02
Total	**1,635**	**122,103**	**100.00**	849,352	**7.73**	**9.85**	8.13	**17.48**	**19.20**	**17.25**	**31.45**	**35.23**	**31.51**	**41.09**	**34.01**	**41.08**	**2.24**	**1.71**	**2.02**

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022 - 2023**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022-2023 New York CSA	2,784	262,699	100.00	1,436,120	90.21	68.93	52.17	4.05	30.32	5.74	0.75
Total	**2,784**	**262,699**	**100.00**	**1,436,120**	**90.21**	**68.93**	**52.17**	**4.05**	**30.32**	**5.74**	**0.75**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
New York CSA	1,635	122,103	100.00	850,642	89.63	61.77	53.93	3.82	35.72	6.55	2.51
Total	**1,635**	**122,103**	**100.00**	**850,642**	**89.63**	**61.77**	**53.93**	**3.82**	**35.72**	**6.55**	**2.51**

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

Philadelphia CSA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts	
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
2022-2023 Philadelphia CSA	18,844	3,799,893	100.00	351,062	3.82	2.40	3.51	17.95	14.89	19.14	42.61	39.83	41.77	35.03	42.44	34.99	0.59	0.45	0.56
Total	**18,844**	**3,799,893**	**100.00**	**351,062**	**3.82**	**2.40**	**3.51**	**17.95**	**14.89**	**19.14**	**42.61**	**39.83**	**41.77**	**35.03**	**42.44**	**34.99**	**0.59**	**0.45**	**0.56**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts	
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Philadelphia CSA	6,344	1,295,148	100.00	154,874	3.82	2.60	3.90	17.95	15.34	20.05	42.61	38.45	41.56	35.03	43.14	33.77	0.59	0.47	0.70
Total	**6,344**	**1,295,148**	**100.00**	**154,874**	**3.82**	**2.60**	**3.90**	**17.95**	**15.34**	**20.05**	**42.61**	**38.45**	**41.56**	**35.03**	**43.14**	**33.77**	**0.59**	**0.47**	**0.70**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
2022-2023 Philadelphia CSA	18,844	3,799,893	100.00	351,062	21.61	13.09	9.10	17.32	23.24	20.04	20.25	24.81	22.17	40.83	38.38	32.14	--	0.48	16.55	
Total	**18,844**	**3,799,893**	**100.00**	**351,062**	**21.61**	**13.09**	**9.10**	**17.32**	**23.24**	**20.04**	**20.25**	**24.81**	**22.17**	**40.83**	**38.38**	**32.14**	**--**	**0.48**	**16.55**	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Philadelphia CSA	6,344	1,295,148	100.00	154,874	21.61	14.03	8.00	17.32	22.98	18.76	20.25	23.41	21.82	40.83	39.20	32.00	--	0.38	19.42	
Total	**6,344**	**1,295,148**	**100.00**	**154,874**	**21.61**	**14.03**	**8.00**	**17.32**	**22.98**	**18.76**	**20.25**	**23.41**	**21.82**	**40.83**	**39.20**	**32.00**	**--**	**0.38**	**19.42**	

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	
2022-2023 Philadelphia CSA	2,795	197,594	100.00	337,518	4.79	4.62	3.57	19.24	20.57	18.84	36.74	37.85	38.13	37.29	35.46	37.83	1.93	1.50	1.62	
Total	**2,795**	**197,594**	**100.00**	**337,518**	**4.79**	**4.62**	**3.57**	**19.24**	**20.57**	**18.84**	**36.74**	**37.85**	**38.13**	**37.29**	**35.46**	**37.83**	**1.93**	**1.50**	**1.62**	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			**2024**
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
Philadelphia CSA	2,451	77,754	100.00	176,864	4.95	4.24	3.43	19.71	17.54	18.38	36.71	37.98	37.77	36.68	38.56	38.67	1.95	1.67	1.75
Total	**2,451**	**77,754**	**100.00**	**176,864**	**4.95**	**4.24**	**3.43**	**19.71**	**17.54**	**18.38**	**36.71**	**37.98**	**37.77**	**36.68**	**38.56**	**38.67**	**1.95**	**1.67**	**1.75**

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022-2023 Philadelphia CSA BE	2,795	197,594	100.00	337,518	89.20	72.13	51.06	3.81	26.62	6.99	1.25
Total	**2,795**	**197,594**	**100.00**	**337,518**	**89.20**	**72.13**	**51.06**	**3.81**	**26.62**	**6.99**	**1.25**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Philadelphia CSA	2,451	77,754	100.00	176,684	89.25	81.64	51.93	3.57	16.65	7.18	1.71
Total	**2,451**	**77,754**	**100.00**	**--**	**89.25**	**81.64**	**--**	**3.57**	**16.65**	**7.18**	**1.71**

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

Washington DC

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
2022 - 2023 Washington DC MSA	2,010	898,010	100.00	142,571	4.32	3.63	5.07	13.52	9.60	14.26	30.30	26.37	30.74	51.57	60.10	49.61	0.30	0.30	0.32
Total	**2,010**	**898,010**	**100.00**	**142,571**	**4.32**	**3.63**	**5.07**	**13.52**	**9.60**	**14.26**	**30.30**	**26.37**	**30.74**	**51.57**	**60.10**	**49.61**	**0.30**	**0.30**	**0.32**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Washington DC MSA	738	352,899	100.00	56,853	4.51	5.56	5.46	14.62	14.91	15.53	31.86	32.11	33.93	48.71	47.43	44.84	0.30	--	0.22
Total	**738**	**352,899**	**100.00**	**56,853**	**4.51**	**5.56**	**5.46**	**14.62**	**14.91**	**15.53**	**31.86**	**32.11**	**33.93**	**48.71**	**47.43**	**44.84**	**0.30**	**--**	**0.22**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022 - 2023 Washington DC MSA	2,010	898,010	100.00	142,571	20.89	7.31	7.24	14.71	16.12	16.89	18.28	22.64	21.02	46.13	53.53	40.88	--	0.40	13.97
Total	**2,010**	**898,010**	**100.00**	**142,571**	**20.89**	**7.31**	**7.24**	**14.71**	**16.12**	**16.89**	**18.28**	**22.64**	**21.02**	**46.13**	**53.53**	**40.88**	**--**	**0.40**	**13.97**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Washington DC MSA	738	352,899	100.00	56,853	21.06	7.59	6.81	15.04	19.51	15.46	18.66	22.49	21.30	45.25	50.00	39.42	--	0.41	17.01
Total	**738**	**352,899**	**100.00**	**56,853**	**21.06**	**7.59**	**6.81**	**15.04**	**19.51**	**15.46**	**18.66**	**22.49**	**21.30**	**45.25**	**50.00**	**39.42**	**--**	**0.41**	**17.01**

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022 - 2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 Washington DC MSA	197	9,937	100.00	199,280	5.15	5.58	4.93	15.46	20.30	15.32	30.20	37.06	31.51	48.02	37.06	47.71	1.18	--	0.53
Total	**197**	**9,937**	**100.00**	**199,280**	**5.15**	**5.58**	**4.93**	**15.46**	**20.30**	**15.32**	**30.20**	**37.06**	**31.51**	**48.02**	**37.06**	**47.71**	**1.18**	**--**	**0.53**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2024**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Washington DC MSA	46	3,799	100.00	109,111	5.66	2.17	4.85	14.93	8.70	14.69	32.89	28.26	32.74	45.44	60.87	47.17	1.08	--	0.56
Total	**46**	**3,799**	**100.00**	**109,111**	**5.66**	**2.17**	**4.85**	**14.93**	**8.70**	**14.69**	**32.89**	**28.26**	**32.74**	**45.44**	**60.87**	**47.17**	**1.08**	**--**	**0.56**

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022 - 2023**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022 - 2023 Washington DC MSA	197	9,937	100.00	199,280	86.65	88.32	52.72	4.74	10.66	8.61	1.02
Total	**197**	**9,937**	**100.00**	**199,280**	**86.65**	**88.32**	**52.72**	**4.74**	**10.66**	**8.61**	**1.02**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Washington DC MSA	46	3,799	100.00	109,111	87.28	76.09	53.74	4.38	23.91	8.34	--
Total	**46**	**3,799**	**100.00**	**109,111**	**87.28**	**76.09**	**53.74**	**4.38**	**23.91**	**8.34**	**--**

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

Youngstown CSA 2022-2023

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
2022-2023 Youngstown CSA	814	90,258	100.00	31,434	3.25	1.60	1.59	14.48	8.97	12.49	56.67	57.13	57.56	25.26	32.19	28.10	0.34	0.12	0.23
Total	**814**	**90,258**	**100.00**	**31,434**	**3.25**	**1.60**	**1.59**	**14.48**	**8.97**	**12.49**	**56.67**	**57.13**	**57.56**	**25.26**	**32.19**	**28.10**	**0.34**	**0.12**	**0.23**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022-2023 Youngstown CSA	814	90,258	100.00	31,434	22.05	17.08	10.32	17.00	24.94	22.99	23.00	25.18	23.02	39.66	32.56	30.83	--	0.25	13.02
Total	**814**	**90,258**	**100.00**	**31,434**	**22.05**	17.08	**10.32**	**17.00**	**24.94**	**22.99**	**23.00**	**25.18**	**23.02**	**39.66**	**32.56**	**30.83**	**--**	**0.25**	**13.02**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 Youngstown CSA	77	6,838	100.00	20,376	5.79	5.19	4.11	15.47	12.99	11.86	48.94	48.05	53.03	30.39	33.77	30.55	0.33	--	0.46
Total	**77**	**6,838**	**100.00**	**20,376**	**5.79**	**5.19**	**4.11**	**15.47**	**12.99**	**11.86**	**48.94**	**48.05**	**53.03**	**30.39**	**33.77**	**30.55**	**0.33**	**--**	**0.46**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022-2023 Youngstown CSA	77	6,838	100.00	20,376	83.82	83.12	54.67	4.86	16.88	11.31	--
Total	**77**	**6,838**	**100.00**	**20,376**	83.82	**83.12**	**54.67**	**4.86**	**16.88**	**11.31**	**--**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Connecticut

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
2022-2023 Hartford CSA	2,863	570,781	100.00	67,055	3.39	2.79	4.91	13.00	8.98	14.42	47.56	47.52	45.99	36.02	40.67	34.60	0.03	0.03	0.06
Total	**2,863**	**570,781**	**100.00**	**67,055**	**3.39**	**2.79**	**4.91**	**13.00**	**8.98**	**14.42**	**47.56**	**47.52**	**45.99**	**36.02**	**40.67**	**34.60**	**0.03**	**0.03**	**0.06**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
New Haven CSA	1,542	304,139	100.00	45,500	3.37	2.20	4.81	12.69	10.12	14.84	44.83	41.83	43.92	39.08	45.85	36.40	0.02	--	0.03
Total	**1,542**	**304,139**	**100.00**	**45,500**	**3.37**	**2.20**	**4.81**	**12.69**	**10.12**	**14.84**	**44.83**	**41.83**	**43.92**	**39.08**	**45.85**	**36.40**	**0.02**	**--**	**0.03**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022-2023 Hartford CSA	2,863	570,781	100.00	67,055	22.74	13.52	11.14	17.28	26.58	26.71	20.60	24.84	22.56	39.38	34.59	27.58	--	0.45	12.02
Total	**2,863**	**570,781**	**100.00**	**67,055**	**22.74**	**13.52**	**11.14**	**17.28**	**26.58**	**26.71**	**20.60**	**24.84**	**22.56**	**39.38**	**34.59**	**27.58**	**--**	**0.45**	**12.02**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
New Haven CSA	1,542	304,139	100.00	45,500	22.05	10.31	8.12	17.09	24.12	24.15	20.27	25.88	23.78	40.58	38.85	29.42	--	0.84	14.54
Total	**1,542**	**304,139**	**100.00**	**45,500**	**22.05**	**10.31**	**8.12**	**17.09**	**24.12**	**24.15**	**20.27**	**25.88**	**23.78**	**40.58**	**38.85**	**29.42**	**--**	**0.84**	**14.54**

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 Hartford CSA	399	31,517	100.00	67,917	9.47	6.77	7.34	15.38	13.28	15.18	44.63	48.12	45.62	29.93	30.83	31.30	0.81	1.00	0.56
Total	**399**	**31,517**	**100.00**	**67,917**	**9.47**	**6.77**	**7.34**	**15.38**	**13.28**	**15.18**	**44.63**	**48.12**	**45.62**	**29.93**	**30.83**	**31.30**	**0.81**	**1.00**	**0.56**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
New Haven CSA	665	17,428	100.00	--	8.79	3.91	6.88	16.09	15.79	14.89	40.19	34.89	40.81	34.41	45.11	37.09	0.52	0.30	0.34
Total	**665**	**17,428**	**100.00**	**--**	**8.79**	**3.91**	**6.88**	**16.09**	**15.79**	**14.89**	**40.19**	**34.89**	**40.81**	**34.41**	**45.11**	**37.09**	**0.52**	**0.30**	**0.34**

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022-2023 Hartford CSA	399	31,517	100.00	67,917	81.82	78.45	54.48	4.15	19.30	8.73	2.26
Total	**399**	**31,517**	**100.00**	**67,917**	**81.82**	**78.45**	**54.48**	**4.15**	**19.30**	**8.73**	**2.26**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
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Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
New Haven CSA	665	17,428	100.00	53,970	87.50	80.30	54.87	4.05	17.89	8.46	1.80
Total	**665**	**17,428**	**100.00**	**53,970**	**87.50**	**80.30**	**54.87**	**4.05**	**17.89**	**8.46**	**1.80**

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

State of Delaware

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022 - 2023 Salisbury MSA	619	159,431	100.00	22,299	--	--	--	13.65	12.28	11.22	60.09	56.87	58.71	25.57	30.69	29.85	0.69	0.16	0.20
Total	**619**	**159,431**	**100.00**	**22,299**	**--**	**--**	**--**	**13.65**	**12.28**	**11.22**	**60.09**	**56.87**	**58.71**	**25.57**	**30.69**	**29.85**	**0.69**	**0.16**	**0.20**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
DE Non-MSA	222	41,695	100.00	10,335	--	--	--	13.65	13.51	14.00	60.89	54.05	61.66	24.77	32.43	24.17	0.69	--	0.15
Total	**222**	**41,695**	**100.00**	**10,335**	**--**	**--**	**--**	**13.65**	**13.51**	**14.00**	**60.89**	**54.05**	**61.66**	**24.77**	**32.43**	**24.17**	**0.69**	**--**	**0.15**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
2022 - 2023 Salisbury MSA	619	159,431	100.00	22,299	18.26	10.02	5.43	19.79	17.77	14.02	20.50	24.07	18.20	41.45	47.50	46.72	--	0.65	15.63
Total	**619**	**159,431**	**100.00**	**22,299**	**18.26**	**10.02**	**5.43**	**19.79**	**17.77**	**14.02**	**20.50**	**24.07**	**18.20**	**41.45**	**47.50**	**46.72**	**--**	**0.65**	**15.63**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																					2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**				
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**		
DE Non-MSA	222	41,695	100.00	10,335	18.82	10.36	6.60	20.03	22.07	16.80	20.76	26.58	17.82	40.38	40.54	38.12	--	0.45	20.66		
Total	**222**	**41,695**	**100.00**	**10,335**	**18.82**	**10.36**	**6.60**	**20.03**	**22.07**	**16.80**	**20.76**	**26.58**	**17.82**	**40.38**	**40.54**	**38.12**	**--**	**0.45**	**20.66**		

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2022 - 2023 Salisbury MSA	79	3,662	100.00	12,117	--	--	--	21.30	11.39	14.18	57.02	65.82	59.92	25.71	22.78	25.36	0.44	--	0.54
Total	**79**	**3,662**	**100.00**	**12,117**	**--**	**--**	**--**	**21.30**	**11.39**	**14.18**	**57.02**	**65.82**	**59.92**	**25.71**	**22.78**	**25.36**	**0.44**	**--**	**0.54**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
DE Non-MSA	54	1,052	100.00	6,654	--	--	--	17.02	14.81	12.61	57.88	62.96	62.25	24.70	22.22	24.69	0.40	--	0.45
Total	**54**	**1,052**	**100.00**	**6,654**	**--**	**--**	**--**	**17.02**	**14.81**	**12.61**	**57.88**	**62.96**	**62.25**	**24.70**	**22.22**	**24.09**	**0.40**	**--**	**0.45**

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022 - 2023 Salisbury MSA	79	3,662	100.00	12,117	86.01	87.34	53.02	4.05	11.39	10.00	1.27
Total	**79**	**3,662**	**100.00**	**12,117**	**86.01**	**87.34**	**53.02**	**4.05**	**11.39**	**10.00**	**1.27**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
DE Non-MSA	54	1,052	100.00	6,666	86.01	77.78	51.10	3.89	18.52	10.09	3.70
Total	**54**	**1,052**	**100.00**	**6,666**	**86.01**	**77.78**	**51.10**	**3.89**	**18.52**	**10.09**	**3.70**

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

State of Florida

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
2022 - 2023 Miami MSA	2,997	944,075	100.00	275,878	2.91	1.60	2.64	21.81	14.85	21.00	32.09	25.93	32.31	42.16	56.74	42.99	1.02	0.87	1.04	
Total	**2,997**	**944,075**	**100.00**	**275,878**	**2.91**	**1.60**	**2.64**	**21.81**	**14.85**	**21.00**	**32.09**	**25.93**	**32.31**	**42.16**	**56.74**	**42.99**	**1.02**	**0.87**	**1.04**	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Miami MSA	1,179	608,057	100.00	112,299	2.91	1.61	2.87	21.81	18.41	21.82	32.09	25.36	33.77	42.16	53.10	40.62	1.02	1.53	0.91
Total	**1,179**	**608,057**	**100.00**	**112,299**	**2.91**	**1.61**	**2.87**	**21.81**	**18.41**	**21.82**	**32.09**	**25.36**	**33.77**	**42.16**	**53.10**	**40.62**	**1.02**	**1.53**	**0.91**

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

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Naples MSA	528	271,655	100.00	38,046	2.25	--	1.13	17.43	9.09	19.95	40.69	48.30	44.24	38.39	41.10	33.64	1.24	1.52	1.03
Total	**528**	**271,655**	**100.00**	**38,046**	**2.25**	**--**	**1.13**	**17.43**	**9.09**	**19.95**	**40.69**	**48.30**	**44.24**	**38.39**	**41.10**	**33.64**	**1.24**	**1.52**	**1.03**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022 - 2023 Miami MSA	2,997	944,075	100.00	275,878	22.46	2.57	3.80	17.65	8.44	8.36	18.02	16.49	15.95	41.88	72.26	52.68	--	0.23	19.21
Total	**2,997**	**944,075**	**100.00**	**275,878**	**22.46**	**2.57**	**3.80**	**17.65**	**8.44**	**8.36**	**18.02**	**16.49**	**15.95**	**41.88**	**72.26**	**52.68**	**--**	**0.23**	**19.21**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Miami MSA	1,179	608,057	100.00	112,299	22.46	4.07	3.48	17.65	8.74	6.98	18.02	13.91	14.44	41.88	72.77	52.69	--	0.51	22.41	
Total	**1,179**	**608,057**	**100.00**	**112,299**	**22.46**	**4.07**	**3.48**	**17.65**	**8.74**	**6.98**	**18.02**	**13.91**	**14.44**	**41.88**	**72.77**	**52.69**	**--**	**0.51**	**22.41**	

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Naples MSA	528	271,655	100.00	38,046	21.93	1.89	4.01	18.03	9.47	10.23	19.55	14.39	17.62	40.49	72.35	53.06	--	1.89	15.08	
Total	**528**	**271,655**	**100.00**	**38,046**	**21.93**	**1.89**	**4.01**	**18.03**	**9.47**	**10.23**	**19.55**	**14.39**	**17.62**	**40.49**	**72.35**	**53.06**	**--**	**1.89**	**15.08**	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	
2022 - 2023 Miami MSA	528	30,302	100.00	733,779	3.01	3.03	2.83	22.92	21.02	21.97	29.27	32.01	29.38	42.22	41.29	43.27	2.58	2.65	2.55	
Total	**528**	**30,302**	**100.00**	**733,779**	**3.01**	**3.03**	**2.83**	**22.92**	**21.02**	**21.97**	**29.27**	**32.01**	**29.38**	**42.22**	**41.29**	**43.27**	**2.58**	**2.65**	**2.55**	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	
Miami MSA	212	8,919	100.00	395,492	2.75	2.36	2.76	23.17	24.53	21.66	28.59	22.64	29.24	43.21	47.17	43.68	2.29	3.30	2.66	
Total	**212**	**8,919**	**100.00**	**395,492**	**2.75**	**2.36**	**2.76**	**23.17**	**24.53**	**21.66**	**28.59**	**22.64**	**29.24**	**43.21**	**47.17**	**43.68**	**2.29**	**3.30**	**2.66**	

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	
Naples MSA	18	1,600	100.00	34,514	2.81	5.56	2.24	14.69	5.56	16.54	40.44	55.56	45.60	41.03	33.33	34.77	1.03	--	0.85	
Total	**18**	**1,600**	**100.00**	**34,514**	**2.81**	**5.56**	**2.24**	**14.69**	**5.56**	**16.54**	**40.44**	**55.56**	**45.60**	**41.03**	**33.33**	**34.77**	**1.03**	**--**	**0.85**	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022 - 2023 Miami MSA	528	30,302	100.00	733,779	92.21	81.82	53.23	2.35	18.18	5.44	--
Total	**528**	**30,302**	**100.00**	**733,779**	**92.21**	**81.82**	**53.23**	**2.35**	**18.18**	**5.44**	**--**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Miami MSA	212	8,919	100.00	395,492	90.84	75.47	53.16	2.34	23.58	6.82	0.94
Total	**212**	**8,919**	**100.00**	**395,492**	**90.84**	**75.47**	**53.16**	**2.34**	**23.58**	**6.82**	**0.94**

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Naples MSA	18	1,600	100.00	34,514	90.40	77.78	51.87	2.55	22.22	7.06	--
Total	**18**	**1,600**	**100.00**	**34,514**	**90.40**	**77.78**	**51.87**	**2.55**	**22.22**	**7.06**	**--**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Massachusetts

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
2022-2023 Springfield CSA	1,515	237,549	100.00	30,224	2.02	6.01	3.83	14.77	24.09	19.29	42.20	37.03	40.42	41.01	32.81	36.38	0.01	0.07	0.06
Total	**1,515**	**237,549**	**100.00**	**30,224**	**2.02**	**6.01**	**3.83**	**14.77**	**24.09**	**19.29**	**42.20**	**37.03**	**40.42**	**41.01**	**32.81**	**36.38**	**0.01**	**0.07**	**0.06**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Springfield CSA	510	79,935	100.00	13,412	2.47	5.69	4.44	13.14	22.55	17.22	50.78	43.73	46.82	33.60	27.84	31.41	0.01	0.20	0.11
Total	**510**	**79,935**	**100.00**	**13,412**	**2.47**	**5.69**	**4.44**	**13.14**	**22.55**	**17.22**	**50.78**	**43.73**	**46.82**	**33.60**	**27.84**	**31.41**	**0.01**	**0.20**	**0.11**

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

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
MA Non-MSA	67	107,608	28.76	1,849	--	--	--	--	1.49	5.68	6.83	64.18	74.91	93.17	34.33	19.42	--	--	--
Pittsfield MSA	166	27,150	71.24	9,283	0.30	--	1.30	15.41	12.65	17.98	56.48	55.42	55.32	27.81	31.93	25.40	--	--	--
Total	**233**	**134,758**	**100.00**	**11,132**	**0.28**	**--**	**1.09**	**14.45**	**9.44**	**15.94**	**53.37**	**57.94**	**58.57**	**31.90**	**32.62**	**24.41**	**--**	**--**	**--**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
2022-2023 Springfield CSA	1,515	237,549	100.00	30,224	23.60	12.28	7.66	16.30	33.99	25.12	18.67	26.34	25.26	41.43	26.73	29.23	--	0.66	12.72
Total	**1,515**	**237,549**	**100.00**	**30,224**	**23.60**	**12.28**	**7.66**	**16.30**	**33.99**	**25.12**	**18.67**	**26.34**	**25.26**	**41.43**	**26.73**	**29.23**	**--**	**0.66**	**12.72**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
Springfield CSA	510	79,935	100.00	13,412	23.50	9.02	6.04	16.58	31.96	20.32	19.17	27.06	27.23	40.76	31.18	31.28	--	0.78	15.14
Total	**510**	**79,935**	**100.00**	**13,412**	**23.50**	**9.02**	**6.04**	**16.58**	**31.96**	**20.32**	**19.17**	**27.06**	**27.23**	**40.76**	**31.18**	**31.28**	**--**	**0.78**	**15.14**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
MA Non-MSA	67	107,608	28.76	1,849	10.67	--	2.38	12.60	--	4.00	15.49	8.96	6.87	61.24	91.04	56.46	--	--	30.29
Pittsfield MSA	166	27,150	71.24	9,283	19.70	6.02	8.42	17.84	21.69	21.08	22.08	19.88	23.24	40.38	51.81	36.57	--	0.60	10.69
Total	**233**	**134,758**	**100.00**	**11,132**	**19.03**	**4.29**	**7.42**	**17.45**	**15.45**	**18.24**	**21.60**	**16.74**	**20.52**	**41.92**	**63.09**	**39.88**	**--**	**0.43**	**13.94**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2022-2023 Springfield CSA	174	9,740	100.00	27,110	8.80	8.62	7.34	20.80	21.84	20.04	33.53	40.80	34.45	35.79	28.74	37.75	1.07	--	0.43
Total	**174**	**9,740**	**100.00**	**27,110**	**8.80**	**8.62**	**7.34**	**20.80**	**21.84**	**20.04**	**33.53**	**40.80**	**34.45**	**35.79**	**28.74**	**37.75**	**1.07**	**--**	**0.43**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
Springfield CSA	172	2,827	100.00	14,098	9.01	4.65	7.19	18.19	15.12	17.60	45.19	49.42	44.47	26.57	29.65	30.39	1.04	1.16	0.35
Total	**172**	**2,827**	**100.00**	**14,098**	**9.01**	**4.65**	**7.19**	**18.19**	**15.12**	**17.60**	**45.19**	**49.42**	**44.47**	**26.57**	**29.65**	**30.39**	**1.04**	**1.16**	**0.35**

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
MA Non-MSA	13	726	27.66	2,656	--	--	--	--	--	1.88	3.07	100.00	98.12	96.93	--	--	--	--	--
Pittsfield MSA	34	982	72.34	5,553	17.54	14.71	11.44	14.14	11.76	12.77	44.76	47.06	51.88	23.56	26.47	23.92	--	--	--
Total	**47**	**1,708**	**100.00**	**8,209**	**14.28**	**10.64**	**7.74**	**11.52**	**8.51**	**9.25**	**37.02**	**61.70**	**66.84**	**37.18**	**19.15**	**16.18**	**--**	**--**	**--**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022-2023 Springfield CSA	174	9,740	100.00	27,110	84.03	83.91	54.87	4.94	12.64	11.03	3.45
Total	**174**	**9,740**	**100.00**	**27,110**	**84.03**	**83.91**	**54.87**	**4.94**	**12.64**	**11.03**	**3.45**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Springfield CSA	172	2,827	100.00	14,098	83.37	89.53	56.20	4.93	8.14	11.71	2.33
Total	**172**	**2,827**	**100.00**	**14,098**	**83.37**	**89.53**	**56.20**	**4.93**	**8.14**	**11.71**	**2.33**

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MA Non-MSA	13	726	27.66	2,656	89.17	92.31	47.10	3.53	7.69	7.30	--
Pittsfield MSA	34	982	72.34	5,553	83.83	91.18	50.91	4.52	8.82	11.66	--
Total	**47**	**1,708**	**100.00**	**8,209**	**84.82**	**91.49**	**49.68**	**4.33**	**8.51**	**10.85**	**--**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Michigan

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Detroit CSA	9,940	1,522,788	98.35	314,717	4.41	2.63	3.59	19.67	15.61	18.34	34.95	33.01	36.80	40.49	48.55	40.85	0.47	0.20	0.41
Saginaw MSA	167	19,208	1.65	11,166	2.80	--	1.23	21.27	3.59	19.35	34.26	74.85	34.23	41.66	21.56	45.15	--	--	--
Total	**10,107**	**1,541,996**	**100.00**	**325,883**	**4.34**	**2.58**	**3.51**	**19.74**	**15.42**	**18.37**	**34.92**	**33.70**	**36.71**	**40.54**	**48.11**	**41.00**	**0.45**	**0.20**	**0.39**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
2022-2023 Lansing MSA	128	12,995	100.00	3,842	--	--	--	21.29	24.22	23.35	78.71	75.78	76.65	--	--	--	--	--	--
Total	**128**	**12,995**	**100.00**	**3,842**	**--**	**--**	**--**	**21.29**	**24.22**	**23.35**	**78.71**	**75.78**	**76.65**	**--**	**--**	**--**	**--**	**--**	**--**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
MI Non-MSA	56	6,261	100.00	1,839	--	--	--	4.50	3.57	7.77	54.68	62.50	54.76	40.82	33.93	37.47	--	--	--
Total	**56**	**6,261**	**100.00**	**1,839**	**--**	**--**	**--**	**4.50**	**3.57**	**7.77**	**54.68**	**62.50**	**54.76**	**40.82**	**33.93**	**37.47**	**--**	**--**	**--**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Detroit CSA	9,940	1,522,788	98.35	314,717	21.43	14.38	10.20	16.85	22.46	21.76	20.87	24.34	22.76	41.79	38.78	32.57	--	0.50	11.81
Saginaw MSA	167	19,208	1.65	11,166	20.70	15.57	9.20	17.66	25.40	19.80	21.24	24.55	22.76	40.39	32.34	32.91	--	0.60	13.85
Total	**10,107**	**1,541,996**	**100.00**	**325,883**	**21.40**	**13.94**	**11.04**	**16.89**	**22.54**	**21.74**	**19.98**	**24.34**	**22.76**	**41.73**	**38.68**	**32.58**	**--**	**0.50**	**11.88**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022-2023 Lansing MSA	128	12,995	100.00	3,842	21.84	28.91	17.39	22.81	33.59	28.03	23.25	21.88	21.84	32.10	15.63	18.19	--	--	14.55
Total	**128**	**12,995**	**100.00**	**3,842**	**21.84**	**28.91**	**17.39**	**22.81**	**33.59**	**28.03**	**23.25**	**21.88**	**21.84**	**32.10**	**15.63**	**18.19**	**--**	**--**	**14.55**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																					2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**				
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**		
MI Non-MSA	56	6,261	100.00	1,839	15.36	19.64	8.53	18.14	23.21	20.98	21.55	30.36	27.03	44.94	26.79	27.13	--	--	16.31		
Total	**56**	**6,261**	**100.00**	**1,839**	**15.37**	**19.64**	**8.54**	**18.14**	**23.21**	**20.98**	**21.55**	**30.36**	**27.03**	**44.94**	**26.79**	**27.13**	**--**	**--**	**16.31**		

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
Detroit CSA	2,939	163,613	97.93	215,019	6.98	6.12	5.59	21.21	22.56	18.95	30.54	29.91	31.44	39.04	39.23	41.83	2.23	2.18	2.03
Saginaw MSA	62	1,605	2.07	4,323	4.74	--	3.37	28.21	6.45	22.93	30.54	90.32	31.53	36.52	3.23	42.45	--	--	--
Total	**3,001**	**165,218**	**100.00**	**219,342**	**6.92**	**6.00**	**5.67**	**21.41**	**22.23**	**19.05**	**30.54**	**31.16**	**31.44**	**38.96**	**38.49**	**41.84**	**2.16**	**2.13**	**1.99**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**
2022-2023 Lansing MSA	11	286	100.00	1,423	--	--	--	31.27	54.55	29.94	68.73	45.45	70.06	--	--	--	--	--	--
Total	**11**	**286**	**100.00**	**1,423**	**--**	**--**	**--**	**31.27**	**54.55**	**29.94**	**68.73**	**45.45**	**70.06**	**--**	**--**	**--**	**--**	**--**	**--**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																					2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
MI Non-MSA	18	308	100.00	--	--	--	--	13.22	22.22	10.35	50.40	55.56	--	36.38	22.22	--	--	--	--		
Total	**18**	**308**	**100.00**	**--**	**--**	**--**	**--**	**13.22**	**22.22**	**10.35**	**50.40**	**55.56**	**--**	**36.38**	**22.22**	**--**	**--**	**--**	**--**		

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Detroit CSA	2,939	163,613	97.93	215,019	88.31	76.45	51.16	3.89	22.49	7.80	1.05
LS Saginaw MSA	62	1,605	2.07	4,323	82.28	85.48	49.68	5.08	14.52	12.64	--
Total	**3,001**	**165,218**	**100.00**	**219,342**	**88.14**	**76.64**	**51.27**	**3.92**	**22.33**	**7.94**	**1.03**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022-2023 Lansing MSA	11	286	100.00	1,423	74.27	100.00	56.36	4.29	--	13.46	--
Total	**11**	**286**	**100.00**	**1,423**	**74.27**	**100.00**	**56.36**	**4.29**	**--**	**13.46**	**--**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MI Non-MSA	18	308	100.00	--	84.87	94.44	59.81	3.47	5.56	11.66	--
Total	**18**	**308**	**100.00**	**--**	**84.87**	**94.44**	**59.81**	**3.47**	**5.56**	**11.66**	**--**

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

State of New Hampshire

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
NH Non-MSA	1,207	232,507	100.00	21,451	0.79	--	0.79	22.68	27.75	22.79	69.00	63.71	68.47	7.53	8.53	7.94	--	--	--
Total	**1,207**	**232,507**	**100.00**	**21,451**	**0.79**	**--**	**0.79**	**22.68**	**27.75**	**22.79**	**69.00**	**63.71**	**68.47**	**7.53**	**8.53**	**7.94**	**--**	**--**	**--**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
NH Non-MSA	1,207	232,507	100.00	21,451	21.78	13.26	8.10	19.58	22.70	19.09	24.04	23.78	22.29	34.60	39.77	40.08	--	0.50	10.45
Total	**1,207**	**232,507**	**100.00**	**21,451**	**21.78**	**13.26**	**8.10**	**19.58**	**22.70**	**19.09**	**24.04**	**23.78**	**22.29**	**34.60**	**39.77**	**40.08**	**--**	**0.50**	**10.45**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
NH Non-MSA	283	8,085	100.00	13,431	0.94	1.41	0.67	22.43	35.34	21.43	67.54	58.30	69.64	9.09	4.95	8.26	--	--	--
Total	**283**	**8,085**	**100.00**	**13,431**	**0.94**	**1.41**	**0.67**	**22.43**	**35.34**	**21.43**	**67.54**	**58.30**	**69.64**	**9.09**	**4.95**	**8.26**	**--**	**--**	**--**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
NH Non-MSA	283	8,085	100.00	13,431	85.26	87.28	54.48	4.02	11.66	10.72	1.06	
Total	**283**	**8,085**	**100.00**	**13,431**	**85.26**	**87.28**	**54.48**	**4.02**	**11.66**	**10.72**	**1.06**	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of New York

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Albany CSA	2,543	417,407	18.07	67,137	3.45	3.97	5.46	10.13	11.72	12.30	53.48	48.64	51.09	32.72	35.43	31.46	0.23	0.24	0.45
Rochester MSA	3,857	606,562	27.41	78,272	4.16	5.83	6.34	14.02	14.18	14.92	47.32	41.46	45.19	34.34	38.22	33.48	0.16	0.31	0.22
Binghamton MSA	414	49,237	2.94	9,967	1.41	1.93	2.26	17.39	20.05	18.39	48.79	42.75	45.96	32.29	34.78	33.53	0.12	0.48	0.41
Buffalo MSA	5,811	854,413	41.29	70,354	5.26	3.53	5.25	13.95	11.70	13.81	47.63	48.06	47.39	32.76	36.26	33.96	0.40	0.45	0.40
Ithaca MSA	60	9,962	0.43	3,715	--	--	--	12.26	11.67	11.62	69.58	71.67	66.92	17.72	16.67	20.11	0.44	--	0.86
Syracuse MSA	1,016	154,041	7.22	32,958	2.65	1.57	3.44	12.09	9.74	13.73	46.33	41.73	44.54	38.46	46.75	38.73	0.48	0.20	0.62
Utica MSA	372	51,890	2.64	12,956	3.64	5.65	4.47	14.34	15.32	15.75	50.94	51.61	50.90	29.59	25.81	29.27	1.49	1.61	1.47
Total	**14,073**	**2,143,512**	**100.00**	**275,359**	**3.88**	**4.09**	**4.68**	**13.01**	**12.58**	**13.80**	**49.38**	**45.94**	**47.70**	**33.36**	**37.00**	**33.36**	**0.36**	**0.38**	**0.44**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2022 - 2024
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**			
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	
Albany CSA	2,543	417,407	18.07	67,137	20.88	15.10	8.85	17.29	26.78	22.89	21.52	29.41	24.70	40.32	28.23	30.83	--	0.47	11.28	
Rochester MSA	3,857	606,562	27.41	78,272	20.52	15.19	9.56	17.39	24.73	21.17	20.35	26.08	22.34	41.74	33.70	31.61	--	0.29	14.31	
Binghamton MSA	414	49,237	2.94	9,967	22.62	17.39	10.30	17.75	28.74	22.56	19.86	23.43	22.41	39.77	30.19	30.49	--	0.24	14.31	
Buffalo MSA	5,811	854,413	41.29	70,354	22.09	12.52	9.12	16.93	24.94	22.13	20.86	29.29	23.29	40.11	33.21	31.25	--	0.28	13.32	
Ithaca MSA	60	9,962	0.43	3,715	19.83	20.00	12.25	19.57	25.00	18.92	20.79	18.33	22.99	39.81	36.67	38.44	--	--	7.67	
Syracuse MSA	1,016	154,041	7.22	32,958	21.22	10.33	8.29	16.83	25.00	20.13	20.37	25.89	23.27	41.59	38.39	34.34	--	0.39	11.41	
Utica MSA	372	51,890	2.64	12,956	22.00	13.44	7.35	16.32	25.27	21.17	21.57	30.65	25.31	40.10	30.65	32.33	--	--	11.48	
Total	**14,073**	**2,143,512**	**100.00**	**275,359**	**21.29**	**13.66**	**9.66**	**17.17**	**25.34**	**22.43**	**20.82**	**28.00**	**23.42**	**40.72**	**32.68**	**31.74**	**--**	**0.31**	**12.75**	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**			
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Aggregate**	
Albany CSA	533	21,400	22.63	42,326	6.11	5.07	6.17	9.59	7.88	9.15	45.37	50.47	48.59	24.76	32.83	28.16	14.17	3.75	7.50	
Rochester MSA	582	12,994	24.71	37,359	6.61	6.87	5.18	15.81	16.15	14.82	41.85	40.38	44.56	33.03	34.71	33.60	2.69	1.89	1.87	
Binghamton MSA	105	3,643	4.46	5,482	12.96	19.05	9.17	16.82	20.00	17.16	40.57	33.33	41.63	28.66	26.67	30.41	0.98	0.95	1.04	
Buffalo MSA	844	24,502	35.84	41,284	8.62	6.16	7.59	15.79	14.34	14.27	41.72	48.22	41.01	31.30	29.74	34.65	2.56	1.54	1.95	
Ithaca MSA	12	343	0.51	3,870	--	--	--	17.79	41.67	16.31	45.53	33.33	51.50	18.77	25.00	20.23	17.91	--	12.17	
Syracuse MSA	215	7,208	9.13	19,293	7.69	6.05	5.57	12.19	18.14	13.40	40.77	43.26	42.34	32.07	29.30	33.65	7.29	3.26	4.75	
Utica MSA	64	2,361	2.72	7,443	9.17	10.94	7.68	12.46	21.88	12.66	43.44	45.31	42.87	25.94	15.63	31.48	8.99	6.25	6.15	
Total	**2,355**	**72,451**	**100.00**	**157,057**	**7.35**	**6.75**	**6.38**	**13.57**	**14.27**	**13.13**	**42.75**	**45.52**	**44.43**	**29.40**	**31.08**	**31.87**	**6.93**	**2.38**	**4.19**	

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	**Total Loans to Small Businesses**				**Businesses with Revenues <= 1MM**			**Businesses with Revenues > 1MM**		**Businesses with Revenues Not Available**	
	#	**$**	**% of Total Number**	**Overall Market**	**% Businesses**	**% Bank Loans**	**% Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Albany CSA	533	21,400	22.63	42,326	85.24	83.11	53.43	3.82	15.95	10.94	0.94
Rochester MSA	582	12,994	24.71	37,359	84.39	88.49	53.79	4.96	9.62	10.65	1.89
Binghamton MSA	105	3,643	4.46	5,482	80.79	88.57	52.37	5.47	11.43	13.74	--
Buffalo MSA	844	24,502	35.84	41,284	83.76	87.32	53.97	5.07	10.90	11.17	1.78
Ithaca MSA	12	343	0.51	3,870	82.77	75.00	51.85	4.10	16.67	13.13	8.33
Syracuse MSA	215	7,208	9.13	19,293	82.40	87.44	52.92	5.01	11.63	12.58	0.93
Utica MSA	64	2,361	2.72	7,443	82.11	81.25	52.27	5.28	15.63	12.61	3.13
Total	**2,355**	**72,451**	**100.00**	**157,057**	**83.93**	**86.50**	**51.26**	**4.70**	**11.97**	**11.37**	**1.53**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Ohio

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**Overall Market**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**	**% of Owner-Occupied Housing Units**	**% Bank Loans**	**% Aggregate**
2022-2023 Cleveland CSA	7,111	901,518	100.00	167,145	5.58	3.90	4.86	15.06	12.38	14.90	41.03	40.64	41.65	37.68	42.79	38.05	0.66	0.30	0.43
Total	**7,111**	**901,518**	**100.00**	**167,145**	**5.58**	**3.90**	**4.86**	**15.06**	**12.38**	**14.90**	**41.03**	**40.64**	**41.65**	**37.68**	**42.79**	**38.05**	**0.66**	**0.30**	**0.43**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Cleveland CSA	2,639	368,227	100.00	75,357	5.40	4.96	5.95	14.92	13.34	16.31	40.08	38.61	40.33	38.94	42.97	36.92	0.66	0.11	0.48
Total	**2,639**	**368,227**	**100.00**	**75,357**	**5.40**	**4.96**	**5.95**	**14.92**	**13.34**	**16.31**	**40.08**	**38.61**	**40.33**	**38.94**	**42.97**	**36.92**	**0.66**	**0.11**	**0.48**

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

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
OH Non-MSA	138	13,096	8.68	3,826	5.55	2.90	5.93	31.15	25.36	28.12	60.27	71.74	64.45	3.03	--	1.39	--	--	--
Toledo MSA	1,451	160,301	91.32	36,932	4.88	3.45	3.14	16.54	16.13	15.68	34.00	34.39	34.42	42.39	43.97	44.94	2.19	2.07	1.61
Total	**1,589**	**173,396**	**100.00**	**40,758**	**4.96**	**3.40**	**3.40**	**18.34**	**16.93**	**16.85**	**37.24**	**37.63**	**37.24**	**37.54**	**40.15**	**40.85**	**1.92**	**1.89**	**1.45**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
2024 Youngstown CSA	235	29,511	100.00	12,280	3.07	2.55	1.98	15.06	7.66	13.63	56.10	64.26	57.00	25.36	25.53	26.94	0.41	--	0.44
Total	**235**	**29,511**	**100.00**	**12,280**	**3.07**	**2.55**	**1.98**	**15.06**	**7.66**	**13.63**	**56.10**	**64.26**	**57.00**	**25.36**	**25.53**	**26.94**	**0.41**	**--**	**0.44**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022-2023 Cleveland CSA	7,111	901,518	100.00	167,145	21.76	16.33	11.11	17.39	27.68	22.16	20.04	24.47	21.09	40.80	30.91	31.93	--	0.62	13.71
Total	**7,111**	**901,518**	**100.00**	**167,145**	**21.76**	**16.33**	**11.11**	**17.39**	**27.68**	**22.16**	**20.04**	**24.47**	**21.09**	**40.80**	**30.91**	**31.93**	**--**	**0.62**	**13.71**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Cleveland CSA	2,639	368,227	100.00	75,357	21.45	17.96	10.81	17.25	27.28	21.38	19.91	21.86	20.46	41.39	32.36	30.66	--	0.53	16.69
Total	**2,639**	**368,227**	**100.00**	**75,357**	**21.45**	**17.96**	**10.81**	**17.25**	**27.28**	**21.38**	**19.91**	**21.86**	**20.46**	**41.39**	**32.36**	**30.66**	**--**	**0.53**	**16.69**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
OH Non-MSA	138	13,096	8.68	3,826	30.41	19.57	11.34	17.41	28.26	22.16	18.19	25.36	22.90	34.00	26.81	27.84	--	--	15.76
Toledo MSA	1,451	160,301	91.32	36,932	22.91	19.23	10.99	16.09	25.02	22.27	19.59	24.53	22.78	41.41	30.32	32.74	--	0.90	11.22
Total	**1,589**	**173,396**	**100.00**	**40,758**	**23.83**	**19.26**	**11.02**	**16.25**	**25.30**	**22.26**	**19.42**	**24.61**	**22.79**	**40.50**	**30.02**	**32.28**	**--**	**0.82**	**11.65**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2024 Youngstown CSA	235	29,511	100.00	12,280	21.83	13.19	8.54	16.78	22.13	20.92	21.38	24.26	23.77	40.01	40.00	32.13	--	0.43	14.63
Total	**235**	**29,511**	**100.00**	**12,280**	**21.83**	**13.19**	**8.54**	**16.78**	**22.13**	**20.92**	**21.38**	**24.26**	**23.77**	**40.01**	**40.00**	**32.13**	**--**	**0.43**	**14.63**

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 Cleveland CSA	836	54,605	100.00	125,946	8.90	9.21	6.91	15.91	16.15	14.01	31.78	34.09	32.99	41.60	39.35	44.92	1.81	1.20	1.18
Total	**836**	**54,605**	**100.00**	**125,946**	**8.90**	**9.21**	**6.91**	**15.91**	**16.15**	**14.01**	**31.78**	**34.09**	**32.99**	**41.60**	**39.35**	**44.92**	**1.81**	**1.20**	**1.18**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Cleveland CSA	1,210	25,575	100.00	64,198	9.11	7.36	6.23	15.72	14.79	13.50	31.00	30.50	31.63	42.35	47.02	47.62	1.82	0.33	1.01
Total	**1,210**	**25,575**	**100.00**	**64,198**	**9.11**	**7.36**	**6.23**	**15.72**	**14.79**	**13.50**	**31.00**	**30.50**	**31.63**	**42.35**	**47.02**	**47.62**	**1.82**	**0.33**	**1.01**

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
OH Non-MSA	25	1,566	9.92	1,494	21.09	24.00	17.87	27.13	20.00	23.90	44.74	52.00	58.23	7.04	4.00	--	--	--	--
Toledo MSA	227	8,162	90.08	16,062	8.49	9.25	6.62	18.82	19.38	15.69	28.90	34.80	30.08	36.40	31.72	42.01	7.38	4.85	5.60
Total	**252**	**9,728**	**100.00**	**17,556**	**9.58**	**10.71**	**7.58**	**19.55**	**19.44**	**16.39**	**30.28**	**36.51**	**32.47**	**33.85**	**28.97**	**38.43**	**6.74**	**4.37**	**5.13**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2024 Youngstown CSA	46	750	100.00	8,010	4.74	2.17	3.38	16.89	4.35	13.21	46.75	67.39	5.97	31.21	26.09	32.87	0.41	--	0.35
Total	**46**	**750**	**100.00**	**8,010**	**4.74**	**2.17**	3.38	**16.89**	**4.35**	**13.21**	**46.75**	**67.39**	**5.97**	**31.21**	**26.09**	**32.87**	**0.41**	**--**	**0.35**

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022-2023 Cleveland CSA	836	54,605	100.00	125,946	87.22	78.59	50.98	4.60	20.69	8.18	0.72
Total	**836**	**54,605**	**100.00**	**125,946**	**87.22**	**78.59**	**50.98**	**4.60**	**20.69**	**8.18**	**0.72**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
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Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cleveland CSA	1,210	25,575	100.00	64,147	87.00	88.02	53.27	4.31	10.66	8.69	1.32
Total	**1,210**	**25,575**	**100.00**	**64,147**	**87.00**	**88.02**	**53.27**	**4.31**	**10.66**	**8.69**	**1.32**

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
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Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
OH Non-MSA	25	1,566	9.92	1,494	81.49	68.00	64.32	4.33	32.00	14.18	--
Toledo MSA	227	8,162	90.08	16,062	84.63	80.18	52.04	4.56	18.50	10.81	1.32
Total	**252**	**9,728**	**100.00**	**17,556**	**84.36**	**78.97**	**53.09**	**4.54**	**19.84**	**11.10**	**1.19**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2024 Youngstown CSA	46	750	100.00	7,662	84.03	78.26	56.70	4.63	19.57	11.33	2.17
Total	**46**	**750**	**100.00**	**7,662**	**84.03**	**78.26**	**56.70**	**4.63**	**19.57**	**11.33**	**2.17**

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

State of Pennsylvania

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	
2022-2023 Pittsburgh CSA	9,751	1,598,690	100.00	126,679	2.52	2.34	2.11	16.51	13.49	14.34	48.89	43.04	45.62	31.90	41.00	37.77	0.18	0.13	0.16	
Total	**9,751**	**1,598,690**	**100.00**	**126,679**	**2.52**	**2.34**	**2.11**	**16.51**	**13.49**	**14.34**	**48.89**	**43.04**	**45.62**	**31.90**	**41.00**	**37.77**	**0.18**	**0.13**	**0.16**	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Pittsburgh CSA	3,077	502,030	100.00	55,876	2.41	2.44	2.25	15.76	13.45	14.77	49.33	40.88	45.84	32.33	43.09	36.99	0.17	0.13	0.14
Total	**3,077**	**502,030**	**100.00**	**55,876**	**2.41**	**2.44**	**2.25**	**15.76**	**13.45**	**14.77**	**49.33**	**40.88**	**45.84**	**32.33**	**43.09**	**36.99**	**0.17**	**0.13**	**0.14**

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

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022 - 2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Altoona MSA	379	47,008	6.58	7,474	1.47	0.79	1.11	15.46	11.87	15.69	61.32	60.95	60.56	21.74	26.39	22.64	--	--	--
Erie CSA	726	85,331	12.60	20,355	3.05	2.75	2.19	14.67	11.85	14.87	52.88	49.86	51.59	29.27	35.40	31.13	0.13	0.14	0.22
Harrisburg CSA	2,060	391,156	35.76	86,644	2.63	2.18	4.20	9.91	8.93	10.90	59.58	53.54	56.85	27.88	35.34	28.02	0.00	--	--
Lancaster MSA	1,006	180,479	17.46	38,129	1.49	1.09	2.20	11.26	9.34	13.01	72.53	70.97	69.22	14.72	18.59	15.56	--	--	--
Scranton MSA	973	122,820	16.89	35,395	1.38	1.54	1.56	19.09	19.22	22.36	49.27	38.13	45.69	30.10	40.90	30.16	0.16	0.21	0.21
State College MSA	617	146,568	10.71	8,432	--	--	--	16.75	10.21	16.40	59.90	53.97	58.68	23.21	35.82	24.48	0.14	--	0.40
Total	**5,761**	**973,362**	**100.00**	**196,429**	**2.03**	**1.63**	**2.83**	**13.25**	**11.44**	**14.21**	**59.24**	**54.05**	**56.92**	**25.43**	**32.82**	**25.95**	**0.06**	**0.05**	**0.08**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
2022-2023 PA Non-MSA	497	69,437	100.00	13,053	--	--	--	7.32	6.24	8.28	80.91	82.70	78.66	11.01	10.06	11.81	0.76	1.01	1.26
Total	**497**	**69,437**	**100.00**	**13,053**	**--**	**--**	**--**	**7.32**	**6.24**	**8.28**	**80.91**	**82.70**	**78.66**	**11.01**	**10.06**	**11.81**	**0.76**	**1.01**	**1.26**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
PA Non-MSA	182	25,082	100.00	5,812	0.64	2.75	0.21	3.93	3.30	4.39	55.13	55.49	50.31	39.54	38.46	43.67	0.76	--	1.43
Total	**182**	**25,082**	**100.00**	**5,812**	**0.64**	**2.75**	**0.21**	**3.93**	**3.30**	**4.39**	**55.13**	**55.49**	**50.31**	**39.54**	**38.46**	**43.67**	**0.76**	**--**	**1.43**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022-2023 Pittsburgh CSA	9,751	1,598,690	100.00	126,679	19.56	17.65	12.18	17.98	26.88	20.86	21.15	23.85	20.95	41.31	31.19	32.00	--	0.43	14.01
Total	**9,751**	**1,598,690**	**100.00**	**126,679**	**19.56**	**17.65**	**12.18**	**17.98**	**26.88**	**20.86**	**21.15**	**23.85**	**20.95**	**41.31**	**31.19**	**32.00**	**--**	**0.43**	**14.01**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Pittsburgh CSA	3,077	502,030	100.00	55,876	19.51	15.92	10.79	17.75	24.44	20.20	20.99	24.41	20.09	41.74	34.68	32.63	--	0.55	16.29
Total	**3,077**	**502,030**	**100.00**	**55,876**	**19.51**	**15.92**	**10.79**	**17.75**	**24.44**	**20.20**	**20.99**	**24.41**	**20.09**	**41.74**	**34.68**	**32.63**	**--**	**0.55**	**16.29**

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

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Altoona MSA	379	47,008	6.58	7,474	20.10	16.62	11.32	18.74	30.34	22.21	21.31	23.22	22.21	39.85	28.50	31.36	--	1.32	12.90
Erie CSA	726	85,331	12.60	20,355	20.29	19.56	9.74	18.36	26.58	21.75	21.76	24.79	23.49	39.58	28.51	33.51	--	0.55	11.51
Harrisburg CSA	2,060	391,156	35.76	86,644	18.64	11.89	9.91	18.84	26.41	22.23	23.32	25.83	22.89	39.20	35.63	30.23	--	0.24	14.74
Lancaster MSA	1,006	180,479	17.46	38,129	17.37	11.83	7.93	19.28	25.35	22.48	24.56	27.53	24.75	38.80	34.99	33.71	--	0.30	11.13
Scranton MSA	973	122,820	16.89	35,395	21.81	11.41	9.64	17.23	24.67	20.12	20.43	25.59	20.99	40.52	37.72	30.98	--	0.62	18.26
State College MSA	617	146,568	10.71	8,432	18.21	11.02	10.88	19.03	24.80	20.40	23.24	25.77	23.32	39.53	37.93	36.01	--	0.49	9.40
Total	**5,761**	**973,362**	**100.00**	**196,429**	**19.26**	**12.98**	**9.56**	**18.56**	**26.04**	**21.77**	**22.71**	**25.78**	**22.96**	**39.47**	**34.75**	**31.67**	**--**	**0.45**	**14.04**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2022-2023 PA Non-MSA	497	69,437	100.00	13,053	20.05	10.66	6.52	18.64	25.15	19.35	22.13	25.75	23.48	39.18	37.63	34.30	--	0.80	16.35
Total	**497**	**69,437**	**100.00**	**13,053**	**20.05**	**10.66**	**6.52**	**18.64**	**25.15**	**19.35**	**22.13**	**25.75**	**23.48**	**39.18**	**37.63**	**34.30**	**--**	**0.80**	**16.35**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
PA Non-MSA	182	25,082	100.00	5,812	16.70	9.89	5.16	16.10	20.88	13.37	20.41	25.27	20.99	46.80	43.41	41.35	--	0.55	19.13
Total	**182**	**25,082**	**100.00**	**5,812**	**16.70**	**9.89**	**5.16**	**16.10**	**20.88**	**13.37**	**20.41**	**25.27**	**20.99**	**46.80**	**43.41**	**41.35**	**--**	**0.55**	**19.13**

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 Pittsburgh CSA	1,174	103,277	100.00	91,692	5.41	3.75	3.89	14.90	14.31	14.53	40.38	44.21	41.28	37.57	36.46	37.78	1.73	1.28	2.51
Total	**1,174**	**103,277**	**100.00**	**91,692**	**5.41**	**3.75**	**3.89**	**14.90**	**14.31**	**14.53**	**40.38**	**44.21**	**41.28**	**37.57**	**36.46**	**37.78**	**1.73**	**1.28**	**2.51**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Pittsburgh CSA	1,048	33,336	100.00	49,940	5.37	4.58	4.09	14.46	11.64	13.94	40.50	40.84	40.17	38.01	41.70	40.47	1.65	1.24	1.33
Total	**1,048**	**33,336**	**100.00**	**49,940**	**5.37**	**4.58**	**4.09**	**14.46**	**11.64**	**13.94**	**40.50**	**40.84**	**40.17**	**38.01**	**41.70**	**40.47**	**1.65**	**1.24**	**1.33**

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

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Altoona MSA	60	2,070	6.19	4,865	2.39	--	0.74	21.74	18.33	17.08	58.37	61.67	61.77	17.49	20.00	20.41	--	--	--
Erie CSA	140	6,758	14.43	14,877	10.58	12.14	6.28	16.38	20.71	15.55	44.44	36.43	44.49	27.00	30.71	28.95	1.60	--	4.72
Harrisburg CSA	305	16,422	31.44	49,832	6.41	5.25	4.66	15.04	11.15	11.43	53.27	55.08	56.17	25.25	28.52	27.74	0.02	--	0.01
Lancaster MSA	165	7,624	17.01	34,250	3.76	7.27	2.69	11.22	6.06	10.49	69.19	63.03	71.19	15.83	23.64	15.63	--	--	--
Scranton MSA	235	8,679	24.23	28,194	5.06	0.43	4.01	25.33	23.83	23.42	40.99	43.40	41.93	28.28	31.91	30.27	0.33	0.43	0.38
State College MSA	65	2,195	6.70	6,748	1.02	--	0.04	16.91	12.31	16.54	49.17	50.77	52.46	26.05	24.62	26.26	6.86	12.31	4.70
Total	**970**	**43,748**	**100.00**	**138,766**	**5.62**	**4.74**	**3.85**	**16.92**	**15.26**	**14.52**	**52.99**	**51.03**	**55.75**	**23.86**	**28.04**	**25.06**	**0.61**	**0.93**	**0.81**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2022-2023 PA Non-MSA	60	2,489	100.00	9,163	--	--	--	8.51	5.00	8.08	78.60	78.33	77.15	12.47	16.67	14.34	0.41	--	0.44
Total	**60**	**2,489**	**100.00**	**9,163**	**--**	**--**	**--**	**8.51**	**5.00**	**8.08**	**78.60**	**78.33**	**77.15**	**12.47**	**16.67**	**14.34**	**0.41**	**--**	**0.44**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
PA Non-MSA	61	1,234	100.00	4,600	1.04	3.28	0.57	3.93	9.84	4.13	52.98	57.38	48.24	41.60	29.51	46.57	0.45	--	0.50
Total	**61**	**1,234**	**100.00**	**4,600**	**1.04**	**3.28**	**0.57**	**3.93**	**9.84**	**4.13**	**52.98**	**57.38**	**48.24**	**41.60**	**29.51**	**46.57**	**0.45**	**--**	**0.50**

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022-2023 Pittsburgh CSA	1,174	103,277	100.00	91,692	85.40	74.19	51.11	4.57	25.21	10.03	0.60
Total	**1,174**	**103,277**	**100.00**	**91,692**	**85.40**	**74.19**	**51.11**	**4.57**	**25.21**	**10.03**	**0.60**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pittsburgh CSA	1,048	33,336	100.00	49,940	85.27	83.87	53.72	4.34	15.17	10.39	0.95
Total	**1,048**	**33,336**	**100.00**	**49,940**	**85.27**	**83.87**	**53.72**	**4.34**	**15.17**	**10.39**	**0.95**

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

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Altoona MSA	60	2,070	6.19	4,865	83.17	76.67	56.05	5.00	20.00	11.84	3.33
Erie CSA	140	6,758	14.43	14,877	83.89	75.71	53.20	5.16	22.86	10.95	1.43
Harrisburg CSA	305	16,422	31.44	49,832	85.72	81.31	53.30	3.74	17.05	10.54	1.64
Lancaster MSA	165	7,624	17.01	34,250	87.54	81.21	55.59	4.23	17.58	8.24	1.21
Scranton MSA	235	8,679	24.23	28,194	86.04	92.77	52.10	3.76	7.23	10.20	--
State College MSA	65	2,195	6.70	6,748	84.38	86.15	53.45	3.69	10.77	11.93	3.08
Total	**970**	**43,748**	**100.00**	**138,766**	**85.79**	**83.30**	**53.71**	**4.05**	**15.36**	**10.16**	**1.34**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, 2024 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2022-2023 PA Non-MSA	60	2,489	100.00	9,163	88.38	95.00	56.18	2.78	5.00	8.84	--
Total	**60**	**2,489**	**100.00**	**9,163**	**88.38**	**95.00**	**56.18**	**2.78**	**5.00**	**8.84**	**--**

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
PA Non-MSA	61	1,234	100.00	4,600	88.46	85.25	57.91	2.56	14.75	8.98	--
Total	**61**	**1,234**	**100.00**	**4,600**	**88.46**	**85.25**	**57.91**	**2.56**	**14.75**	**8.98**	**--**

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

State of Vermont

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
VT Non-MSA	466	87,505	46.41	9,879	--	--	--	9.45	9.87	8.06	67.97	67.38	68.21	21.92	19.53	20.36	0.65	3.22	3.38
Burlington CSA	538	119,655	53.59	19,581	0.84	0.93	1.05	13.03	10.04	16.05	64.00	58.74	62.08	21.97	30.11	20.57	0.16	0.19	0.26
Total	**1,004**	**207,160**	**100.00**	**29,460**	**0.49**	**0.50**	**0.70**	**11.54**	**9.96**	**13.37**	**65.65**	**62.75**	**64.13**	**21.95**	**25.20**	**20.50**	**0.36**	**1.59**	**1.30**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
VT Non-MSA	466	87,505	46.41	9,879	19.27	10.30	6.79	17.44	18.67	17.31	22.64	21.89	22.14	40.65	48.28	44.75	--	0.86	9.01
Burlington CSA	538	119,655	53.59	19,581	19.70	10.78	7.74	17.19	24.72	21.05	23.22	22.12	25.23	39.89	41.82	37.51	--	0.56	8.47
Total	**1,004**	**207,160**	**100.00**	**29,460**	**19.53**	**10.56**	**7.42**	**17.29**	**21.91**	**19.80**	**22.99**	**22.01**	**24.19**	**40.19**	**44.82**	**39.94**	**--**	**0.70**	**8.65**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
VT Non-MSA	131	3,212	34.75	8,021	--	--	--	12.86	7.63	9.76	62.91	67.94	64.03	22.74	22.90	24.57	1.50	1.53	1.63
Burlington CSA	246	10,288	65.25	12,522	1.25	0.41	1.22	15.70	18.29	16.83	49.03	49.59	49.98	33.05	31.30	31.35	0.97	0.41	0.61
Total	**377**	**13,500**	**100.00**	**20,543**	**0.77**	**0.27**	**0.74**	**14.62**	**14.59**	**14.07**	**54.30**	**55.97**	**55.47**	**29.14**	**28.38**	**28.71**	**1.17**	**0.80**	**1.01**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available
	#	$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
VT Non-MSA	131	3,212	34.75	8,021	86.59	91.60	50.60	3.88	8.40	9.52	--
Burlington CSA	246	10,288	65.25	12,522	86.43	86.99	50.76	4.35	11.38	9.22	1.63
Total	**377**	**13,500**	**100.00**	**20,543**	**86.49**	**88.59**	**50.70**	**4.17**	**10.34**	**9.34**	**1.06**

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%