



PUBLIC DISCLOSURE

August 28, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Capital One, National Association
Charter Number: 13688

1680 Capital One Drive
McLean, Virginia 22102

Office of the Comptroller of the Currency

Large Bank Supervision
Constitution Center
400 7th Street, S.W.
Washington, D.C. 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 bank. 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.

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Overall CRA Rating

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

The following table indicates the performance level of Capital One, National Association (CONA, or the bank) with respect to the Lending, Investment, and Service Tests:

| Performance Levels | Capital One, National Association Performance Tests | | |
|---------------------------|--|-----------------|--------------|
| | 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 deposits, of the three multi-state metropolitan statistical areas (MMSAs) and 16 state ratings, with the performance in the New York-Newark, NY-NJ-CT-PA Combined Statistical Area (New York CSA), Washington-Baltimore-Arlington, DC-MD-VA-WV-PA Combined Statistical Area (Washington, DC CSA) assessment areas (AAs) and State of Louisiana rating area carrying the greatest weight.
- The Investment Test rating is based on performance across all rating areas. Examiners weighted performance in the same manner as the Lending Test.
- The Service Test rating is based on performance across all rating areas. Examiners weighted performance in the same manner as the Lending Test.

Flexible Lending Products

CONA offered two flexible secured consumer credit card products that provided access to credit to individuals that do not meet CONA’s traditional underwriting guidelines. Both products required customers to provide a deposit to establish an initial credit line and did not carry an annual membership fee. With responsible card use, customers can earn back the deposit and be considered for a credit line increase or an unsecured card. During the evaluation period, CONA originated approximately 4.2 million secured credit card loans nationwide, including nearly 1.7 million secured credit card loans inside CONA’s AAs.

CONA also offered flexible loans to small businesses that served AA credit needs through Small

Business Administration (SBA) loans and loans made pursuant to the SBA’s Paycheck Protection Program (PPP) in response to the coronavirus disease 2019 (COVID-19) pandemic. CONA originated or purchased 24,275 SBA loans totaling \$1.5 billion, including 24,206 PPP loans totaling \$1.4 billion. Approximately 92 percent of CONA’s SBA loans were made inside the bank’s AAs.

Bank-wide Community Development Services

CONA formalized its volunteer services under a centralized *Pro Bono* volunteer program that matches bank employees’ skills and expertise with specific needs identified by nonprofit organizations. The *Pro Bono* volunteer program enables nonprofit and community organizations to request specific skillsets under different categories to meet their needs. CONA identifies the employees and staff with the requested skills, knowledge, or expertise and matches the volunteer with the organization. Services offered through the *Pro Bono* model include branding, communications, cybersecurity, data, design, finance, human resources, legal, product, and technology. During the evaluation period, a total of 3,470 CONA associates provided 58,443 total hours of community development services to 175 community partners through the bank’s *Pro Bono* volunteer program.

Lending in Assessment Area

An adequate percentage of the bank’s loans are in its AAs.

The bank originated and purchased 37 percent of its total loans inside its 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. This percentage reflects CONA’s primary lending product as a nationwide consumer credit card lender. CONA is one of the largest nationwide credit card originators by volume. Examiners considered CONA’s business model as part of performance context. CONA’s business model primarily relies on digital delivery systems for deposits and consumer lending, which had the effect of lowering CONA’s proportion of lending within the AAs.

| Table D - Lending Inside and Outside of the Assessment Area | | | | | | | | | | |
|---|------------------------|-----------|-------------------|-----------|--------------------|--|-------------|--------------------|-------------|---------------------------|
| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$(000s) |
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Home Mortgage | 813 | 54.6 | 675 | 45.4 | 1,488 | 16,099,553 | 59.3 | 11,031,048 | 40.7 | 27,130,601 |
| Small Business | 558,664 | 41 | 805,196 | 59 | 1,363,860 | 8,928,390 | 48.9 | 9,313,261 | 51.1 | 18,241,651 |
| Small Farm | 1,922 | 9.5 | 18,242 | 90.5 | 20,164 | 19,781 | 8.9 | 202,271 | 91.1 | 222,052 |
| Consumer | 30,950,779 | 36.9 | 52,879,060 | 63.1 | 83,829,839 | 64,175,184 | 40.7 | 93,437,349 | 59.3 | 157,612,533 |
| Total | 31,512,178 | 37 | 53,703,173 | 63 | 85,215,351 | 89,222,908 | 43.9 | 113,983,929 | 56.1 | 203,206,837 |
| <i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i> | | | | | | | | | | |

Description of Institution

CONA is an interstate bank headquartered in McLean, Virginia. CONA is a wholly owned subsidiary of Capital One Financial Corporation (COF), a bank holding company also headquartered in McLean, Virginia with total assets of \$455.2 billion as of December 31, 2022. On October 1, 2022, Capital One Bank, National Association (COBNA), a wholly owned subsidiary of COF and an affiliate of CONA, merged with CONA. COBNA's data and activities were considered in this evaluation of CONA. COBNA's consolidation into CONA did not impact CONA's scope of operations as COBNA operated as a limited purpose institution prior to the merger. COBNA engaged exclusively in credit card operations and had a single office headquartered in Glen Allen, Virginia. Refer to appendix A for a complete list of subsidiaries, affiliates, and products considered.

CONA offers a broad spectrum of financial products and services to consumers, small businesses, and commercial clients through physical and digital delivery systems. CONA's consumer banking products include deposit accounts with no monthly fees or minimum balance requirements and consumer credit cards offered directly to consumers primarily through online channels or partnerships with retailers. CONA offers small business credit cards, loans, and lines of credit as well as commercial loans, including multifamily residential loans, and commercial deposit accounts including checking, money market, certificates of deposits, and treasury management services. CONA's primary business strategy is consumer credit card lending, which comprised 98.4 percent of CONA's total lending during the evaluation period.

As of December 31, 2022, CONA operated 291 retail banking branches, 52 cafés, and 1,816 deposit-taking Automated Teller Machines (ATMs). The cafés contain deposit-taking ATMs. CONA considers the AAs where it has no branches to be digital markets for purposes of delivering banking products and services.

CONA delineated 70 AAs within 19 rating areas across 23 states, including two Combined Statistical Areas (CSAs) and one MMSA where CONA operates in at least two states. CONA operated retail bank branches, cafés, or deposit-taking ATMs in Arizona, California, Colorado, Connecticut, Delaware, the District of Columbia, Florida, Georgia, Illinois, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Nevada, New Jersey, New York, Ohio, Oregon, Pennsylvania, Texas, Virginia, and Washington. New rating areas for this evaluation include the states of Arizona, Georgia, Michigan, Nevada, and Ohio. These new rating areas were the result of CONA establishing cafés with deposit-taking ATMs. CONA further expanded its presence through new cafés in Sacramento, California and Tampa, Florida.

As of December 31, 2022, CONA reported total assets of \$453.3 billion, deposits of \$355 billion, and tier 1 capital of \$46.6 billion. The deposits included \$179.2 billion of internet deposits assigned to a processing center in Wilmington, Delaware for accounting purposes and the bank's McLean, Virginia headquarters. CONA tracks the geographic distribution of internet deposits based on the customer's address. The internet deposits within CONA's footprint were allocated to specific AAs ("allocated internet deposits").

As of December 31, 2022, CONA's loans and leases totaled \$312.5 billion, representing 68.9 percent of total assets. The composition of the loan portfolio consists of \$204.8 billion in loans to individuals (65.5 percent of total loans and leases), \$30.5 billion (9.7 percent) in real estate-related loans, \$47.2 billion (15.1 percent) in commercial loans, \$30.1 billion (9.6 percent) in other loans, and \$1 million (less than 0.1 percent) in agricultural loans.

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

CONA received an overall Outstanding rating at its previous CRA evaluation by the OCC, dated August 24, 2020.

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 from January 1, 2020 through December 31, 2022. In evaluating the bank's lending performance, examiners reviewed home mortgage loan data reported under the Home Mortgage Disclosure Act (HMDA), small loans to businesses and small loans to farms reported under the Community Reinvestment Act (CRA), consumer loan data provided by management, and community development (CD) loans. Consumer loans consist solely of consumer credit card loans. Examiners also evaluated retail banking services, qualified investments, and CD services from January 1, 2020 through December 31, 2022. Qualifying activities performed in response to the significant impact of the COVID-19 pandemic across the United States were considered in this evaluation.

Examiners reviewed the United States Office of Management and Budget (OMB) Bulletin No. 20-01, effective March 6, 2020, to evaluate the delineation of Metropolitan Statistical Areas (MSAs), Micropolitan Statistical Areas, CSAs, and Metropolitan Divisions (MDs) for potential impacts on the bank's AAs. Examiners found the revised delineations for statistical areas did not impact the bank's AAs.

Due to updated 2020 U.S. Census data and census tract income level designation changes that became effective January 1, 2022, examiners conducted a separate analysis of CONA's lending performance during the January 1, 2020 through December 31, 2021 period (2020-2021 period) and from the January 1, 2022 through December 31, 2022 period (2022 period). Examiners analyzed CONA's home mortgage lending, small loans to businesses, small loans to farms, and consumer lending performance for the 2020-2021 period using the 2015 American Community Survey (ACS) demographic information. For the 2022 period, examiners used the 2020 U.S. Census demographic information to analyze CONA's lending performance. Except where noted, examiners provided more consideration to CONA's lending performance during the 2020-2021 period as this covered more of the overall evaluation period. Examiners evaluated CONA's lending performance for the 2022 period in comparison to the 2020-2021 period and, where applicable, discussed the factors contributing to differences in lending performance between the two periods. Appendix D only includes data from the 2020-2021 period.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, MMSA, or CSA were combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state were 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.

For AAs comprised of contiguous MSAs that are part of a CSA, CONA's performance is presented at the CSA level. For each full-scope review, economic information is separately detailed for each MSA area within a CSA.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA rating section for details regarding how the areas were weighted in arriving at the respective ratings.

The New York CSA, Washington, DC CSA, and the state of Louisiana rating areas represented CONA's most significant markets in terms of deposits (after allocating internet deposits) and carried the greatest weight in the overall conclusions. These three rating areas represented 73.9 percent of CONA's total deposits.

Description of Factors Considered Under Each Performance Test

Lending Test

Loan Products Evaluated

Examiners evaluated consumer credit card loans, small loans to businesses, home mortgage loans, and small loans to farms in each AA. Examiners did not perform a statistical analysis or draw conclusions for a loan product if the bank originated or purchased less than 20 loans in the 2020-2021 evaluation period or the 2022 evaluation period. CONA's strategic focus is consumer credit card loans. Home mortgage loans and small loans to farms are not primary loan products in any of the bank's AAs and the loan volumes for these products were minimal for most of CONA's rating areas. CONA's home mortgage loans consist solely of multifamily residential loans. If examiners included an analysis of home mortgage loans or small loans to farms in a rating area, it was noted in the narrative for the applicable rating area. Examiners did not include the lending tables for rating areas in which the bank did not purchase or originate a loan product in that rating area.

The analysis included both the number and dollar volume of lending. The analysis of lending, except for CD loans, emphasized the number of loans rather than the dollar volume because it is a better indicator of the number of individuals, businesses, or farms served. In AAs where examiners identified differences in performance between loan products, examiners evaluated the products based on the loan mix by number of loans specific to the AA over the evaluation period. For all AAs, consumer lending received significantly greater weight than small loans to businesses in developing the overall conclusions due to the higher volume of consumer loans during the evaluation period. Examiners' weighting of loan products in determining the bank's performance is described within the narrative comments of each rating area.

Lending Activity

For all rating areas, examiners evaluated CONA's lending activity by measuring the volume of CONA's lending compared to its size and resources in its AAs. For each applicable loan product in its AAs, examiners compared CONA's lending market share and rank to its deposit market share and rank to approximate CONA'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's (FDIC)

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

For AAs in which CONA does not operate a licensed branch and, as a result, CONA's deposits are not reported on the FDIC's Deposit Market Share reports, examiners relied on bank provided data to estimate what CONA's deposit market share and rank would have been in these AAs to approximate CONA's size, lending capacity, and competitive environment. CONA's deposit data allocated customer deposits to AAs based on the customer's address. Examiners compared CONA's lending volume to the estimated deposit market share and rank to assess its lending volume compared to the bank's size and resources.

As lenders do not report data on their consumer lending activities, aggregate market share or aggregate market rank data is not available. To measure CONA's consumer lending activity, examiners compared CONA's consumer lending volume to its total deposits in each AA.

Loan Distribution Analysis

Examiners' analysis of CONA's loan distribution compared home mortgage loans, small loans to businesses, and small loans to farms to demographic and aggregate data under the applicable Lending Test components. For consumer loans, examiners compared consumer lending to demographic data only as aggregate consumer loan data was not available.

Examiners placed more weight on the demographic comparators than aggregate comparators in evaluating CONA's geographic and borrower distributions, unless otherwise noted. Demographic data is used to determine the reasonableness of a bank's distribution of loans among borrowers of different incomes and across geographies of different income levels. Aggregate data illustrates how the bank's lending performs relative to other lenders in the AA and provides context on the reasonableness of the bank's performance.

For the 2020-2021 period, geographic and borrower demographic comparators included data from both 2020 and 2021 whereas aggregate comparators included only data from 2021. For the 2022 period, aggregate market data was only available for home mortgage loans and not for small business and small farm loans. As a result, examiners concluded only on demographic data for small loans to businesses and small loans to farms for the 2022 evaluation period.

Examiners aggregated lending performance for the 2020-2021 period and the 2022 period to conclude on CONA's overall performance under the Lending Test for the entire evaluation period.

Geographic and Borrower Distribution

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

For the analysis of the bank's geographic distribution of loans, examiners weighted the bank's performance between low- and moderate-income geographies equally, unless otherwise noted. In certain AAs, examiners placed more weight on the bank's performance in low- or moderate-income geographies if warranted by limited opportunities to lend or other performance context factors. Examiners have identified each AA in which this occurred within the Lending Test section.

For examiners' analysis of CONA's borrower distribution of home mortgage lending, examiners did not conclude on mortgage lending as CONA's home mortgage lending consists solely of multifamily residential loans for which there is no income data, and the borrower distribution analysis was not meaningful. In each AA, examiners' conclusions on the bank's borrower distribution were based on an aggregate of CONA's lending performance for consumer loans, small loans to businesses, and, when applicable, small loans to farms.

Community Development Loans

Examiners' analysis considered the number and dollar volume of CD loans with more positive consideration provided to those loans that were particularly innovative, complex, or responsive to the needs of the AA. To provide perspective on the relative level of CD lending, the bank's tier 1 capital was allocated to the rating areas and AAs based on the pro rata share of allocated deposits. CD lending could have a positive, neutral, or negative impact on the performance rating, which examiners described within the narrative comments. The level of CD lending in each AA had a positive or minimal effect on the AA's Lending Test conclusion, as applicable.

Other Loan Data

Examiners also considered, at the bank's option, commercial leases and letters of credit with a CD purpose. The bank originated 19 commercial leases totaling \$172.8 million and 15 letters of credit totaling \$225 million. Six commercial leases totaling \$109.1 million, and all letters of credit, were made inside the bank's AAs.

Broader Statewide and Regional Area CD Lending

Examiners also considered, at the bank's option, broader statewide and regional area (BSRA) CD lending activity that includes the bank's AAs. The analysis considered the number and dollar volume of CD lending. The bank originated 699 loans totaling \$10.1 billion across all of its BSRAs.

Investment Test

Examiners' analysis of qualified investments included the investment portfolio as well as donations and grants made during the evaluation period with CD as the primary purpose. Qualified investments included investments that met the definition of CD that the bank made during the current evaluation period and investments made during the prior period that were still outstanding. Examiners considered prior-period investments at the book value of the investments at the end of the current evaluation period and current-period investments at their original investment amount. Examiners evaluated the bank's performance based on the number and amount of investments and the extent that the investments met the credit and community development needs of an AA. Examiners further considered unfunded commitments that are legally binding and tracked and recorded in the bank's financial reporting system. Examiners also considered the complexity and innovativeness of investments, including the expertise required to execute the investment and the use of multiple funding sources.

Examiners compared the dollar amount of qualified investments made in the current period and prior periods to the tier 1 capital allocated to the AAs to evaluate the volume of investment activity. Tier 1 capital was allocated to the rating areas and AAs based on the pro rata share of allocated deposits.

CONA's investment strategy focused on affordable housing, primarily using low-income housing tax credits (LIHTCs). These are complex transactions that provide substantial impact to low- and moderate-income individuals and communities in the form of affordable housing.

In some AAs, examiners considered the limited number of investment opportunities and strong competition for investment opportunities as performance context factors.

Broader Statewide and Regional Area CD Investments

Examiners also considered, at the bank's option, BSRA activities that included the bank's AAs. Examiners' analysis considered the number and dollar volume of both current period and prior period CD investments. CONA provided 503 qualified BSRA investments and grants totaling \$927.9 million.

Service Test

Performance Criteria

For all rating areas, examiners evaluated CONA's record of helping to meet the credit needs of its AAs by analyzing both the effectiveness and availability of CONA's systems for delivering retail banking services (service delivery systems) and the extent and innovativeness of CONA's CD services. Examiners placed greater weight on the effectiveness and availability of the bank's service delivery systems in concluding on the bank's performance. Where applicable, performance context factors that resulted in changes to examiners' conclusions on the bank's performance under the Service Test are discussed in the retail banking services or CD services section of that AA.

Effectiveness of Service Delivery Systems

For the four rating areas in which CONA operated a licensed branch, examiners evaluated the effectiveness and availability of CONA's service delivery systems based on the following criteria:

- the distribution of CONA's branches among low-, moderate-, middle-, and upper-income geographies as of the end of the evaluation period;
- in the context of the distribution of CONA's branches, CONA's record of opening and closing branches during the evaluation period, particularly branches located in low- and moderate-income geographies or primarily serving low- and moderate-income individuals;
- the availability and effectiveness of CONA's alternative delivery systems (ADS) for delivering retail banking services in low- and moderate-income geographies and to low- and moderate-income individuals; and
- the range of retail banking products and services CONA provided in low-, moderate-, middle-, and upper-income geographies and the degree to which CONA's retail banking products and services are tailored to meet the needs of those geographies.

Branch Distribution

To evaluate the bank's branch distribution, examiners compared the percentages of the bank's branches located in low- and moderate-income geographies to the percentages of the population in those

geographies. Examiners weighted the bank's branch distribution among low- and moderate-income geographies equally, except where indicated.

The analysis of the distribution of the bank's retail branches was based on locations as of December 31, 2022. Income category classifications were based on the 2020 U.S. Census. When applicable, examiners considered changes to the branch distribution in an AA that resulted solely from a geography's income classification changing from the 2015 ACS to the 2020 U.S. Census.

Branches Accessible to Low- and Moderate-Income Residents

Examiners considered bank-provided data on the accessibility of branches located in middle- and upper-income geographies to bank customers that resided in low- and moderate-income geographies. This data included information on the number of unique customers that reside in a low- or moderate-income geography that conducted one or more transactions at a branch located in a middle- or upper-income geography. CONA determined the income category of the customers conducting transactions at the branches by geocoding the customer's address.

Examiners gave positive consideration for additional accessibility when the percentages of the branch's usage, as measured by the number of unique customers conducting transactions at the branch, by customers residing in low- and moderate-income geographies was equal to or greater than the percentages of the low- or moderate-income population in the AA.

Examiners did not consider or include branches located in middle- and upper-income geographies as part of CONA's branch distribution for low- and moderate-income geographies. Examiners considered these branches with high rates of usage by residents of low- or moderate-income geographies as additional performance context when concluding on the accessibility of the bank's service delivery systems in each of its AAs.

Branch Openings and Closings

In AAs where CONA opened or closed branches during the evaluation period, examiners assessed the impact of those changes on the distribution of the bank's branches among low- and moderate-income geographies. If CONA did not open or close any branches in an AA during the evaluation period, examiners did not include that performance element in the analysis. For all café markets, CONA did not open any licensed branches during the evaluation period and this performance element is not applicable.

CONA has an ongoing process that incorporates several departments of the bank, including its CRA personnel, to assess and mitigate any negative impact of branch consolidations to low- and moderate-income customers and communities.

In AAs where the bank closed branches, particularly in low- or moderate-income geographies, examiners evaluated the following:

- The impact of the branch closure on the overall geographic distribution of branches within the AA relative to the percentages of the population.
- The bank's rationale or justification for the branch closure.
- Customer complaints and comment letters resulting from, or related to, the branch closure.
- The availability of ADS to provide access to retail banking services.
- Bank-provided information related to customer use of the branch.

Capital One Cafés – Digital Market Delivery Systems

CONA did not operate licensed branches in 15 of the 19 rating areas. For these 15 rating areas, CONA operated cafés and deposit-taking ATMs and considered these markets to be digital markets for the purposes of delivering banking products and services. Capital One cafés provided access to retail banking services exclusively through ADS, including deposit-taking ATMs, online banking, and mobile banking. The cafés are predominantly located in high-traffic areas that are most likely to be routinely convenient to broad and diverse populations. Cafés are staffed by CONA personnel that provide customer service and account assistance through digital tools. Customers establish deposit accounts exclusively through online applications, either via self-service or, with assistance from café personnel, on their mobile phone or bank-provided tablets. The cafés include several amenities that benefit the whole community, such as meeting spaces available for use by the community, free Wi-Fi, and financial literacy education workshops that are open to the public. Retail products and services offered at cafés and café hours of operation are generally consistent throughout CONA's AAs.

Examiners evaluated the effectiveness and availability of CONA's ADS for delivering retail banking services to low- and moderate-income geographies and to low- and moderate-income individuals in these rating areas based on the distribution of deposit-taking ATMs, proprietary bank data on the use of ADS, the range of services CONA provided in all the various income geographies and the degree to which those services were tailored to meet the needs of those geographies. Examiners' methodology for evaluating the effectiveness of the bank's ADS is discussed in the "Bank-wide Alternative Delivery Systems" section below.

Bank-wide Alternative Delivery Systems

CONA leveraged several ADS, including deposit-taking ATMs, mobile banking, and online banking, to deliver retail banking services to its consumers across all rating areas. CONA's ADS were available to customers at no cost. Allpoint and MoneyPass ATMs provided customers access to fee-free cash withdrawals. To assess the effectiveness of CONA's ADS for delivering retail banking services, examiners evaluated the distribution of CONA's deposit-taking ATMs among low- and moderate-income geographies compared to the percentages of the population in those geographies and the change in the use of CONA's ADS by channel (online banking, mobile banking, and deposit-taking ATMs) among customers residing in low- and moderate-income geographies over the evaluation period. To evaluate the change in bank customers' use of ADS over the evaluation period, examiners used internal bank data on customer transactions performed through the bank's online website, mobile application, and deposit-taking ATMs to calculate the difference in the use of ADS from the beginning of the evaluation period and the end of the evaluation period. Examiners compared the increase (or decrease) in ADS usage by customers residing in low- and moderate-income geographies to the increase (or decrease) in ADS usage by customers residing in middle- and upper-income geographies. Examiners considered ADS to be effective in delivering retail banking services in AAs where the percentage change in ADS usage by customers residing in low- and moderate-income geographies was equal to, or greater than, the percentage change in ADS usage by customers residing in middle- and upper-income geographies.

Range of Services

CONA is a nationwide consumer credit card lender and offers its credit card products directly to consumers through its online applications and indirectly to consumers through its partnerships with

retailers. CONA's online applications enable prospective customers to apply for credit 24 hours a day and 7 days a week, irrespective of location. For small businesses, CONA offers small business credit cards, deposit products, loans, and lines of credit nationwide via online application, telephone, and through its branches.

CONA's branch services are consistent with the bank's ADS including check depositing, which is available via remote deposit capture on the bank's mobile application, cash deposits and withdrawals available through the bank's ATMs, and ordering cashier's checks that is available via the bank's online website and mobile application. Other services such as wire transfers, ordering checks, making transfers between deposit accounts, and making loan payments are offered through the bank's branches and the bank's online platforms. CONA's online services maintain parity with in-branch services.

During the prior evaluation period, the bank partnered with CVS Pharmacy, Inc (CVS) to allow Capital One 360 checking customers to deposit cash into their accounts through the check-out register at select CVS stores. This provides an additional method that customers can use to deposit cash in areas that lack access to branches, cafés, or deposit-taking ATMs. This feature was initially limited to existing 360 checking account customers in Atlanta and New York City before expanding to Philadelphia, Phoenix, Minneapolis, Orlando, and Cleveland in November 2020. In October 2021, CONA further expanded the service to all 360 checking customers nationwide and then to all consumer checking customers in September 2022.

On December 1, 2021, CONA announced the elimination of fees associated with overdraft protection services and fees associated with not sufficient funds (NSF) for deposit customers. CONA eliminated these fees in the first calendar quarter of 2022. Examiners positively considered the responsiveness of CONA's deposit fee elimination in the evaluation of the bank's performance.

For the full-scope AAs, examiners evaluated the range of services offered at CONA's branches, cafés, and deposit-taking ATMs to determine if there were measurable differences in the services offered to, or available for, low- and moderate-income individuals or residents of low- and moderate-income geographies. Examiners also evaluated the hours of operation in CONA's branches and cafés to determine if there were any significant differences in operations between low- and moderate-income geographies and middle- and upper-income geographies. Examiners did not identify material or significant differences in CONA's services and hours of operation for its branches, cafés, and deposit-taking ATMs in the full-scope AAs.

Community Development Services

Examiners evaluated CONA's record of providing CD services only in the full-scope AAs. CD services were not considered for limited-scope AAs. Examiners' primary consideration was the responsiveness of CONA's CD services to the needs of the community. Services that addressed critical needs, were most impactful, or that reflected ongoing relationships with community organizations received the most consideration in this analysis. In early 2020, the COVID-19 pandemic led to a public health emergency that severely impacted the national economy. COVID-19 had spread worldwide and caused deteriorating economic conditions resulting from mandated stay-at-home orders and business shutdowns used to slow the spread of the virus. Due to the COVID-19 public health crisis and associated government-mandated shutdowns, CONA was unable to provide CD services through traditional in-person volunteer activities for a portion of the evaluation period as nonprofit organizations adjusted their processes to provide community services remotely. This resulted in less opportunities for CD services during a portion of the

evaluation period. CONA shifted to providing CD services virtually through online channels during the 2020-2021 period.

Other Information

Assessment Areas

Examiners determined that all AAs consisted of whole geographies and met the regulatory requirements. The AAs reasonably reflected the different trade areas that CONA's branches and deposit-taking ATMs serve, and the AAs did not arbitrarily exclude any low- or moderate-income areas.

Lending Gap Analysis

Examiners reviewed lending maps and analyzed consumer 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 any of the full-scope AAs reviewed.

Deposit Allocation and Tier 1 Capital Calculation Methodology

The internet deposits that were located outside CONA's AAs ("unallocated internet deposits") were assigned to CONA's headquarters in McLean, Virginia. Our analysis reflects the dispersion of these internet accounts, and allocated tier 1 capital was adjusted accordingly. For AAs in which CONA operated a licensed branch, the total deposits include deposits reported on the FDIC Deposit Market Share Reports based on the annual Summary of Deposits survey for FDIC-insured institutions as of June 30, 2022, and the allocated internet deposits. For AAs in which CONA did not operate a licensed branch, the total deposits included only the allocated internet deposits. For the Washington, DC CSA AA, the total deposits included the FDIC-reported deposits as of June 30, 2022, allocated internet deposits, and the unallocated internet deposits.

As a result of the COBNA merger, and the resulting capital influx, examiners used a weighted average calculation of CONA's tier 1 capital for allocating tier 1 capital to the rating areas and AAs. CONA's tier 1 capital as of September 30, 2022 was weighted 33 months (or 11 quarters) and the tier 1 capital as of December 31, 2022, following the bank merger, was weighted three months (or one quarter). Total deposits used to allocate tier 1 capital included all CONA and COBNA deposits (less intercompany amounts) as of June 30, 2022. Seventy-five billion dollars of COBNA's deposits reported on the June 30th, 2022 FDIC Summary of Deposits survey were intercompany deposits and were excluded from the allocated tier 1 capital calculation.

Community Contacts

Examiners reviewed and considered community contacts conducted by the OCC, FDIC, and Federal Reserve Bank 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. Where noted, examiners also considered community needs the bank identified through its community contacts. In the evaluation, 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 literacy education continued to be the primary credit and CD needs in many AAs.

Coronavirus Disease 2019 (COVID-19)

In March 2020, the United States began to face the pandemic from the COVID-19 virus, which resulted in massive economic issues, including business shutdowns and increased unemployment. The government instituted several programs and initiatives to assist businesses and individuals, including the SBA's PPP, COVID-19 Economic Injury Disaster Loan program, mortgage foreclosure and eviction protection programs, and extended unemployment benefits. Examiners considered the bank's participation in addressing community and customer needs during the COVID-19 pandemic for all AAs in the Lending, Investment, and Service Tests of this evaluation.

PPP Lending

During the evaluation period, CONA originated 24,206 PPP loans totaling \$1.4 billion. The bank's PPP lending program targeted companies with 20 or fewer employees, which comprised 93 percent of CONA's PPP loans. Further, 86 percent of CONA's PPP loans were for \$100,000 or less.

Loan Payment Relief

In response to the COVID-19 pandemic, CONA provided loan payment deferrals to retail consumers and small businesses to provide customers with financial flexibility.

Small Business Loans: CONA provided relief to small businesses by deferring payments on 1,852 loans for a total of 5,957 payments, totaling \$21.2 million. In addition, over 700 small business loans received six-month loan forgiveness from the SBA (through the SBA Coronavirus Aid, Relief, and Economic Security Act), totaling more than \$22 million.

Small Business Credit Cards: CONA provided 64,000 payment deferrals totaling \$81.9 million. In addition, the annual percentage rate (APR) was reduced to 9.99 percent on 662 credit card accounts for nine months for customers who were more than 60 days past due and impacted by COVID-19.

Consumer Credit Cards: CONA provided 2.2 million payment deferrals totaling \$357 million. In addition, the bank reduced the APR on 101,000 credit card accounts to 9.99 percent for nine months for customers who were more than 60 days past due and impacted by COVID-19.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c), in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considered evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans the OCC considered as part of the bank's lending performance. As part of this evaluation process, the OCC consulted 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.

Examiners did not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC considered information that was made available to the OCC on a confidential basis during its consultations.

The CRA performance rating was not lowered as a result of these findings. Examiners considered the nature, extent, and strength of the evidence of the practices; the extent to which the bank had policies and procedures in place to prevent the practices; and the extent to which the bank has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

Examiners 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 bank'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

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

CRA rating for the New York CSA: 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:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- An excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.
- CONA was a leader in providing CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in the New York CSA

The New York CSA AA was comprised of one MSA and four MDs. CONA delineated the entirety of the Bridgeport-Stamford-Norwalk, CT MSA (Bridgeport MSA), Nassau County-Suffolk County, NY MD, and New Brunswick-Lakewood, NJ MD as AAs. CONA also delineated as AAs the portions of the New York-Jersey City-White Plains, NY-NJ MD and Newark, NJ-PA MD where CONA had branch locations. Refer to appendix A for a complete description of the AA.

CONA had 110 branches, two cafés, 504 deposit-taking ATMs, and \$75.9 billion of deposits (including allocated internet deposits) within these AAs, which represented 23.4 percent of the bank's total domestic deposits. The bank originated or purchased 17.5 percent of its evaluation period lending by count and 19.8 percent by dollar volume in the AA.

Based on June 30, 2022 FDIC summary of deposit information, CONA ranked 11th out of 166 FDIC-insured depository institutions with a 1.7 percent deposit market share. The top three depository institutions by deposit market share were JP Morgan Chase Bank, N.A. (31 percent), Goldman Sachs Bank USA (9.1 percent), and Bank of America, N.A. (7.2 percent).

The following table provides a summary of the demographics that include housing and business information for the New York CSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|------------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: New York CSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 4,649 | 11.3 | 21.5 | 32.8 | 32.4 | 2.0 |
| Population by Geography | 19,819,321 | 11.9 | 22.5 | 31.8 | 33.5 | 0.2 |
| Housing Units by Geography | 7,770,260 | 11.1 | 21.7 | 31.6 | 35.4 | 0.2 |
| Owner-Occupied Units by Geography | 3,617,579 | 3.1 | 13.9 | 37.0 | 45.9 | 0.1 |
| Occupied Rental Units by Geography | 3,449,897 | 19.5 | 29.6 | 25.9 | 24.8 | 0.2 |
| Vacant Units by Geography | 702,784 | 11.6 | 23.4 | 31.2 | 33.5 | 0.2 |
| Businesses by Geography | 2,596,588 | 7.8 | 17.5 | 29.7 | 43.9 | 1.1 |
| Farms by Geography | 31,951 | 5.3 | 16.6 | 33.8 | 43.9 | 0.3 |
| Family Distribution by Income Level | 4,675,301 | 25.4 | 15.5 | 17.1 | 42.0 | 0.0 |
| Household Distribution by Income Level | 7,067,476 | 27.4 | 14.3 | 15.8 | 42.5 | 0.0 |
| Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA | | \$105,628 | Median Gross Rent | | | \$1,340 |
| Median Family Income MSA - 35084 Newark, NJ-PA | | \$90,570 | Median Housing Value | | | \$468,669 |
| Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ | | \$67,560 | Families Below Poverty Level | | | 11.3% |
| Median Family Income MSA - 35004 Nassau County-Suffolk County, NY | | \$108,193 | | | | |
| Median Family Income MSA - 35154 New Brunswick-Lakewood, NJ | | \$95,564 | | | | |
| <i>Source: 2015 ACS and 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|------------|-------------------|------------------------|----------------------|---------------------|-------------------|
| Assessment Area: New York CSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 5,059 | 10.6 | 21.4 | 32.8 | 31.3 | 3.9 |
| Population by Geography | 20,668,518 | 11.5 | 22.3 | 32.4 | 32.8 | 0.9 |
| Housing Units by Geography | 7,940,011 | 10.9 | 21.2 | 32.4 | 34.6 | 0.9 |
| Owner-Occupied Units by Geography | 3,740,725 | 3.3 | 14.8 | 37.6 | 44.0 | 0.4 |
| Occupied Rental Units by Geography | 3,510,436 | 19.4 | 28.2 | 26.7 | 24.4 | 1.3 |
| Vacant Units by Geography | 688,850 | 9.0 | 21.2 | 32.5 | 36.0 | 1.3 |
| Businesses by Geography | 2,803,795 | 8.2 | 17.5 | 30.0 | 42.0 | 2.3 |
| Farms by Geography | 33,904 | 5.8 | 16.8 | 34.3 | 42.2 | 0.8 |
| Family Distribution by Income Level | 4,763,137 | 24.7 | 15.8 | 17.8 | 41.7 | 0.0 |
| Household Distribution by Income Level | 7,251,161 | 27.3 | 14.3 | 15.7 | 42.6 | 0.0 |
| Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA | | \$120,156 | Median Housing Value | | | \$556,608 |
| Median Family Income MSA - 35004 Nassau County-Suffolk County, NY | | \$130,301 | Median Gross Rent | | | \$1,571 |

| | | | |
|--|-----------|------------------------------|------|
| Median Family Income MSA - 35084 Newark, NJ-PA | \$107,333 | Families Below Poverty Level | 9.3% |
| Median Family Income MSA - 35154 New Brunswick-Lakewood, NJ | \$113,495 | | |
| Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ | \$85,483 | | |
| <i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | |

Economic Data

New York-Jersey City-White Plains, NY-NJ MD

Data from Moody's Analytics over the evaluation period indicated that the New York-Jersey City-White Plains, NY-NJ area's above-average payroll growth has slowed. Despite the slower pace, gains were widespread, bolstered by consumer industries and construction. The housing market slowed, but the broader single-family price correction was softened by a heavy reliance on condos. Apartment rent growth is far below its robust early-year pace. Permanent changes in working patterns contributed to elevated vacancy rates on commercial real estate in the area. Data from Kastle Systems, which tracks security badge swipes, showed office occupancy in the broader metro division was about half its pre-pandemic level. With fewer offices being occupied, companies offloaded real estate, pushing vacancies sharply higher.

Based on data from the Bureau of Labor Statistics (BLS), the unemployment rate for the New York-Jersey City-White Plains, NY-NJ area was 4 percent in January 2020, as high as 18.7 percent in May 2020, and 4.1 percent in December 2022. Major employers in the AA included Montefiore Health System, Mount Sinai Health System, JP Morgan Chase, Bank of America, New York Presbyterian Healthcare, and NYU Langone Medical Center.

Nassau County-Suffolk County, NY MD

Data from Moody's Analytics over the evaluation period indicated that the Nassau County-Suffolk County, NY area's payroll growth has been inconsistent with payroll declines in the spring of 2022 following by increases in the summer. Payroll increases were driven by consumer industries. According to data from OneKey MLS, housing prices declined in late 2022 in both Nassau and Suffolk counties, and brokers reported a decline in high-end home sales in the high-cost Hamptons market. The extended New York City metro area experienced one of the slowest rates of price growth in the nation, with less impact on housing affordability in Nassau and Suffolk compared to the nation. However, among the 65 metro areas or divisions in the Northeast, only Bridgeport CT featured a higher cost of living.

Based on data from the BLS, the unemployment rate for the Nassau County-Suffolk County, NY area was 3.9 percent in January 2020, as high as 18.1 percent in April 2020, and 2.7 percent in December 2022. Major employers in the AA included Northwell Health, Henry Schein Inc., Volt Information Sciences Inc., and JetBlue Airways.

Newark, NJ-PA MD

Data from Moody's Analytics over the evaluation period indicated that the Newark, NJ-PA area had an economy that was steadily improving. Consistent job gains propelled this area closer toward its pre-pandemic employment level. Education and health services were two recent sources of strength, along with leisure and hospitality. Logistics also contributed to growth as supply-chain bottlenecks and robust

consumer spending on goods led to above-average hiring trends. The area's strengths include an abundance of high value-added industries, including financial services, pharmaceuticals, high tech, a coastal location that allows it to benefit from trade, and a well-educated and productive workforce. Weaknesses include weak population growth, high business and living costs, and an unfavorable age structure.

Based on data from the BLS, the unemployment rate for the Newark, NJ-PA area was 4.3 percent in January 2020, as high as 14.6 percent in May 2020, and 3.4 percent in December 2022. Major employers in the AA included Newark International Airport, University of Medicine and Dentistry of New Jersey, Verizon, United Airlines, and Public Service Enterprise Group, Inc.

Bridgeport-Stamford-Norwalk, CT MSA

Data from Moody's Analytics over the evaluation period indicated that the Bridgeport-Stamford-Norwalk, CT area's economy struggled for most of 2022 with payroll growth below the national and regional averages. Job performance was mixed with stalling employment in financial services and gains in the defense manufacturing and healthcare sectors. The area's strengths include a global financial center with proximity to New York City, a highly educated labor force, and an above-average exposure to high-tech industries such as aerospace parts manufacturing and semiconductor production. Weaknesses include high living and business costs, skewed income distribution, and weak migration trends.

Based on data from the BLS, the unemployment rate for the Bridgeport-Stamford-Norwalk, CT area was 4.3 percent in January 2020, as high as 12.4 percent in July 2020, and 3.1 percent in December 2022. Major employers in the AA included Sikorsky Aircraft Corp., Boehringer Ingelheim Corp, ASML US Inc., Ceci Brothers Inc., and Deloitte.

Community Contact

A review was conducted of seven community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on 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 housing costs were high compared to their income. The COVID-19 pandemic helped to drive up home prices and housing demand as wealthier families from the New York City area relocated to more suburban parts of the rating area for less housing congestion. Air BNB and investor purchases also impacted access to affordable housing by 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 was 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, their household incomes were too high to qualify for state and federal subsidy programs. Contacts also noted the need for greater support for small businesses. Many small businesses suffered during the pandemic and in many cases, the Coronavirus Aid, Relief, and Economic Security Act funding was insufficient or did not reach those businesses that needed funding the most. Credit and community development needs identified included:

- 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 for renewable energy

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

Scope of Evaluation in the New York CSA

The New York CSA AA received a full-scope review. The New York CSA AA represents one of CONA's most significant markets in terms of lending and deposits, therefore, the performance in the New York CSA AA was weighted more heavily in determining CONA's overall CRA rating. CONA's strategic focus is consumer lending. Consumer loans received greater weight than home mortgage loans, small loans to businesses, and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NEW YORK CSA

LENDING TEST

The bank's performance under the Lending Test in the New York CSA AA 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 an excellent responsiveness to AA credit needs.

| Number of Loans | | | | | | |
|------------------------|---------------|----------------|------------|------------------|-----------------------|------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total |
| New York CSA | 240 | 107,454 | 164 | 5,396,441 | 652 | 5,504,951 |
| Statewide | 0 | 0 | 0 | 0 | 63 | 63 |
| Regional | 0 | 0 | 0 | 0 | 6 | 6 |
| Total | 240 | 107,454 | 164 | 5,396,441 | 721 | 5,505,020 |

| Dollar Volume of Loans (\$000) | | | | | | |
|---------------------------------------|------------------|------------------|--------------|-------------------|-----------------------|-------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total |
| New York CSA | 4,125,390 | 2,690,723 | 2,201 | 10,876,318 | 3,241,654 | 20,936,286 |
| Statewide | 0 | 0 | 0 | 0 | 680,707 | 680,707 |
| Regional | 0 | 0 | 0 | 0 | 67,253 | 67,253 |
| Total | 4,125,390 | 2,690,723 | 2,201 | 10,876,318 | 3,989,614 | 21,684,246 |

CONA ranked 11th out of 166 FDIC-insured depository institutions with a 1.7 percent deposit market share.

According to peer mortgage data for 2022, CONA had a market share of less than one percent based on the number of home mortgage loans originated or purchased in this AA. The bank also ranked 508th among 1,008 home mortgage lenders in this AA, which placed it in the top 51 percent of lenders. The top lenders in this AA based on market share were Wells Fargo Bank, N.A. (5.1 percent), JP Morgan Chase Bank, N.A. (4.8 percent), and Bank of America, N.A. (4.4 percent).

According to peer small business data for 2021, CONA had a market share of 4.4 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked sixth out of 440 small business lenders, which placed it in the top two percent of lenders. The top lenders in this AA based on market share were American Express National Bank (24.8 percent), JP Morgan Chase Bank, N.A. (20.2 percent), and Bank of America, N.A. (7.5 percent).

According to peer small farm data for 2021, CONA had a market share of 6.9 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked third out of 38 small farm lenders, which placed it in the top eight percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (48 percent), Bank of America, N.A. (11 percent), and Capital One, N.A. (6.9 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 22.3 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O 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.

Based on the data in the tables, the overall geographic distribution of home mortgage loans was excellent.

For 2020 through 2021, the percentages of home mortgage loans in both low- and moderate-income geographies exceeded both the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Businesses

Refer to Table Q 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 1,946 PPP loans totaling \$104.6 million that provided support to small businesses in low- and moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table S 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 farms.

Based on the data in the tables, the overall geographic distribution of small loans to farms was good.

For 2020 through 2021, the percentages of small loans to farms in low-income geographies was below, and in moderate-income geographies exceeded, the percentages of farms located in those geographies. The percentages of small loans to farms in both low- and moderate-income geographies exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was weaker than the 2020 through 2021 period. The percentages of small loans to farms in moderate-income geographies was below the percentages of farms located in those geographies.

Consumer Loans

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

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households in those geographies.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage, small business, small farm, and consumer 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 and farms of different sizes.

Home Mortgage Loans

The bank's home mortgage lending was limited to multifamily loans for which borrower income was not applicable. Therefore, no analysis of the borrower distribution of home mortgage loans was completed.

Small Loans to Businesses

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

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 5,537 PPP loans totaling \$136 million that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographic in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the New York CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was adequate.

For 2020 through 2021, the percentages of small loans to farms with revenues of \$1 million or less was well below the percentages of farms with revenues of \$1 million or less in the AA and was near to the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographic in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the New York CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Commercial Leases and Letters of Credit

The bank originated four commercial leases for \$39.9 million and 14 letters of credit totaling \$224.7 million that have a qualified CD purpose. Two commercial leases supported the revitalization and stabilization of low- and moderate-income geographies, one lease supported community services targeted to low- and moderate-income individuals or geographies, and one lease supported the preservation of affordable housing. All four leases and 14 letters of credit were given positive consideration.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made 652 CD loans totaling \$3.2 billion, which represented 46.6 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 91.7 percent funded affordable housing, 3.9 percent funded economic development activities, three percent funded revitalization and stabilization efforts, and 1.5 percent funded community services.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- A \$10.8 million loan to finance the new construction of a 150-unit affordable housing development. One hundred and forty-nine of 150 units were restricted to low-income individuals earning up to 50 percent of the area median income (AMI). This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$12.1 million in LIHTC equity in the project.
- A \$13.7 million loan to construct a new 45-unit affordable housing development. Forty-four of 45 units were reserved for individuals with incomes up to 60 percent of the AMI. This transaction involved several sources of financing in addition to debt and equity from CONA. This development addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$19.3 million in LIHTC equity in the project.
- Two loans totaling \$11.3 million to refinance a 107-unit affordable housing development. The property was subject to a regulatory agreement requiring that all units be rented to low- and moderate-income households. These loans addressed the community identified need for affordable housing.

Broader Statewide and Regional Area

In addition, CONA made 69 qualified loans totaling \$748 million and two qualified leases totaling \$27.8 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving its AAs. Fifty-nine loans provided financing for affordable housing, four loans were for revitalization and stabilization efforts, four loans were for economic development, and two loans were

for community services benefiting low- and moderate-income individuals. The two leases supported community services targeted to low- and moderate-income individuals.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 312,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices further supported the Lending Test conclusion.

INVESTMENT TEST

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

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

Number and Amount of Qualified Investments

| 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 | 132 | 615,828 | 769 | 509,676 | 901 | 96.2 | 1,125,504 | 92.8 | 0 | 0 |
| Regional | 3 | 20,347 | 1 | 13,027 | 4 | 0.4 | 33,374 | 2.8 | 0 | 0 |
| Statewide | 27 | 51,040 | 5 | 2,918 | 32 | 3.4 | 53,958 | 4.4 | 0 | 0 |
| Total | 162 | 687,215 | 775 | 525,621 | 937 | 100.0 | 1,212,836 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 16.2 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. A substantial majority of the dollar volume of the bank's current- and prior-period investment transactions involved LIHTCs and mortgage-backed securities (MBS) that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services or affordable housing to primarily low- and moderate-income individuals. By dollar volume, 98.1 percent of total investments and grants supported affordable housing, 1.3 percent funded community services to low- and moderate-income individuals, and less than one percent supported economic development and revitalization and stabilization efforts.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included 30 LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate CONA's use of complex investments or responsiveness to community needs:

- An investment of \$15.3 million in LIHTC equity for the new construction of a 70-unit affordable housing development. Sixty-nine of 70 units are reserved for low- and moderate-income households. This transaction included many layers of financing, rent subsidies, and tax abatements from the state, county, and municipality. This investment met the community-identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a construction loan of \$17 million and two letters of credit totaling \$1.2 million for this project.
- An investment of \$11.7 million in LIHTC equity to finance the new construction of an 81-unit affordable housing development. All units are set aside for low- and moderate-income individuals with incomes up to 60 percent of the AMI. This investment is part of a multi-investor fund that includes 26 other properties and six other investors. This investment addressed the identified needs of community revitalization and affordable housing. CONA demonstrated multi-faceted support by also providing a \$1.9 million loan for this project.
- An investment of \$43.8 million in LIHTC equity to finance the new construction of a 157-unit affordable housing development. One hundred and fifty-six of 157 units are reserved for low- and moderate-income individuals earning up to 60 percent of the AMI. This transaction involved public financing from federal and local government sources. This investment addressed the community identified need for affordable housing.
- Grants totaling \$1.5 million to a nonprofit organization that helps improve the living standards for low- and moderate-income individuals by providing grant funds to other organizations working to accomplish this mission. The grants financed COVID-19 relief, learning facilities, and other programs supported by the organization.

Broader Statewide and Regional Area

In addition, CONA made 36 current- and prior-period investments totaling \$87.3 million in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. These investments included 29 prior-period investments totaling \$70.7 million that supported affordable housing, one prior-period investment totaling \$707,874 for economic development, two current-period investments totaling \$15.8 million that supported affordable housing, three grants totaling \$71,667 for community services to low- and moderate-income individuals and one grant totaling \$86,760 for economic development. Investments in the broader statewide and regional area further supported the Outstanding rating.

SERVICE TEST

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

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

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

| Distribution of Branch Delivery System | | | | | | | | | | | |
|--|--------------------------------|--------------------|--------------------------------|---|-----|-----|------|---------------------------------------|------|------|------|
| 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 | Low | Mod | Mid | Upp |
| New York CSA | 100% | 110 | 100% | 8.2 | 20 | 40 | 29.1 | 11.5 | 22.3 | 32.4 | 32.8 |

NOTE: The number of bank branches includes three branches in geographies with no income designation.

Based on the table above, the bank's distribution of branches in low-income geographies was near to, and in moderate-income geographies approximated, the percentages of the population in those geographies.

| Distribution of Branch Openings/Closings | | | | | | |
|--|----------------------|----------------------|---|-----|-----|-----|
| Assessment Area | # of Branch Openings | # of Branch Closings | Branch Openings/Closings | | | |
| | | | Net change in Location of Branches (+ or -) | | | |
| | | | Low | Mod | Mid | Upp |
| New York CSA | 1 | 68 | -1 | -13 | -22 | -30 |

NOTE: The number of branch closings includes one branch in a geography with no income designation.

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. CONA opened one branch in an upper-income geography and closed 14 branches in low- and moderate-income geographies. Factors contributing to the branch closures in low- and moderate-income geographies included the underperformance in branch teller transactions and other key performance metrics identified by the bank.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of two low-income, 10 moderate-income, 11 middle-income, and 12 upper-income geographies where CONA had branches. The U.S. Census changed the income-designation of both low-income geographies to moderate-income geographies. The U.S. Census changed eight of 10 moderate-income geographies to middle-income geographies and two of 10 moderate-income geographies to low-income geographies. These changes resulted in a minor decrease in the total number of branches in moderate-income geographies and no change in the total number of branches in low-income geographies. These changes had a minimal impact on the distribution of branches in those geographies relative to the percentages of the population in their respective geographies.

| | Low-income Geographies | | Moderate-income Geographies | |
|---------------------------|------------------------|------------|-----------------------------|-------------|
| | Branches (#) | % of Total | Branches (#) | % of Total |
| New York CSA | | | | |
| Prior to 2020 U.S. Census | 9 | 8.2 | 23 | 20.9 |
| After 2020 U.S. Census | 9 | 8.2 | 22 | 20 |
| Net Change | 0 | 0 | -1 | -0.9 |

Additional Branch Accessibility

In addition to the bank's branch distribution, examiners gave positive consideration for 29 bank branches in middle- and upper-income geographies that provided additional access to retail banking services to customers residing in low- and moderate-income geographies, as determined by customer usage.

ADS Usage

CONA's ADS provided additional accessibility to retail banking services for the various portions of its AA, including low- and moderate-income geographies or individuals. CONA's ADS had a positive impact on the service test conclusion.

| ATM Distribution | | | | | | | | | |
|---------------------|-----------|------------------------------------|------|------|------|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| New York CSA | 504 | 7.3 | 22.6 | 43.7 | 24.0 | 11.5 | 22.3 | 32.4 | 32.8 |

NOTE: The number of ATMs includes 12 ATMs in geographies with no income designation.

Based on the table above, the distribution of the bank's ATMs in low-income geographies was below, and in moderate-income geographies exceeded, the percentages of the population in those geographies.

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 38.7% | 16.4% |
| Mobile Banking | 64.1% | 47.1% |
| ATM Usage | -39.4% | -56.9% |
| Net Change Across All Channels (Averaged) | 21.1% | 2.2% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AAs, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open 9:00 a.m. to 5:00 p.m. Monday through Friday, and 9:00 a.m. to 12:00 p.m. Saturday. There were 102 full-service branches and eight branches with limited services or accessibility. Eighty-five of the full-service branches were open on Saturdays, 29 full-service branches had drive-up hours, and 26 full-service branches were in low- and moderate-income geographies. Five branches were open 9:00 a.m. to 12:00 p.m. on Sundays. Three of the five branches were in low- and moderate-income geographies.

Community Development Services

The institution was a leader in providing CD services.

CD services were responsive to the community needs the institution identified through community contacts. One thousand and thirty-one bank associates provided 6,822 hours of qualified service activities to 105 organizations. Strong leadership was evident through board or committee participation with 867 hours of those activities to 25 organizations. *Pro Bono* services accounted for 2,894 service hours or 42 percent of CD services. Services consisted of providing workforce development through CONA's *Pro Bono* volunteer program and financial literacy education.

Examples of CD services in the AA include:

- A CONA executive provided 78 hours of board service to a community development corporation (CDC) that supports low- and moderate-income individuals and small businesses. The organization's mission is to preserve and develop affordable housing and support small businesses.
- CONA associates provided 352 hours of workforce development services to a nonprofit organization whose mission is to close the opportunity divide by ensuring that low- and moderate-income young adults gain the skills, experiences, and support that will empower them to reach their potential in higher education and their careers. CONA associates provided resume writing, mock interviews, and networking workshops to clients of the nonprofit organization. These services addressed the bank-identified community need for workforce development.
- A CONA executive provided 27 hours of board service to a national nonprofit organization whose mission is to break the cycle of poverty by investing in parents. Additionally, CONA associates provided 30 hours of financial education. CONA associates provided one-on-one financial counseling and coaching to 668 low- and moderate-income individuals. These services addressed several bank-identified community needs, including pandemic relief, financial education, and credit repair for low- and moderate-income individuals.

Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate Metropolitan Statistical Area (Philadelphia MMSA)

CRA rating for the Philadelphia MMSA: 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:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.
- CONA was a leader in providing CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Philadelphia MMSA

The Philadelphia MMSA AA was comprised of four MDs. CONA delineated the entirety of the Camden, NJ MD, Montgomery County-Bucks County-Chester County, PA MD, and Philadelphia, PA MD as AAs. CONA also delineated as an AA, the portion of the Wilmington, DE-MD-NJ MD where CONA had deposit-taking ATMs. Refer to appendix A for a complete description of the AA.

CONA had no branches, two cafés, 50 deposit-taking ATMs, and \$8.8 billion of allocated internet deposits within these AAs, which represented 2.7 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems within these AAs. CONA assigned \$176.8 billion of customer deposits to a processing facility in Wilmington, Delaware for accounting purposes. Because of this assignment, CONA's deposits were reported on the FDIC's June 30, 2022 summary of deposit information. These deposits do not reflect actual customer deposits from customers residing in the Philadelphia MMSA. For purposes of this evaluation, the bank allocated \$8.8 billion of internet deposits to this AA based on customer addresses. The bank originated or purchased 5.3 percent of its evaluation period lending by count and 6.2 percent by dollar volume in the AA.

Based on June 30, 2022 FDIC summary of deposit information, there were 96 depository institutions with branches in these AAs. The top three depository institutions by deposit market share were Capital One, N.A. (29.7 percent), TD Bank, N.A. (25.6 percent), and Wells Fargo Bank, N.A. (6 percent). Excluding CONA (due to the assignment of deposits to the Wilmington processing facility), the top three depository institutions were TD Bank, N.A. (25.6 percent), Wells Fargo Bank, N.A. (6 percent), and PNC Bank, N.A. (5.4 percent).

The following table provides a summary of the demographics that include housing and business information for the Philadelphia MMSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Philadelphia MMSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 1,433 | 6.9 | 23.9 | 37.4 | 30.4 | 1.4 |
| Population by Geography | 5,868,600 | 6.7 | 22.8 | 38.5 | 31.7 | 0.3 |
| Housing Units by Geography | 2,374,723 | 6.9 | 23.8 | 38.1 | 31.0 | 0.2 |
| Owner-Occupied Units by Geography | 1,464,554 | 3.6 | 18.4 | 41.5 | 36.5 | 0.0 |
| Occupied Rental Units by Geography | 705,358 | 11.7 | 31.8 | 33.5 | 22.5 | 0.5 |
| Vacant Units by Geography | 204,811 | 13.3 | 34.7 | 30.3 | 21.5 | 0.2 |
| Businesses by Geography | 690,673 | 4.5 | 19.3 | 37.2 | 38.5 | 0.5 |
| Farms by Geography | 13,201 | 2.1 | 14.5 | 45.5 | 37.8 | 0.1 |
| Family Distribution by Income Level | 1,402,918 | 22.0 | 17.2 | 19.9 | 40.8 | 0.0 |
| Household Distribution by Income Level | 2,169,912 | 25.2 | 15.6 | 17.0 | 42.3 | 0.0 |
| Median Family Income MSA - 15804 Camden, NJ | | \$87,133 | Median Housing Value | | | \$241,896 |
| Median Family Income MSA - 33874 Montgomery County-Bucks County-Chester County, PA | | \$99,939 | Median Gross Rent | | | \$1,054 |
| Median Family Income MSA - 37964 Philadelphia, PA | | \$56,411 | Families Below Poverty Level | | | 9.2% |
| Median Family Income MSA - 48864 Wilmington, DE-MD-NJ | | \$80,707 | | | | |
| <i>Source: 2015 ACS and 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|---|-----------|-----------------------|----------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Philadelphia MMSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 1,510 | 6.6 | 22.5 | 36.3 | 31.3 | 3.3 |
| Population by Geography | 6,076,489 | 6.5 | 22.4 | 38.0 | 32.0 | 1.2 |
| Housing Units by Geography | 2,427,533 | 6.8 | 23.1 | 37.9 | 31.3 | 1.0 |
| Owner-Occupied Units by Geography | 1,508,472 | 4.0 | 18.7 | 40.9 | 35.7 | 0.6 |
| Occupied Rental Units by Geography | 741,273 | 11.2 | 30.2 | 33.4 | 23.8 | 1.4 |
| Vacant Units by Geography | 177,788 | 12.1 | 30.8 | 30.2 | 25.0 | 2.0 |
| Businesses by Geography | 802,465 | 4.7 | 19.3 | 35.4 | 38.6 | 1.9 |
| Farms by Geography | 14,367 | 2.5 | 15.8 | 44.0 | 36.9 | 0.7 |
| Family Distribution by Income Level | 1,450,586 | 21.7 | 17.3 | 20.1 | 40.9 | 0.0 |
| Household Distribution by Income Level | 2,249,745 | 25.1 | 15.6 | 17.2 | 42.1 | 0.0 |
| Median Family Income MSA - 15804 Camden, NJ | | \$100,987 | Median Housing Value | | | \$269,905 |

| | | | |
|--|-----------|------------------------------|---------|
| Median Family Income MSA - 33874 Montgomery County-Bucks County-Chester County, PA | \$117,345 | Median Gross Rent | \$1,211 |
| Median Family Income MSA - 37964 Philadelphia, PA | \$68,458 | Families Below Poverty Level | 8.2% |
| Median Family Income MSA - 48864 Wilmington, DE-MD-NJ | \$93,347 | | |
| <i>Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | |

Economic Data

Philadelphia, PA MD

Data from Moody's Analytics over the evaluation period indicated that the Philadelphia, PA area's economy slowed. Since mid-2022, monthly job growth decelerated below the regional and national pace. Hotel occupancy rates rose throughout 2022 as tourists returned to the area, pushing hotel tax revenue in the third quarter to more than 90 percent of 2019 levels.

Based on data from the BLS, the unemployment rate for the Philadelphia, PA area was 5.2 percent in January 2020, as high as 16.1 percent in April 2020, and 4.3 percent in December 2022. Major employers in the AA included University of Pennsylvania Health System, Thomas Jefferson University and TJU Health System, Inc., Children's Hospital of Philadelphia, Comcast, and Drexel University.

Montgomery County-Bucks County-Chester County, PA MD

Data from Moody's Analytics over the evaluation period indicated that the Montgomery County-Bucks County-Chester County, PA area's economy performed better than many in the Northeast. Payroll gains were steady which led to rising employment closer to pre-pandemic levels compared to other large metro areas in the region. The jobless rate fell below pre-pandemic lows and the growth in the labor force exceeded the regional average.

The BLS did not maintain unemployment rate data for the Montgomery County-Bucks County-Chester County, PA MD. Major employers in the area included Tower Health, the Vanguard Group, Einstein Healthcare Network, and Universal Health Services Inc.

Camden, NJ MD

Data from Moody's Analytics over the evaluation period indicated that the Camden, NJ area's strengths include high industrial diversity with low costs, proximity to highways and waterways essential to trade, above-average educational attainment, and very high housing affordability. The Camden, NJ area's economy was expanding with recent gains driven by leisure and hospitality, logistics, and health services. Residential housing permits remained elevated in the second quarter despite higher mortgage rates and below-average house price growth weighing on builder sentiment. The area's weaknesses include high crime rates, a poor reputation, and below-average productivity of workers.

Based on data from the BLS, the unemployment rate for the Camden, NJ area was 4.4 percent in January 2020, as high as 14.7 percent in May 2020, and 3.5 percent in December 2022. Major employers in the AA included Virtua Health, McGuire-Dix Air Force Base, Cooper Health System, and TD Bank Corp.

Wilmington, DE-MD-NJ MD

Data from Moody's Analytics over the evaluation period indicated that the Wilmington, DE-MD-NJ area's strengths include low business costs, a healthy business climate, valuable financial services jobs, and the ability to draw from labor pools in nearby states of Maryland, New Jersey, and Pennsylvania.

Based on data from the BLS, the unemployment rate for the Wilmington, DE-MD-NJ area was 3.9 percent in January 2020, as high as 12.1 percent in May 2020, and 3.3 percent in December 2022. Major employers in the AA included Christiana Care Health System, JP Morgan Chase & Co., Bank of America Corp., and AstraZeneca.

Community Contact

A review was conducted of five community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing, workforce development, small business financing and support, and financial capability. Contacts noted the challenges faced by individuals and small businesses during the COVID-19 pandemic. Restaurants, childcare facilities, and healthcare businesses struggled. Many businesses had to innovate or change their business models to remain open (restaurants shifting to delivery or outdoor dining for example). Many professional services employees were working from home or were only coming into the office a few days a week. This impacted service industry employees who had fewer customers to serve and as a result had their work hours and incomes reduced.

Contacts noted many small businesses were unable to access PPP loans which might have helped sustain their businesses. Contacts also noted how gentrification in certain communities contributed to increased housing costs for low- and moderate-income households and rents for small business owners. Many small businesses lease the space where their businesses operate and when their leases come up for renewal, landlords increased the rent to levels that are unaffordable to existing tenants. Contacts further noted the number of micro and small businesses increased as individuals look for new income sources. These businesses needed technical assistance as well as start-up capital. Contacts stated housing values increased in many communities yet consumers with credit challenges were unable to take advantage of record low interest rates to refinance. Foreclosures were still an issue in some New Jersey communities. Credit and community development needs identified included:

- Foreclosure prevention and eviction support services
- 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

The area is served by numerous nonprofit organizations, community-based organizations, CDFIs, loan funds, economic development organizations, and community development organizations that provide opportunities to help meet community needs.

Scope of Evaluation in the Philadelphia MMSA

The Philadelphia MMSA AA received a full-scope review. CONA's strategic focus is consumer lending. Consumer loans received greater weight than home mortgage loans, small loans to businesses, and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PHILADELPHIA MMSA

LENDING TEST

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

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

Lending Activity

Lending levels reflected an excellent responsiveness to AA credit needs.

| Number of Loans | | | | | | |
|--------------------------|---------------|----------------|------------|------------------|-----------------------|------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total |
| Philadelphia MMSA | 77 | 25,358 | 95 | 1,635,480 | 84 | 1,661,094 |
| Statewide | 0 | 0 | 0 | 0 | 39 | 39 |
| Regional | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 77 | 25,358 | 95 | 1,635,480 | 123 | 1,661,133 |

| Dollar Volume of Loans (\$000) | | | | | | |
|---------------------------------------|------------------|----------------|------------|------------------|-----------------------|------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total |
| Philadelphia MMSA | 2,012,362 | 287,202 | 989 | 3,239,371 | 1,877,507 | 7,417,431 |
| Statewide | 0 | 0 | 0 | 0 | 587,335 | 587,335 |
| Regional | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 2,012,362 | 287,202 | 989 | 3,239,371 | 2,464,842 | 8,004,766 |

To evaluate the bank's capacity, examiners estimated CONA's deposit market rank and market share based on the allocated internet deposits of \$8.8 billion originating from customers residing in CONA's AAs rather than the total dollar amount of deposits assigned to the Wilmington processing center as this represented a more accurate reflection of customer deposits in the AA and the bank's lending capacity. Based on these deposits, CONA would have had an estimated deposit market share of 2.1 percent and would have ranked ninth out of 97 depository institutions, placing it in the top 10 percent of depository institutions in this AA.

According to peer mortgage data for 2022, CONA had a market share of less than one percent based on the number of home mortgage loans originated or purchased in this AA. The bank also ranked 500th among 944 home mortgage lenders in this AA, which placed it in the top 53 percent of lenders. The top lenders in this AA based on market share were Community Bank, National Association (6 percent), Police and Fire Federal Credit Union (4.3 percent), and Wells Fargo Bank, N.A. (3.8 percent).

According to peer small business data for 2021, CONA had a market share of 5.2 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fifth out of

310 small business lenders, which placed it in the top one percent of lenders. The top lenders in this AA based on market share were American Express National Bank (20.9 percent), JP Morgan Chase Bank, N.A. (7.7 percent), and Bank of America, N.A. (6.1 percent).

According to peer small farm data for 2021, CONA had a market share of 5.9 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked eighth out of 33 small farm lenders, which placed it in the top 25 percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (16.1 percent), Truist Bank (15.6 percent), and U.S. Bank, N.A. (11.3 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 36.8 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the Philadelphia 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.

Based on the data in the tables, the overall geographic distribution of home mortgage loans was excellent.

For 2020 through 2021, the percentages of home mortgage loans in low-income geographies was below, and in moderate-income geographies exceeded, the percentages of owner-occupied housing units located in those geographies. The percentages of home mortgage loans in both low- and moderate-income geographies exceeded the aggregate percentages of all reporting lenders.

The bank did not originate or purchase a sufficient volume of home mortgage loans in the 2022 period for a meaningful analysis.

Small Loans to Businesses

Refer to Table Q in the Philadelphia 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 29 PPP loans totaling \$879,000 that provided support to small businesses in low- and moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table S in the Philadelphia 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 farms.

Based on the data in the tables and the performance context factors discussed below, the overall geographic distribution of small loans to farms was adequate.

For 2020 through 2021, the bank did not originate or purchase any small loans to farms in low-income geographies.

- There were a limited number of farms in low-income geographies in the AA. Based on the demographic data in Table A for 2020-2021, there were 277 farms in low-income geographies, representing 2.1 percent of all farms in the AA. As a result, the OCC provided more consideration to the bank's lending to farms in moderate-income geographies.
- There was strong competition in the market, with the top three lenders holding 43 percent market share of small farm lending.
- Small loans to farms were not a primary lending product of the bank.

The percentages of small loans to farms in moderate-income geographies exceeded the percentages of farms located in moderate-income geographies and was below the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was weaker than the 2020 through 2021 period. The percentages of small loans to farms in moderate-income geographies was below the percentages of farms located in those geographies.

Consumer Loans

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

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in both low- and moderate- income geographies exceeded the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage, small business, small farm, and consumer 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 and farms of different sizes.

Home Mortgage Loans

The bank's home mortgage lending was limited to multifamily loans for which borrower income was not applicable. Therefore, no analysis of the borrower distribution of home mortgage loans was completed.

Small Loans to Businesses

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

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 88 PPP loans totaling \$1.6 million that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographic in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the Philadelphia MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was adequate.

For 2020 through 2021, the percentages of small loans to farms with revenues of \$1 million or less was well below the percentages of farms with revenues of \$1 million or less in the AA and was near to the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographic in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the Philadelphia MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily mortgage loans that also qualify as CD loans.

The level of CD lending was excellent. CONA made 84 CD loans totaling \$1.9 billion, which represented 232.6 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 97.8 percent funded affordable housing, 2.1 percent funded economic development activities, and 0.1 percent funded community services.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- A \$10 million loan for the construction of a 46-unit mixed-use affordable housing development for low- and moderate-income individuals with incomes up to 60 percent of the AMI. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$13.4 million in LIHTC equity for the project. In addition to CONA's loan and LIHTC investment, there were five additional funding sources, including municipal government and Federal Home Loan Bank funds and funding from various nonprofit organizations.
- A \$10 million loan to finance the rehabilitation of a 201-unit affordable housing development. One hundred and ninety-nine of 201 units were reserved for low- and moderate-income individuals. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$10.6 million in LIHTC equity, and the development involved numerous sources of financing, including private activity bonds from the Pennsylvania Housing Finance Agency and solar tax credits to fund enhancements that created energy efficiencies and reduced residents' utility costs.
- CONA provided New Markets Tax Credit (NMTC) program financing in the amount of \$9.8 million for the renovation of an existing facility to expand a local nonprofit organization's youth programs. The renovated facility included several new athletic fields and new or updated programs involving internet and literacy education, science, technology, engineering, and math (STEM) labs, and access to healthy meals. The expansion of services was expected to create 18 new full-time jobs. This financing addressed the bank-identified community needs including providing the foundation for early workforce development, addressing the digital divide, improving access to healthy food, and improving life skills for low- and moderate-income youth.

Broader Statewide and Regional Area

In addition, CONA made 39 qualified loans totaling \$587.3 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving its AA. Thirty-seven loans provided financing for affordable housing and two loans were for revitalization and stabilization efforts.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 93,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices during the evaluation period further supported the Lending Test rating.

INVESTMENT TEST

The bank's performance under the Investment Test in the Philadelphia MMSA AA is rated Outstanding.

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

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|--------------------------|---------------|----------------|----------------|---------------|------------|--------------|----------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Philadelphia MMSA | 37 | 113,286 | 201 | 73,131 | 238 | 93.7 | 186,417 | 90.2 | 0 | 0 |
| Statewide | 11 | 19,614 | 5 | 612 | 16 | 6.3 | 20,226 | 9.8 | 0 | 0 |
| Total | 48 | 132,900 | 206 | 73,743 | 254 | 100.0 | 206,643 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 23.1 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. A substantial majority of the dollar volume of the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services or affordable housing to primarily low- and moderate-income individuals. By dollar volume, 96.8 percent of total investments and grants supported affordable housing, 2.3 percent funded community services to low- and moderate-income individuals, 0.9 percent supported economic development, and less than 1 percent supported revitalization and stabilization efforts.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included five LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness to community identified needs:

- An investment of \$8.7 million in LIHTC equity for the rehabilitation of a market-rate residential building and conversion of the property to LIHTC status. The building contains 123 studio and one-bedroom units set aside for low- and moderate-income individuals. This transaction was complex due to the conversion of the property to LIHTC requirements and because the property is part of a syndication which required additional due diligence. This investment addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$2 million bridge loan.
- An investment of \$1.5 million in LIHTC equity for the rehabilitation of a 24-unit property. The property serves a mix of low- and moderate-income families and individuals. This investment addressed the community need for rehabilitation and retention of existing affordable housing stock.
- Grants totaling \$1.2 million to support a local organization comprised of a national network of CDFIs. The consortium and its partners work to ensure that low-income, low-wealth, and other disadvantaged people and communities have access to affordable, responsible financial products and services. These grants responded to the need for support for CDFIs.

Broader Statewide and Regional Area

In addition, CONA made 16 current- and prior-period investments totaling \$20.2 million in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. These investments included 11 prior-period investments totaling \$19.6 million that supported affordable housing and three current-period grants totaling \$545,000 for community services to low- and moderate-income individuals, one grant totaling \$30,000 that supported affordable housing, and one grant totaling \$36,760 for economic development. Investments in the broader statewide and regional area further supported the Outstanding rating.

SERVICE TEST

The bank's performance under the Service Test in the Philadelphia MMSA AA is rated High Satisfactory.

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

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online, and mobile banking.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.

CONA had two cafés with five deposit-taking ATMs. CONA had 45 additional deposit-taking ATMs in various locations throughout the AA. One café was in an upper-income geography and the other was in a geography with no income designation. During the evaluation period, CONA opened a café with two

deposit-taking ATMs in a middle-income geography, however the 2020 U.S. Census changed the income-level designation of the middle-income geography to a geography with no income designation.

| ATM Distribution | | | | | | | | | |
|--------------------------|-----------|------------------------------------|-----|-----|-----|---------------------------------------|------|-----|-----|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Philadelphia MMSA | 50 | 0 | 12 | 38 | 44 | 6.5 | 22.4 | 38 | 32 |

NOTE: The number of ATMs includes three ATMs in geographies with no income designation.

Due to the 2020 U.S. Census changes to the income-level designations of low-income geographies in the AA, CONA had no deposit-taking ATMs in low-income geographies as of the end of the evaluation period. Based on the table above, the distribution of the bank's ATMs in moderate-income geographies was below the percentages of the population in moderate-income geographies.

During the evaluation period, CONA installed six deposit-taking ATMs and removed one ATM from an upper-income geography. CONA installed two ATMs in low-income geographies, two ATMs in moderate-income geographies, and two ATMs in middle-income geographies.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of two low-income, two moderate-income, six middle-income geographies, and five upper-income geographies where CONA had deposit-taking ATMs. The U.S. Census changed the income-designation of both low-income geographies to a moderate-income and upper-income geography, respectively. The U.S. Census also changed the income-level designation of both moderate-income geographies to a middle-income and upper-income geography, respectively. The U.S. Census changes to the income-level designation of the low-income geographies resulted in a significant decrease in the total number of deposit-taking ATMs in low-income geographies and had a significant impact on the distribution of deposit-taking ATMs in those geographies relative to the percentages of the population in those geographies. As a result, the OCC provided more consideration to the bank's performance in moderate-income geographies and the change in ADS use over the evaluation period in determining the accessibility of the bank's service delivery systems.

| | Low-income Geographies | | Moderate-income Geographies | |
|---------------------------|------------------------|------------|-----------------------------|------------|
| | ATMs (#) | % of Total | ATMs (#) | % of Total |
| Philadelphia MMSA | | | | |
| Prior to 2020 U.S. Census | 2 | 4 | 5 | 10 |
| After 2020 U.S. Census | 0 | 0 | 6 | 12 |
| Net Change | -2 | -4 | +1 | +2 |

ADS Usage

| Change in ADS Use, by channel | | |
|--|--------------|-------------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 25.4% | 5.9% |
| Mobile Banking | 78.2% | 48.7% |
| ATM Usage | -10% | -27.2% |
| Net Change Across All Channels (Averaged) | 31.2% | 9.1% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AAs, particularly low- and moderate-income geographies and/or individuals. There were no significant differences in café hours and available services at the two café locations. The hours of operations for the café in the upper-income geography were 7:00 a.m. to 7:00 p.m. Monday through Friday, 8:00 a.m. to 7:00 p.m. on Saturdays, and 9:00 a.m. to 5:00 p.m. on Sundays. The hours of operation for the café in the geography with no income designation were 9:00 a.m. to 9:00 p.m. Monday through Friday, 9:00 a.m. to 9:00 p.m. on Saturdays, and 10:00 a.m. to 6:00 p.m. on Sundays. Cafés offered similar extended business hours and weekend hours of operation to serve their local communities.

Community Development Services

The institution was a leader in providing CD services.

CD services were responsive to the community needs the institution identified through community contacts. Four hundred bank associates provided 3,053 hours of qualified service activities to 30 organizations. Strong leadership was evident through board or committee participation with 468 hours of those activities to 11 organizations. *Pro Bono* services accounted for 1,900 service hours or 62 percent of CD services. Services consisted of providing workforce development through CONA's *Pro Bono* volunteer program and financial literacy education.

Examples of CD services in the AA include:

- Fifty-four CONA associates provided 65 hours of financial literacy education at seven schools where the majority of the students were from low- or moderate-income families. These services addressed the bank-identified community need of improving financial literacy education for low- and moderate-income youth.
- Forty-eight CONA associates provided 1,353 hours of workforce development services to students of a middle school that serves students from low- and moderate-income families. The services involved teaching coding skills to the students under the Capital One Coders program. These services addressed the bank-identified community need for science, technology, engineering, and mathematics (STEM) education for low- and moderate-income children.

Washington-Baltimore-Arlington, DC-MD-VA-WV-PA Combined Statistical Area (Washington, DC CSA)

CRA rating for the Washington, DC CSA¹: 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:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels.
- CONA was a leader in providing CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in the Washington, DC CSA

The Washington, DC CSA AA was comprised of one MSA and two MDs. CONA delineated the entirety of the Frederick-Gaithersburg-Rockville, MD MD as an AA. CONA also delineated as AAs the portions of the Baltimore-Columbia-Towson, MD MSA and Washington-Arlington-Alexandria, DC-VA-MD-WV MD where CONA had branch locations. Refer to appendix A for a complete description of the AA.

CONA had 78 branches, three cafés, 281 deposit-taking ATMs, and \$135.6 billion of deposits (including allocated and unallocated internet deposits) within these AAs, which represented 41.8 percent of the bank's total domestic deposits. The bank originated or purchased 6.9 percent of its evaluation period lending by count and 9.7 percent by dollar volume in the AA.

Based on June 30, 2022 FDIC summary of deposit information, CONA ranked second out of 82 FDIC-insured depository institutions with a 13.4 percent deposit market share. The top three depository institutions by deposit market share were Bank of America, N.A. (20 percent), Capital One, N.A. (13.4 percent), and Truist Bank (13.3 percent).

The following table provides a summary of the demographics that include housing and business information for the Washington, DC CSA AA.

¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: Washington, DC CSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 1,880 | 11.3 | 21.8 | 33.3 | 32.1 | 1.6 |
| Population by Geography | 8,012,606 | 9.3 | 21.2 | 34.6 | 34.2 | 0.7 |
| Housing Units by Geography | 3,153,148 | 10.2 | 21.5 | 34.6 | 33.3 | 0.4 |
| Owner-Occupied Units by Geography | 1,846,589 | 4.3 | 16.9 | 37.2 | 41.4 | 0.1 |
| Occupied Rental Units by Geography | 1,072,064 | 17.7 | 28.7 | 31.3 | 21.4 | 0.8 |
| Vacant Units by Geography | 234,495 | 21.7 | 24.9 | 28.8 | 23.9 | 0.7 |
| Businesses by Geography | 997,649 | 5.4 | 18.4 | 35.6 | 40.0 | 0.6 |
| Farms by Geography | 16,736 | 3.3 | 16.1 | 40.0 | 40.5 | 0.1 |
| Family Distribution by Income Level | 1,898,584 | 22.1 | 16.7 | 20.0 | 41.2 | 0.0 |
| Household Distribution by Income Level | 2,918,653 | 23.7 | 16.2 | 18.2 | 41.9 | 0.0 |
| Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA | | \$87,788 | Median Housing Value | | | \$371,599 |
| Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD | | \$112,655 | Families Below Poverty Level | | | 6.4% |
| Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV | | \$106,105 | Median Gross Rent | | | \$1,442 |
| <i>Source: 2015 ACS and 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: Washington, DC CSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 2,027 | 9.9 | 22.1 | 33.5 | 32.5 | 2.0 |
| Population by Geography | 8,471,129 | 8.0 | 22.3 | 35.2 | 33.6 | 0.9 |
| Housing Units by Geography | 3,252,517 | 9.1 | 22.4 | 35.1 | 32.7 | 0.7 |
| Owner-Occupied Units by Geography | 1,932,996 | 4.1 | 18.0 | 37.9 | 39.7 | 0.3 |
| Occupied Rental Units by Geography | 1,104,234 | 16.0 | 29.4 | 31.4 | 21.9 | 1.3 |
| Vacant Units by Geography | 215,287 | 18.7 | 26.5 | 28.4 | 24.8 | 1.7 |
| Businesses by Geography | 1,167,820 | 5.3 | 19.8 | 36.2 | 37.8 | 0.9 |
| Farms by Geography | 18,796 | 3.2 | 17.9 | 39.7 | 38.8 | 0.4 |
| Family Distribution by Income Level | 1,958,334 | 21.7 | 16.8 | 20.5 | 41.0 | 0.0 |
| Household Distribution by Income Level | 3,037,230 | 23.6 | 16.1 | 18.7 | 41.6 | 0.0 |
| Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA | | \$104,637 | Median Housing Value | | | \$425,671 |
| Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD | | \$129,092 | Median Gross Rent | | | \$1,624 |
| Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV | | \$126,224 | Families Below Poverty Level | | | 5.5% |
| <i>Source: 2020 U.S. Census and 2022 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Economic Data

Washington-Arlington-Alexandria, DC-VA-MD-WV MD

Data from Moody's Analytics over the evaluation period indicated that the Washington-Arlington-Alexandria MD area's economy stagnated. The labor market made minimal progress in the second half of 2022 as nonfarm payrolls struggled to return to their pre-pandemic level. The unemployment rate remained low and near its pre-pandemic level, but the area labor force added workers at a slower rate than the national average. The area's economic performance is heavily reliant on the public sector as it accounts for more than one fifth of all jobs in the metro division.

Based on data from the BLS, the unemployment rate for the Washington-Arlington-Alexandria MD area was 3.2 percent in January 2020, as high as 9.8 percent in April 2020, and 2.6 percent in December 2022. Major employers in the AA included: Naval Support Activity Washington, Joint Base Andrews-Naval Air Facility, MedStar Health, Marriott International Inc., and Inova Health System.

Baltimore-Columbia-Towson, MD MD

Data from Moody's Analytics over the evaluation period indicated that the Baltimore-Columbia-Towson MD area's jobs recovery was ahead of Maryland and the Northeast. House price appreciation slowed, but by less than in most metro areas. The state closed the fiscal year with a budget surplus and much of these funds were earmarked for infrastructure improvements, education, and a raise for state government employees. Labor shortages were weighing on healthcare. Medical hubs, such as the Baltimore area, are more exposed to shortages than other metro areas.

Based on data from the BLS, the unemployment rate for the Baltimore-Columbia-Towson MD area was 3.4 percent in January 2020, as high as 9 percent in May 2020, and 2.1 percent in December 2022. Major employers in the AA included: Fort George G Meade, Johns Hopkins University, Johns Hopkins Health System, University of Maryland Medical System, and Aberdeen Proving Ground.

Frederick-Gaithersburg-Rockville, MD MD

Data from Moody's Analytics over the evaluation period indicated that the Frederick-Gaithersburg-Rockville, MD area is slowly returning to pre-pandemic levels. Job growth lagged regional and national averages during the second half of 2022. Gains in education and healthcare sectors were followed by declines in professional and business services and retail trade in 2022. In response to mixed job market conditions, the labor force contracted to early 2022 levels. The Frederick-Gaithersburg-Rockville MD area's economy is heavily reliant on the federal government, as federal government agencies account for four times as many jobs compared to the national average. After a near 20 percent increase in single-family housing prices post-pandemic, housing prices fell nearly 3 percent since May 2022. The area's strengths include high per capita income, a highly skilled and educated workforce, and lower business costs compared to the neighboring Washington, DC metro area. Weaknesses include a high dependency on government spending, a high cost of living, and limited recovery in home equity.

Based on data from the BLS, the unemployment rate for the Frederick-Gaithersburg-Rockville, MD area was 2.8 percent in January 2020, as high as 8.4 percent in May 2020, and 1.9 percent in December 2022. Major employers in the AA included: National Institutes of Health, the Food and Drug Administration, Naval Support Activity Bethesda, Fort Detrick Campus, and Marriott International.

Community Contact

A review was conducted of seven community contacts completed during the evaluation period with organizations located throughout the Washington DC, CSA AA. The organizations contacted focus on affordable housing, small business and economic development, community development, human and social services, financial education, and workforce development. Contacts noted there was a need for more investment in Baltimore's underserved neighborhoods, particularly those in West Baltimore. Underserved neighborhoods needed greater access to traditional banking services, particularly bank branches. Contacts noted the COVID-19 pandemic exacerbated already existing needs such as affordable housing, support for small businesses, access to childcare, economic inequality, and behavioral health issues. Other credit and community development needs identified include:

- Small dollar mortgages for low-income first-time homebuyers
- Access to capital and technical assistance for small businesses
- Support for Volunteer Income Tax Assistance programs
- Financing to support rehabilitation of older homes
- Workforce development funding to increase access to living-wage jobs
- Financial literacy training
- Funding to increase access to technology for low- and moderate-income individuals
- Affordable housing (both rental and owner-occupied)
- Support for behavioral health services

The area is served by numerous nonprofit organizations, community-based organizations, CDFIs, loan funds, economic development organizations, and community development organizations that provide opportunities to help meet community needs.

Scope of Evaluation in the Washington, DC CSA

The Washington, DC CSA AA received a full-scope review. The Washington, DC CSA AA represents one of CONA's most significant markets in terms of lending and deposits, therefore, the performance in the Washington, DC CSA AA was weighted more heavily in determining CONA's overall CRA rating. CONA's strategic focus is consumer lending. Consumer loans received greater weight than home mortgage loans, small loans to businesses, and small loans to farms.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WASHINGTON, DC CSA

LENDING TEST

The bank's performance under the Lending Test in the Washington, DC CSA AA is rated Outstanding.

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

Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

| Number of Loans | | | | | | |
|--------------------------|---------------|----------------|------------|------------------|-----------------------|------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total |
| Washington DC CSA | 98 | 46,722 | 177 | 2,134,481 | 327 | 2,181,805 |
| Statewide | 0 | 0 | 0 | 0 | 45 | 45 |
| Regional | 0 | 0 | 0 | 0 | 119 | 119 |
| Total | 98 | 46,722 | 177 | 2,134,481 | 491 | 2,181,969 |

| Dollar Volume of Loans (\$000) | | | | | | |
|---------------------------------------|------------------|----------------|--------------|------------------|-----------------------|-------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total |
| Washington DC CSA | 2,537,059 | 951,533 | 1,383 | 5,157,345 | 3,147,593 | 11,794,913 |
| Statewide | 0 | 0 | 0 | 0 | 687,217 | 687,217 |
| Regional | 0 | 0 | 0 | 0 | 1,566,896 | 1,566,896 |
| Total | 2,537,059 | 951,533 | 1,383 | 5,157,345 | 5,401,706 | 14,049,026 |

CONA ranked second out of 82 FDIC-insured depository institutions with a 13.4 percent deposit market share.

According to peer mortgage data for 2022, CONA had a market share of less than one percent based on the number of home mortgage loans originated or purchased in this AA. The bank also ranked 456th among 1,013 home mortgage lenders in this AA, which placed it in the top 46 percent of lenders. The top lenders in this AA based on market share were Truist Bank (5 percent), Rocket Mortgage (3.9 percent), and Navy Federal Credit Union (3.9 percent).

According to peer small business data for 2021, CONA had a market share of 6.3 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fourth out of 343 small business lenders, which placed it in the top two percent of lenders. The top lenders in this AA based on market share were American Express National Bank (20.2 percent), Bank of America, N.A. (13.8 percent), and JP Morgan Chase Bank, N.A. (9.5 percent).

According to peer small farm data for 2021, CONA had a market share of 7.5 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked sixth out of 39 small farm lenders, which placed it in the top 16 percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (21.3 percent), John Deere Financial FSB (18.9 percent), and Wells Fargo Bank, N.A. (12.1 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 10.1 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the Washington, DC 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.

Based on the data in the tables, the overall geographic distribution of home mortgage loans was excellent.

For 2020 through 2021, the percentages of home mortgage loans in both low- and moderate-income geographies exceeded both the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Businesses

Refer to Table Q in the Washington, DC 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 1,095 PPP loans totaling \$51.7 million that provided support to small businesses in low- and moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table S in the Washington, DC 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 farms.

Based on the data in the tables, the overall geographic distribution of small loans to farms was adequate.

For 2020 through 2021, the percentages of small loans to farms in low-income geographies was significantly below, and in moderate-income geographies was well below, the percentages of farms located in those geographies. The percentages of small loans to farms in low-income geographies exceeded, and in moderate-income geographies was near to, the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was weaker than the 2020 through 2021 period. Examiners considered the impact of the increase in the percentages of farms located in moderate-income geographies relative to the percentages of the bank's loans to small farms in moderate-income geographies the 2022 period when evaluating the bank's overall lending performance. There were no small loans to farms originated or purchased in low-income geographies, and the percentages of small loans to farms in moderate-income geographies was significantly below the percentages of farms located in those geographies.

Consumer Loans

Refer to Table U in the Washington, DC CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage, small business, small farm, and consumer 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 and farms of different sizes.

Home Mortgage Loans

The bank's home mortgage lending was limited to multifamily loans for which borrower income was not applicable. Therefore, no analysis of the borrower distribution of home mortgage loans was completed.

Small Loans to Businesses

Refer to Table R in the Washington, DC CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 3,530 PPP loans totaling \$83 million that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less located in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the Washington, DC CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was adequate.

For 2020 through 2021, the percentages of small loans to farms with revenues of \$1 million or less was well below the percentages of farms with revenues of \$1 million or less located in the AA and was near to the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the Washington, DC CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Commercial Leases and Letters of Credit

The bank originated one letter of credit totaling \$344,000 that had a qualified CD purpose. The letter of credit supported the development and preservation of affordable housing and was given positive consideration.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made 327 CD loans totaling \$3.1 billion, which represented 25.3 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 98 percent affordable housing, 1 percent funded economic development activities, and 1 percent funded revitalization and stabilization efforts.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- A \$23.6 million loan for the new construction of an 81-unit affordable housing development. All 81 units were reserved for low- and moderate-income households earning up to 60 percent of the AMI. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$500,000 line of credit to the housing developer for

predevelopment costs and \$19.1 million in LIHTC equity. This transaction also included federal, state, and city funding sources.

- A construction loan of \$39.4 million to finance the demolition of existing structures and the new construction of a 148-unit affordable housing development. One hundred and thirty-three of 148 units were reserved for households earning up to 50 percent of the AMI and 15 of 148 units were reserved for households earning up to 30 percent of the AMI. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$38.6 million in federal LIHTC equity. This transaction included public financing. CONA's financing included flexible terms, such as a 36-month forward commitment of permanent financing that will have a longer-than-standard (i.e., 40-year) amortization period and was rate-locked at transaction closing.
- CONA provided NMTC financing in the amount of \$11.8 million for the construction of a hospice facility that primarily served low- and moderate-income patients. This addressed the bank-identified community need for hospice care.

Broader Statewide and Regional Area

In addition, CONA made 164 qualified loans totaling \$2.3 billion and one qualified lease totaling \$872,000 to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AAs. One hundred and thirty-nine loans provided financing for affordable housing, eight loans were for revitalization and stabilization efforts, 16 loans were for economic development, and one loan was for community services benefiting low- and moderate-income individuals.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 112,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices further supported the Lending Test rating.

INVESTMENT TEST

The bank's performance under the Investment Test in Washington, DC CSA AA is rated Outstanding.

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

Number and Amount of Qualified Investments

| 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 CSA | 120 | 399,899 | 469 | 531,010 | 589 | 77.7 | 930,909 | 71.1 | 0 | 0 |
| Regional | 52 | 105,856 | 16 | 72,078 | 68 | 9.0 | 177,934 | 13.6 | 0 | 0 |
| Statewide | 63 | 126,150 | 38 | 73,763 | 101 | 13.3 | 199,913 | 15.3 | 0 | 0 |
| Total | 235 | 631,905 | 523 | 676,851 | 758 | 100.0 | 1,308,756 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 7.5 percent of allocated tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services or supported economic development. By dollar volume, 98 percent of total investments and grants supported affordable housing, 1.5 percent funded community services to low- and moderate-income individuals, and less than one percent supported economic development and revitalization and stabilization efforts.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included 33 LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$37.2 million in LIHTC equity for the new construction of a 160-unit affordable housing development. All units are reserved for low- and moderate-income households earning up to 30 percent, 50 percent, 60 percent, and 80 percent of the AMI (8, 52, 82, and 18 units, respectively). This complex investment included multiple sources of financing and the "twinning" of nine percent and four percent LIHTCs. The investment responded to the bank-identified community needs for increasing affordable housing coupled with supportive services for vulnerable populations, such as veterans and people with disabilities. CONA demonstrated multi-faceted support by also providing a \$26.3 million loan for this project.
- An investment of \$17 million in LIHTC equity for the new construction of a 97-unit affordable family housing development. The development includes 46 units for low-income households with incomes up to 50 percent of the AMI, 11 units up to 60 percent of the AMI, and 40 units up to 70 percent of the AMI. This transaction included several layers of financing from federal, state, municipal, and nonprofit sources. The investment responded to the community-identified need for affordable housing for low- and moderate-income households and the bank-identified community needs for providing services to improve self-sufficiency for low- and moderate-income individuals and using sustainable building practices.

- An investment of \$23.9 million in LIHTC equity for the new construction of a 240-unit affordable housing development for low- and moderate-income individuals aged 62 and above. All units serve low- and moderate-income households and have federal rent subsidies that effectively limit rent to no more than 30 percent of tenant income. This transaction included financing from federal, state, municipal, and nonprofit funding sources. This investment addressed the community identified need for affordable housing and the bank-identified community need for supportive services targeted to vulnerable populations.
- An investment of \$13.4 million in LIHTC equity for the adaptive reuse and full historic rehabilitation of a commercial property into an 83-unit family apartment complex for low- and moderate-income households earning up to 60 percent of the AMI. The development is in a qualified Opportunity Zone and a distressed community designated as such by the Bureau of Economic Analysis. This transaction included public financing from federal and state sources. Further, the development qualifies for property tax abatement under a municipal tax relief program, which required CONA to create a special schedule for the release of LIHTC funds. This investment addressed the community identified need for affordable housing and the bank-identified community needs for the redevelopment of distressed areas and maintenance of the historic integrity of the neighborhood. CONA demonstrated multi-faceted support by also providing construction loans totaling \$14.7 million and a permanent loan of \$11 million for this project.

Broader Statewide and Regional Area

In addition, CONA made 169 current- and prior-period investments totaling \$377.8 million in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AAs. These investments included 115 prior-period investments totaling \$232 million that supported affordable housing, 23 current-period investments totaling \$145.4 million that supported affordable housing, 24 grants totaling \$225,556 for community services to low- and moderate-income individuals, four grants totaling \$50,000 for economic development, and three grants totaling \$145,000 that supported affordable housing. Investments in the broader statewide and regional area further supported the Outstanding rating.

SERVICE TEST

The bank's performance under the Service Test in the Washington, DC CSA AA is rated Outstanding.

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

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.

| Distribution of Branch Delivery System | | | | | | | | | | | |
|--|--------------------------------|--------------------|--------------------------------|---|------|------|------|---------------------------------------|------|------|------|
| 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 | Low | Mod | Mid | Upp |
| Washington DC CSA | 100% | 78 | 100% | 7.7 | 21.8 | 37.2 | 33.3 | 8.0 | 22.3 | 35.2 | 33.6 |

Based on the table above, the bank's distribution of branches in both low- and moderate-income geographies approximated the percentages of the population living in those geographies.

| Distribution of Branch Openings/Closings | | | | | | |
|--|--------------------------|----------------------|---|-----|-----|-----|
| Assessment Area | Branch Openings/Closings | | | | | |
| | # of Branch Openings | # of Branch Closings | Net change in Location of Branches (+ or -) | | | |
| | | | Low | Mod | Mid | Upp |
| Washington DC CSA | 0 | 31 | -1 | -6 | -9 | -14 |

NOTE: The number of branch closings includes one branch that was in a geography with no income designation.

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, CONA did not open any branches in the AA. CONA closed seven branches in low- and moderate-income geographies, including one branch in a low-income geography and six branches in moderate-income geographies. However, these branch closures did not impact the distribution of branches in low- and moderate-income geographies relative to the percentages of the population living in those geographies. Factors that contributed to the branch closures in low- and moderate-income geographies included underperformance in branch teller transactions and other key performance metrics.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of four low-income, eight moderate-income, one middle-income, and five upper-income geographies where CONA had branches. The U.S. Census changed the income-designation of all four low-income geographies to moderate-income geographies and changed the income-level designation of three of eight moderate-income geographies to low-income geographies. While these changes resulted in a minor decrease in the total number of branches in low- and moderate-income geographies, these changes had a minimal impact on the distribution of branches in those geographies relative to the percentages of the population in their respective geographies.

| Washington DC CSA | Low-income Geographies | | Moderate-income Geographies | |
|----------------------------------|------------------------|------------|-----------------------------|------------|
| | Branches (#) | % of Total | Branches (#) | % of Total |
| Prior to 2020 U.S. Census Change | 7 | 9 | 21 | 26.9 |
| After 2020 U.S. Census Change | 6 | 7.7 | 17 | 21.8 |
| Net Change | -1 | -1.3 | -4 | -5.1 |

Additional Branch Accessibility

In addition to the bank's branch distribution, the OCC gave positive consideration for 21 bank branches in middle- and upper-income geographies that provided additional access to retail banking services to customers residing in low- and moderate-income geographies, as determined by customer usage.

ADS Usage

CONA's ADS provided additional accessibility to retail banking services for the various portions of its AA, including low- and moderate-income geographies or individuals. CONA's ADS had a positive impact on the Service Test conclusion.

| ATM Distribution | | | | | | | | | |
|--------------------------|-----------|------------------------------------|-----|------|------|---------------------------------------|------|------|------|
| Assessment Area | # of ATMs | ATMs | | | | Population | | | |
| | | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Washington DC CSA | 281 | 7.8 | 27 | 36.3 | 28.8 | 8 | 22.3 | 35.2 | 33.6 |

Based on the table above, the distribution of the bank's ATMs in low-income geographies approximated, and in moderate-income geographies exceeded, the percentages of the population in those geographies.

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 27% | 14.3% |
| Mobile Banking | 50.3% | 41.8% |
| ATM Usage | -51.8% | -64.5% |
| Net Change Across All Channels (Averaged) | 8.5% | -2.8% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, the various portions of its AAs, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open 9:00 a.m. to 5:00 p.m. Monday through Friday, and 9:00 a.m. to 12:00 p.m. Saturday. There are six branches with limited services or accessibility, and 72 full-service branches of which 60 are open on Saturday, 51 with drive-up hours, and 21 in low- and moderate-income geographies.

Community Development Services

The institution was a leader in providing CD services.

CD services were responsive to the community needs the institution identified through community contacts. Two thousand three hundred and fifteen bank associates provided 25,054 hours of qualified service activities to 110 organizations. Strong leadership was evident through board or committee participation with 947 hours to 26 organizations. *Pro Bono* volunteer services accounted for 17,754 service hours or 71 percent of all CD services. Services consisted of providing workforce development

through CONA's *Pro Bono* volunteer program, financial literacy education, and technical assistance to small businesses.

Examples of CD services in the AA include:

- CONA associates provided 223 hours of workforce development services to clients of a nonprofit organization that provides professional development and technical training services. CONA associates aided with mock interviews, resume preparation, and informational interviews. Of the 223 hours, 114 represented *Pro Bono* volunteer services provided by CONA associates in their fields of expertise (e.g., technology and human resources). These services addressed the bank-identified community need for workforce development.
- A CONA associate provided 260 hours of board service to a college preparatory charter school that is in a low-income geography and provides services to local residents of the community. These services addressed the bank-identified community need for improvement in education for low- and moderate-income students.
- CONA associates provided 105 hours of technical assistance to benefit a nonprofit food bank. The service consisted of strategic planning assistance to prepare a report on the state of hunger and food insecurity. These services addressed the community identified need for providing technical assistance to small businesses.

State Ratings

State of Arizona

CRA rating for the State of Arizona: 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:

- A good geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were accessible to geographies and individuals of different income levels.
- CONA provided an adequate level of CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Arizona

CONA delineated one AA in the state of Arizona, which was the portion of the Phoenix-Mesa-Chandler, AZ MSA (Phoenix MSA) where CONA had deposit-taking ATMs. Refer to appendix A for a complete description of the AA. CONA entered the Phoenix MSA AA on October 7, 2020 through the opening of a café with three deposit-taking ATMs, and installed additional deposit-taking ATMs at Target stores later that same month.

CONA had no branches, one café, 21 deposit-taking ATMs, and \$2 billion of allocated internet deposits within these AAs, which represented 0.6 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems within these AAs. Because CONA does not operate a licensed branch in Arizona, there are no deposits reported on the June 30, 2022 FDIC Deposit Market Share report. The bank originated or purchased 3.4 percent of its evaluation period lending by count and 2.8 percent by dollar volume in the portion of Arizona where CONA has its AA.

Based on June 30, 2022 FDIC summary of deposit information, there were 61 depository institutions with licensed branches in the portion of Arizona where the bank has its AA. The top three depository institutions by deposit market share were JP Morgan Chase Bank, N.A. (25.4 percent), Wells Fargo Bank, (19 percent), and Bank of America, N.A. (17.5 percent).

Phoenix MSA

The following table provides a summary of the demographic information that includes housing and business information for the Phoenix MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: Phoenix MSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 916 | 11.5 | 22.5 | 31.2 | 33.4 | 1.4 |
| Population by Geography | 4,018,143 | 11.1 | 22.9 | 31.3 | 34.4 | 0.3 |
| Housing Units by Geography | 1,668,555 | 9.8 | 23.4 | 33.3 | 33.4 | 0.1 |
| Owner-Occupied Units by Geography | 875,327 | 4.6 | 18.8 | 34.7 | 41.9 | 0.0 |
| Occupied Rental Units by Geography | 567,191 | 17.1 | 29.4 | 31.2 | 21.9 | 0.3 |
| Vacant Units by Geography | 226,037 | 11.8 | 25.6 | 33.2 | 29.3 | 0.2 |
| Businesses by Geography | 792,533 | 7.0 | 15.2 | 29.5 | 47.8 | 0.5 |
| Farms by Geography | 12,656 | 7.2 | 18.5 | 28.9 | 45.1 | 0.3 |
| Family Distribution by Income Level | 945,115 | 21.8 | 16.9 | 19.2 | 42.2 | 0.0 |
| Household Distribution by Income Level | 1,442,518 | 23.3 | 16.3 | 17.7 | 42.7 | 0.0 |
| Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA | | \$63,6860 | Median Housing Value | | | \$203,811 |
| | | | Median Gross Rent | | | \$993 |
| | | | Families Below Poverty Level | | | 12.6% |
| <i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: Phoenix MSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 1,009 | 6.3 | 25.7 | 31.1 | 34.5 | 2.4 |
| Population by Geography | 4,420,568 | 5.8 | 25.6 | 32.6 | 35.4 | 0.6 |
| Housing Units by Geography | 1,765,880 | 5.4 | 26.5 | 33.5 | 34.3 | 0.4 |
| Owner-Occupied Units by Geography | 1,008,487 | 2.6 | 20.6 | 34.7 | 41.9 | 0.1 |
| Occupied Rental Units by Geography | 588,297 | 10.0 | 35.6 | 31.6 | 22.1 | 0.7 |
| Vacant Units by Geography | 169,096 | 5.6 | 29.3 | 32.5 | 32.0 | 0.6 |
| Businesses by Geography | 936,819 | 4.0 | 18.3 | 28.2 | 48.9 | 0.6 |
| Farms by Geography | 14,841 | 4.4 | 20.3 | 29.9 | 44.7 | 0.7 |
| Family Distribution by Income Level | 1,047,899 | 20.4 | 17.9 | 20.0 | 41.7 | 0.0 |
| Household Distribution by Income Level | 1,596,784 | 22.3 | 16.9 | 18.5 | 42.3 | 0.0 |
| Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA | | \$78,930 | Median Housing Value | | | \$292,183 |
| | | | Median Gross Rent | | | \$1,221 |
| | | | Families Below Poverty Level | | | 9.1% |
| <i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Economic Data

Data from Moody's Analytics over the evaluation period indicated that the Phoenix, AZ area's economy is maintaining its lead over the region. The area's strengths include robust population growth and positive net migration, a hub for expansion and relocation of banks, insurance companies, and business service firms, and lower business costs than California. Weaknesses include average wages well-below those of the West, and high cyclical due to dependence on investment and population inflows. Despite regaining all pandemic-induced job losses nearly a full year earlier than the region, job growth still outpaced the Mountain West and U.S. Job gains were broad-based, with a few standout performers. Manufacturing, leisure, and hospitality advanced at more than twice the national pace over the second half of 2022. House prices and residential permit issuance declined in the second half of 2022.

Based on data from the BLS, the unemployment rate was 4.1 percent in January 2020, as high as 12.6 percent in April 2020, and 2.9 percent in December 2022. Major employers in the AA included Banner Health System, Walmart, Inc., Fry's Food Stores, Wells Fargo, and Arizona State University.

Community Contact

A review was conducted of three community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing, economic development, and social services. Contacts noted the impact of the COVID-19 pandemic as well as record high temperatures due to climate change on vulnerable members of the community, including low-income households and seniors. Contacts noted that in 2020 the area experienced a record high number of days with extreme heat. Many low-income households struggled to afford the cost of cooling their homes which puts them at increased risk of heat related illness or death. Credit and community development needs identified for the area include:

- Access to affordable housing
- Rental assistance for low- and moderate-income households
- Support for households facing food insecurity
- Access to mental health and substance use disorder treatment
- Access to affordable childcare
- Support for workforce development programs
- Home rehabilitation loans
- Micro-loans for consumers and small businesses

The area is served by several nonprofit organizations, community-based organizations, community development entities, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in Arizona

The Phoenix MSA AA received a full-scope review. CONA's strategic focus is consumer lending. Consumer loans received greater weight than small loans to businesses. There was an insufficient number of home mortgage loans and small loans to farms for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans | | | | | | | | |
|------------------------|---------------|----------------|------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Phoenix MSA | 13 | 14,246 | 39 | 1,068,199 | 13 | 1,082,510 | 100 | 100 |
| Statewide | 0 | 0 | 0 | 0 | 4 | 4 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 3 | 3 | 0 | 0 |
| Total | 13 | 14,246 | 39 | 1,068,199 | 20 | 1,082,517 | 100 | 100 |

| Dollar Volume of Loans (\$000) | | | | | | | | |
|---------------------------------------|----------------|----------------|------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Phoenix MSA | 356,706 | 208,894 | 306 | 1,970,768 | 348,517 | 2,885,191 | 97.1 | 100 |
| Statewide | 0 | 0 | 0 | 0 | 19,433 | 19,433 | 0.7 | 0 |
| Regional | 0 | 0 | 0 | 0 | 68,249 | 68,249 | 2.3 | 0 |
| Total | 356,706 | 208,894 | 306 | 1,970,768 | 436,199 | 2,972,873 | 100 | 100 |

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$2 billion in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of 1.1 percent and would have ranked 11th out of 62 depository institutions, placing it in the top 18 percent of depository institutions in this AA.

According to peer small business data for 2021, CONA had a market share of 4.4 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked seventh out of 302 small business lenders, which placed it in the top three percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (18.8 percent), American Express National Bank (16.5 percent), and Wells Fargo Bank, N.A. (10.6 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 98.5 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of Arizona 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were two PPP loans totaling \$47,000 that provided support to small businesses in low- and moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table U in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in low-income geographies equaled, and in moderate-income geographies approximated, the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed small business and consumer 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 any of the full-scope areas 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.

Small Loans to Businesses

Refer to Table R in the state of Arizona 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 12 PPP loans totaling \$156,000 that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the state of Arizona section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to low-income borrowers approximated, and to moderate-income borrowers exceeded, the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made 13 CD loans totaling \$348.5 million, which represented 189.8 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 100 percent funded affordable housing.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- A \$73.4 million loan to finance the acquisition and rehabilitation of a 330-unit affordable housing development. Two hundred and fifty-eight of 330 units were affordable to low- or moderate-income households earning less than 80 percent of the AMI. This loan addressed the community identified need for affordable housing.
- Two loans totaling \$30.4 million for bridge and permanent financing for the purchase and rehabilitation of a 164-unit affordable housing development for special needs households. The

property was encumbered by a LIHTC agreement and a Land Use Restrictive Agreement requiring that all units be occupied by low- or moderate-income tenants whose incomes were up to 60 percent of the AMI. The bridge loan allowed the borrower to arrange the long-term financing for the rehabilitation of the property, which required an equity investor in addition to CONA's permanent loan. These loans addressed the community identified need for affordable housing.

Broader Statewide and Regional Area

In addition, CONA made seven qualified loans totaling \$87.7 million and one qualified lease totaling \$2.2 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. Four loans provided financing for affordable housing, one loan was for economic development, and two loans were for community services benefiting low- and moderate-income individuals.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 49,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices further supported the Lending Test rating.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|--------------|----------------|---------------|-----------|--------------|---------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Phoenix MSA | 3 | 1,756 | 13 | 17,714 | 16 | 80.0 | 19,470 | 72.2 | 0 | 0 |
| Statewide | 4 | 7,511 | 0 | 0 | 4 | 20.0 | 7,511 | 27.8 | 0 | 0 |
| Total | 7 | 9,267 | 13 | 17,714 | 20 | 100.0 | 26,981 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 10.6 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTC projects that supported affordable housing, a primary need in the AA. Grants supported organizations that provided needed community services to primarily low- and moderate-income individuals or supported economic

development. By dollar volume, 98.2 percent of total investments and grants supported affordable housing, 1.2 percent supported economic development, and less than one percent funded community services to low- and moderate-income individuals.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included one LIHTC project, which was complex and required more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness to community needs:

- An investment of \$17.4 million in LIHTC equity for the construction of an 80-unit affordable housing development. All units are designated for low- and moderate-income households, with 54 units specifically reserved for low-income residents. This investment addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing an \$18.2 million construction loan for this project.
- Grants totaling \$153,500 to a nonprofit organization whose mission is to drive economic and political empowerment for traditionally underserved people. The majority of the grants supported the organization's CDFI which provides affordable capital through nontraditional small business financing resources. The remaining grants supported a pilot project providing youth aged 17-24 with the opportunity to explore STEM-focused careers through virtual reality headsets. These grants responded to the needs for small business capital and workforce development for low- and moderate-income youth.
- Grants totaling \$80,000 to a CDFI dedicated to helping transform distressed neighborhoods into healthy and sustainable communities by providing local organizations with loans, grants, and equity investments, local, state, and national policy support, and technical and management assistance. These grants funded the CDFI's training, guidance, and strategy in coordination with other CDFIs active in small business development, which are needs identified by the bank.

Broader Statewide and Regional Area

In addition, CONA made four investments totaling \$7.5 million in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. These investments supported affordable housing. Investments in the broader statewide and regional area further supported the Outstanding rating.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online, and mobile banking.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.

CONA had one café with three deposit-taking ATMs. CONA had 18 additional deposit-taking ATMs in various locations throughout the AA. CONA's café was in an upper-income geography. CONA opened one café during the evaluation period.

| ATM Distribution | | | | | | | | | |
|--------------------|-----------|------------------------------------|------|------|------|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Phoenix MSA | 21 | 4.8 | 23.8 | 28.6 | 33.3 | 5.8 | 25.6 | 32.6 | 35.4 |

NOTE: The number of ATMs includes two ATMs in geographies with no income designation.

Based on the table above, the distribution of the bank's ATMs in low-income geographies was near to, and in moderate-income geographies approximated, the percentages of the population in those geographies.

During the evaluation period, CONA installed four deposit-taking ATMs in moderate-income geographies and did not remove any ATMs. The 2020 U.S. Census changed the income-level designation of one of the moderate-income geographies to a low-income geography.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of two moderate-income, five middle-income, and two upper-income geographies where CONA had deposit-taking ATMs. The U.S. Census changed the income-level designations of the two moderate-income geographies to a low-income geography and a geography with no income-designation, respectively. The U.S. Census also changed the income-level designations of three of five middle-income geographies to moderate-income geographies. These changes resulted in an increase in the total number of deposit-taking ATMs in low- and moderate-income geographies and had a significant impact on the distribution of deposit-taking ATMs in low-income geographies relative to the percentages of the population in those geographies. As a result, the OCC provided more consideration to the change in ADS use over the evaluation period in determining the accessibility of the bank's service delivery systems.

| | Low-income Geographies | | Moderate-income Geographies | |
|---------------------------|------------------------|-------------|-----------------------------|-------------|
| | ATMs (#) | % of Total | ATMs (#) | % of Total |
| Phoenix MSA | | | | |
| Prior to 2020 U.S. Census | 0 | 0 | 4 | 19 |
| After 2020 U.S. Census | 1 | 4.8 | 5 | 23.8 |
| Net Change | +1 | +4.8 | +1 | +4.8 |

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 98.4% | 36.9% |
| Mobile Banking | 190.2% | 98.9% |
| ATM Usage | 363.2% | 170.5% |
| Net Change Across All Channels (Averaged) | 217.3% | 102.1% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences, its AAs, particularly low- and moderate-income geographies and/or individuals. Café hours and available services did not vary as there was one café location in the AA. The café hours of operation were 9:00 a.m. to 9:00 p.m. Monday through Saturday and 11:00 a.m. to 6:00 p.m. on Sundays.

Community Development Services

The institution provided an adequate level of CD services.

CD services were responsive to the community needs the institution identified through community contacts. Twenty-two bank associates provided 54 hours of qualified service activities to three organizations. *Pro Bono* volunteer services accounted for 18 service hours or 33.3 percent of CD services. Services consisted of providing workforce development through CONA's *Pro Bono* volunteer program and financial literacy education.

Examples of CD services in the AA include:

- Seven CONA associates provided 34 hours of financial literacy education to clients of a nonprofit organization that provides professional development, networking, and other career readiness services. CONA associates provided the financial literacy education via virtual program that was created in partnership with the organization during the COVID-19 pandemic. These services addressed the community identified need for support for workforce development programs.
- Fourteen CONA associates provided 18 hours of workforce development services to clients of a nonprofit organization that provides community services to the homeless. CONA associates conducted mock job interviews with the organization's clients. These services addressed the community identified need for support for workforce development programs.

State of California

CRA rating for the State of California: 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:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were accessible to geographies and individuals of different income levels.
- CONA was a leader in providing CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in California

CONA delineated 12 AAs in the state of California. They included the entirety of the Anaheim-Santa Ana-Irvine, CA MD, Los Angeles-Long Beach-Glendale, CA MD, Napa, CA MSA, Oakland-Hayward-Berkeley, CA MD, San Diego-Chula Vista-Carlsbad, CA MSA (San Diego MSA), San Francisco-San Mateo-Redwood City, CA MD, San Jose-Sunnyvale-Santa Clara, CA MSA, San Rafael, CA MD, Santa Rosa-Petaluma, CA MSA, and Vallejo, CA MSA. CONA also delineated as AAs the portions of the Riverside-San Bernadino-Ontario, CA MSA and Sacramento-Roseville-Folsom, CA MSA (Sacramento MSA) where CONA had deposit-taking ATMs. Refer to appendix A for a complete description of the AAs. CONA entered the Riverside MSA AA on February 10, 2021 through the opening of a café with three deposit-taking ATMs in an upper-income geography. CONA installed an additional deposit-taking ATM in an upper-income geography in the Riverside MSA AA on May 14, 2021. The Sacramento MSA AA consists solely of Placer County. CONA entered the Sacramento MSA AA on December 15, 2021 through the opening of a café with two deposit-taking ATMs in a middle-income geography.

CONA had no branches, 12 cafés, 205 deposit-taking ATMs, and \$24 billion of allocated internet deposits, which represented 7.4 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems within these AAs. Because CONA does not operate a licensed branch in California, there are no deposits reported on the June 30, 2022 FDIC Deposit Market Share report. The bank originated or purchased 18.4 percent of its evaluation period lending by count and 19.2 percent by dollar volume in the portions of California where CONA has AAs.

Based on June 30, 2022 FDIC summary of deposit information, there were 161 depository institutions with licensed branches in the portions of California where the bank has AAs. The top three depository institutions by deposit market share were Bank of America, N.A. (21.1 percent), Wells Fargo Bank, N.A. (14.3 percent), and JP Morgan Chase Bank, N.A. (12.7 percent).

Los Angeles CSA

The following table provides a summary of the demographics that include housing and business information for the Los Angeles CSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|------------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Los Angeles CSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 3,298 | 8.9 | 28.4 | 27.1 | 33.9 | 1.8 |
| Population by Geography | 15,249,226 | 8.3 | 29.0 | 28.2 | 33.9 | 0.6 |
| Housing Units by Geography | 5,247,322 | 7.3 | 26.3 | 27.7 | 38.3 | 0.4 |
| Owner-Occupied Units by Geography | 2,448,544 | 2.7 | 18.3 | 29.2 | 49.7 | 0.1 |
| Occupied Rental Units by Geography | 2,438,203 | 11.9 | 34.4 | 25.9 | 27.1 | 0.6 |
| Vacant Units by Geography | 360,575 | 7.4 | 25.9 | 29.4 | 36.3 | 0.9 |
| Businesses by Geography | 1,685,649 | 5.0 | 20.0 | 25.5 | 47.8 | 1.7 |
| Farms by Geography | 17,525 | 3.7 | 19.3 | 28.3 | 47.8 | 0.8 |
| Family Distribution by Income Level | 3,377,927 | 24.4 | 16.4 | 17.3 | 41.9 | 0.0 |
| Household Distribution by Income Level | 4,886,747 | 25.6 | 15.5 | 16.3 | 42.5 | 0.0 |
| Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA | | \$86,003 | Median Housing Value | | | \$477,589 |
| Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA | | \$62,703 | Median Gross Rent | | | \$1,331 |
| Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA | | \$61,507 | Families Below Poverty Level | | | 13.4% |
| <i>Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|---|------------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Los Angeles CSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 3,578 | 5.8 | 28.2 | 30.7 | 32.8 | 2.5 |
| Population by Geography | 15,382,652 | 5.2 | 28.8 | 31.9 | 32.9 | 1.1 |
| Housing Units by Geography | 5,382,410 | 4.9 | 26.3 | 31.0 | 36.6 | 1.2 |
| Owner-Occupied Units by Geography | 2,514,474 | 1.6 | 18.4 | 32.8 | 46.9 | 0.4 |
| Occupied Rental Units by Geography | 2,498,121 | 8.3 | 34.6 | 29.4 | 25.9 | 1.9 |
| Vacant Units by Geography | 369,815 | 5.1 | 24.7 | 29.1 | 38.7 | 2.4 |
| Businesses by Geography | 1,969,196 | 3.5 | 19.3 | 28.2 | 46.6 | 2.4 |
| Farms by Geography | 19,781 | 2.7 | 18.9 | 30.6 | 46.5 | 1.3 |
| Family Distribution by Income Level | 3,443,333 | 23.7 | 16.7 | 18.2 | 41.4 | 0.0 |
| Household Distribution by Income Level | 5,012,595 | 25.5 | 15.4 | 16.9 | 42.2 | 0.0 |
| Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA | | \$106,451 | Median Housing Value | | | \$648,247 |
| Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA | | \$80,317 | Median Gross Rent | | | \$1,645 |
| Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA | | \$76,686 | Families Below Poverty Level | | | 9.9% |
| <i>Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (* The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Economic Data

Los Angeles-Long Beach-Glendale, CA MD

Data from Moody's Analytics over the evaluation period indicated that the economy of the Los Angeles-Long Beach-Glendale, CA area cooled. Healthcare, leisure, and hospitality led gains in 2022.

Information, which includes the pivotal entertainment industry, also lent support. According to Equifax data, the population migration during the COVID-19 pandemic slowed but the loss of residents was still greater than before COVID-19. The area's strengths include a strong healthcare base and a growing tech presence providing well-paying jobs and global links through entertainment, tourism, and fashion.

Weaknesses include high costs that hinder net migration gains and being prone to disasters, including droughts, wildfires, and earthquakes.

As rising borrowing costs impacted demand, house prices declined. Housing sales fell to near-historic lows and inventories returned to pre-pandemic levels after spending much of the past two years on the floor. High prices, soaring mortgage rates, and sluggish income growth negatively impacted home affordability for many residents.

Based on data from the BLS, the unemployment rate for the Los Angeles-Long Beach-Glendale, CA area was 4.9 percent in January 2020, as high as 18.9 percent in May 2020, and 4.4 percent in December

2022. Major employers in the AA included Cedars-Sinai Medical Center, Los Angeles International Airport, University of California Los Angeles, and VXI Global Solutions.

Riverside-San Bernardino-Ontario, CA MSA

Data from Moody's Analytics over the evaluation period indicated that Riverside-San Bernardino-Ontario, CA area's employment improved, with nearly two-thirds of private sector industries adding jobs. The unemployment rate fell to a historic low and the labor force increased. Residential construction slowed but building permits increased compared to the previous business cycle. The Riverside area's lower costs compared to surrounding California metro area has led to an expanding population. However, the growth in population has fueled housing demand resulting in upward pressure on housing prices, impacting housing affordability.

Based on data from the BLS, the unemployment rate for the Riverside-San Bernardino-Ontario, CA area was 4.1 percent in January 2020, as high as 15.3 percent in April 2020, and 3.8 percent in December 2022. Major employers in the AA included State Brothers Markets, Arrowhead Regional Medical Center, U.S. Marine Corps Air Ground Combat Center, Fort Irwin, and Walmart Inc.

Community Contact

A review was conducted of four community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing, small business and economic development, and financial literacy. Contacts noted the significant impact the COVID-19 pandemic had on small businesses and low-income households. Many smaller businesses struggled during the pandemic and closed permanently. In addition, many living-wage jobs were lost and have yet to come back at pre-pandemic levels. Credit and community development needs identified include:

- Access to safe and affordable housing
- Credit counseling services
- Small dollar consumer loans
- Small business loans for micro-businesses and start-ups
- Financial education for small businesses
- Education, employment, and other program assistance for undocumented residents

The area is served by numerous nonprofit organizations, community-based organizations, CDFIs, loan funds, economic development organizations, and community development organizations that provide opportunities to help meet community needs. Opportunities for support include grant funding, technical assistance for small businesses, volunteers and support for financial education programs, and providing credit building products.

San Diego MSA

The following table provides a summary of the demographic information that includes housing and business information for the San Diego MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: San Diego MSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 628 | 9.7 | 22.6 | 32.5 | 34.1 | 1.1 |
| Population by Geography | 3,223,096 | 8.9 | 23.6 | 32.5 | 34.7 | 0.3 |
| Housing Units by Geography | 1,180,806 | 7.7 | 21.7 | 34.2 | 36.5 | 0.0 |
| Owner-Occupied Units by Geography | 579,079 | 2.8 | 15.1 | 35.5 | 46.6 | 0.0 |
| Occupied Rental Units by Geography | 515,078 | 13.1 | 28.8 | 32.8 | 25.2 | 0.0 |
| Vacant Units by Geography | 86,649 | 7.6 | 22.8 | 33.8 | 35.8 | 0.0 |
| Businesses by Geography | 345,784 | 5.6 | 14.7 | 34.7 | 44.9 | 0.1 |
| Farms by Geography | 6,598 | 4.1 | 17.2 | 37.6 | 41.1 | 0.0 |
| Family Distribution by Income Level | 731,328 | 23.6 | 16.9 | 17.8 | 41.7 | 0.0 |
| Household Distribution by Income Level | 1,094,157 | 24.8 | 15.7 | 17.1 | 42.4 | 0.0 |
| Median Family Income MSA - 41740 San Diego-Chula Vista-Carlsbad, CA MSA | | \$75,179 | Median Housing Value | | | \$458,248 |
| | | | Median Gross Rent | | | \$1,404 |
| | | | Families Below Poverty Level | | | 10.6% |
| <i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|---|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: San Diego MSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 737 | 6.2 | 22.7 | 35.5 | 33.6 | 1.9 |
| Population by Geography | 3,298,634 | 6.5 | 24.5 | 34.6 | 33.4 | 1.0 |
| Housing Units by Geography | 1,215,528 | 5.7 | 23.0 | 36.0 | 34.9 | 0.4 |
| Owner-Occupied Units by Geography | 609,350 | 2.4 | 15.8 | 37.2 | 44.4 | 0.2 |
| Occupied Rental Units by Geography | 521,353 | 9.8 | 31.5 | 34.7 | 23.3 | 0.7 |
| Vacant Units by Geography | 84,825 | 4.4 | 21.9 | 36.0 | 37.4 | 0.3 |
| Businesses by Geography | 400,327 | 3.8 | 17.7 | 34.0 | 43.7 | 0.8 |
| Farms by Geography | 7,360 | 3.2 | 17.9 | 38.8 | 39.9 | 0.2 |
| Family Distribution by Income Level | 759,418 | 22.8 | 17.3 | 18.7 | 41.2 | 0.0 |
| Household Distribution by Income Level | 1,130,703 | 24.4 | 16.0 | 17.6 | 42.0 | 0.0 |
| Median Family Income MSA - 41740 San Diego-Chula Vista-Carlsbad, CA MSA | | \$95,623 | Median Housing Value | | | \$619,119 |
| | | | Median Gross Rent | | | \$1,778 |
| | | | Families Below Poverty Level | | | 7.2% |

Source: 2020 U.S. Census and 2022 D&B Data

Due to rounding, totals may not equal 100.0%

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

Economic Data

Data from Moody's Analytics over the evaluation period indicated that the San Diego-Carlsbad, CA MSA area's economy slowed in the latter half of 2022, but its expansion remained consistent with California and the nation. The labor market was healthy and job gains were broad-based across industries. Finance and retail were the only industries showing year-over-year declines in jobs through December 2022. Job losses in finance and retail were offset by robust hiring elsewhere, especially healthcare and hospitality. The labor force declined but remained near its all-time high. The area's strengths include a highly trained and well-educated workforce, a beneficiary of buildup of Pacific naval forces and unmanned aerial vehicles, and research and development clusters that contribute to healthy demand for office space. Weaknesses include high costs that hinder net migration gains, a significantly overvalued housing market, and low and falling affordability. The residential real estate market has reversed course and with higher mortgage rates, the most unaffordable markets have registered the largest declines, including high-cost San Diego.

Soaring prices in the prior two years caused home values to diverge from what economic fundamentals, including income, supported. Prices contracted in consecutive quarters for the first time since 2011; prices were down seven percent in the second half of 2022.

Based on data from the BLS, the unemployment rate was 3.4 percent in January 2020, as high as 16 percent in April 2020, and 3.1 percent in December 2022. Major employers in the AA included the University of California, 32nd St Naval Station, Marine Corps Community Services Marine Corps Recruit Depot San Diego, and Kaiser Permanente.

Community Contact

A review was conducted of two community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing and financing and support for small businesses. Credit and community development needs identified include:

- Grant funding to support small businesses
- Access to low-cost banking services for low- and moderate-income individuals
- Affordable housing development
- Technical assistance and education for small businesses
- Grant support for small businesses

The area is served by many nonprofit organizations, community-based organizations, CDFIs, economic development organizations, and community development organizations that provide opportunities to help meet community needs. Opportunities for support include grant funding and lending and equity investments for income restricted multifamily rental housing.

Scope of Evaluation in California

In evaluating the bank's performance in the state of California, the Los Angeles CSA and San Diego MSA AAs received full-scope reviews, and the San Jose CSA and Sacramento MSA AAs received limited-scope reviews. The Los Angeles CSA AA had 61.8 percent of the lending and 44.3 percent of the deposits (allocated internet deposits only) and the San Diego MSA AA had 12.7 percent of the lending and 8.2 percent of the deposits (allocated internet deposits only) in the state of California. We based our ratings primarily on the results of the areas that received full-scope reviews.

CONA's strategic focus is consumer lending. In the Los Angeles CSA AA, San Diego MSA AA, and San Jose CSA AA consumer loans received greater weight than home mortgage loans, small loans to businesses, and small loans to farms. In the San Jose CSA, the bank did not originate or purchase a sufficient number of home mortgage loans for a meaningful analysis during the evaluation period. In the Sacramento MSA AA, the bank did not originate or purchase any home mortgage loans during the evaluation period and did not originate or purchase a sufficient number of small loans to farms for a meaningful analysis during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Los Angeles CSA AA and San Diego MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans* | | | | | | | | |
|-------------------------|---------------|----------------|------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Los Angeles CSA | 99 | 59,098 | 95 | 3,526,588 | 87 | 3,585,967 | 61.8 | 44.3 |
| San Diego MSA | 42 | 12,403 | 46 | 724,851 | 35 | 737,377 | 12.7 | 8.2 |
| Sacramento MSA | 0 | 781 | 5 | 38,974 | 0 | 39,760 | 0.7 | 1.1 |
| San Jose CSA | 22 | 25,871 | 142 | 1,410,658 | 37 | 1,436,730 | 24.8 | 46.3 |
| Statewide | 0 | 0 | 0 | 0 | 30 | 30 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 163 | 98,153 | 288 | 5,701,071 | 189 | 5,799,834 | 100 | 100 |

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

| Dollar Volume of Loans (\$000)* | | | | | | | | |
|--|------------------|------------------|--------------|-------------------|-----------------------|-------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Los Angeles CSA | 2,067,647 | 707,867 | 964 | 6,803,988 | 967,696 | 10,548,162 | 54.8 | 44.3 |
| San Diego MSA | 241,084 | 173,320 | 575 | 1,678,070 | 180,459 | 2,273,508 | 11.8 | 8.2 |
| Sacramento MSA | 0 | 12,848 | 112 | 142,427 | 0 | 155,387 | 0.8 | 1.1 |
| San Jose CSA | 523,302 | 346,380 | 1,639 | 4,441,897 | 545,268 | 5,858,486 | 30.4 | 46.3 |
| Statewide | 0 | 0 | 0 | 0 | 413,016 | 413,016 | 2.1 | 0 |
| Regional | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 2,832,033 | 1,240,415 | 3,290 | 13,066,382 | 2,106,439 | 19,248,559 | 100 | 100 |

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

Los Angeles CSA

Lending levels reflected excellent responsiveness to AA credit needs.

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$10.6 billion in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of 1.3 percent and would have ranked 15th out of 114 depository institutions, placing it in the top 14 percent of depository institutions in this AA. Based on June 30, 2022 FDIC summary of deposit information, there were 113 depository institutions (excluding CONA) in these AAs. The top three depository institutions by deposit market share were Bank of America, N.A. (17.6 percent), JP Morgan Chase Bank, N.A. (16.8 percent), and Wells Fargo Bank, N.A. (13.9 percent).

According to peer mortgage data for 2022, CONA had a market share of less than one percent based on the number of home mortgage loans originated or purchased in this AA. The bank also ranked 496th among 1,020 home mortgage lenders in this AA, which placed it in the top 49 percent of lenders. The top lenders in this AA based on market share were United Wholesale Mortgage (6.4 percent), Bank of America, N.A. (5 percent), and Rocket Mortgage (4.6 percent).

According to peer small business data for 2021, CONA had a market share of 3.2 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked seventh out of 364 small business lenders, which placed it in the top two percent of lenders. The top lenders in this AA based on market share were American Express National Bank (20.7 percent), JP Morgan Chase Bank, N.A. (15.6 percent), and Bank of America, N.A. (14 percent).

According to peer small farm data for 2021, CONA had a market share of 5.6 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked fifth out of 39 small farm lenders, which placed it in the top 13 percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (34.8 percent), Wells Fargo Bank, N.A. (20.5 percent), and Bank of America, N.A. (13.5 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 63.9 percent of total deposits.

San Diego MSA

Lending levels reflected excellent responsiveness to AA credit needs.

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$2 billion in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of 1.3 percent and would have ranked 14th out of 46 depository institutions, placing it in the top 31 percent of depository institutions in this AA. Based on June 30, 2022 FDIC summary of deposit information, there were 45 depository institutions with licensed branches in the portions of the San Diego MSA where the bank has its AA. The top three depository institutions by deposit market share were Wells Fargo Bank, N.A. (17.9 percent), JP Morgan Chase Bank, N.A. (16.5 percent), and Bank of America, N.A. (13 percent).

According to peer mortgage data for 2022, CONA had a market share of less than one percent based on the number of home mortgage loans originated or purchased in this AA. The bank also ranked 349th among 813 home mortgage lenders in this AA, which placed it in the top 43 percent of lenders. The top lenders in this AA based on market share were United Wholesale Mortgage (7.5 percent), Rocket Mortgage (4.2 percent), and Navy Federal Credit Union (3.8 percent).

According to peer small business data for 2021, CONA had a market share of 3.7 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked eighth out of 254 small business lenders, which placed it in the top four percent of lenders. The top lenders in this AA based on market share were American Express National Bank (17.8 percent), JP Morgan Chase Bank, N.A. (17.2 percent), and Bank of America, N.A. (10.3 percent).

According to peer small farm data for 2021, CONA had a market share of three percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked fifth out of 17 small farm lenders, which placed it in the top 30 percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (36.5 percent), Wells Fargo Bank, N.A. (20.7 percent), and U.S. Bank, N.A. (15.9 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 84.7 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs.

Los Angeles CSA***Home Mortgage Loans***

Refer to Table O in the state of California 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.

Based on the data in the tables, the overall geographic distribution of home mortgage loans was excellent.

For 2020 through 2021, the percentages of home mortgage loans in both low- and moderate-income geographies exceeded both the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Businesses

Refer to Table Q in the state of California 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 48 PPP loans totaling \$981,000 that provided support to small businesses in low- and moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table S in the state of California 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 farms.

Based on the data in the tables, the overall geographic distribution of small loans to farms was good.

For 2020 through 2021, the percentages of small loans to farms in low-income geographies was near to, and in moderate-income geographies exceeded, the percentages of farms located in those geographies. The percentages of small loans to farms in both low- and moderate-income geographies exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was weaker than the 2020 through 2021 period. There were no small loans to farms originated or purchased in low-income geographies.

Consumer Loans

Refer to Table U in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

San Diego MSA

Home Mortgage Loans

Refer to Table O in the state of California 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.

Based on the data in the tables, the overall geographic distribution of home mortgage loans was excellent.

For 2020 through 2021, the percentages of home mortgage loans in both low- and moderate-income geographies exceeded both the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank did not originate or purchase a sufficient volume of home mortgage loans in the 2022 period for a meaningful analysis.

Small Loans to Businesses

Refer to Table Q in the state of California 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were three PPP loans totaling \$26,000 that provided support to small businesses in moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table S in the state of California 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 farms.

Based on the data in the tables, the overall geographic distribution of small loans to farms was adequate.

During the evaluation period, the bank did not originate or purchase any small loans to farms located in low-income geographies. There were a limited number of farms located in low-income geographies in the AA. Based on the demographic data in Table A for 2020-2021, there were 271 farms located in low-income geographies. For 2022, there were 236 farms located in low-income geographies. As a result, the OCC provided more consideration to the bank's lending to farms in moderate-income geographies.

The percentages of small loans to farms in moderate-income geographies was near to the percentages of farms located in moderate-income geographies and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of small loans to farms in moderate-income geographies exceeded the percentages of farms located in moderate-income geographies.

Consumer Loans

Refer to Table U in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage, small business, small farm, and consumer 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 any of the full-scope areas 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 and farms of different sizes.

Los Angeles CSA

Home Mortgage Loans

The bank's home mortgage lending was limited to multifamily loans for which borrower income was not applicable. Therefore, no analysis of the borrower distribution of home mortgage loans was completed.

Small Loans to Businesses

Refer to Table R in the state of California 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 165 PPP loans totaling \$2.7 million that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less in the AA and exceeded the aggregates percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was poor.

For 2020 through 2021, the percentages of small loans to farms with revenues of \$1 million or less was well below the percentages of farms with revenues of \$1 million or less in the AA and was below the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographic in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to low-income borrowers equaled, and to moderate-income borrowers exceeded, the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

San Diego MSA

Home Mortgage Loans

The bank's home mortgage lending was limited to multifamily loans for which borrower income was not applicable. Therefore, no analysis of the borrower distribution of home mortgage loans was completed.

Small Loans to Businesses

Refer to Table R in the state of California 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 27 PPP loans totaling \$298,000 that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographic in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was poor.

For 2020 through 2021, the percentages of small loans to farms with revenues of \$1 million or less was well below both the percentages of farms with revenues of \$1 million or less in the AA and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Commercial Leases and Letters of Credit

The bank originated two leases in the San Diego MSA AA totaling \$69.2 million that have a qualified CD purpose. The leases supported the development and preservation of affordable housing and were given positive consideration.

Community Development Lending

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Los Angeles CSA

The institution was a leader in making CD loans.

The level of CD lending was excellent. CONA made 87 CD loans totaling \$967.7 million, which represented 99 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 93.7 percent funded affordable housing and 6.3 percent funded economic development activities.

The following are examples of the bank's CD loans that illustrate the complexity or responsiveness of CONA's CD lending:

- A \$21.6 million loan to finance the construction of a new 46-unit affordable housing development. Forty-five of 46 units were reserved for low- or moderate-income households with incomes up to 60 percent of the AMI. This transaction involved federal and state tax credits and financing from a nonprofit multifamily affordable housing lender that aimed to improve outcomes for low- and moderate-income residents. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$20.3 million in LIHTC equity in the project.
- CONA provided NMTC financing in the amount of \$9.5 million to a qualified active low-income community business to provide financing for renovating and replacing an abandoned supermarket in a food desert and to provide working capital for the new supermarket. The business was expected to create 100 full-time and 120 part-time jobs, hired directly from the surrounding area. This financing addressed several bank-identified community needs, including improving food security in a food desert and creating up to 220 jobs.
- A \$500,000 below-market rate line of credit to a CDFI to cover architecture, engineering, and legal expenses related to the development of 85 affordable, supportive housing units for homeless residents. The line of credit was extended through CONA's "Blueprints to Buildings" (B2B) program. This line of credit addressed the community identified needs for affordable housing and the bank-identified community needs for related resident services. CONA demonstrated multi-faceted support by also providing a \$50,000 grant to the CDFI.

San Diego MSA

The institution was a leader in making CD loans.

The level of CD lending was excellent. CONA made 35 CD loans totaling \$180.5 million, which represented 99.2 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 69.9 percent funded affordable housing, 25.9 percent funded economic development activities, and 4.2 percent funded revitalization and stabilization efforts.

The following are examples of the bank's CD loans that illustrate the complexity or responsiveness of CONA's CD lending:

- A \$10 million loan for the rehabilitation of a 172-unit mixed-income affordable housing complex. The loan represented CONA's 50 percent portion of a \$20 million loan participation, and proceeds were used to bridge the mismatch between the funding schedule and the cash needs of the developer. One hundred and fifty-four of 172 units were set aside for low- or moderate-income households

earning up to 60 percent of the AMI. This transaction was complex because it was a syndication, which required CONA to perform due diligence on all investor partners and assess the risk of the individual properties within the fund. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$10 million in LIHTC equity in the project.

- An \$11.6 million loan to finance the acquisition of a 91-unit affordable housing development. All units were restricted to low- or moderate-income households earning up to 80 percent of the AMI. This loan addressed the community identified need for affordable housing.
- CONA provided refinancing of a \$34.6 million lease to fund capital improvements for seven buildings in a school district within the AA. Five of the seven buildings were high schools that primarily served students from low- and moderate-income families. Two of seven facilities were in a low-income census tract. This financing addressed the bank-identified community need to upgrade community facilities for low- and moderate-income populations.

Broader Statewide and Regional Area

In addition, CONA made 30 qualified loans totaling \$413 million and one qualified lease totaling \$10.1 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AAs. Twenty-seven loans provided financing for affordable housing and three loans were for economic development. The lease supported community services targeted to low- and moderate-income individuals.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs in the Los Angeles CSA AA and San Diego MSA AA.

During the evaluation period, CONA issued more than 154,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies in the Los Angeles CSA AA and more than 29,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies in the San Diego MSA AA. CONA's flexible lending practices during the evaluation period further supported the Lending Test rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the San Jose CSA AA and Sacramento MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through V in the state of California section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Los Angeles CSA AA and San Diego MSA AA was excellent.

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|------------------------|---------------|----------------|----------------|----------------|------------|--------------|----------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Los Angeles CSA | 37 | 126,732 | 189 | 144,725 | 226 | 44.3 | 271,457 | 44.6 | 0 | 0 |
| San Diego MSA | 7 | 15,726 | 39 | 28,737 | 46 | 9.0 | 44,463 | 7.3 | 0 | 0 |
| Sacramento MSA | 0 | 0 | 3 | 470 | 3 | 0.6 | 470 | 0.1 | 0 | 0 |
| San Jose CSA | 28 | 80,655 | 177 | 136,689 | 205 | 40.2 | 217,344 | 35.7 | 0 | 0 |
| Regional | 2 | 678 | 1 | 3,007 | 3 | 0.6 | 3,685 | 0.6 | 0 | 0 |
| Statewide | 12 | 19,724 | 15 | 50,960 | 27 | 5.3 | 70,684 | 11.6 | 0 | 0 |
| Total | 86 | 243,515 | 424 | 364,588 | 510 | 100.0 | 608,103 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Los Angeles CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 27.8 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services or affordable housing to primarily low- and moderate-income individuals. By dollar volume, 98.8 percent of total investments and grants supported affordable housing, 0.9 percent funded community services to low- and moderate-income individuals, and less than one percent supported economic development.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included nine LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness to community needs:

- An investment of \$29.1 million in LIHTC equity to help finance the construction of a 92-unit affordable housing development. Ninety units will be set aside for low- and moderate-income households, 46 of which will be occupied by formerly homeless individuals with incomes up to 30 percent of the AMI. This investment is complex as it involves financing commitments from local government, and federal and state tax credits. This investment is responsive to the community

identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$29.9 million construction loan for this project.

- An investment of \$10.5 million in LIHTC equity for the construction of a 27-unit rent-subsidized supportive housing development for low-income, homeless youth ages 18-25 with severe mental health issues. Onsite services provided by a nonprofit organization include case management that focuses on healthcare, education, employment, and trauma recovery. This investment is complex due to the nature of the financing structure, which included public financing from the Los Angeles County Development Authority. This investment addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing an \$8.5 million construction loan for this project.
- Grants totaling \$360,000 to a nonprofit organization providing community development services to low- and moderate-income individuals. These grants supported the organization's workforce development programs, including employment counseling, resume writing, mock interviews, and professional attire. These grants responded to the bank-identified community need for workforce development for low- and moderate-income individuals.

San Diego MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 24.4 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services to primarily low- and moderate-income individuals. By dollar volume, 98.9 percent of total investments and grants supported affordable housing, 0.9 percent funded community services to low- and moderate-income individuals, and less than one percent supported economic development.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included three LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness to community needs:

- An investment of \$14.8 million in LIHTC equity to help finance the rehabilitation of a 100-unit affordable housing development for seniors. All units are restricted to low- and moderate-income individuals. This development involved federal and local funding. This investment addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$5.2 million construction loan for this project.
- An investment of \$3.4 million in LIHTC equity to help finance the new construction of a 175-unit affordable housing development that includes 10,000 square feet of commercial space on the street level for retail and restaurant tenants. All units are restricted to low- and moderate-income households earning up to 50 percent and 60 percent of the AMI. This investment is part of a fund

containing 19 properties and five other investors. This investment addressed the community identified need for affordable housing.

- Grants totaling \$105,000 to a nonprofit organization whose mission is to solve family homelessness. CONA's grants supported COVID-19 pandemic relief and a 700-day personal training program offered by the nonprofit involving workforce development, early childhood development, financial management, personal development, and housing. The pandemic relief was provided through a program that addressed the immediate needs of client families and included supplies and cash to help cover emergencies due to job loss. These grants addressed the community's needs for COVID relief and bank-identified community needs for solutions for homelessness and self-sufficiency for low- and moderate-income families.

Broader Statewide and Regional Area

In addition, CONA made 30 current- and prior-period investments totaling \$74.4 million in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AAs. These investments included 14 prior-period investments totaling \$20.4 million that supported affordable housing, six current-period investments totaling \$53.8 million that supported affordable housing, five grants totaling \$171,760 for economic development, three grants totaling \$18,500 to organizations providing community services to low- and moderate-income individuals, and two grants totaling \$18,000 that supported affordable housing. Investments in the broader statewide and regional area further supported the Outstanding rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the San Jose CSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope areas. Based on a limited-scope review, the bank's performance under the Investment Test in the Sacramento MSA AA was weaker than the bank's overall performance under the Investment Test in the full-scope areas due to a lower level of investment activity. The bank's performance in the limited-scope areas had a minimal impact on the bank's overall Investment Test rating for the state of California.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Los Angeles CSA AA and San Diego MSA AA was good.

As these were digital markets for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online, and mobile banking.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.

| ATM Distribution | | | | | | | | | |
|------------------------|-----------|------------------------------------|------|------|------|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Los Angeles CSA | 130 | 2.3 | 20 | 30.8 | 40.8 | 5.2 | 28.8 | 31.9 | 32.9 |
| San Diego MSA | 4 | 0 | 0 | 0 | 100 | 6.5 | 24.5 | 34.6 | 33.4 |
| Sacramento MSA | 2 | 0 | 0 | 0 | 100 | 0.8 | 7.4 | 35.3 | 56.5 |
| San Jose CSA | 69 | 5.8 | 27.5 | 52.2 | 8.7 | 7.1 | 22.9 | 38.2 | 30.5 |

NOTE: The number of ATMs in the Los Angeles CSA includes eight ATMs in geographies with no income designation.

NOTE: The number of ATMs in the San Jose CSA includes four ATMs in geographies with no income designation.

Los Angeles CSA

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.

CONA had seven café locations with 19 deposit-taking ATMs. CONA had 111 additional deposit-taking ATMs at various locations throughout the AA. Five cafés were in middle- and upper-income geographies and two cafés were in geographies with no income designation. During the evaluation period, CONA opened four of the seven cafés and did not close any cafés.

Based on the table above, the distribution of the bank's ATMs in low-income geographies was well below, and in moderate-income geographies was below, the percentages of the population in those geographies.

During the evaluation period, CONA installed 17 deposit-taking ATMs and removed three ATMs. CONA installed three ATMs in low-income geographies, four ATMs in moderate-income geographies, two ATMs in middle-income geographies, and eight ATMs in upper-income geographies. CONA removed one ATM each from a moderate-income geography, an upper-income geography, and a geography with no income designation.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of three low-income, 17 moderate-income, 17 middle-income, and 10 upper-income geographies where CONA had deposit-taking ATMs. The U.S. Census also changed the income-level designation of two geographies with no income designation where CONA had deposit-taking ATMs. The U.S. Census changed the income designation of all three low-income geographies to moderate-income geographies. The U.S. Census also changed the income-level designation of 15 moderate-income geographies to middle-income and upper-income geography. One moderate-income geography was changed to a low-income geography and one moderate-income geography was changed to a geography with no income-level designation.

The U.S. Census changes to the income-level designation of the low- and moderate-income geographies where CONA had deposit-taking ATMs resulted in a minor decrease in the total number of deposit-taking ATMs in each of those geographies and had a minimal impact on the distribution of deposit-taking ATMs in each of those geographies relative to the percentages of the population in those geographies.

| Los Angeles CSA | Low-income Geographies | | Moderate-income Geographies | |
|---------------------------|------------------------|-------------|-----------------------------|-------------|
| | ATMs (#) | % of Total | ATMs (#) | % of Total |
| Prior to 2020 U.S. Census | 5 | 3.8 | 27 | 20.8 |
| After 2020 U.S. Census | 3 | 2.3 | 26 | 20 |
| Net Change | -2 | -1.5 | -1 | -0.8 |

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 65.9% | 24.9% |
| Mobile Banking | 137.4% | 78.1% |
| ATM Usage | 57.5% | 16.9% |
| Net Change Across All Channels (Averaged) | 86.9% | 39.9% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. All seven cafés were open seven days per week with varying hours of operation. There are no standard hours of operation for the seven cafés in the Los Angeles CSA AA. Each café has individual hours of operation. However, there were no significant differences in café hours and available services at café locations.

San Diego MSA

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.

CONA had one café location with four deposit-taking ATMs. CONA's café was in an upper income geography. CONA did not open any additional cafés in the AA during the evaluation period.

As there were no ATMs in low- and moderate-income geographies during the evaluation period, the OCC placed significantly greater weight on the growth in ADS use (including online and mobile banking) by bank customers residing in low- and moderate-income geographies over the evaluation period to assess the effectiveness of the bank's ADS to deliver retail banking services to low- and moderate-income geographies and individuals. CONA did not install any additional ATMs or remove any ATMs in the AA during the evaluation period.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census did not change the income-level designations of the upper-income geographies where CONA had deposit-taking ATMs.

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 69.8% | 28% |
| Mobile Banking | 135% | 79.6% |
| ATM Usage | -41.6% | 49.6% |
| Net Change Across All Channels (Averaged) | 54.4% | 19.3% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Café hours and available services did not vary as there was one café location in the AA. The café hours of operation were 9:00 a.m. to 8:00 p.m. Monday through Saturday and 10:00 a.m. to 7:00 p.m. on Sundays.

Community Development Services

Los Angeles CSA

The institution was a leader in providing CD services.

CD services were responsive to the community needs the institution identified through community contacts. Eighty-eight bank associates provided 568 hours of qualified service activities to 26 organizations. Leadership was demonstrated through eight hours of board or committee participation to two organizations. *Pro Bono* volunteer services accounted for 128 service hours or 22.5 percent of CD services. Financial literacy education accounted for 311 service hours or 54.8 percent of CD services. Services consisted of providing financial education workforce development through CONA's *Pro Bono* volunteer program.

Examples of CD services in the AA include:

- A CONA associate served on the Community Advisory Board of a certified CDFI that provides direct and indirect financing for community and economic development projects. The CONA associate provided advisory services with respect to the feasibility and potential community benefits of specific CDFI projects proposed by the organization.
- Five CONA associates provided 30 hours of financial literacy education to clients of a nonprofit that provides financial education and community services to low-income families. The nonprofit organization is in a low-income geography and serves the local community. In addition, five CONA associates provided 10 hours of resume writing and job interviewing assistance to the clients of the nonprofit organization. These services addressed the bank-identified community needs for financial literacy education and workforce development.

San Diego MSA

The institution was a leader in providing CD services.

CD services were responsive to the community needs the institution identified through community contacts. Twenty-four bank associates provided 137 hours of qualified service activities to five organizations. Leadership was evident through 19 hours of board or committee participation with one organization. *Pro Bono* volunteer services accounted for 10 service hours or 7 percent of CD services. Financial literacy education accounted for 92 service hours or 67 percent of CD services. Services consisted of providing financial literacy education, social support services, and workforce development.

An example of CD services in this AA was:

- Six CONA associates provided 72 hours of financial literacy education to elementary and middle-school students from schools where the majority of students were eligible for free and reduced meal programs. These services addressed the bank-identified community needs for financial literacy education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Sacramento MSA AA was weaker than the bank's overall performance under the Service Test in the full-scope areas. The weaker performance was primarily due to a lower number of deposit-taking ATMs in low- and moderate-income geographies. The weaker performance in the Sacramento MSA AA had a minimal impact on the overall Service Test rating. Based on a limited-scope review, the bank's performance under the Service Test in the San Jose CSA AA was stronger than the bank's overall performance under the Service Test in the full-scope areas. The stronger performance was primarily due to a higher number of deposit-taking ATMs in low- and moderate-income geographies. The stronger performance in the San Jose CSA AA had a minimal impact on the overall Service Test rating.

State of Colorado

CRA rating for the State of Colorado: 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:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were accessible to geographies and individuals of different income levels.
- CONA provided a relatively high level of CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Colorado

CONA delineated two AAs in the state of Colorado. They included the entirety of the Boulder, CO MSA and the portions of the Denver-Aurora-Lakewood, CO MSA where CONA had deposit-taking ATMs. Refer to appendix A for a complete description of the AA.

CONA had no branches, two cafés, 35 deposit-taking ATMs, and \$2.2 billion of allocated internet deposits, which represented 0.7 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems within these AAs. Because CONA does not operate a licensed branch in Colorado, there are no deposits reported on the June 30, 2022 FDIC Deposit Market Share report. The bank originated or purchased 2.7 percent of its evaluation period lending by count and 3.2 percent by dollar volume in the portions of Colorado where CONA has AAs.

Based on June 30, 2022 FDIC summary of deposit information, there were 71 depository institutions with licensed branches in the portions of Colorado where the bank has AAs. The top three depository institutions by deposit market share were Wells Fargo Bank, N.A. (22.5 percent), JP Morgan Chase Bank, N.A. (15.7 percent), and Firstbank (14 percent).

Denver CSA

The following table provides a summary of the demographic information that includes housing and business information for the Denver CSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: Denver CSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 655 | 8.5 | 24.6 | 33.3 | 32.8 | 0.8 |
| Population by Geography | 2,898,520 | 8.8 | 24.7 | 33.4 | 33.0 | 0.1 |
| Housing Units by Geography | 1,177,952 | 8.5 | 24.1 | 34.8 | 32.5 | 0.0 |
| Owner-Occupied Units by Geography | 700,149 | 4.6 | 19.2 | 35.0 | 41.1 | 0.0 |
| Occupied Rental Units by Geography | 418,396 | 14.5 | 32.1 | 34.5 | 18.8 | 0.0 |
| Vacant Units by Geography | 59,407 | 11.4 | 25.6 | 35.3 | 27.7 | 0.0 |
| Businesses by Geography | 559,792 | 6.6 | 20.5 | 32.2 | 40.3 | 0.3 |
| Farms by Geography | 10,215 | 7.5 | 20.8 | 32.0 | 39.4 | 0.3 |
| Family Distribution by Income Level | 699,855 | 21.7 | 17.5 | 20.3 | 40.5 | 0.0 |
| Household Distribution by Income Level | 1,118,545 | 23.9 | 16.5 | 17.9 | 41.7 | 0.0 |
| Median Family Income MSA - 14500 Boulder, CO MSA | | \$96,926 | Median Housing Value | | | \$293,631 |
| Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA | | \$80,820 | Median Gross Rent | | | \$1,085 |
| | | | Families Below Poverty Level | | | 8.0% |
| <i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: Denver CSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 742 | 5.5 | 25.1 | 35.7 | 31.1 | 2.6 |
| Population by Geography | 3,161,810 | 5.3 | 26.4 | 34.5 | 32.7 | 1.1 |
| Housing Units by Geography | 1,231,627 | 5.1 | 26.3 | 36.0 | 31.2 | 1.5 |
| Owner-Occupied Units by Geography | 753,942 | 2.9 | 20.9 | 37.5 | 38.1 | 0.6 |
| Occupied Rental Units by Geography | 420,857 | 8.9 | 35.6 | 33.5 | 19.0 | 3.0 |
| Vacant Units by Geography | 56,828 | 5.6 | 27.9 | 34.1 | 29.3 | 3.2 |
| Businesses by Geography | 713,181 | 3.9 | 22.0 | 32.8 | 38.0 | 3.3 |
| Farms by Geography | 12,071 | 4.2 | 23.2 | 35.6 | 35.3 | 1.7 |
| Family Distribution by Income Level | 726,581 | 20.4 | 18.3 | 21.8 | 39.5 | 0.0 |
| Household Distribution by Income Level | 1,174,799 | 23.1 | 16.9 | 18.7 | 41.3 | 0.0 |
| Median Family Income MSA - 14500 Boulder, CO MSA | | \$118,307 | Median Housing Value | | | \$447,408 |
| Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA | | \$103,157 | Median Gross Rent | | | \$1,471 |
| | | | Families Below Poverty Level | | | 5.3% |

Source: 2020 U.S. Census and 2022 D&B Data

Due to rounding, totals may not equal 100.0%

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

Economic Data

Denver-Aurora-Lakewood, CO MSA

Data from Moody's Analytics over the evaluation period indicated that after slowing at the start of summer, job growth in the Denver-Aurora-Lakewood, CO area increased. Professional and business services and healthcare drove recent employment strength, with help from a growing public sector. This outweighed weakness in leisure and hospitality and financial services. The unemployment rate ticked up, largely due to an expanding labor force putting upward pressure on the jobless rate. The area's strengths include a high concentration of dynamic, knowledge-based industries, population growth, a skilled workforce, and high employment diversity. Weaknesses include an elevated cost of living relative to other Mountain West metro areas, and a significantly overvalued housing market with low and falling affordability.

Based on data from the BLS, the unemployment rate for the Denver-Aurora-Lakewood, CO area was 3 percent in January 2020, as high as 12.2 percent in May 2020, and 2.6 percent in December 2022. Major employers in the AA included HealthOne, UCHHealth, University of Colorado, Lockheed Martin Corporation, and United Airlines.

Boulder, CO MSA

Data from Moody's Analytics over the evaluation period indicated that the Boulder, CO area's economic growth slowed due to weaknesses in the professional and business services, and finance industries which accounted for more than one-fifth of private sector employment. Manufacturing and higher education offset some of the declines in professional services and finances, mitigating some of the economic slowdown. The area's strengths include high educational attainment, above-average per capita income, and superior consumer credit quality. Weaknesses include high living costs relative to nearby areas, high employment volatility, and rising housing prices leading to sharp declines in home affordability.

Based on data from the BLS, the unemployment rate for the Boulder, CO area was 2.6 percent in January 2020, as high as 10.2 percent in June 2020, and 2.2 percent in December 2022. Major employers in the AA included University of Colorado, Medtronic, Inc., and Boulder Community Health.

Community Contact

A review was conducted of two community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing and financing and support for small businesses. Contacts noted that the area is experiencing positive net migration and has become more diverse with the largest growth among the Hispanic/Latino population. Credit and community development needs identified include:

- Affordable housing
- Down payment assistance for first-time homebuyers
- Access to capital for small businesses
- Grant support for small businesses

The area is served by many nonprofit organizations, community-based organizations, CDFIs, economic development organizations, and community development organizations that provide opportunities to help meet community needs. Opportunities for support include investing in affordable housing bonds and securitized loan pools, and providing technical assistance to small businesses.

Scope of Evaluation in Colorado

The Denver CSA AA received a full-scope review. CONA's strategic focus is consumer lending. Consumer loans received a greater weight than small loans to businesses and small loans to farms. There was an insufficient number of home mortgage loans for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans | | | | | | | | |
|-------------------|---------------|----------------|------------|----------------|-----------------------|----------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Denver CSA | 5 | 16,760 | 73 | 844,476 | 12 | 861,326 | 100.0 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 10 | 10 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 7 | 7 | 0 | 0 |
| Total | 5 | 16,760 | 73 | 844,476 | 29 | 861,343 | 100 | 100 |

| Dollar Volume of Loans (\$000) | | | | | | | | |
|--------------------------------|----------------|----------------|------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Denver CSA | 193,449 | 241,738 | 603 | 2,376,881 | 122,048 | 2,934,719 | 86.3 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 267,152 | 267,152 | 7.9 | 0 |
| Regional | 0 | 0 | 0 | 0 | 199,618 | 199,618 | 5.9 | 0 |
| Total | 193,449 | 241,738 | 603 | 2,376,881 | 588,818 | 3,401,489 | 100 | 100 |

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$2.2 billion in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of 1.6 percent and would have ranked 13th out of 72 depository institutions, placing it in the top 19 percent of depository institutions in this AA.

According to peer small business data for 2021, CONA had a market share of 5.2 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fifth out of 294 small business lenders, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (19.9 percent), American Express National Bank (14 percent), and Wells Fargo Bank, N.A. (12.5 percent).

According to peer small farm data for 2021, CONA had a market share of 5.1 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked sixth out of 34 small farm lenders, which placed it in the top 18 percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (30.2 percent), Wells Fargo Bank, N.A. (18.4 percent), and U.S. Bank, N.A. (14.2 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 107.5 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of Colorado 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 17 PPP loans totaling \$286,000 that provided support to small businesses in low- and moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table S in the state of Colorado 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 farms.

Based on the data in the tables, the overall geographic distribution of small loans to farms was adequate.

For 2020 through 2021, the percentages of small loans to farms in low-income geographies was below, and in moderate-income geographies was significantly below, the percentages of farms located in those geographies. The percentages of small loans to farms in both low- and moderate-income geographies exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was weaker than the 2020 through 2021 period. There were no small loans to farms originated or purchased in low-income geographies.

Consumer Loans

Refer to Table U in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed small business, small farm, and consumer 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 any of the full-scope areas 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 and farms of different sizes.

Small Loans to Businesses

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

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 72 PPP loans totaling \$1.2 million that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was good.

For 2020 through 2021, the percentages of small loans to farms with revenues of \$1 million or less was below the percentages of farms with revenues of \$1 million or less in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made 12 CD loans totaling \$122 million, which represented 60.1 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 99.9 percent funded affordable housing activities and 0.1 percent funded economic development activities and revitalization and stabilization efforts.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- A loan of \$11.9 million for the construction of a 62-unit affordable housing development. Forty-seven of 62 units were reserved for low-income households earning up to 50 percent of the AMI and the remaining 15 units were reserved for households earning up to 60 percent of the AMI. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$10.8 million in LIHTC equity in the project. In addition to CONA's debt and equity financing, this transaction included a permanent loan through the Federal National Mortgage Association.
- A construction loan of \$6.5 million to help finance the new construction of a 59-unit affordable housing development. All units were restricted to low- or moderate-income households earning up to 60 percent of the AMI. Fourteen units were supported by development-based rental subsidies. A nonprofit organization provided residents with onsite services, including medical care and transportation services. This loan addressed the community identified need for affordable housing.

CONA demonstrated multi-faceted support by also providing \$3 million in LIHTC equity in the project. The property was part of a fund that included 22 other properties and eight other equity investors.

Broader Statewide and Regional Area

In addition, CONA made 17 qualified loans totaling \$466.8 million and two qualified leases totaling \$2.9 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. Fourteen loans provided financing for affordable housing and three loans were for community services benefiting low- and moderate-income individuals. One lease supported the revitalization and stabilization of a low-income geography and another lease supported community services targeted to low- and moderate-income individuals.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 36,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices further supported the Lending Test rating.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|---------------|----------------|---------------|-----------|--------------|---------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Denver CSA | 11 | 22,520 | 69 | 55,499 | 80 | 80.8 | 78,019 | 85.8 | 0 | 0 |
| Regional | 2 | 429 | 13 | 107 | 15 | 15.2 | 536 | 0.6 | 0 | 0 |
| Statewide | 1 | 506 | 3 | 11,852 | 4 | 4.0 | 12,358 | 13.6 | 0 | 0 |
| Total | 14 | 23,455 | 85 | 67,458 | 99 | 100.0 | 90,913 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 38.4 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services to primarily low- and moderate-income

individuals. By dollar volume, 99.1 percent of total investments and grants supported affordable housing and less than 1 percent funded community services to low- and moderate-income individuals and economic development.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included five LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$17.8 million LIHTC equity to finance the construction of a new 60-unit affordable housing development, with 11 units set aside for homeless individuals. All residents will have access to onsite health and wellness programming, free groceries from a food distribution service, and free unlimited rides on all local, regional, and airport public transit services. This investment included public financing from federal, state, and county sources. This investment addressed the community identified need for affordable housing.
- An investment of \$4.9 million in LIHTC equity for the rehabilitation and adaptive reuse of a vacant historic school building consisting of 72 housing units now set aside for low- and moderate-income households. This was the first phase of a large redevelopment effort to convert a 70-acre former college campus into mixed uses. This investment addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$4.4 million loan for this project.
- Grants totaling \$85,000 to a local nonprofit organization that provides affordable housing for low- and moderate-income individuals. CONA's funds were used for the organization's COVID-19 pandemic relief effort to help implement online banking education for residents and to fund onsite healthcare services for residents. These grants responded to the bank-identified community needs for pandemic relief and supportive services for low- and moderate-income residents.

Broader Statewide and Regional Area

In addition, CONA made 20 current- and prior-period investments totaling \$12.9 million in the broader statewide and regional area whose purpose, mandate, or function included serving its AA. These investments included three prior-period investments totaling more than \$934,000 that supported affordable housing, two current-period investments totaling \$11.8 million that supported affordable housing, 14 grants totaling \$192,000 to organizations providing community services to low- and moderate-income individuals, and one grant totaling \$15,000 for economic development. Investments in the broader statewide and regional area further supported the Investment test conclusion.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online banking, and mobile banking.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.

CONA has two cafés with five deposit-taking ATMs. CONA had 30 additional deposit-taking ATMs at various locations throughout the AA. One café was in a moderate-income geography, and one was in an upper-income geography. CONA did not open or close any cafés during the evaluation period.

| ATM Distribution | | | | | | | | | |
|-------------------|-----------|------------------------------------|------|------|------|---------------------------------------|------|------|------|
| Assessment Area | # of ATMs | ATMs | | | | Population | | | |
| | | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Denver CSA | 35 | 5.7 | 14.3 | 51.4 | 25.7 | 5.3 | 26.4 | 34.5 | 32.7 |

NOTE: The number of ATMs includes one ATM in a geography with no income designation.

Based on the table above, the distribution of the bank's ATMs in low-income geographies exceeded, and in moderate-income geographies was below, the percentages of the population in those geographies. During the evaluation period, CONA removed one deposit-taking ATM from an upper-income geography.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of one low-income, four moderate-income, two middle-income, and six upper-income geographies where CONA had deposit-taking ATMs. The U.S. Census changed the income-designation of the low-income geography to a middle-income geography. The U.S. Census also changed three of four moderate-income geographies to middle-income geographies and one moderate-income geography to a low-income geography. The U.S. Census changes to the income-level designation of the moderate-income geographies resulted in a significant decrease in the total number of deposit-taking ATMs in those geographies and decrease in the distribution of deposit-taking ATMs in those geographies relative to the percentages of the population in those geographies. As a result, the OCC provided more consideration to the distribution of deposit-taking ATMs in low-income geographies and the change in ADS use over the evaluation period in determining the accessibility of the bank's service delivery systems.

| Denver CSA | Low-income Geographies | | Moderate-income Geographies | |
|---------------------------|------------------------|------------|-----------------------------|-------------|
| | ATMs (#) | % of Total | ATMs (#) | % of Total |
| Prior to 2020 U.S. Census | 2 | 5.7 | 7 | 20 |
| After 2020 U.S. Census | 2 | 5.7 | 5 | 14.3 |
| Net Change | - | - | -2 | -5.7 |

ADS Usage

| Change in ADS Use, by Channel | | |
|-------------------------------|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 70% | 29.6% |

| | | |
|---|--------|--------|
| Mobile Banking | 130.8% | 78.7% |
| ATM Usage | 19.1% | -11.7% |
| Net Change Across All Channels (Averaged) | 73.3% | 32.2% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Café hours of operation were 7:00 a.m. to 6:00 p.m. Monday through Friday for the cafés in both the moderate-income geography and upper-income geography. However, only the café in the moderate-income geography provided weekend services and was open 9:00 a.m. to 6:00 p.m. on Saturdays and Sundays.

Community Development Services

The institution provided a relatively high level of CD services.

CD services were responsive to the community needs the institution identified through community contacts. Forty bank associates provided 404 hours of qualified service activities to six organizations. *Pro Bono* volunteer services accounted for eight service hours or two percent of CD services. Financial literacy education accounted for 394 service hours or 97.5 percent of CD services.

Examples of CD services in the AA include:

- Eleven CONA associates provided 202 hours of financial literacy education to clients of a nonprofit CDC that provides homebuyer education, rental and utility assistance, housing counseling programs, and other housing services. These services addressed the bank-identified community need of financial education.
- Twenty-eight CONA associates provided 188 hours of financial literacy education to clients of a nonprofit organization that provides workforce development, networking, mentoring, and career preparation services. These services addressed the bank-identified community need of financial education.

State of Florida

CRA rating for the State of Florida: 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:

- An excellent geographic distribution of loans.
- A good borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were accessible to geographies and individuals of different income levels.
- CONA was a leader in providing CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Florida

CONA delineated four AAs in the state of Florida. They included the entirety of the Fort Lauderdale-Pompano Beach-Sunrise, FL MD, Miami-Miami Beach-Kendall, FL MD, and West Palm Beach-Boca Raton-Boynton Beach, FL MD. CONA also delineated as an AA the portion of the Tampa-St. Petersburg-Clearwater, FL MSA (Tampa MSA) where CONA had deposit-taking ATMs. Refer to appendix A for a complete description of the AAs. CONA entered the Tampa MSA AA on October 14, 2020 through the opening of a café with three deposit-taking ATMs.

CONA had no branches, six cafés, 51 deposit-taking ATMs, and \$3.8 billion of allocated internet deposits, which represented 1.2 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems within these AAs. Because CONA does not operate a licensed branch in Florida, there are no deposits reported on the June 30, 2022 FDIC Deposit Market Share report. The bank originated or purchased 7.9 percent of its evaluation period lending by count and 5.3 percent by dollar volume in the portions of Florida where CONA has AAs.

Based on June 30, 2022 FDIC summary of deposit information, there were 104 depository institutions with licensed branches in the portions of Florida in which the bank has AAs. The top three depository institutions by deposit market share were Bank of America, N.A. (17.9 percent), Wells Fargo Bank, N.A. (13.4 percent), and JP Morgan Chase Bank, N.A. (11.6 percent).

Miami MSA

The following table provides a summary of the demographics that include housing and business information for the Miami MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Miami MSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 1,219 | 6.2 | 28.2 | 29.5 | 33.6 | 2.5 |
| Population by Geography | 5,861,000 | 5.8 | 28.9 | 31.5 | 33.4 | 0.4 |
| Housing Units by Geography | 2,484,604 | 5.5 | 27.9 | 30.9 | 35.3 | 0.3 |
| Owner-Occupied Units by Geography | 1,248,038 | 2.6 | 23.2 | 32.9 | 41.2 | 0.2 |
| Occupied Rental Units by Geography | 799,004 | 10.1 | 36.4 | 30.1 | 22.9 | 0.5 |
| Vacant Units by Geography | 437,562 | 5.6 | 25.9 | 26.7 | 41.2 | 0.6 |
| Businesses by Geography | 1,666,020 | 4.1 | 22.2 | 28.3 | 44.1 | 1.2 |
| Farms by Geography | 21,208 | 5.1 | 25.2 | 29.6 | 39.7 | 0.4 |
| Family Distribution by Income Level | 1,330,793 | 23.1 | 17.0 | 17.7 | 42.2 | 0.0 |
| Household Distribution by Income Level | 2,047,042 | 25.1 | 15.7 | 16.6 | 42.6 | 0.0 |
| Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach- Sunrise, FL | | \$61,809 | Median Housing Value | | | \$227,861 |
| Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL | | \$49,264 | Median Gross Rent | | | \$1,194 |
| Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL | | \$65,914 | Families Below Poverty Level | | | 13.5% |
| <i>Source: 2015 ACS and 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|---|-----------|-----------------------|----------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Miami MSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 1,497 | 5.3 | 26.3 | 30.5 | 34.2 | 3.7 |
| Population by Geography | 6,138,333 | 4.7 | 28.0 | 31.4 | 34.4 | 1.5 |
| Housing Units by Geography | 2,548,767 | 4.8 | 27.4 | 30.9 | 35.5 | 1.5 |
| Owner-Occupied Units by Geography | 1,299,739 | 2.9 | 21.8 | 32.1 | 42.2 | 1.0 |
| Occupied Rental Units by Geography | 873,001 | 7.8 | 37.4 | 31.0 | 22.0 | 1.8 |
| Vacant Units by Geography | 376,027 | 4.5 | 23.5 | 26.3 | 43.6 | 2.2 |
| Businesses by Geography | 1,969,338 | 2.9 | 22.1 | 29.2 | 43.1 | 2.7 |
| Farms by Geography | 23,703 | 3.8 | 24.7 | 30.2 | 40.0 | 1.3 |
| Family Distribution by Income Level | 1,418,815 | 22.5 | 17.6 | 18.0 | 41.9 | 0.0 |
| Household Distribution by Income Level | 2,172,740 | 24.7 | 16.0 | 16.8 | 42.5 | 0.0 |
| Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach- Sunrise, FL | | \$73,430 | Median Housing Value | | | \$321,948 |

| | | | |
|---|----------|------------------------------|---------|
| Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL | \$60,666 | Median Gross Rent | \$1,449 |
| Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL | \$79,785 | Families Below Poverty Level | 10.6% |
| <i>Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (* The NA category consists of geographies that have not been assigned an income classification.</i> | | | |

Economic Data

Miami-Miami Beach-Kendall, FL MD

Data from Moody's Analytics over the evaluation period indicated the Miami-Miami Beach-Kendall, FL area's economy settled into a slower pace of growth in 2022. Leisure and hospitality were key drivers of the economy, however the outlook for the tourism industry was tenuous given heightened economic uncertainty. Net job creation slowed since the first half of 2022 and trailed the Florida average in the last quarter. The Miami-Miami Beach-Kendall, FL area ranked near the top in job growth among the large metro areas and divisions nationally. Manufacturing, leisure and hospitality, and finance were driving job growth. Housing affordability was an issue and low-wage workers were increasingly being priced out of the housing market. House price appreciation was nearly three times the national average. Affordability was the lowest in Florida and ranked in the bottom 10 nationally. Cash buyers made up an unusually large share of buyers in Miami. The area's strengths include strong ties to Latin America, a well-developed shipping and distribution infrastructure, a luxury status that attracts international capital, and the world's second-busiest cruise port. Weaknesses include high household debt burden, congested roads and airport, and an industrial structure that leaves the economy susceptible to business cycle downturns.

Based on data from the BLS, the unemployment rate was 2.3 percent in January 2020, as high as 12 percent in May 2020, and 2.1 percent in December 2022. Major employers in the AA included Publix Super Markets Inc., Baptist Health South Florida, American Airlines, Jackson Health System, and Florida International University.

Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD

Data from Moody's Analytics over the evaluation period indicated the Fort Lauderdale-Pompano Beach-Deerfield Beach, FL area's job growth exceeded the state in 2022 and net job growth ranked among the top 10 metro areas and divisions nationally. Healthcare and business/professional services were key drivers of job growth. Housing affordability remained a challenge as single-family and condo prices were up more than 30 percent in 2022 compared to 2021. Housing affordability was the second highest in the state, behind only the Miami metro area. The area's strengths include strong ties to Latin America, proximity to Miami's tourism and trade industries, and tourism. Weaknesses include worsening population trends and a highly volatile employment base.

Based on data from the BLS, the unemployment rate was 3 percent in January 2020, as high as 17.1 percent in May 2020, and 2.3 percent in December 2022. Major employers in the AA included Nova Southeastern University, First Service Residential, HEICO Corporation, Spirit Airlines, and American Express.

West Palm Beach-Boca Raton-Delray Beach, FL MD

Data from Moody's Analytics over the evaluation period indicated the West Palm Beach-Boca Raton-Delray Beach, FL area's economy improved in the second half of 2022 with job growth exceeding the state and national average. Leisure/hospitality and healthcare were key drivers of job growth. Housing affordability was constrained as housing prices increased over 65 percent since 2020 ranking the West Palm Beach area among the top 10 metro areas nationally. The area's strengths included a vibrant professional/business services industry, favorable migration patterns, and very high per capita income. Weaknesses included high cost of living primarily due to housing prices and high employment volatility.

Based on data from the BLS, the unemployment rate was 3.1 percent in January 2020, as high as 14.1 percent in May 2020, and 2.4 percent in December 2022. Major employers in the AA included Tenet Healthcare Corp., NextEra Energy/Florida Power & Light Co., Florida Atlantic University, Hospital Corp. of America, and Boca Raton Regional Hospital.

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 affordable housing, community services, and revitalization. Contacts noted that Miami needed access to capital, especially for small businesses, and affordable rental housing for low- and moderate-income individuals. Credit and community development needs identified include:

- Affordable housing
- Small business lending
- Redevelopment in distressed areas including commercial corridors

Tampa MSA

The following table provides a summary of the demographics that include housing and business information for the Tampa MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|---------------|----------------------|------------------|-----------------|---------------|
| Assessment Area: Tampa MSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 321 | 9.7 | 21.5 | 29.6 | 35.2 | 4.0 |
| Population by Geography | 1,302,884 | 7.6 | 21.9 | 31.2 | 38.4 | 0.8 |
| Housing Units by Geography | 549,024 | 8.0 | 22.0 | 32.1 | 37.5 | 0.4 |
| Owner-Occupied Units by Geography | 284,285 | 3.3 | 17.8 | 31.8 | 46.9 | 0.2 |
| Occupied Rental Units by Geography | 201,793 | 13.6 | 26.9 | 32.6 | 26.1 | 0.8 |
| Vacant Units by Geography | 62,946 | 11.5 | 24.8 | 32.0 | 31.2 | 0.5 |
| Businesses by Geography | 259,294 | 6.6 | 19.5 | 27.7 | 45.6 | 0.6 |
| Farms by Geography | 5,551 | 4.6 | 19.7 | 34.0 | 41.4 | 0.3 |
| Family Distribution by Income Level | 309,914 | 21.9 | 16.8 | 17.7 | 43.6 | 0.0 |
| Household Distribution by Income Level | 486,078 | 22.8 | 14.9 | 16.9 | 45.4 | 0.0 |
| Median Family Income MSA - 45300 Tampa-St. Petersburg-Clearwater, FL MSA | | \$58,916 | Median Housing Value | | | \$166,916 |

| | | |
|--|------------------------------|-------|
| | Families Below Poverty Level | 12.7% |
| | Median Gross Rent | \$998 |
| <i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Tampa MSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 335 | 7.8 | 26.6 | 30.7 | 30.7 | 4.2 |
| Population by Geography | 1,459,762 | 5.9 | 24.1 | 33.3 | 35.6 | 1.1 |
| Housing Units by Geography | 590,714 | 6.3 | 25.1 | 33.3 | 34.3 | 1.0 |
| Owner-Occupied Units by Geography | 320,042 | 2.0 | 22.1 | 33.9 | 41.8 | 0.2 |
| Occupied Rental Units by Geography | 219,877 | 12.0 | 29.0 | 32.6 | 24.4 | 2.0 |
| Vacant Units by Geography | 50,795 | 9.3 | 26.5 | 32.9 | 29.8 | 1.5 |
| Businesses by Geography | 303,823 | 5.1 | 22.4 | 28.8 | 42.1 | 1.5 |
| Farms by Geography | 6,224 | 3.7 | 23.9 | 35.9 | 36.1 | 0.4 |
| Family Distribution by Income Level | 338,683 | 21.2 | 16.9 | 18.7 | 43.2 | 0.0 |
| Household Distribution by Income Level | 539,919 | 22.2 | 15.9 | 17.2 | 44.7 | 0.0 |
| Median Family Income MSA - 45300 Tampa-St. Petersburg-Clearwater, FL MSA | | \$71,769 | Median Housing Value | | | \$237,982 |
| | | | Families Below Poverty Level | | | 10.0% |
| | | | Median Gross Rent | | | \$1,223 |
| <i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Economic Data

Data from Moody's Analytics over the evaluation period indicated the Tampa-St. Petersburg-Clearwater, FL MSA area's year-over-year job growth remained in line with that of fast-growing Florida and comfortably ahead of both the South and the U.S. Strength in the labor market was broad-based, with consumer industries helping to set the pace to close 2022. Finance, however, backtracked amid heightened financial market uncertainty. The unemployment rate was below its previous cyclical low, even as strong demographic trends pushed the labor force far above its pre-pandemic levels. Tampa had seen population growth due to weather, cost of living, and employment opportunities. Population growth ranked in the top quartile of metro areas nationally. Housing affordability concerns were sapping demand, exacerbating the impact of rapidly rising mortgage rates to drive a steep drop in house prices. The area's housing market ranked among the 50 most overvalued of the nation's 400 metro areas and divisions. The area's strengths include serving as the financial services capital of Florida with low taxes and strong tourism. Weaknesses include housing affordability due to rising mortgage rates and an overvalued housing market. Major employment industries in the area include professional and business services, education and health services, retail trade, and government.

Based on data from the BLS, the unemployment rate was 3.2 percent in January 2020, as high as 13.2 percent in May 2020, and 2.4 percent in December 2022. Major employers in the AA included BayCare Health System, Publix Super Markets Inc., Hillsborough County School District, HCA West Florida Division, and MacDill Air Force Base.

Community Contacts

A review was conducted of two community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing and economic development. Contacts noted that Tampa needed support for small businesses and development in distressed communities. Credit and community development needs identified include:

- Affordable housing
- Small business lending
- Redevelopment in distressed areas

Scope of Evaluation in Florida

In evaluating the bank's performance in the state of Florida, the Miami MSA AA and the Tampa MSA AA received full-scope reviews. The Miami MSA AA had 84.6 percent of the lending and 85.5 percent of the deposits (allocated internet deposits only) in the state of Florida. The Tampa MSA AA had 15.4 percent of the lending and 14.5 percent of the deposits (allocated internet deposits only) in the state of Florida. CONA's strategic focus is consumer lending.

Consumer loans received greater weight than small loans to businesses and small loans to farms. In the Miami MSA AA, the bank did not originate or purchase a sufficient number of home mortgage loans for a meaningful analysis for the 2020-2021 period and the bank did not originate or purchase any home mortgage loans for the 2022 period. In the Tampa MSA AA, the bank did not originate or purchase any home mortgage loans in the 2020-2021 period and did not originate or purchase a sufficient number of home mortgage loans in the 2022 period for a meaningful analysis. In the Tampa MSA AA, the bank did not originate or purchase a sufficient number of small loans to farms for a meaningful analysis during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Miami MSA AA and Tampa MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans | | | | | | | | |
|------------------------|---------------|----------------|------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Miami MSA | 3 | 41,876 | 107 | 2,073,905 | 17 | 2,115,908 | 84.6 | 85.5 |
| Tampa MSA | 2 | 6,692 | 38 | 379,477 | 4 | 386,213 | 15.4 | 14.5 |
| Statewide | 0 | 0 | 0 | 0 | 63 | 63 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 25 | 25 | 0 | 0 |
| Total | 5 | 48,568 | 145 | 2,453,382 | 109 | 2,502,209 | 100.0 | 100.0 |

| Dollar Volume of Loans (\$000) | | | | | | | | |
|---------------------------------------|----------------|----------------|--------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Miami MSA | 40,662 | 457,274 | 860 | 3,395,203 | 330,849 | 4,224,848 | 63.5 | 85.5 |
| Tampa MSA | 85,943 | 77,292 | 308 | 675,548 | 49,747 | 888,838 | 13.4 | 14.5 |
| Statewide | 0 | 0 | 0 | 0 | 1,033,042 | 1,033,042 | 15.5 | 0 |
| Regional | 0 | 0 | 0 | 0 | 502,669 | 502,669 | 7.6 | 0 |
| Total | 126,605 | 534,566 | 1,168 | 4,070,751 | 1,916,307 | 6,649,397 | 100.0 | 100.0 |

Miami MSA

Lending levels reflected excellent responsiveness to AA credit needs.

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$3.2 billion in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of 0.9 percent and would have ranked 18th out of 84 depository institutions, placing it in the top 22 percent of depository institutions in this AA. Based on June 30, 2022 FDIC summary of deposit information, there were 83 depository institutions with licensed branches in the portions of the Miami MSA where the bank has AAs. The top three depository institutions by deposit market share were Bank of America, N.A. (18 percent), Wells Fargo Bank, N.A (13.3 percent), and JP Morgan Chase Bank, N.A. (12.1 percent).

According to peer small business data for 2021, CONA had a market share of 3.6 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked eighth out of 363 small business lenders, which placed it in the top three percent of lenders. The top lenders in this AA based on market share were American Express National Bank (22.1 percent), Bank of America, N.A. (14.9 percent), and JP Morgan Chase Bank, N.A. (11.9 percent).

According to peer small farm data for 2021, CONA had a market share of 4.8 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked fifth out of 21 small farm lenders, which placed it in the top 24 percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (33.3 percent), Bank of America, N.A. (20.3 percent), and Wells Fargo Bank, N.A. (17.9 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 105.9 percent of total deposits.

Tampa MSA

Lending levels reflected excellent responsiveness to AA credit needs.

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$544.3 million in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of 1.2 percent and would have ranked 15th out of 46 depository institutions, placing it in the top 33 percent of depository institutions in this AA. Based on June 30, 2022 FDIC summary of deposit information, there were 45 depository institutions with licensed branches in the portions of the Tampa MSA where the bank has an AA. The top three depository institutions by deposit market share were Truist Bank (19 percent), Bank of America, N.A. (17.3 percent), and Wells Fargo Bank, N.A. (14.6 percent).

According to peer small business data for 2021, CONA had a market share of 5.2 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fifth out of 195 small business lenders, which placed it in the top three percent of lenders. The top lenders in this AA based on market share were American Express National Bank (20.2 percent), Bank of America, N.A. (12.4 percent), and JP Morgan Chase Bank, N.A. (11.6 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 124.1 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs.

Miami MSA***Small Loans to Businesses***

Refer to Table Q 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 28 PPP loans totaling \$1.6 million that provided support to small businesses in low- and moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table S 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 farms.

Based on the data in the tables, the overall geographic distribution of small loans to farms was adequate.

For 2020 through 2021, the percentages of small loans to farms in low-income geographies equaled the percentages of farms located in low-income geographies and exceeded the aggregate percentages of all reporting lenders. The percentages of small loans to farms in moderate-income geographies was significantly below both the percentages of farms located in moderate-income geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of small loans to farms in moderate-income geographies exceeded the percentages of farms located in moderate-income geographies.

Consumer Loans

Refer to Table U in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Tampa MSA

Small Loans to Businesses

Refer to Table Q 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis was one PPP loan totaling \$2,000 that provided support to small businesses in moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table U in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in low-income geographies approximated, and in moderate-income geographies exceeded, the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of consumer loans in low-income geographies exceeded the percentages of households located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed small business, small farm, and consumer 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 any of the full-scope areas 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 and farms of different sizes.

Miami MSA

Small Loans to Businesses

Refer to Table R 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 113 PPP loans totaling \$1.8 million that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was adequate.

For 2020 through 2021, the percentages of small loans to farms with revenues of \$1 million or less was below the percentages of farms with revenues of \$1 million or less in the AA and approximated the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was weaker than the 2020 through 2021 period. The percentages of small loans to farms with revenues of \$1 million or less was well below the percentages of farms with revenues of \$1 million or less in the AA.

Consumer Loans

Refer to Table V in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was good.

For 2020 through 2021, the percentages of consumer loans to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentages of those households.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of consumer loans to low-income borrowers was near to the percentages of those households.

Tampa MSA

Small Loans to Businesses

Refer to Table R 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were four PPP loans totaling \$58,000 that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to low-income borrowers approximated, and to moderate-income borrowers exceeded, the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Miami MSA

The institution was a leader in making CD loans.

The level of CD lending was excellent. CONA made 17 CD loans totaling \$330.8 million, which represented 112.4 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 77.3 percent of these loans funded affordable housing and 22.7 percent funded economic development activities.

The following are examples of the bank's CD loans that illustrate the complexity or responsiveness of CONA's CD lending:

- An acquisition bridge loan of \$17.3 million and subsequent permanent financing of \$23.2 million to finance the purchase and renovation of an existing 159-unit property. Ninety units were set aside for low-income households with incomes up to 50 percent of the AMI, with the remaining 69 units set aside for low- and moderate-income households with incomes up to 60 percent of the AMI. Residents had access to on-site services including welfare- to-work programs, homeownership and first-time homebuyer seminars, literacy training, health and nutrition classes, financial counseling, and a computer lab. This loan addressed the community identified need for affordable housing and the bank-identified community need for social services for low- and moderate-income families.
- A loan of \$1.5 million to help finance a 224-unit affordable housing development. Two hundred and twenty-two out of 224 units were restricted to low- and moderate-income households earning up to 60 percent of the AMI. Special set-asides included five units for low-income residents with income up to 50 percent of the AMI, and 12 units reserved for disabled households. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$1.5 million in LIHTC equity to this project. This development received public financing from state and local sources in addition to federal tax credits, including tax-exempt bond financing from the local government and a low-interest loan from the state housing finance agency.
- A loan of \$33.1 million to help finance the rehabilitation of a 123-unit affordable housing development. All units were restricted to low- and moderate-income individuals earning less than 60 percent of the AMI and were supported by HUD rent subsidies. This loan addressed the community identified need for affordable housing.

Tampa MSA

The institution was a leader in making CD loans.

The level of CD lending was excellent. CONA made four CD loans totaling \$49.7 million, which represented 99.6 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a

leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 100 percent of these loans funded affordable housing.

The following are examples of the bank's CD loans that illustrate the complexity or responsiveness of CONA's CD lending:

- A loan refinancing for \$28.5 million to support the maintenance of an affordable housing property. The loan proceeds funded property improvements. Two hundred and forty-two of 244 residential units were considered affordable to low- or moderate-income households earning less than 80 percent of the AMI. This loan addressed the community identified need for affordable housing.
- A \$200,000 working capital line of credit to a nonprofit organization in the AA. The organization's mission was to empower low- and moderate-income communities by attracting investments for health, education, home ownership, employment, and entrepreneurship using a holistic advocacy approach. The line of credit provided funding to the organization that supported resources, training, and advocacy in community reinvestment and revitalization for underserved communities.

Broader Statewide and Regional Area

In addition, CONA made 88 qualified loans totaling \$1.5 billion and two qualified leases totaling \$9.3 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AAs. Eighty loans provided financing for affordable housing, three loans were for revitalization and stabilization efforts, four loans were for economic development, and one loan was for community services benefiting low- and moderate-income individuals. The two qualified leases supported the revitalization and stabilization of low- and moderate-income geographies.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs in the Miami MSA AA and the Tampa MSA AA.

During the evaluation period, CONA issued more than 126,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies in the Miami MSA AA and more than 20,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies in the Tampa MSA AA. CONA's flexible lending practices during the evaluation period further supported the Lending Test 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 and Tampa MSA AA was excellent.

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|---------------|----------------|---------------|------------|--------------|----------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Miami MSA | 15 | 53,433 | 96 | 25,724 | 111 | 70.7 | 79,157 | 76.6 | 0 | 0 |
| Tampa MSA | 1 | 2,158 | 27 | 8,905 | 28 | 17.8 | 11,063 | 10.7 | 0 | 0 |
| Regional | 0 | 0 | 2 | 10 | 2 | 1.3 | 10 | 0.0 | 0 | 0 |
| Statewide | 6 | 10,350 | 10 | 2,730 | 16 | 10.2 | 13,080 | 12.7 | 0 | 0 |
| Total | 22 | 65,941 | 135 | 37,369 | 157 | 100.0 | 103,310 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Miami MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 26.9 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services or affordable housing to primarily low- and moderate-income individuals. By dollar volume, 98.3 percent of total investments and grants supported affordable housing, 1.2 percent funded community services to low- and moderate-income individuals, and less than one percent supported economic development and revitalization and stabilization efforts.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included three LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$12.9 million in LIHTC equity for the new construction of 100 units of affordable housing for low- and moderate-income households. Eight units are set aside for special needs populations. Some of the onsite services include literacy training, financial management assistance, and daily activities for residents. This investment included funding from the county and a private investor. This investment addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a construction loan in the amount of \$25.7 million for this project.
- An investment of \$6.9 million in LIHTC equity to help finance the rehabilitation of a 112-unit affordable housing development. All units are restricted to low- and moderate-income households earning up to 60 percent of the AMI. In addition to funding from CONA, the development's complex financing structure combined short-term tax-exempt bonds with a long-term mortgage loan backed by HUD. This investment addressed the community identified need for affordable housing.
- Four grants totaling \$75,000 to a nonprofit organization specializing in providing bilingual assistance to Hispanic entrepreneurs trying to establish, sustain, or expand their business. CONA took a leadership role by being a pilot funder for a new multi-week training series that was

developed in direct response to the technology needs of underserved small businesses. CONA provided \$25,000 to support this new program and \$50,000 for three other programs offered by the nonprofit organization. These grants were responsive and addressed the bank-identified community need of providing funding for underserved small businesses.

Tampa MSA

The bank had an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 22.1 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services to primarily low- and moderate-income individuals. By dollar volume, 97.7 percent of total investments and grants supported affordable housing, 1.9 percent funded community services to low- and moderate-income individuals, and less than 1 percent supported economic development.

The bank occasionally used innovative or complex investments to support CD initiatives. Current period investments included one LIHTC project, which was complex and required more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness to community needs:

- An investment of \$7.3 million in LIHTC equity to help finance the new construction of a 196-unit affordable housing development. All units are restricted to households earning up to 80 percent of the AMI, and a majority of the units are supported by rental assistance programs. A nonprofit provides supportive services for residents, including financial management, adult literacy, and other services. This transaction included several additional sources of financing, including tax-exempt bonds to support the construction of the development and four permanent loans from various parties. This investment addressed the community identified need for affordable housing.
- Three MBS pools totaling \$1.4 million that supported affordable housing in the AA. The MBS investments consisted of mortgages originated to low- and moderate-income borrowers in the AA.
- Two grants totaling \$20,000 to support a CDFI that promotes economic development by providing technical and financial support to area small businesses. These grants were responsive to the bank-identified community needs for providing support to small business entrepreneurs.

Broader Statewide and Regional Area

In addition, CONA made 18 current- and prior-period investments totaling \$13.1 million in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AAs. These investments included six prior-period investments totaling \$10.4 million that supported affordable housing, one current-period investment totaling \$2.6 million that supported affordable housing, eight grants totaling \$85,000 for community services to low- and moderate-income individuals and three

grants totaling \$35,000 for economic development. Investments in the broader statewide and regional area further supported the Outstanding rating.

SERVICE TEST

The bank’s performance under the Service 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 and in the Tampa MSA AA was adequate.

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online banking, and mobile banking.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank’s AAs.

| ATM Distribution | | | | | | | | | |
|------------------|-----------|------------------------------------|------|------|-------|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Miami MSA | 48 | 4.2 | 18.8 | 31.3 | 45.8 | 4.7 | 28.0 | 31.4 | 34.4 |
| Tampa MSA | 3 | 0.0 | 0.0 | 0.0 | 100.0 | 5.9 | 24.1 | 33.3 | 35.6 |

Miami MSA

Service delivery systems were accessible to geographies and individuals of different income levels in the bank’s AA.

CONA had five cafés with 16 deposit-taking ATMs. CONA had 32 additional deposit-taking ATMs at various locations through the AA. Three of five cafés were in upper-income geographies, one café was in a middle-income geography, and one café was in a moderate-income geography. During the evaluation period, CONA closed one café in an upper-income geography.

Based on the table above, the distribution of the bank’s ATMs in low-income geographies was near to, and in moderate-income geographies was below, the percentages of the population in those geographies. During the evaluation period, CONA installed one ATM in a low-income geography and removed seven ATMs from upper-income geographies.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of six moderate-income, three middle-income, and six upper-income geographies where CONA’s had deposit-taking ATMs. The U.S. Census

changed the income-designation of five of six moderate-income geographies to middle-income geographies and one moderate-income geography to a low-income geography.

The U.S. Census also changed two of three middle-income geographies to moderate-income geographies and four of six upper-income geographies to moderate-income geographies. The U.S. Census changes to the income-level designation of the moderate-income geographies resulted in a significant increase in the total number of deposit-taking ATMs in low-income geographies and had a significant impact on the distribution of deposit-taking ATMs in low-income geographies relative to the percentages of the population in those geographies. As a result, the OCC provided more consideration to the distribution of deposit-taking ATMs in moderate-income geographies and the change in ADS use over the evaluation period in determining the accessibility of the bank's service delivery systems.

| Miami MSA | Low-income Geographies | | Moderate-income Geographies | |
|---------------------------|-------------------------------|------------|------------------------------------|------------|
| | ATMs (#) | % of Total | ATMs (#) | % of Total |
| Prior to 2020 U.S. Census | 1 | 2.1 | 9 | 18.8 |
| After 2020 U.S. Census | 2 | 4.2 | 9 | 18.8 |
| Net Change | 1 | 2.1 | - | - |

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 98.9% | 55.6% |
| Mobile Banking | 168.4% | 112.5% |
| ATM Usage | 14.9% | -8.1% |
| Net Change Across All Channels (Averaged) | 94.1% | 53.4% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. There are no standard hours of operation for the five cafés in the Miami MSA AA. Each café has individual hours of operation. However, there were no significant differences in café hours and available services at café locations.

Tampa MSA

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.

CONA had one café with three deposit-taking ATMs. CONA's café was in an upper-income geography. CONA opened one café and removed one deposit-taking ATM during the evaluation period. As there were no ATMs in low- and moderate-income geographies during the evaluation period, the OCC placed significantly greater weight on the growth in ADS use (including online and mobile banking) by bank customers residing in low- and moderate-income geographies over the evaluation period to assess the effectiveness of the bank's ADS to deliver retail banking services to low- and moderate-income geographies and individuals.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census did not change the income-level designations of the upper-income geographies where CONA had deposit-taking ATMs.

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 108.6% | 49.6% |
| Mobile Banking | 167.2% | 108.8% |
| ATM Usage | -51.5% | -49.4% |
| Net Change Across All Channels (Averaged) | 74.8% | 36.3% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals. Café hours and available services did not vary as there was one café location in the AA. The café hours of operation were 8:00 a.m. to 8:00 p.m. Monday through Saturday and 9:00 a.m. to 5:00 p.m. on Sundays.

Community Development Services

Miami MSA

The institution was a leader in providing CD services.

CD services were responsive to the community needs the institution identified through community contacts. One hundred and forty-two bank associates provided 1,059 hours of qualified service activities to 31 organizations. Leadership was evident through board or committee participation with one organization. *Pro Bono* volunteer services accounted for 455 service hours or 43 percent of CD services. Services consisted of providing workforce development through CONA's *Pro Bono* volunteer program and financial literacy education.

An example of CD services in this AA was:

- A CONA executive provided 55 hours of board service to a nonprofit organization located in a moderate-income geography. The nonprofit organization provides academic resources, job preparation and career development, and financial literacy programs to members of the community.

Tampa MSA

The institution provided a relatively high level of CD services.

CD services were responsive to the community needs the institution identified through community contacts. Thirty-four bank associates provided 403 hours of qualified service activities to five organizations. *Pro Bono* volunteer services accounted for 269 service hours or 67 percent of CD services. Services consisted of providing technical assistance to small businesses and nonprofit organizations through CONA's *Pro Bono* volunteer program and financial literacy education.

Examples of CD services in the AA include:

- Six CONA associates provided 208 hours of technical assistance to a nonprofit organization located in a low-income geography. The nonprofit served as the only food bank in the area and provided food and other services to the local community. CONA associates assisted the organization with developing data reports to identify client behavior patterns.
- Four CONA associates provided 61 hours of technical assistance to a local nonprofit organization that provides residential and emergency shelter services, education services, free meals, and other social support services to low-income individuals and families.

State of Georgia

CRA rating for the State of Georgia: 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:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels.
- CONA was a leader in providing CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Georgia

CONA delineated one AA in the state of Georgia, which was the portion of the Atlanta-Sandy Springs-Roswell, GA MSA (Atlanta MSA), where CONA had deposit-taking ATMs. Refer to appendix A for a complete description of the AA. CONA entered the Atlanta MSA AA on December 18, 2019 through the opening of a café with three deposit-taking ATMs.

CONA had no branches, one café, three deposit-taking ATMs, and \$960.7 million of allocated internet deposits, which represented 0.3 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems in this AA. Because CONA does not operate a licensed branch in Georgia, there are no deposits reported on the June 30, 2022 FDIC Deposit Market Share report. The bank originated or purchased one percent of its evaluation period lending by count and one percent by dollar volume in the portions of Georgia where CONA has its AA.

Based on June 30, 2022 FDIC summary of deposit information, there were 47 depository institutions with licensed branches in the portions of Georgia where the bank has its AA. The top three depository institutions by deposit market share were Truist Bank (31.2 percent), Bank of America, N.A. (25 percent), and Wells Fargo Bank, N.A. (16.8 percent).

Atlanta MSA

The following table provides a summary of the demographic information that includes housing and business information for the Atlanta MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: Atlanta MSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 204 | 24.5 | 18.6 | 10.8 | 43.6 | 2.5 |
| Population by Geography | 983,903 | 16.6 | 18.8 | 14.0 | 49.3 | 1.3 |
| Housing Units by Geography | 444,761 | 18.1 | 19.3 | 13.2 | 48.8 | 0.6 |
| Owner-Occupied Units by Geography | 196,617 | 7.9 | 15.0 | 13.7 | 63.3 | 0.1 |
| Occupied Rental Units by Geography | 183,340 | 24.6 | 22.1 | 13.5 | 38.6 | 1.1 |
| Vacant Units by Geography | 64,804 | 30.4 | 24.4 | 11.2 | 33.4 | 0.5 |
| Businesses by Geography | 258,436 | 10.1 | 16.0 | 13.5 | 58.9 | 1.5 |
| Farms by Geography | 2,474 | 11.3 | 14.9 | 16.4 | 56.9 | 0.6 |
| Family Distribution by Income Level | 207,569 | 23.4 | 13.2 | 14.5 | 48.9 | 0.0 |
| Household Distribution by Income Level | 379,957 | 26.5 | 14.8 | 15.3 | 43.4 | 0.0 |
| Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA | | \$67,322 | Median Housing Value | | | \$247,476 |
| | | | Median Gross Rent | | | \$1,015 |
| | | | Families Below Poverty Level | | | 13.0% |
| <i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|---|-----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: Atlanta MSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 327 | 13.5 | 15.6 | 12.8 | 47.7 | 10.4 |
| Population by Geography | 1,066,710 | 11.3 | 16.6 | 13.6 | 50.5 | 8.0 |
| Housing Units by Geography | 479,696 | 12.6 | 16.6 | 13.8 | 49.0 | 8.0 |
| Owner-Occupied Units by Geography | 225,903 | 5.8 | 14.1 | 13.7 | 61.4 | 4.9 |
| Occupied Rental Units by Geography | 201,476 | 17.8 | 18.1 | 14.8 | 38.1 | 11.2 |
| Vacant Units by Geography | 52,317 | 21.3 | 22.2 | 10.4 | 36.9 | 9.2 |
| Businesses by Geography | 324,202 | 7.3 | 14.0 | 13.2 | 56.9 | 8.5 |
| Farms by Geography | 2,946 | 7.9 | 17.9 | 13.3 | 54.9 | 5.9 |
| Family Distribution by Income Level | 229,604 | 22.0 | 13.2 | 15.5 | 49.2 | 0.0 |
| Household Distribution by Income Level | 427,379 | 25.9 | 14.4 | 15.9 | 43.8 | 0.0 |
| Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA | | \$84,791 | Median Housing Value | | | \$328,630 |
| | | | Median Gross Rent | | | \$1,264 |
| | | | Families Below Poverty Level | | | 9.6% |

Source: 2020 U.S. Census and 2022 D&B Data

Due to rounding, totals may not equal 100.0%

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

Economic Data

Data from Moody's Analytics over the evaluation period indicated the Atlanta-Sandy Springs-Roswell, GA area's economy was strengthening. Payroll growth was broad-based with white-collar industries leading the way. Construction was the lone outlier, with headcounts falling year-over-year. The unemployment rate fell below three percent to reach an all-time low. The strength of the labor market was not enough to offset housing affordability issues. Housing prices posted monthly declines, and single-family housing permits declined in 2022. The area's strengths include a diverse economy, distribution and cultural center, business-friendly environment with a large talent pool, and healthy net migration. Weaknesses include heavy dependence on transportation that raises cyclical volatility, strained infrastructure, and a single-family housing market that was overvalued.

Based on data from the BLS, the unemployment rate was 3.6 percent in January 2020, as high as 12.3 percent in April 2020, and 2.8 percent in December 2022. Major employers in the AA included Delta Airlines, Emory University & Emory Health Care, The Home Depot, Northside Hospital, Piedmont Healthcare, and Publix Super Markets.

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 affordable housing and economic development. Credit and community development needs identified include:

- Affordable rental housing
- Affordable for-sale housing
- Small business technical assistance
- Living wage employment
- Financial literacy education
- Reinvestment in low- and moderate-income neighborhoods
- Down payment assistance programs for homebuyers
- Start-up business capital financing

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Down payment assistance programs
- Working with the area's CDC network
- Various state and local government partnership opportunities

Scope of Evaluation in Georgia

The Atlanta MSA AA received a full-scope review. CONA's strategic focus is consumer lending. Consumer loans received a greater weight than small loans to businesses. There was an insufficient number of home mortgage loans and small loans to farms for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans | | | | | | | | |
|------------------------|---------------|----------------|------------|----------------|-----------------------|----------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Atlanta MSA | 7 | 8,699 | 18 | 297,894 | 11 | 306,629 | 100.0 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 45 | 45 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 10 | 10 | 0 | 0 |
| Total | 7 | 8,699 | 18 | 297,894 | 66 | 306,684 | 100.0 | 100.0 |

| Dollar Volume of Loans (\$000) | | | | | | | | |
|---------------------------------------|----------------|----------------|------------|----------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Atlanta MSA | 206,013 | 88,686 | 76 | 593,576 | 198,869 | 1,087,220 | 54.6 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 758,460 | 758,460 | 38.1 | 0 |
| Regional | 0 | 0 | 0 | 0 | 144,095 | 144,095 | 7.2 | 0 |
| Total | 206,013 | 88,686 | 76 | 593,576 | 1,101,424 | 1,989,775 | 100.0 | 100.0 |

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$960.7 million in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of 0.8 percent and would have ranked 14th out of 48 depository institutions, placing it in the top 30 percent of depository institutions in this AA.

According to peer small business data for 2021, CONA had a market share of 5.1 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked sixth out of 221 small business lenders, which placed it in the top three percent of lenders. The top lenders in this AA based on market share were American Express National Bank (26.3 percent), Bank of America, N.A. (10.5 percent), and JP Morgan Chase Bank, N.A. (9.2 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 61.8 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of Georgia 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 10 PPP loans totaling \$361,000 that provided support to small businesses in low- and moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table U in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed small business and consumer 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 any of the full-scope areas 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.

Small Loans to Businesses

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

Based on the data in the tables, the overall borrower distribution of small loans to businesses was good. Included in this analysis were 32 PPP loans totaling \$389,000 that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was below the percentages of businesses with revenues of \$1 million or less in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to low-income borrowers approximated, and to moderate-income borrowers exceeded, the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made 11 CD loans totaling \$198.9 million, which represented 225.6 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 84.9 percent funded affordable housing, and 15.1 percent funded economic development activities.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- A \$26.4 million loan to provide permanent financing for the acquisition and rehabilitation of a 181-unit high rise building and 11 townhouse buildings. One hundred and fifty-four of 181 units were rent subsidized. The remaining units were restricted to tenants earning a maximum of 80 percent of the AMI. This transaction was complex as it involved both the acquisition and rehabilitation of a property with tax credits, a housing assistance contract, and bridge loan financing provided by another lender. This loan addressed the community identified need for affordable housing.

- A \$10.2 million loan to refinance a 155-unit multifamily housing development. The financing was used to stabilize the development after it experienced fire damage and then to improve the property. Ninety percent of the units were for households earning less than 80 percent of the AMI. This loan addressed the community identified need for affordable housing.
- A \$7.5 million loan to help finance construction of a 60-unit mixed income housing development. Ten units were restricted to households earning up to 50 percent of the AMI and 40 units were restricted to households earning up to 60 percent of the AMI. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing an \$11.5 million LIHTC equity investment for this project.

Broader Statewide and Regional Area

In addition, CONA made 55 qualified loans totaling \$902.6 million and one qualified lease totaling \$5 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. Forty-eight loans provided financing for affordable housing, one loan was for revitalization and stabilization efforts, four loans were for economic development, and two loans were for community services benefiting low- and moderate-income individuals. The qualified lease supported community services benefiting low- and moderate-income individuals.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 22,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices further supported the Lending Test rating.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|---------------|----------------|---------------|-----------|--------------|---------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Atlanta MSA | 1 | 4,390 | 30 | 25,743 | 31 | 66.0 | 30,133 | 52.9 | 0 | 0 |
| Regional | 8 | 6,554 | 0 | 0 | 8 | 17.0 | 6,554 | 11.5 | 0 | 0 |
| Statewide | 5 | 16,590 | 3 | 3,676 | 8 | 17.0 | 20,266 | 35.6 | 0 | 0 |
| Total | 14 | 27,534 | 33 | 29,419 | 47 | 100.0 | 56,953 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 34.2 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported economic development and organizations that provided needed community services to primarily low- and moderate-income individuals. By dollar volume, 95.3 percent of total investments and grants supported affordable housing, 3.7 percent supported economic development, and less than one percent funded community services to low- and moderate-income individuals and supported revitalization and stabilization efforts.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included three LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness to community needs:

- An investment of \$11.5 million in LIHTC equity to help finance the new construction of a 60-unit mixed-income housing development, with 50 units restricted to low- and moderate-income households. This investment addressed the community identified needs for affordable housing. CONA demonstrated multi-faceted support by also providing an \$7.5 million construction loan for this project.
- An investment of \$10.5 million in LIHTC equity to help finance the construction of a 42-unit rent affordable housing development. All units are for low- and moderate-income households, with 10 set aside for households with incomes up to 30 percent AMI. Twenty-nine units have three bedrooms and can accommodate families. This investment included 13 other investors and 26 other properties and is responsive to the identified needs for affordable housing.
- A \$1 million grant to an organization whose mission is to drive economic progress through public policy, advocacy, and political engagement. This grant funded a program that supports underserved small businesses and emerging entrepreneurs through curriculum development and technical assistance and is responsive to the community identified need for small business technical assistance.

Broader Statewide and Regional Area

In addition, CONA made 16 current- and prior-period investments totaling \$26.8 million in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. These investments including 13 prior-period investments totaling \$23.1 million that supported affordable housing, one current-period investment totaling \$3.6 million that supported affordable housing, and one grant totaling \$55,000 to organizations providing community services to low- and moderate-income individuals and one grant totaling \$10,000 for economic development. Investments in the broader statewide and regional area further supported the Outstanding rating.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online, and mobile banking.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.

CONA had one café with three deposit-taking ATMs. CONA's café was in an upper-income geography. CONA did not open any additional cafés during the evaluation period.

| ATM Distribution | | | | | | | | | |
|--------------------|-----------|------------------------------------|-----|-----|-----|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Atlanta MSA | 3 | 0 | 0 | 0 | 100 | 11.3 | 16.6 | 13.6 | 50.5 |

As there were no ATMs in low- and moderate-income geographies during the evaluation period, the OCC provided more consideration to the growth in ADS use (including online and mobile banking) by bank customers residing in low- and moderate-income geographies over the evaluation period to assess the effectiveness of the bank's ADS to deliver retail banking services to low- and moderate-income geographies and individuals. CONA did not install any additional ATMs or remove any ATMs in the AA during the evaluation period.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census did not change the income-level designations of the upper-income geographies where CONA had deposit-taking ATMs.

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 59.2% | 26.9% |
| Mobile Banking | 108.6% | 72.8% |
| ATM Usage | -46% | -55.6% |
| Net Change Across All Channels (Averaged) | 40.6% | 14.7% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Café hours and available services did not vary as there was one café location in the AA. The café hours of operation were 8:00 a.m. to 8:00 p.m. Monday through Saturday and 9:00 a.m. to 5:00 p.m. on Sundays.

Community Development Services

The institution was a leader in providing CD services.

CD services were responsive to the community needs the OCC identified through community contacts. One hundred and thirty-four bank associates provided 1,248 hours of qualified service activities to three organizations. *Pro Bono* volunteer services accounted for 1,046 service hours or 84 percent of CD services. Services consisted of providing workforce development through CONA's *Pro Bono* volunteer program and financial literacy education.

An example of CD services in this AA was:

- Twenty-six CONA associates provided 145 hours of financial literacy education to clients of the local chapter of a national nonprofit organization that provides career development and financial literacy services to low-income individuals. In addition, a CONA associate provided 49 hours of board services for the same organization. These services addressed the community identified need for financial literacy education.

State of Illinois

CRA rating for the State of Illinois: 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:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were accessible to geographies and individuals of different income levels.
- CONA was a leader in providing CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Illinois

CONA delineated one AA in the state of Illinois, which was the portion of the Chicago-Naperville-Elgin, IL-IN MSA (Chicago MSA) where CONA had deposit-taking ATMs. Refer to appendix A for a complete description of the AA.

CONA had no branches, four cafés, 14 deposit-taking ATMs, and \$3 billion of allocated internet deposits, which represented 0.9 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems in this AA. Because CONA does not have a licensed branch in Illinois, there are no deposits reported on the June 30, 2022 FDIC Deposit Market Share report. The bank originated or purchased 4.6 percent of its evaluation period by count and 3.3 percent by dollar volume lending in the portions of Illinois where CONA has its AA.

Based on June 30, 2022 FDIC summary of deposit information, there were 100 depository institutions with licensed branches in the portions of Illinois where the bank has its AA. The top three depository institutions by deposit market share were JP Morgan Chase Bank, N.A. (23.8 percent), BMO Harris Bank, N.A. (16.1 percent), and Bank of America, N.A. (12.2 percent).

Chicago MSA

The following table provides a summary of the demographic information that includes housing and business information for the Chicago MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: Chicago MSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 1,319 | 19.2 | 28.9 | 24.0 | 26.9 | 1.0 |
| Population by Geography | 5,236,393 | 14.5 | 29.9 | 27.0 | 28.3 | 0.4 |
| Housing Units by Geography | 2,176,549 | 14.4 | 27.9 | 26.3 | 30.8 | 0.5 |
| Owner-Occupied Units by Geography | 1,107,485 | 6.9 | 24.2 | 32.0 | 36.7 | 0.2 |
| Occupied Rental Units by Geography | 835,474 | 20.8 | 32.1 | 20.9 | 25.3 | 0.9 |
| Vacant Units by Geography | 233,590 | 27.5 | 30.5 | 19.1 | 22.3 | 0.6 |
| Businesses by Geography | 474,429 | 8.6 | 21.7 | 24.6 | 44.3 | 0.7 |
| Farms by Geography | 4,567 | 7.2 | 23.4 | 29.2 | 40.0 | 0.2 |
| Family Distribution by Income Level | 1,184,857 | 28.0 | 17.0 | 17.7 | 37.2 | 0.0 |
| Household Distribution by Income Level | 1,942,959 | 29.2 | 15.8 | 16.7 | 38.2 | 0.0 |
| Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL | | \$75,024 | Median Housing Value | | | \$245,250 |
| | | | Families Below Poverty Level | | | 13.2% |
| | | | Median Gross Rent | | | \$1,038 |
| <i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: Chicago MSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 1,332 | 16.9 | 26.4 | 27.7 | 27.9 | 1.2 |
| Population by Geography | 5,275,541 | 13.4 | 26.8 | 30.4 | 28.8 | 0.5 |
| Housing Units by Geography | 2,198,489 | 13.3 | 25.4 | 29.7 | 30.9 | 0.6 |
| Owner-Occupied Units by Geography | 1,139,938 | 7.3 | 22.8 | 34.7 | 34.9 | 0.3 |
| Occupied Rental Units by Geography | 851,536 | 18.8 | 28.5 | 25.1 | 26.6 | 1.0 |
| Vacant Units by Geography | 207,015 | 24.0 | 26.9 | 21.4 | 26.8 | 0.9 |
| Businesses by Geography | 627,874 | 8.4 | 20.5 | 28.4 | 42.0 | 0.7 |
| Farms by Geography | 5,627 | 8.7 | 22.9 | 31.0 | 37.0 | 0.4 |
| Family Distribution by Income Level | 1,183,425 | 27.3 | 16.9 | 18.1 | 37.7 | 0.0 |
| Household Distribution by Income Level | 1,991,474 | 28.8 | 15.7 | 16.4 | 39.2 | 0.0 |
| Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL | | \$92,622 | Median Housing Value | | | \$287,457 |
| | | | Families Below Poverty Level | | | 10.1% |
| | | | Median Gross Rent | | | \$1,230 |
| <i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Economic Data

Data from Moody's Analytics over the evaluation period indicated the Chicago-Naperville-Evanston, IL area's economy was performing well and job growth during the last few months of 2022 outpaced the Midwest and the U.S. but was slightly below average for the country's 25 largest metro areas and divisions. Single and multifamily housing construction slowed. The area's housing affordability was high, however, the declining population limited household formation and the number of potential homebuyers. The area's strengths include being a major center for business, distribution, transportation, and finance, a huge talent pool, a strong roster of well-regarded educational institutions, and a budding high-tech center in the River North neighborhood. Weaknesses include state and local budget pressures, weak population trends, and a high crime rate.

Based on data from the BLS, the unemployment rate was 3.8 percent in January 2020, as high as 18.9 percent in April 2020, and 3.8 percent in December 2022. Major employers in the AA included Advocate Health Care System, Northwestern Memorial Healthcare, Amita Health, University of Chicago, and JP Morgan Chase & Co.

Community Contacts

A review was conducted of seven community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing, small business and economic development, financial literacy, and community revitalization and stabilization. Contacts noted that poverty has been increasing in the suburban areas around Chicago and the population is declining. Contacts further noted that during the height of the pandemic many people working in low-wage service industry jobs became unemployed and were unable to access COVID-19 relief funds due to concerns regarding their immigration status. While housing in Chicago is generally considered affordable, many low-wage households nonetheless still faced challenges accessing affordable housing. This was particularly prevalent during the pandemic. Credit and community development needs identified include:

- Small business loan funds
- Affordable housing creation (single family and multifamily units)
- Deposit and lending products for underserved
- Neighborhood business guidance
- Workforce development

Scope of Evaluation in Illinois

The Chicago MSA AA received a full-scope review. CONA's strategic focus is consumer lending. Consumer loans received a greater weight than small loans to businesses. There was an insufficient number of home mortgage loans and small loans to farms for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans | | | | | | | | |
|------------------------|---------------|----------------|------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Chicago MSA | 23 | 20,690 | 20 | 1,423,896 | 29 | 1,444,658 | 100.0 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 8 | 8 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 15 | 15 | 0 | 0 |
| Total | 23 | 20,690 | 20 | 1,423,896 | 52 | 1,444,681 | 100.0 | 100.0 |

| Dollar Volume of Loans (\$000) | | | | | | | | |
|---------------------------------------|---------------|----------------|------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Chicago MSA | 87,663 | 209,401 | 102 | 2,657,000 | 194,815 | 3,148,981 | 92.0 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 61,937 | 61,937 | 1.8 | 0 |
| Regional | 0 | 0 | 0 | 0 | 211,330 | 211,330 | 6.2 | 0 |
| Total | 87,663 | 209,401 | 102 | 2,657,000 | 468,082 | 3,422,248 | 100.0 | 100.0 |

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$3 billion in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of 0.7 percent and would have ranked 17th out of 101 depository institutions, placing it in the top 17 percent of depository institutions in this AA.

According to peer small business data for 2021, CONA had a market share of four percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked eighth out of 292 small business lenders, which placed it in the top three percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (20.1 percent), American Express National Bank (14 percent), and Cross River (13 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 89.9 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of Illinois 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 16 PPP loans totaling \$124,000 that provided support to small businesses in low- and moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded the percentages of businesses located in those geographies. The percentages of small loans to businesses in low-income geographies was near to, and in moderate-income geographies exceeded, the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table U in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed small business and consumer 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 any of 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.

Small Loans to Businesses

Refer to Table R in the state of Illinois 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 58 PPP loans totaling \$1.2 million that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was below the percentages of businesses with revenues of \$1 million or less in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographic in the 2022 period was weaker than the 2020 through 2021 performance.

Consumer Loans

Refer to Table V in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made 29 CD loans totaling \$194.8 million, which represented 71.9 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 65.1 percent funded affordable housing, 19 percent funded economic development activities, 15.6 percent funded community services, and 0.3 percent funded revitalization and stabilization efforts.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- CONA provided NMTC debt financing in the amount of \$31.7 million for the renovation and expansion of a school serving elementary and middle school students. Ninety percent of students were from low- and moderate-income families and all students qualified for free or reduced meal plans. The debt financing addressed the bank-identified community need to improve education in disadvantaged communities.
- An \$18 million loan extension to provide financing for the construction of a multifamily LIHTC property. Sixty of the 75 total units are restricted to tenants earning less than 80 percent of the AMI. Additionally, 12 units are set aside for tenants who are homeless or are at risk of being homeless. This loan extension addressed the community identified need for affordable housing.

- A \$500,000 below-market interest rate line of credit to a local CDFI that provided affordable housing, financial education, and other services. The line of credit covered pre-development expenses and early-stage operational costs for a development that will provide 45 permanently restricted affordable housing units for low- and moderate-income working households earning between 30 percent and 60 percent of the AMI. This line of credit addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$100,000 in additional grants during the evaluation period to support the organization's affordable housing programs.

Broader Statewide and Regional Area

In addition, CONA made 23 qualified loans totaling \$273.3 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. Fifteen loans provided financing for affordable housing and eight loans were for economic development.

Product Innovation and Flexibility

The bank used innovative or flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 78,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices further supported the Lending Test rating.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|---------------|----------------|---------------|------------|--------------|---------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Chicago MSA | 12 | 31,636 | 110 | 25,651 | 122 | 93.1 | 57,287 | 78.6 | 0 | 0 |
| Regional | 0 | 0 | 5 | 11,410 | 5 | 3.8 | 11,410 | 15.6 | 0 | 0 |
| Statewide | 2 | 4,168 | 2 | 51 | 4 | 3.1 | 4,219 | 5.8 | 0 | 0 |
| Total | 14 | 35,804 | 117 | 37,112 | 131 | 100.0 | 72,916 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 21.1 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported

affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services or affordable housing to primarily low- and moderate-income individuals. By dollar volume, 93.4 percent of total investments and grants supported affordable housing, 5.6 percent funded community services to low- and moderate-income individuals, and one percent supported economic development.

The bank made significant use of innovative or complex investments to support CD initiatives. Current period investments included one LIHTC project, which was complex and required more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- A \$19 million investment in LIHTC equity to help finance the new construction of a 75-unit mixed-income housing development. Sixty units are set aside for low- and moderate-income households, and 15 of these units are set aside for low-income households with a preference for veterans and people with special needs. The transaction was complex due to operating subsidiaries, a Federal Home Loan Bank grant, and other subordinate financing. This investment was responsive to the need for affordable housing. CONA demonstrated multi-faceted support by also providing a construction loan of \$18 million for this project.
- Five grants totaling \$250,000 to support a nonprofit organization that serves the unhoused, those living in poverty, or those seeking safety. Two grants totaling \$100,000 were made under CONA's B2B initiative and were directed to pre-development costs associated with the rehabilitation and repurposing of a former bank building into a 76-unit affordable housing development with 70 percent of the units set aside for low- and moderate-income households. CONA demonstrated leadership by being the first financial institution to provide grant and lending support for the development. One grant totaling \$50,000 supported an affordable housing program, and two grants totaling \$100,000 supported community services that are targeted to helping low- and moderate-income individuals and their families.
- Grants totaling \$75,000 to support a nonprofit organization that provides programs and services to support and accelerate women's business ownership and strengthen the impact of women on the economy. Grants supported a variety of programs including COVID-19 relief for small businesses, access to capital, and digital bootcamp. These programs focused on assisting businesses through the COVID-19 pandemic, ensuring small businesses had the capital, resources, and tools needed to rebuild after the pandemic, and building knowledge, skills, and comfort with digital tools. During the evaluation period, 111 businesses were helped through these programs.

Broader Statewide and Regional Area

In addition, CONA made nine current- and prior-period investments totaling \$15.6 million in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. These investments included one current-period investment totaling \$9.2 million that supported affordable housing, two prior-period investments totaling \$4.2 million that supported affordable housing, five grants totaling \$2.3 million for community services to low- and moderate-income individuals, and one grant totaling \$36,760 for economic development. Investments in the broader statewide and regional area further supported the Outstanding rating.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online, and mobile banking.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.

CONA had four cafés with 11 deposit-taking ATMs. CONA had three additional deposit-taking ATMs at various locations throughout the AA. Three of four cafés were in upper-income geographies and one café was in a middle-income geography. CONA did not open or close any cafés during the evaluation period.

| ATM Distribution | | | | | | | | | |
|--------------------|-----------|------------------------------------|-----|------|------|---------------------------------------|------|------|------|
| Assessment Area | # of ATMs | ATMs | | | | Population | | | |
| | | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Chicago MSA | 14 | 14.3 | 7.1 | 14.3 | 64.3 | 13.4 | 26.8 | 30.4 | 28.8 |

Based on the table above, the distribution of the bank's ATMs in low-income geographies exceeded, and in moderate-income geographies was well below, the percentages of the population in those geographies. During the evaluation period, CONA installed one ATM in a low-income geography and two ATMs in moderate-income geographies. CONA removed one ATM from a middle-income geography and three ATMs from upper-income geographies.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of one moderate-income geography where CONA had deposit-taking ATMs. The U.S. Census did not change the income-level designation of any low-income, middle-income, or upper-income geographies. The U.S. Census changed the income-designation of the moderate-income geography to a low-income geography. The U.S. Census changes to the income-level designation of the moderate-income geography resulted in a significant increase in the total number of deposit-taking ATMs in low-income geographies and a significant decrease in the total number of deposit-taking ATMs in moderate-income geographies. These changes had a significant impact on the distribution of deposit-taking ATMs in low- and moderate-income geographies relative to the percentages of the population in each of those geographies. As a result, the OCC provided more consideration to the change in ADS use over the evaluation period in determining the accessibility of the bank's service delivery systems.

| Chicago MSA | Low-income Geographies | | Moderate-income Geographies | |
|---------------------------|------------------------|------------|-----------------------------|-------------|
| | ATMs (#) | % of Total | ATMs (#) | % of Total |
| Prior to 2020 U.S. Census | 1 | 7.1 | 2 | 14.3 |
| After 2020 U.S. Census | 2 | 14.3 | 1 | 7.1 |
| Net Change | 1 | 7.2 | -1 | -7.2 |

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 81.7% | 29.8% |
| Mobile Banking | 148.2% | 80.1% |
| ATM Usage | -1.5% | -36.9% |
| Net Change Across All Channels (Averaged) | 76.2% | 24.3% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Generally, café hours of operation were 7:00 a.m. to 7:00 p.m. Monday through Friday, 9:00 a.m. to 5:00 p.m. on Saturdays and Sundays. One of the three cafés in upper-income geographies was not open on Saturdays and Sundays.

Community Development Services

The institution was a leader in providing CD services.

CD services were responsive to the community needs the institution identified through community contacts. Three hundred and sixty-two bank associates provided 6,088 hours of qualified service activities to 15 organizations. Leadership was evident through board or committee participation. CONA associates provided 16 hours serving on board or board committees of two organizations. *Pro Bono* volunteer services accounted for 5,293 service hours or 87 percent of CD services. Services consisted of providing workforce development through CONA's *Pro Bono* volunteer program, financial literacy education, and technical assistance to nonprofit organizations.

Examples of CD services in the AA include:

- Two hundred and thirty-five CONA associates provided 4,842 hours of workforce development services to students served by a local nonprofit organization that provides scholarships, academic programs, and leadership development. CONA associates taught coding skills to low- and moderate-income students served by the organization.
- Thirty-six CONA associates provided 180 hours of technical assistance to a local chapter of a national nonprofit organization that provides homebuyer education, home mortgage loans and down payment assistance, foreclosure intervention services, and grants to support home repair and improvement as well as utility assistance. CONA associates assisted the organization with designing its data warehouse.

- A CONA associate provided 11 hours of board services for the local chapter of a global nonprofit organization that provides education to youth in low- and moderate-income communities on entrepreneurship and business formation. These services addressed the bank-identified community need for career development for low- and moderate-income youth.

State of Louisiana

CRA rating for the State of Louisiana: 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:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels.
- CONA was a leader in providing CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Louisiana

CONA delineated 10 AAs in the state of Louisiana. They included the entirety of the Hammond, LA MSA, Houma-Thibodaux, LA MSA (Houma MSA), and Lake Charles, LA MSA as AAs. CONA also delineated as AAs the portions of the Alexandria, LA MSA (Alexandria MSA), Baton Rouge, LA MSA (Baton Rouge MSA), Lafayette, LA MSA, Monroe, LA MSA (Monroe MSA), New Orleans-Metairie, LA MSA, Shreveport-Bossier City, LA MSA, and non-MSA counties where CONA had branches. Examiners combined the non-MSA counties into one AA (Louisiana non-metro) for analysis and presentation. Refer to appendix A for a complete description of the AAs.

CONA had 67 branches, 297 deposit-taking ATMs, and \$28.3 billion of deposits (including allocated internet deposits) within these AAs, which represented 8.7 percent of the bank's total domestic deposits. The bank originated or purchased 3.4 percent of its evaluation period lending by count and 2.6 percent by dollar volume in the portions of Louisiana where CONA has AAs.

Based on June 30, 2022 FDIC summary of deposit information, CONA ranked second out of 103 FDIC-insured depository institutions with a 19.8 percent deposit market share. The top three depository institutions by deposit market share were JP Morgan Chase Bank, N.A. (20 percent), Capital One, N.A. (19.8 percent), and Hancock Whitney Bank (13.7 percent).

New Orleans CSA

The following table provides a summary of the demographic information that includes housing and business information for the New Orleans CSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: New Orleans CSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 420 | 15.7 | 24.5 | 29.8 | 26.2 | 3.8 |
| Population by Geography | 1,366,490 | 9.1 | 24.0 | 36.8 | 29.3 | 0.8 |
| Housing Units by Geography | 606,768 | 10.8 | 24.4 | 34.8 | 29.2 | 0.9 |
| Owner-Occupied Units by Geography | 323,314 | 4.9 | 19.4 | 40.5 | 34.7 | 0.4 |
| Occupied Rental Units by Geography | 198,313 | 17.4 | 30.4 | 28.6 | 22.2 | 1.4 |
| Vacant Units by Geography | 85,141 | 17.3 | 29.2 | 27.4 | 24.6 | 1.5 |
| Businesses by Geography | 201,158 | 8.7 | 20.6 | 31.3 | 38.3 | 1.1 |
| Farms by Geography | 3,403 | 5.3 | 18.5 | 43.7 | 32.0 | 0.6 |
| Family Distribution by Income Level | 326,108 | 25.2 | 15.8 | 17.3 | 41.8 | 0.0 |
| Household Distribution by Income Level | 521,627 | 26.7 | 15.0 | 15.4 | 42.9 | 0.0 |
| Median Family Income MSA - 25220 Hammond, LA MSA | | \$52,864 | Median Housing Value | | | \$187,269 |
| Median Family Income MSA - 35380 New Orleans-Metairie, LA MSA | | \$61,124 | Median Gross Rent | | | \$903 |
| Median Family Income Non-MSAs - LA | | \$46,614 | Families Below Poverty Level | | | 15.0% |
| <i>Source: 2015 ACS and 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: New Orleans CSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 457 | 11.2 | 26.7 | 27.4 | 30.0 | 4.8 |
| Population by Geography | 1,406,758 | 8.6 | 25.6 | 32.3 | 32.2 | 1.3 |
| Housing Units by Geography | 618,902 | 8.6 | 26.8 | 31.4 | 31.5 | 1.6 |
| Owner-Occupied Units by Geography | 344,000 | 5.2 | 21.7 | 35.6 | 36.6 | 0.9 |
| Occupied Rental Units by Geography | 192,344 | 13.8 | 35.5 | 26.5 | 22.1 | 2.1 |
| Vacant Units by Geography | 82,558 | 10.8 | 27.7 | 25.9 | 32.2 | 3.4 |
| Businesses by Geography | 223,260 | 7.2 | 23.6 | 30.3 | 37.2 | 1.7 |
| Farms by Geography | 3,883 | 5.0 | 21.2 | 38.8 | 33.9 | 1.1 |
| Family Distribution by Income Level | 322,871 | 25.0 | 15.3 | 18.0 | 41.6 | 0.0 |
| Household Distribution by Income Level | 536,344 | 27.0 | 14.5 | 15.5 | 43.0 | 0.0 |
| Median Family Income MSA - 25220 Hammond, LA MSA | | \$62,373 | Median Housing Value | | | \$224,483 |
| Median Family Income MSA - 35380 New Orleans-Metairie, LA MSA | | \$72,053 | Median Gross Rent | | | \$1,017 |
| Median Family Income Non-MSAs - LA | | \$50,254 | Families Below Poverty Level | | | 12.8% |

*Source: 2020 U.S. Census and 2022 D&B Data
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.*

Economic Data

New Orleans-Metairie, LA MSA

Data from Moody's Analytics over the evaluation period indicated the New Orleans-Metairie, LA area's port is a major player in the local economy, notably due to revenue increases from cruises that are back from the pandemic. Healthcare and the refining industries contributed to some employment growth, but wage growth struggled. Hiring in high-paying positions was slower than the national average, whereas low-paying employment was growing rapidly. Tourism grew in 2022 but remained below the pre-pandemic rates. The area's strengths include a well-developed port, pipeline and rail infrastructure, and large-scale investments in energy and manufacturing. Weaknesses included many low-paying jobs in gaming and tourism, susceptibility to boom-bust cycles in energy leading to above-average employment volatility, and weak migration patterns.

Based on data from the BLS, the unemployment rate for the New Orleans-Metairie, LA area was 4.4 percent in January 2020, as high as 17 percent in April 2020, and 3.2 percent in December 2022. Major employers in the AA included Ochsner Health System, East Jefferson General Hospital, ADME Truck Line Inc., Laitram LLC, and Georges Enterprises LLC.

Hammond, LA MD

Data from Moody's Analytics over the evaluation period indicated the Hammond, LA area's economy improved during 2022 with the labor market recovering to pre-pandemic levels towards the end of 2022. The gap between local housing prices and the state average grew to the largest since 2009. The area's strengths included stability provided by Southeastern Louisiana University and the area's proximity to Baton Rouge and New Orleans. Weaknesses included high poverty rates and unequal distribution of income, a low-skilled workforce, and slowing population growth.

The BLS did not maintain unemployment rate data for the Hammond, LA MD. Major employers in the AA included North Oaks Medical Center, Southeastern Louisiana University, and Walmart Inc.

Community Contacts

A review was conducted of two community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing and economic development. Contacts noted the community was still recovering from the long-term impact of Hurricanes Katrina and Ida. Credit and community development needs identified include:

- Affordable housing
- Small business lending
- Workforce development

Shreveport CSA

The following table provides a summary of the demographic information that includes housing and business information for the Shreveport CSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Shreveport CSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 97 | 16.5 | 23.7 | 33.0 | 25.8 | 1.0 |
| Population by Geography | 418,762 | 12.2 | 19.7 | 34.1 | 33.9 | 0.0 |
| Housing Units by Geography | 184,829 | 11.8 | 20.5 | 34.7 | 33.0 | 0.0 |
| Owner-Occupied Units by Geography | 101,913 | 7.5 | 14.6 | 36.0 | 41.9 | 0.0 |
| Occupied Rental Units by Geography | 58,968 | 17.6 | 30.0 | 30.7 | 21.7 | 0.0 |
| Vacant Units by Geography | 23,948 | 15.9 | 22.4 | 38.8 | 22.9 | 0.0 |
| Businesses by Geography | 48,898 | 14.6 | 20.0 | 28.1 | 37.2 | 0.1 |
| Farms by Geography | 1,317 | 7.4 | 14.5 | 36.8 | 41.3 | 0.0 |
| Family Distribution by Income Level | 102,622 | 24.8 | 15.7 | 16.8 | 42.6 | 0.0 |
| Household Distribution by Income Level | 160,881 | 25.3 | 15.9 | 15.6 | 43.2 | 0.0 |
| Median Family Income MSA - 43340 Shreveport-Bossier City, LA MSA | | \$57,974 | Median Housing Value | | | \$126,517 |
| Median Family Income Non-MSAs - LA | | \$46,614 | Median Gross Rent | | | \$780 |
| | | | Families Below Poverty Level | | | 15.1% |
| <i>Source: 2015 ACS and 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|---|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Shreveport CSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 120 | 8.3 | 30.8 | 29.2 | 26.7 | 5.0 |
| Population by Geography | 403,561 | 6.3 | 28.8 | 28.8 | 34.2 | 1.8 |
| Housing Units by Geography | 190,750 | 7.0 | 30.2 | 28.6 | 31.9 | 2.3 |
| Owner-Occupied Units by Geography | 101,422 | 3.5 | 22.4 | 32.6 | 39.7 | 1.8 |
| Occupied Rental Units by Geography | 60,541 | 11.5 | 41.0 | 22.5 | 22.2 | 2.8 |
| Vacant Units by Geography | 28,787 | 9.7 | 35.2 | 27.4 | 24.6 | 3.1 |
| Businesses by Geography | 54,085 | 6.3 | 27.5 | 25.3 | 34.6 | 6.3 |
| Farms by Geography | 1,511 | 4.4 | 22.6 | 32.4 | 37.3 | 3.3 |
| Family Distribution by Income Level | 99,986 | 25.2 | 15.7 | 17.5 | 41.5 | 0.0 |
| Household Distribution by Income Level | 161,963 | 26.3 | 16.1 | 16.0 | 41.6 | 0.0 |
| Median Family Income MSA - 43340 Shreveport-Bossier City, LA MSA | | \$59,467 | Median Housing Value | | | \$143,323 |
| Median Family Income Non-MSAs - LA | | \$50,254 | Median Gross Rent | | | \$859 |
| | | | Families Below Poverty Level | | | 16.7% |

*Source: 2020 U.S. Census and 2022 D&B Data
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.*

Economic Data

Data from Moody's Analytics over the evaluation period indicated the Shreveport area's job growth moved higher since the pandemic but was below the national pace of job growth. The population has been declining for nearly a decade, leading to a loss of educated labor impacting the leisure and hospitality industries such as casinos. The area's strengths include having low business costs and a high concentration of healthcare jobs. Weaknesses include a contracting population, low migration patterns, and a labor force concentrated in low-skill employment.

Based on data from the BLS, the unemployment rate was 5.1 percent in January 2020, as high as 12.2 percent in May 2020, and 3.3 percent in December 2022. Major employers in the AA included Barksdale Air Force Base, Willis-Knighton Health System, and Ochsner LSU Health – Academic Medical Center.

Community Contacts

A review was conducted of two community contacts completed during the evaluation period with organizations serving the area. The organizations contacted focus on social services for low- and moderate-income individuals and economic development. Contacts noted the community was still facing hardships from the COVID-19 pandemic and small businesses needed access to capital. Credit and community development needs identified include:

- Financial literacy education
- Small business start-up loans

Scope of Evaluation in Louisiana

In evaluating the bank's performance in the state of Louisiana, the New Orleans CSA AA and Shreveport CSA AA received full-scope reviews and the Alexandria MSA AA, Baton Rouge MSA AA, Houma MSA AA, Lafayette CSA AA, Lake Charles CSA AA, Monroe MSA AA, and Louisiana non-metro MSA AA received limited-scope reviews.

The New Orleans CSA AA had 38.8 percent of the lending, 57.9 percent of the deposits (including allocated internet deposits), and 41.8 percent of the branches in the state of Louisiana. CONA's deposit market share, deposit market share ranking, and volume of lending were the primary reasons this AA was selected for a full-scope review.

The Shreveport CSA AA had 10.4 percent of the lending, 8.5 percent of the deposits (including allocated internet deposits), and 9 percent of the branches in the state of Louisiana. CONA's deposit market share, deposit market share ranking, and volume of lending were the primary reasons this AA was selected for a full-scope review.

We based our ratings primarily on the results of the areas that received full-scope reviews. CONA's strategic focus is consumer lending. Consumer loans received greater weight than small loans to

businesses and small loans to farms in the New Orleans CSA AA and a greater weight than small loans to businesses in the Shreveport CSA AA. In the New Orleans CSA AA, Shreveport CSA AA, Baton Rouge MSA AA, Lake Charles CSA AA, and Monroe MSA AA, the bank did not originate or purchase a sufficient number of home mortgage loans for a meaningful analysis. In the Alexandria MSA AA, Houma MSA AA, and Louisiana non-metro AA, the bank did not originate or purchase any home mortgage loans during the evaluation period. In the Shreveport CSA AA, Alexandria MSA AA, Baton Rouge MSA AA, Houma MSA AA, Lafayette CSA AA, Lake Charles CSA AA, and Monroe MSA AA, the bank did not originate or purchase a sufficient number of small loans to farms for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISIANA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the New Orleans CSA AA and Shreveport CSA AA was excellent.

Lending Activity

Lending levels reflected adequate responsiveness to AA credit needs.

| Number of Loans* | | | | | | | | |
|------------------------|---------------|----------------|------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| New Orleans CSA | 1 | 11,653 | 45 | 406,374 | 85 | 418,158 | 38.8 | 57.9 |
| Shreveport CSA | 1 | 2,379 | 16 | 109,957 | 22 | 112,375 | 10.4 | 8.5 |
| Alexandria MSA | 0 | 655 | 12 | 30,196 | 3 | 30,866 | 2.9 | 1.3 |
| Baton Rouge MSA | 6 | 5,257 | 23 | 224,780 | 39 | 230,105 | 21.3 | 18.5 |
| Houma MSA | 0 | 1,542 | 13 | 49,733 | 7 | 51,295 | 4.8 | 4.8 |
| Lafayette CSA | 0 | 2,539 | 20 | 104,476 | 8 | 107,043 | 9.9 | 4.1 |
| Lake Charles CSA | 1 | 1,167 | 29 | 60,517 | 3 | 61,717 | 5.7 | 3.3 |
| Monroe MSA | 2 | 1,005 | 22 | 46,287 | 5 | 47,321 | 4.4 | 0.9 |
| Louisiana non-metro | 0 | 384 | 40 | 19,574 | 1 | 19,999 | 1.9 | 0.8 |
| Statewide | 0 | 0 | 0 | 0 | 7 | 7 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 37 | 37 | 0 | 0 |
| Total | 11 | 26,581 | 220 | 1,051,894 | 217 | 1,078,923 | 100 | 100 |

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

| Dollar Volume of Loans (\$000)* | | | | | | | | |
|--|----------------|----------------|--------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| New Orleans CSA | 33,003 | 231,517 | 314 | 691,853 | 107,736 | 1,064,423 | 32.4 | 57.9 |
| Shreveport CSA | 1,286 | 29,758 | 85 | 149,588 | 28,588 | 209,305 | 6.4 | 8.5 |
| Alexandria MSA | 0 | 12,536 | 86 | 40,602 | 4,946 | 58,170 | 1.8 | 1.3 |
| Baton Rouge MSA | 146,565 | 110,082 | 175 | 361,779 | 226,368 | 844,969 | 25.7 | 18.5 |
| Houma MSA | 0 | 35,372 | 169 | 78,960 | 22,278 | 136,779 | 4.2 | 4.8 |
| Lafayette CSA | 0 | 32,385 | 146 | 152,297 | 45,147 | 229,975 | 7.0 | 4.1 |
| Lake Charles CSA | 5,850 | 18,261 | 614 | 87,644 | 14,360 | 126,729 | 3.9 | 3.3 |
| Monroe MSA | 16,875 | 12,752 | 369 | 58,166 | 24,490 | 112,652 | 3.4 | 0.9 |
| Louisiana non-metro | 0 | 2,979 | 1,213 | 23,680 | 13 | 27,885 | 0.8 | 0.8 |
| Statewide | 0 | 0 | 0 | 0 | 16,567 | 16,567 | 0.5 | 0 |
| Regional | 0 | 0 | 0 | 0 | 454,067 | 454,067 | 13.8 | 0 |
| Total | 203,579 | 485,642 | 3,171 | 1,644,569 | 944,560 | 3,281,521 | 100 | 100 |

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

New Orleans CSA

CONA ranked first out of 34 FDIC-insured depository institutions with a 28 percent deposit market share. The top three depository institutions banks by deposit market share were Capital One, N.A. (28 percent), Hancock Whitney Bank (19.2 percent), and JP Morgan Chase Bank, N.A. (16.9 percent). Lending levels reflected adequate responsiveness to AA credit needs.

According to peer small business data for 2021, CONA had a market share of 8.1 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fourth out of 158 small business lenders, which placed it in the top three percent of lenders. The top lenders in this AA based on market share were American Express National Bank (16.9 percent), JP Morgan Chase Bank, N.A. (14.5 percent), and Hancock Whitney Bank (9.2 percent).

According to peer small farm data for 2021, CONA had a market share of 7.9 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked fourth out of 21 small farm lenders, which placed it in the top 20 percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (28.8 percent), First Guaranty Bank (19.5 percent), and John Deere Financial FSB (8.8 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 4.8 percent of total deposits.

Shreveport CSA

CONA ranked first out of 24 FDIC-insured depository institutions with a 20.3 percent deposit market share. The top three depository institutions by deposit market share were Capital One, N.A. (20.3 percent), JP Morgan Chase Bank, N.A. (14 percent), and Regions Bank (12.8 percent).

Lending levels reflected adequate responsiveness to AA credit needs.

According to peer small business data for 2021, CONA had a market share of 7.7 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fourth out of 105 small business lenders, which placed it in the top four percent of lenders. The top lenders in this AA based on market share were American Express National Bank (16.4 percent), JP Morgan Chase Bank, N.A. (8.1 percent), and Lake Forest Bank & Trust, N.A. (8.1 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 6.8 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs.

New Orleans CSA

Small Loans to Businesses

Refer to Table Q in the state of Louisiana 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 504 PPP loans totaling \$20 million that provided support to small businesses in low- and moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table S in the state of Louisiana 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 farms.

Based on the data in the tables and performance context factors discussed below, the overall geographic distribution of small loans to farms was adequate.

For 2020 through 2021, the bank did not originate or purchase any small loans to farms in low-income geographies.

- There were a limited number of farms in low-income geographies in the AA. There were 180 farms located in low-income geographies in the 2020-2021 period, representing 5.3 percent of all farms in the AA. As a result, the OCC provided more consideration to the bank's lending performance to farms located in moderate-income geographies.
- There was strong competition in the market, with the top three lenders holding 57 percent market share of small farm lending in the AA.
- Small loans to farms were not a primary lending product of the bank.

The percentages of small loans to farms in moderate-income geographies was near to both the percentages of farms located in moderate-income geographies and the aggregate percentages of all reporting lenders.

There was an insufficient number of small loans to farms in the 2022 period for a meaningful analysis.

Consumer Loans

Refer to Table U in the state of Louisiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in low-income geographies approximated, and in moderate income geographies exceeded, the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of consumer loans in low-income geographies exceeded the percentages of households located in those geographies.

Shreveport CSA

Small Loans to Businesses

Refer to Table Q in the state of Louisiana 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 74 PPP loans totaling \$3.2 million that provided support to small businesses in low- and moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table U in the state of Louisiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was good.

For 2020 through 2021, the percentages of consumer loans in low-income geographies was below, and in moderate-income geographies approximated, the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed small business, small farm, and consumer 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 any of the full-scope areas 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 and farms of different sizes.

New Orleans CSA

Small Loans to Businesses

Refer to Table R in the state of Louisiana 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 1,323 PPP loans totaling \$27.6 million that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the state of Louisiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was adequate.

For 2020 through 2021, the percentages of small loans to farms with revenues of \$1 million or less was well below the percentages of farms with revenues of \$1 million or less in the AA and was near to the aggregate percentages of all reporting lenders.

The bank did not originate or purchase a sufficient volume of small loans to farms in the 2022 period for a meaningful analysis.

Consumer Loans

Refer to Table V in the state of Louisiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to low-income borrowers approximated, and to moderate-income borrowers exceeded, the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Shreveport CSA

Small Loans to Businesses

Refer to Table R in the state of Louisiana 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 120 PPP loans totaling \$2.4 million that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographic in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the state of Louisiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was good.

For 2020 through 2021, the percentages of consumer loans to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentages of those households.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of consumer loans to low-income borrowers was near to the percentages of those households.

Community Development Lending

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

New Orleans CSA

The institution was a leader in making CD loans.

The level of CD lending was excellent. CONA made 85 CD loans totaling \$107.7 million, which represented 7.2 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 68.3 percent of these loans funded affordable housing, 19.2 percent funded economic development activities, 10.3 percent funded community services, and 2.2 percent funded revitalization and stabilization efforts.

The following are examples of the bank's CD loans that illustrate the complexity or responsiveness of CONA's CD lending:

- A \$7.5 million loan to finance the adaptive reuse of a historic commercial building to convert the property to residential use. The property contains 42 residential units, including 36 units that were set aside for low- and moderate-income households. Twenty-five of 42 units were set aside specifically for low-income households, and all 36 units benefited from HUD rental subsidies. The property was part of a multi-investor fund that included 23 other properties and 10 other investors, which increased the complexity of the underwriting process. The loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$7.6 million LIHTC equity investment.
- A \$2.1 million loan to help finance the historic rehabilitation of a 32-unit affordable housing development. All units were restricted to low- and moderate-income households. Eight units benefited from permanent supportive housing subsidies and were set aside for homeless households earning up to 20 percent of the AMI. The remaining 24 units were restricted to households earning up to 60 percent of the AMI. In addition to funding from CONA, this development involved public financing from municipal and state government sources. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$7.5 million LIHTC equity investment.

- A \$950,000 loan to help fund a nonprofit foundation that aimed to improve the health and wellbeing of low- and moderate-income residents. It achieved this goal through its strategic grantmaking program, which included a local homeless shelter, which used the funds to help build four private medical rooms and a large dental exam room, to expand its healthcare capacity as it faced increased need due to the COVID-19 pandemic and economic downturn. The nonprofit foundation also operated two school-based health centers (SBHC), which provided high-quality healthcare for students. The SBHCs were located at a high school where 71 percent of students were eligible for free and reduced-price meals, and at a community college where 59 percent of students receive Pell grants. This loan addressed the bank-identified community need for healthcare-related services for low- and moderate-income individuals.

Shreveport CSA

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

The level of CD lending was excellent. CONA made 22 CD loans totaling \$28.6 million, which represented 12.9 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 63.3 percent of these loans funded affordable housing, 33.3 percent funded economic development activities, 1.7 percent funded community services, and 1.7 percent funded revitalization and stabilization efforts.

The following are examples of the bank's CD loans that illustrate the complexity or responsiveness of CONA's CD lending:

- A \$4.5 million loan to help finance the rehabilitation of a 40-unit affordable housing development. All units were restricted to low- and moderate-income households earning up to 60 percent of the AMI. This development involved public financing from federal government sources. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$4.5 million LIHTC equity investment.
- A \$4.8 million loan to an organization with a focus on starting new businesses, recruiting new businesses, and retaining current businesses. The loan addressed the community identified need for small business lending and access to credit.
- A \$500,000 working capital line of credit for a Federally Qualified Health Center (FQHC). The FQHC was a nonprofit organization that serves medically underserved areas and populations and provides medical care for underserved, low- and moderate-income, and uninsured families. The line of credit helped the organization work through cash flow issues resulting from the effects of the COVID-19 pandemic. The line of credit addressed the bank-identified community needs for health care services targeted to and benefitting low- and moderate-income individuals and families.

Broader Statewide and Regional Area

In addition, CONA made 44 qualified loans totaling \$470.7 million and one qualified lease totaling \$2.9 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AAs. Thirty loans provided financing for affordable housing, four loans were

for revitalization and stabilization efforts, seven loans were for economic development, and three loans were for community services benefiting low- and moderate-income individuals.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs in the New Orleans CSA AA and Shreveport CSA AA.

During the evaluation period, CONA originated more than 31,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies in the New Orleans CSA AA and more than 6,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies in the Shreveport CSA AA. CONA's flexible lending practices during the evaluation period further supported the Lending Test rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Alexandria MSA AA, Baton Rouge MSA AA, Houma MSA AA, Lafayette CSA AA, Lake Charles CSA AA, and Monroe MSA AA 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 the Louisiana non-metro AA was weaker than the bank's overall performance under the Lending Test in the full-scope areas, primarily due to weaker lending to households in low-income geographies and weaker CD lending performance. The weaker performance in the Louisiana non-metro AA had a minimal impact on the bank's overall Lending Test rating for the state of Louisiana.

Refer to Tables O through V in the state of Louisiana section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the New Orleans CSA AA and Shreveport CSA AA was excellent.

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|------------------------|---------------|----------------|----------------|----------------|------------|--------------|----------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| New Orleans CSA | 55 | 117,724 | 258 | 64,802 | 313 | 43.6 | 182,526 | 31.0 | 0 | 0 |
| Shreveport CSA | 14 | 17,013 | 60 | 37,135 | 74 | 10.3 | 54,148 | 9.2 | 0 | 0 |
| Alexandria MSA | 8 | 9,045 | 22 | 12,069 | 30 | 4.2 | 21,114 | 3.6 | 0 | 0 |
| Baton Rouge MSA | 21 | 25,774 | 93 | 73,869 | 114 | 15.9 | 99,643 | 16.9 | 0 | 0 |
| Houma MSA | 7 | 4,504 | 24 | 11,945 | 31 | 4.3 | 16,449 | 2.8 | 0 | 0 |
| Lafayette CSA | 14 | 14,813 | 23 | 50,819 | 37 | 5.2 | 65,632 | 11.2 | 0 | 0 |
| Lake Charles CSA | 11 | 6,485 | 17 | 9,346 | 28 | 3.9 | 15,831 | 2.7 | 0 | 0 |
| Monroe MSA | 12 | 12,452 | 20 | 14,431 | 32 | 4.5 | 26,883 | 4.6 | 0 | 0 |
| Louisiana non-metro | 2 | 1,284 | 10 | 23,058 | 12 | 1.7 | 24,342 | 4.1 | 0 | 0 |
| Regional | 8 | 12,555 | 10 | 28,995 | 18 | 2.5 | 41,550 | 7.1 | 0 | 0 |
| Statewide | 20 | 15,305 | 9 | 24,864 | 29 | 4.0 | 40,169 | 6.8 | 0 | 0 |
| Total | 172 | 236,954 | 546 | 351,333 | 718 | 100 | 588,287 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

New Orleans CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 12.2 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. A substantial majority of the dollar volume of the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services to primarily low- and moderate-income individuals or economic development. By dollar volume, 95.4 percent of total investments and grants supported affordable housing, 2.4 percent supported economic development, and 2.2 percent funded community services to low- and moderate-income individuals.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included seven LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$12.6 million in LIHTC equity for the acquisition and rehabilitation of a 201-unit affordable housing development, with 200 units dedicated to low- and moderate-income households. Ten units are set aside for households earning up to 20 percent of the AMI, 50 units are for households earning up to 50 percent of the AMI, and the remaining 140 units are set aside for households earning up to 60 percent of the AMI. All 200 units benefit from 15-year development-based housing assistance payments, effectively limiting rents to 30 percent of household income.

This complex investment involved multiple layers of financing from private, state, and municipal sources. This investment addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$3.2 million loan for this project.

- An investment of \$4.1 million in LIHTC equity to finance the rehabilitation of a 48-unit property, with 47 units dedicated to low- and moderate-income households that benefit from rental subsidies through U.S. Department of Agriculture (USDA) Rural Development's Multifamily Housing Rental Assistance program. The rehabilitation was managed so tenants were not displaced. This complex investment is part of a national multi-investor fund that includes 31 additional properties and eight other investors and responded to the need for maintaining affordable housing. CONA demonstrated multi-faceted support by also providing a \$4.1 million construction loan for this project.
- Grants totaling \$575,000 to a nonprofit organization that provides grant funding, training and workshops, and technical assistance to area nonprofits that provide community services benefiting low- and moderate-income individuals, emergency disaster relief and support, workforce development and training, social support services, financial hardship assistance, and other community-focused programs. CONA's funding supported workforce development, job creation and retention, and relief efforts related to the COVID-19 pandemic and Hurricane Ida. A key program focused on retraining workers from the hospitality industry and other tourism-related industries who were affected by the pandemic. The organization and its partners identified areas where there was a shortage of qualified employees and created a program to provide training in those skill sets, which included construction, healthcare, and childcare. The efforts resulted in employment for 67 participants. This grant responded to the bank-identified community need for workforce development.

Shreveport CSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 24.5 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current- and prior-period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services to primarily low- and moderate-income individuals. By dollar volume, 99 percent of total investments and grants supported affordable housing, and less than 1 percent funded community services to low- and moderate-income individuals and supported economic development.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included five LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$14.5 million in LIHTC equity for the construction of a 60-unit affordable housing development. Three permanent supportive housing units are reserved for households at or below 30

percent of the AMI with preference to veterans, disabled, and elderly persons on the local housing authority's waiting list. Of the remaining 57 units, three are reserved for households earning up to 20 percent of the AMI, 21 for up to 50 percent of the AMI, and 33 units are reserved for households up to 60 percent of the AMI. The unit mix includes 18 three-bedroom units, making it suitable for larger families and all units are fitted with energy-efficient appliances to lessen the utility burden on residents, aiding in low- and moderate-income affordability. This complex investment involved private, state, and federal funding, including \$600,000 in below-market rate permanent financing from a nonprofit CDFI. This investment supports the community identified need for affordable rental housing. CONA demonstrated multi-faceted support by also providing a \$7 million construction loan for this project.

- Two investments totaling \$9.7 million in LIHTC equity to help finance the rehabilitation of a 126-unit affordable housing development. The development combined two independent fully subsidized developments into one community. This complex investment is part of a fund that includes seven other investors and 16 other properties and is responsive to the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$1.4 million loan for this project.
- Grants totaling \$70,000 to support the local chapter of a national educational organization that is focused on preparing young people to succeed through workforce development, entrepreneurship, and financial literacy training. CONA's funding supported financial literacy education for students at three elementary schools, most of which are from low- and moderate-income families. These grants responded to the bank-identified community need for financial literacy education.

Broader Statewide and Regional Area

In addition, CONA made 56 current- and prior-period investments totaling \$81.7 million in the broader statewide and regional area whose purpose, mandate, or function included serving its AAs. These included 34 prior-period investments totaling \$27.9 million that supported affordable housing, 11 current-period investments totaling \$53.2 million that supported affordable housing, two investments totaling \$250,000 for economic development, four grants totaling \$328,333 to organizations providing community services to low- and moderate-income individuals, and five grants totaling \$62,700 for economic development. Investments in the broader statewide and regional area further supported the Outstanding rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Alexandria MSA AA, Baton Rouge MSA AA, Houma MSA AA, Lafayette CSA AA, Lake Charles CSA AA, Monroe MSA AA, and Louisiana non-metro AA is 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 Louisiana is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the New Orleans CSA AA was excellent and in the Shreveport CSA AA was good.

Retail Banking Services

| Distribution of Branch Delivery System | | | | | | | | | | | |
|--|--|--------------------------|--|--|------|------|-------|--|------|------|------|
| Assessment Area | Deposits % of Rated Area Deposits in AA | # of BANK Branches | % of Rated Area Branches in AA | Branches | | | | Population | | | |
| | | | | Location of Branches by Income of Geographies (%) | | | | % of Population within Each Geography | | | |
| | | | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| New Orleans CSA | 57.9 | 28 | 41.8 | 10.7 | 28.6 | 17.9 | 42.9 | 8.6 | 25.6 | 32.3 | 32.2 |
| Shreveport CSA | 8.5 | 6 | 9.0 | 0.0 | 50.0 | 33.3 | 16.7 | 6.3 | 28.8 | 28.8 | 34.2 |
| Alexandria MSA | 1.3 | 1 | 1.5 | 0.0 | 0.0 | 0.0 | 100.0 | 5.3 | 21.2 | 35.6 | 37.7 |
| Baton Rouge MSA | 18.5 | 14 | 20.9 | 7.1 | 21.4 | 50.0 | 21.4 | 10.0 | 17.4 | 36.9 | 32.4 |
| Houma MSA | 4.8 | 5 | 7.5 | 0.0 | 20.0 | 20.0 | 60.0 | 3.9 | 15.2 | 47.8 | 30.7 |
| Lafayette CSA | 4.1 | 4 | 6.0 | 0.0 | 50.0 | 25.0 | 25.0 | 5.2 | 19.0 | 34.9 | 40.4 |
| Lake Charles CSA | 3.3 | 3 | 4.5 | 0.0 | 33.3 | 33.3 | 33.3 | 8.5 | 14.5 | 39.2 | 36.4 |
| Monroe MSA | 0.9 | 2 | 3.0 | 50.0 | 0.0 | 0.0 | 50.0 | 17.9 | 18.5 | 24.3 | 39.3 |
| Louisiana non-metro* | 0.8 | 4 | 6.0 | 0.0 | 75.0 | 0.0 | 0.0 | 3.6 | 29.5 | 39.7 | 23.6 |

NOTE: The number of bank branches includes one branch in a geography with no income designation.

New Orleans CSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.

Based on the table above, the bank's distribution of branches in low-income geographies, and in moderate-income geographies, exceeded the percentages of the population living in those geographies.

| Distribution of Branch Openings/Closings | | | | | | |
|--|----------------------|----------------------|---|-----|-----|-----|
| Assessment Area | # of Branch Openings | # of Branch Closings | Branch Openings/Closings | | | |
| | | | Net change in Location of Branches (+ or -) | | | |
| | | | Low | Mod | Mid | Upp |
| New Orleans CSA | 0 | 7 | 0 | -1 | -4 | -2 |
| Shreveport CSA | 0 | 4 | -2 | 0 | -1 | -1 |
| Alexandria MSA | 0 | 1 | 0 | 0 | 0 | -1 |
| Baton Rouge MSA | 0 | 7 | 0 | -1 | -1 | -5 |
| Houma MSA | 0 | 1 | 0 | 0 | -1 | 0 |
| Lafayette CSA | 0 | 3 | 0 | 0 | -3 | 0 |
| Lake Charles CSA | 0 | 4 | 0 | -1 | -1 | -2 |
| Monroe MSA | 0 | 0 | 0 | 0 | 0 | 0 |
| Louisiana non-metro | 0 | 6 | 0 | -2 | -3 | -1 |

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. The institution closed one branch in a moderate-income geography and six branches in middle- and upper-income geographies. Factors that contributed to the branch closure in the moderate-income geography included declining branch teller transactions, increasing customer transactions migrating to ATMs, and underperformance in other key performance metrics.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of three low-income, four moderate-income, one middle-income, and two upper-income geographies where CONA had branches. The U.S. Census changed the income-designation of all three low-income geographies to moderate-income geographies and changed the income-level designation of three of four moderate-income geographies to low-income geographies. These changes did not impact the total number of branches in low- or moderate-income geographies.

| | Low-income Geographies | | Moderate-income Geographies | |
|----------------------------------|------------------------|------------|-----------------------------|------------|
| | Branches (#) | % of Total | Branches (#) | % of Total |
| New Orleans CSA | | | | |
| Prior to 2020 U.S. Census Change | 3 | 10.7 | 8 | 28.6 |
| After 2020 U.S. Census Change | 3 | 10.7 | 8 | 28.6 |
| Net Change | - | - | - | - |

Additional Branch Accessibility

In addition to the bank's branch distribution, the OCC gave positive consideration for four bank branches in middle- and upper-income geographies that provided additional access to retail banking

services to customers residing in low- and moderate-income geographies, as determined by customer usage.

ADS Usage

CONA had several ADS, including ATMs, online banking, and mobile banking options. These ADS provided additional access to retail banking services to low- and moderate-income geographies or individuals. CONA's ADS had a positive impact on the Service Test conclusion.

| ATM Distribution | | | | | | | | | |
|------------------------|-----------|------------------------------------|------|------|------|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| New Orleans CSA | 139 | 10.8 | 28.8 | 19.4 | 41 | 8.6 | 25.6 | 32.3 | 32.2 |
| Shreveport CSA | 28 | 0 | 46.4 | 28.6 | 25 | 6.3 | 28.8 | 28.8 | 34.2 |
| Alexandria MSA | 6 | 16.7 | 0 | 0 | 83.3 | 5.3 | 21.2 | 35.6 | 37.7 |
| Baton Rouge MSA | 49 | 4.1 | 32.7 | 40.8 | 20.4 | 10 | 17.4 | 36.9 | 32.4 |
| Houma MSA | 25 | 0 | 12 | 12 | 76 | 3.9 | 15.2 | 47.8 | 30.7 |
| Lafayette CSA | 17 | 0 | 52.9 | 17.6 | 29.4 | 5.2 | 19 | 34.9 | 40.4 |
| Lake Charles CSA | 18 | 0 | 38.9 | 33.3 | 27.8 | 8.5 | 14.5 | 39.2 | 36.4 |
| Monroe MSA | 9 | 22.2 | 0 | 22.2 | 55.6 | 17.9 | 18.5 | 24.3 | 39.3 |
| Louisiana non-metro | 6 | 0 | 66.7 | 0 | 0 | 3.6 | 29.5 | 39.7 | 23.6 |

NOTE: The number of ATMs in the Baton Rouge MSA includes one ATM in a geography with no income-designation.

NOTE: The number of ATMs in the Louisiana non-metro AA includes two ATMs in geographies with no income-designation.

Based on the table above, the distribution of the bank's ATMs in low-income geographies, and in moderate-income geographies, exceeded the percentages of the population in those geographies.

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 24.7% | 12.4% |
| Mobile Banking | 43% | 33% |
| ATM Usage | -46.2% | -61.3% |
| Net Change Across All Channels (Averaged) | 7.2% | -5.3% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open 9:00 a.m. to 5:00 p.m. Monday through Friday, and 9:00 a.m. to 12:00 p.m. Saturday. There is one branch with limited services, located in an upper-income geography, and 27 full-service branches. Nineteen branches are open on Saturdays, including eight of 19 with drive-up-hours and 10 branches were in low- and moderate-income geographies.

Shreveport CSA

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AAs.

There were no branches located in low-income geographies at the end of the evaluation period, due to the 2020 U.S. Census changes. Based on the table above, the bank's distribution of branches in moderate-income geographies exceeded the percentages of the population living in moderate-income geographies.

| Distribution of Branch Openings/Closings | | | | | | |
|--|----------------------|----------------------|---|-----|-----|-----|
| Assessment Area | # of Branch Openings | # of Branch Closings | Branch Openings/Closings | | | |
| | | | Net change in Location of Branches (+ or -) | | | |
| | | | Low | Mod | Mid | Upp |
| New Orleans CSA | 0 | 7 | 0 | -1 | -4 | -2 |
| Shreveport CSA | 0 | 4 | -2 | 0 | -1 | -1 |
| Alexandria MSA | 0 | 1 | 0 | 0 | 0 | -1 |
| Baton Rouge MSA | 0 | 7 | 0 | -1 | -1 | -5 |
| Houma MSA | 0 | 1 | 0 | 0 | -1 | 0 |
| Lafayette CSA | 0 | 3 | 0 | 0 | -3 | 0 |
| Lake Charles CSA | 0 | 4 | 0 | -1 | -1 | -2 |
| Monroe MSA | 0 | 0 | 0 | 0 | 0 | 0 |
| Louisiana non-metro | 0 | 6 | 0 | -2 | -3 | -1 |

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. The institution closed four branches including two branches in low-income geographies. Factors that contributed to the branch closures in low-income geographies included declining branch teller transactions and underperformance in other key performance metrics.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of one low-income and one upper-income geography, respectively, where CONA had branches. The U.S. Census did not change the income-level designation of any moderate-income geographies. The U.S. Census changed the income-designation of a low-income geography and an upper-income geography to middle-income geographies. This change resulted in a significant decrease in the total number of branches in low-income geographies and had a significant impact on the distribution of branches in low-income geographies relative to the percentages of the population in those geographies. As a result, the OCC provided more consideration to the bank's performance in moderate-income geographies in determining the accessibility of the bank's service delivery systems.

| Shreveport CSA | Low-income Geographies | | Moderate-income Geographies | |
|----------------------------------|-------------------------------|------------|------------------------------------|------------|
| | Branches (#) | % of Total | Branches (#) | % of Total |
| Prior to 2020 U.S. Census Change | 1 | 16.7 | 3 | 50 |
| After 2020 U.S. Census Change | 0 | 0 | 3 | 50 |
| Net Change | -1 | -16.7 | - | - |

Additional Branch Accessibility

In addition to the bank's branch distribution, the OCC gave positive consideration for one bank branch in a middle-income geography that provided additional access to retail banking services to customers residing in low- and moderate-income geographies, as determined by customer usage.

ADS Usage

CONA had several ADS, including ATMs, online banking, and mobile banking options. These ADS provided additional access to retail banking services to low- and moderate-income geographies or individuals. CONA's ADS had a positive impact on the Service Test conclusion. There were no ATMs located in low-income geographies at the end of the evaluation period, due to U.S. Census changes.

| ATM Distribution | | | | | | | | | |
|------------------------|-----------|------------------------------------|------|------|------|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| New Orleans CSA | 139 | 10.8 | 28.8 | 19.4 | 41 | 8.6 | 25.6 | 32.3 | 32.2 |
| Shreveport CSA | 28 | 0 | 46.4 | 28.6 | 25 | 6.3 | 28.8 | 28.8 | 34.2 |
| Alexandria MSA | 6 | 16.7 | 0 | 0 | 83.3 | 5.3 | 21.2 | 35.6 | 37.7 |
| Baton Rouge MSA | 49 | 4.1 | 32.7 | 40.8 | 20.4 | 10 | 17.4 | 36.9 | 32.4 |
| Houma MSA | 25 | 0 | 12 | 12 | 76 | 3.9 | 15.2 | 47.8 | 30.7 |
| Lafayette CSA | 17 | 0 | 52.9 | 17.6 | 29.4 | 5.2 | 19 | 34.9 | 40.4 |
| Lake Charles CSA | 18 | 0 | 38.9 | 33.3 | 27.8 | 8.5 | 14.5 | 39.2 | 36.4 |
| Monroe MSA | 9 | 22.2 | 0 | 22.2 | 55.6 | 17.9 | 18.5 | 24.3 | 39.3 |
| Louisiana non-metro | 6 | 0 | 66.7 | 0 | 0 | 3.6 | 29.5 | 39.7 | 23.6 |

NOTE: The number of ATMs in the Baton Rouge MSA includes one ATM in a geography with no income-designation.

NOTE: The number of ATMs in the Louisiana non-metro AA includes two ATMs in geographies with no income-designation.

Based on the table above, the distribution of the bank's ATMs in moderate-income geographies exceeded the percentages of the population in those geographies.

CONA had deposit-taking ATMs in six low-income geographies. However, the 2020 U.S. Census changed the income designation of these six low-income geographies to middle-income geographies. This change had a significant impact on the distribution of ATMs in low-income geographies relative to the percentages of the population in those geographies. As a result, the OCC provided more consideration to the bank's performance in moderate-income geographies.

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 38.1% | 15.2% |
| Mobile Banking | 56.6% | 36.4% |
| ATM Usage | -42.4% | -61.1% |
| Net Change Across All Channels (Averaged) | 17.4% | -3.2% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Generally, branches are open 9:00 a.m. to 4:00 p.m. Monday through Thursday, 9:00 a.m. to 5:00 p.m. Friday, and 9:00 a.m. to 12:00 p.m. Saturday. There is one branch with limited services, located in a middle-income geography, and five full-service branches. Four branches are open on Saturdays which offer drive-up services with similar hours as the branches, including three of four branches that were in moderate-income geographies.

Community Development Services

New Orleans CSA

The institution was a leader in providing CD services.

CD services were responsive to the community needs the institution identified through community contacts. One hundred and twenty-two bank associates provided 1,321 hours of qualified service activities to 46 organizations. Strong leadership was evident through board or committee participation with nine employees providing more than 362 service hours to 12 organizations. *Pro Bono* volunteer services accounted for 205 service hours or 15 percent of CD services. Services consisted of providing financial literacy education, technical assistance to small businesses and nonprofit organizations through CONA's *Pro Bono* volunteer program, social support services, and workforce development.

Examples of CD services in the AA include:

- A CONA executive provided 32 hours of board services to a religious nonprofit organization that provides community services, housing support, workforce development, educational services, legal advocacy, and other support services to the local community. In addition, three CONA associates provided five hours of financial literacy education to clients of the nonprofit organization. These services addressed the bank-identified community need for comprehensive support for low- and moderate-income populations, including those with special needs.
- CONA associates provided 77 hours of financial literacy education to residents of a child residential facility. The facility houses and supports at-risk youth. In addition, CONA associates provided eight hours of workforce development services through interviewing and resume building

workshops. These services addressed the bank-identified community need to support special needs teens.

- CONA associates provided 45 hours of workforce development services to clients of a local nonprofit organization that is in a low-income geography and provides educational services to low-income individuals. CONA associates provided virtual career development training in banking for the organization's clients. These services addressed the bank-identified community need for secondary education and workforce development for low- and moderate-income youth.

Shreveport CSA

The institution was a leader in providing CD services.

CD services were responsive to the community needs the OCC identified through community contacts. Twenty-four bank associates provided 106 hours of qualified service activities to nine organizations that meet the definition of CD. Strong leadership was evident through 21 hours of board or committee participation to four organizations. Financial literacy education accounted for 78 service hours or 74 percent of CD services, which was identified as a community need in the AA.

An example of CD services in the AA includes:

- CONA associates provided 20 hours of financial literacy education to students participating in a community development corporation's workforce development program. The organization supports business start-ups and existing small businesses and was in a low-income geography. Further, a CONA associate provided eight hours of board service to the same organization. These services addressed the community identified need for financial literacy education for low- and moderate-income individuals.
- CONA associates provided 15 hours of financial education to clients of the local chapter of a national nonprofit organization that provides career and professional development, networking, and job training services. The local chapter is in a moderate-income geography and serves the local community. Financial literacy education focused on savings, budgeting, and credit card use. This service addressed the community identified need for financial literacy education for low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope reviews, the bank's performance in the Baton Rouge MSA, Lafayette CSA, and Monroe MSA AAs was consistent with the bank's overall performance under the Service Test in the full-scope areas. Based on limited-scope reviews, the bank's performance in the Alexandria MSA, Houma MSA, Lake Charles CSA, and Louisiana non-metro AAs was weaker than the bank's overall performance under the Service Test in the full-scope areas, due to a lower branch distribution in low- and moderate-income geographies. The weaker performance in the Alexandria MSA, Houma MSA, Lake Charles CSA, and Louisiana non-metro AAs had a minimal impact on the bank's overall Service Test rating for the state of Louisiana.

Commonwealth of Massachusetts

CRA rating for the Commonwealth 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:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were accessible to geographies and individuals of different income levels.
- CONA was a leader in providing CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Massachusetts

CONA delineated six AAs in the commonwealth of Massachusetts. They included the entirety of the Boston, MA MD, Cambridge-Newton-Framingham, MA MD, and Pittsfield, MA MSA (Pittsfield MSA) as AAs. CONA also delineated as AAs the portions of the Providence-Warwick, RI-MA MSA, Springfield, MA MSA (Springfield MSA), and the Worcester, MA-CT MSA where CONA had deposit-taking ATMs. Refer to appendix A for a complete description of the AAs.

CONA had no branches, five cafés, 60 deposit-taking ATMs, and \$8.1 billion of allocated internet deposits, which represented 2.5 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems within these AAs. Because CONA does not operate a licensed branch in Massachusetts, there are no deposits reported on the June 30, 2022 FDIC Deposit Market Share report. The bank originated or purchased 5.7 percent of its evaluation period lending by count and 5.3 percent by dollar volume in the portions of Massachusetts where CONA has AAs.

Based on June 30, 2022 FDIC summary of deposit information, there were 129 depository institutions with licensed branches in the portions of Massachusetts where the bank has AAs. The top three depository institutions by deposit market share were State Street Bank and Trust Company (29.6 percent), Bank of America, N.A. (19.6 percent), and Citizens Bank, N.A. (9.4 percent).

Boston CSA

The following table provides a summary of the demographics that include housing and business information for the Boston CSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|------------------------------|----------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Boston CSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 1,214 | 12.5 | 20.1 | 36.2 | 29.4 | 1.8 |
| Population by Geography | 5,633,984 | 10.2 | 19.4 | 37.9 | 32.2 | 0.3 |
| Housing Units by Geography | 2,280,309 | 10.1 | 20.2 | 38.8 | 30.7 | 0.3 |
| Owner-Occupied Units by Geography | 1,295,464 | 3.5 | 14.3 | 43.0 | 39.1 | 0.1 |
| Occupied Rental Units by Geography | 828,937 | 19.7 | 28.5 | 32.7 | 18.6 | 0.5 |
| Vacant Units by Geography | 155,908 | 13.1 | 25.0 | 36.6 | 24.9 | 0.4 |
| Businesses by Geography | 550,511 | 7.8 | 15.3 | 35.9 | 40.4 | 0.6 |
| Farms by Geography | 11,195 | 4.0 | 11.1 | 41.2 | 43.5 | 0.1 |
| Family Distribution by Income Level | 1,355,689 | 23.5 | 16.3 | 19.4 | 40.9 | 0.0 |
| Household Distribution by Income Level | 2,124,401 | 26.6 | 14.4 | 16.3 | 42.7 | 0.0 |
| Median Family Income MSA – 14454 Boston, MA | \$100,380 | Median Housing Value | | | | \$373,074 |
| Median Family Income MSA – 15764 Cambridge-Newton-Framingham, MA | \$73,950 | Median Gross Rent | | | | \$1,194 |
| Median Family Income MSA – 39300 Providence-Warwick, RI-MA MSA | \$81,137 | Families Below Poverty Level | | | | 7.9% |
| Median Family Income MSA – 49340 Worcester, MA-CT MSA | \$96,860 | | | | | |
| <i>Source: 2015 ACS and 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|----------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Boston CSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 1,353 | 11.2 | 18.8 | 35.2 | 31.3 | 3.5 |
| Population by Geography | 5,937,878 | 10.1 | 18.8 | 36.5 | 33.6 | 1.1 |
| Housing Units by Geography | 2,357,277 | 9.8 | 19.2 | 37.4 | 32.7 | 0.9 |
| Owner-Occupied Units by Geography | 1,359,693 | 3.5 | 14.4 | 41.3 | 40.3 | 0.4 |
| Occupied Rental Units by Geography | 855,157 | 19.3 | 26.4 | 31.4 | 21.3 | 1.6 |
| Vacant Units by Geography | 142,427 | 12.2 | 21.3 | 36.0 | 29.3 | 1.2 |
| Businesses by Geography | 610,058 | 7.6 | 15.3 | 34.6 | 41.3 | 1.3 |
| Farms by Geography | 11,923 | 3.6 | 13.2 | 39.9 | 42.8 | 0.5 |
| Family Distribution by Income Level | 1,406,967 | 22.9 | 16.3 | 19.9 | 41.0 | 0.0 |
| Household Distribution by Income Level | 2,214,850 | 26.4 | 14.5 | 16.7 | 42.4 | 0.0 |
| Median Family Income MSA – 14454 Boston, MA | \$112,607 | Median Housing Value | | | | \$474,475 |
| Median Family Income MSA – 15764 Cambridge-Newton-Framingham, MA | \$121,481 | Median Gross Rent | | | | \$1,479 |

| | | | |
|--|----------|------------------------------|------|
| Median Family Income MSA – 39300 Providence-Warwick, RI-MA MSA | \$89,555 | Families Below Poverty Level | 6.4% |
| Median Family Income MSA – 49340 Worcester, MA-CT MSA | \$96,860 | | |
| <i>Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | |

Economic Data

Boston, MA MD

Data from Moody’s Analytics over the evaluation period indicated the Boston, MA area is the business capital of New England. The area is home to several top colleges and universities and as such has a highly skilled and well-educated labor force with dynamic high-tech and biomedical research industries. Housing costs and business costs in the area are high.

The BLS did not maintain unemployment rate data for the Boston, MA MD. Major employers in the AA included Massachusetts General Hospital, University of Massachusetts, Amazon, Beth Israel Lahey Health, Boston University, and State Street Bank.

Cambridge-Newton-Framingham, MA MD

Data from Moody’s Analytics over the evaluation period indicated the Cambridge-Newton-Framingham, MA area has a large presence of biotech and high-tech firms that bolster high-wage employment. Like Boston, the area has a well-educated and highly skilled workforce given that it is home to both Harvard University and the Massachusetts Institute of Technology. Job growth in the area was strong. Housing costs and the cost of doing business in the area were also high.

The BLS did not maintain unemployment rate data for the Cambridge-Newton-Framingham, MA MD. Major employers in the area include Beth Israel Lahey Health, Harvard University, the Massachusetts Institute of Technology, and Raytheon Technologies Corp.

Providence-Warwick, RI-MA MSA

Data from Moody’s Analytics over the evaluation period indicated the Providence-Warwick, RI-MA area’s economy has trended lower as the metro area lost jobs in the last few months of 2022. Job growth in Providence’s healthcare industry stalled due to persistent challenge in sourcing skilled labor. Population growth has fallen by more than 50 percent since 2011, impacting demand for consumer services and housing.

Based on data from the BLS, the unemployment rate for the Providence-Warwick, RI-MA area was 4.2 percent in January 2020, as high as 18.3 percent in April 2020, and 2.6 percent in December 2022. Major employers in the AA included Lifespan, Care New England, CVS Health Corp., Citizens Financial Group Inc., and General Dynamics Electric Boat.

Worcester, MA-CT MSA

Data from Moody’s Analytics over the evaluation period indicated the Worcester, MA-CT area’s strengths include a significant presence of college and universities, low living costs for New England, and low employment volatility. As of September 2022, employment in the area was 0.5 percent below its pre-pandemic peak. In 2022, the area added jobs at nearly the same pace as the Northeast and the

U.S. with the education, healthcare, and manufacturing industries performing well. The area's low living costs made it a magnet for commuters working in nearby Boston and Cambridge. Many commuters stayed in the area full time during the COVID-19 pandemic and their spending enabled consumer industries including leisure and hospitality and retail to outperform their state and regional peers.

Based on data from the BLS, the unemployment rate for the Worcester, MA-CT area was 3.7 percent in January 2020, as high as 15.2 percent in April 2020, and 3.3 percent in December 2022. Major employers in the AA included UMass Memorial Healthcare, UMass Medical School, Reliant Medical Group, Saint Vincent Hospital, and MAPFRE USA Corp.

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 affordable housing, small business and economic development, community services, and financial capability. 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 or preventing many low- and moderate-income households from potential homeownership opportunities. Many locations in the AA have significant numbers of unskilled workers in minimum wage jobs whose earnings are insufficient to cover the cost of housing. 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. Contacts also noted that the COVID-19 pandemic exacerbated food and housing insecurity issues among many low- and moderate-income households. Credit and community development needs identified include:

- Affordable housing (both owner-occupied and rental)
- Affordable childcare
- Access to transportation services
- Gap financing for community development 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
- Home rehab funding to help elders age in place

The area is served by numerous nonprofit organizations, community-based organizations, CDFIs, loan funds, economic development organizations, and community development organizations that provide opportunities to help meet community needs.

Scope of Evaluation in Massachusetts

In evaluating the bank's performance in the commonwealth of Massachusetts, the Boston CSA AA received a full-scope review and the Pittsfield MSA AA and Springfield MSA AA received limited-scope reviews. The Boston CSA AA had 87.8 percent of the lending and 96.6 percent of the deposits

(allocated internet deposits only) in the commonwealth of Massachusetts. We based our ratings primarily on the results of the area that received a full-scope review.

CONA's strategic focus is consumer lending. Consumer loans received a greater weight than small loans to businesses and small loans to farms in the Boston CSA AA. In the Springfield MSA AA and Pittsfield MSA AA, consumer loans received a greater weight than small loans to businesses. In the Boston CSA AA and Springfield MSA AA, the bank did not originate or purchase a sufficient number of home mortgage loans for a meaningful analysis. In the Pittsfield MSA AA, the bank did not originate or purchase any home mortgage loans during the evaluation period. In the Pittsfield MSA AA and Springfield MSA AA, the bank did not originate or purchase a sufficient number of small loans to farms for a meaningful analysis.

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 Area Receiving a Full-Scope Review

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.

| Number of Loans* | | | | | | | | |
|-------------------|---------------|----------------|------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Boston CSA | 14 | 26,671 | 132 | 1,540,877 | 26 | 1,567,720 | 87.8 | 96.6 |
| Pittsfield MSA | 0 | 695 | 3 | 30,781 | 2 | 31,481 | 1.8 | 0.7 |
| Springfield MSA | 5 | 2,556 | 28 | 183,486 | 7 | 186,082 | 10.4 | 2.7 |
| Statewide | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 9 | 9 | 0 | 0 |
| Total | 19 | 29,922 | 163 | 1,755,144 | 44 | 1,785,292 | 100 | 100 |

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

| Dollar Volume of Loans (\$000)* | | | | | | | | |
|--|----------------|----------------|--------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Boston CSA | 274,462 | 319,199 | 1,086 | 3,616,849 | 389,859 | 4,601,455 | 85.0 | 96.6 |
| Pittsfield MSA | 0 | 6,639 | 14 | 62,065 | 16,671 | 85,389 | 1.6 | 0.7 |
| Springfield MSA | 87,689 | 25,254 | 332 | 319,215 | 123,713 | 556,203 | 10.3 | 2.7 |
| Statewide | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 172,618 | 172,618 | 3.2 | 0 |
| Total | 362,151 | 351,092 | 1,432 | 3,998,129 | 702,861 | 5,415,665 | 100 | 100 |

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

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$7.8 billion in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of 1.4 percent and would have ranked ninth out of 114 depository institutions, placing it in the top 8 percent of depository institutions in this AA.

According to peer small business data for 2021, CONA had a market share of 5.2 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fifth out of 264 small business lenders, which placed it in the top two percent of lenders. The top lenders in this AA based on market share were American Express National Bank (20.6 percent), Bank of America, N.A. (13.1 percent), and JP Morgan Chase Bank, N.A. (6.8 percent).

According to peer small farm data for 2021, CONA had a market share of 12.5 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked fourth out of 25 small farm lenders, which placed it in the top 16 percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (22.3 percent), U.S. Bank, N.A. (21 percent), and Bank of America, N.A. (13.4 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 46.3 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the commonwealth 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 20 PPP loans totaling \$998,000 that provided support to small businesses in low- and moderate-income geographies during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table S in the commonwealth 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 farms.

Based on the data in the tables and performance context factors discussed below, the overall geographic distribution of small loans to farms was adequate.

For 2020 through 2021, the percentages of small loans to farms in both low- and moderate-income geographies was well below the percentages of farms located in those geographies and was below the aggregate percentages of all reporting lenders.

- There were a limited number of farms in low-income geographies in the AA. There were 448 farms located in low-income geographies at the end of the evaluation period, representing 3.6 percent of all farms in the AA. As a result, the OCC provided more consideration to the bank's lending performance to farms located in moderate-income geographies.
- Small loans to farms were not a primary lending product of the bank.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of small loans to farms in moderate-income geographies was below the percentages of farms located in those geographies.

Consumer Loans

Refer to Table U in the commonwealth of Massachusetts section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed small business, small farm, and consumer 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 any of the full-scope areas 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 and farms of different sizes.

Small Loans to Businesses

Refer to Table R in the commonwealth 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 56 PPP loans totaling \$797,000 that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less located in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the commonwealth of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was poor.

For 2020 through 2021, the percentages of small loans to farms with revenues of \$1 million or less was well below the percentages of farms with revenues of \$1 million or less located in the AA and was below the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographic in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the commonwealth of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made 26 CD loans totaling \$389.9 million, which represented 54.4 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 93.7 percent funded affordable housing, 6.1 percent funded economic development activities, and 0.2 percent funded revitalization and stabilization efforts.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- An \$11 million loan for the adaptive reuse of a former elementary school and the construction of a new addition that collectively provided 40 affordable housing units for low-income individuals. All 40 units were subsidized with development-based rental assistance, with 20 units each reserved for households making up to 30 percent of the AMI and up to 50 percent of the AMI. In addition to the \$11 million loan, this development involved public financing at the federal, state, and local levels, including zero-interest and low-interest loans from three different funds from the Commonwealth, federal, and state LIHTCs, federal and state Historic tax credits, and a zero-interest loan from a local municipality. The loan addressed the community identified need for affordable housing.
- A \$12.2 million construction loan to finance the construction of a new 40-unit affordable housing development. The sponsor of the development was a local CDC that specialized in affordable housing. Twenty-one units were rented to low-income households, with the remainder to low- and moderate-income households with incomes up to 60 percent of the AMI. Sixteen households benefited from federal or state rental subsidies. This transaction had several other sources of financing, including from state and local agencies. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$10 million LIHTC equity investment.
- CONA provided \$13.6 million in NMTC financing to a CDC for the construction of a mixed-use development. The CDC, a bank partner since 2016, provides and preserves affordable housing, offers education and training for youth and adults, and builds community engagement. The bank's financing enabled the borrower to create a new integrated training facility. The training facility will replace the current inadequate space and allow the CDC to more than double the number of low- and moderate-income adults and youth served. CONA demonstrated multi-faceted support by also providing a \$135,000 grant to the CDC to support its programs. This loan addressed the bank-

identified need in the community to develop employment skills for low- and moderate-income youth and adults.

Broader Statewide and Regional Area

In addition, CONA made nine qualified loans totaling \$172.6 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving its AA. Eight loans provided financing for affordable housing and one loan was for revitalization and stabilization efforts.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 66,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices during the evaluation period further supported the Lending Test rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Pittsfield MSA AA and Springfield MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through V in the commonwealth of Massachusetts section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

| 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 | 24 | 65,110 | 128 | 47,450 | 152 | 86.9 | 112,560 | 71.8 | 0 | 0 |
| Pittsfield MSA | 2 | 2,581 | 4 | 9,734 | 6 | 3.4 | 12,315 | 7.9 | 0 | 0 |
| Springfield MSA | 5 | 11,446 | 9 | 17,262 | 14 | 8.0 | 28,708 | 18.3 | 0 | 0 |
| Statewide | 2 | 1,499 | 1 | 1,659 | 3 | 1.7 | 3,158 | 2.0 | 0 | 0 |
| Total | 33 | 80,636 | 142 | 76,105 | 175 | 100.0 | 156,741 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 15.7 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services or affordable housing to primarily low- and moderate-income individuals. By dollar volume, 97.1 percent of total investments and grants supported affordable housing, 2.4 percent funded community services to low- and moderate-income individuals, and less than 1 percent supported economic development.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included four LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$10.4 million in LIHTC equity for the new construction of a 44-unit affordable housing development. All units are restricted to low- and moderate-income households earning up to 60 percent of the AMI. This complex investment included nine other funding sources and responded to the identified need for affordable housing for low-income and special needs populations, revitalization and stabilization of a blighted area in a targeted redevelopment zone, and transit-oriented housing. CONA demonstrated multi-faceted support by also providing a \$10.5 million construction loan for this project.
- An investment of \$9.5 million in LIHTC equity to help finance the construction of a new 40-unit affordable housing development. All units are set aside for low- and moderate-income households with incomes up to 60 percent of the AMI. The investment includes \$130,548 in social purpose funding, which provided computer access and high-speed internet for each unit, along with a resident technology coordinator to assist residents during the first year. This complex investment involved both debt and equity and is part of a fund that includes 13 other properties and six other investors. The investment was responsive to the identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$9.2 million loan for this project.
- Grants totaling \$92,225 to the local chapter of a national nonprofit organization that supported a series of programs and coordinated efforts targeted to small businesses, with an emphasis on technical assistance. A portion of the grants supported entrepreneurs affected by the COVID-19 pandemic, which demonstrated responsiveness.

Broader Statewide and Regional Area

In addition, CONA made three current- and prior-period investments totaling \$3.2 million in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. All three investments supported affordable housing. Investments in the broader statewide and regional area further supported the Outstanding rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Pittsfield MSA AA and Springfield MSA AA 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 Massachusetts is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online, and mobile banking.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.

CONA had five cafés with 12 deposit-taking ATMs. CONA had 45 additional deposit-taking ATMs at various locations throughout the AA. Three of five cafés were in upper-income geographies, one café was in a low-income geography, and one café was in a middle-income geography. During the evaluation period, CONA closed four cafés that were in upper-income geographies.

| ATM Distribution | | | | | | | | | |
|-------------------|-----------|---|------|-------|------|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | Location of ATMs by Income of Geographies (%) | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Boston CSA | 57 | 5.3 | 15.8 | 42.1 | 35.1 | 10.1 | 18.8 | 36.5 | 33.6 |
| Pittsfield MSA | 1 | 0.0 | 0.0 | 100.0 | 0.0 | 2.6 | 19.5 | 52.8 | 25.0 |
| Springfield MSA | 2 | 0.0 | 0.0 | 50.0 | 50.0 | 9.1 | 21.9 | 31.2 | 34.8 |

NOTE: The number of ATMs for the Boston CSA includes one ATM in a geography with no income designation.

Based on the table above, the distribution of the bank's ATMs in low-income geographies was below, and in moderate-income geographies was near to, the percentages of the population in those geographies. During the evaluation period, CONA installed one ATM each in a low-income geography and an upper-income geography. CONA removed 11 ATMs from upper-income geographies as part of the café closures and removed one ATM from a middle-income geography.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of one low-income, six moderate-income, eight middle-income, and five upper-income geographies where CONA had deposit-taking ATMs. The

U.S. Census changed the income-designation of the low-income geography to a moderate-income geography. The U.S. Census also changed the income-level designation of six moderate-income geographies to middle-income geographies and four middle-income geographies to moderate-income geographies. The U.S. Census changes to the income-level designation of low- and moderate-income geographies resulted in a decrease in the total number of deposit-taking ATMs in each of those geographies. These changes did not have a significant impact on the distribution of deposit-taking ATMs in low-income geographies relative to the percentages of the population in those geographies but did have a significant impact on the distribution of deposit-taking ATMs in moderate-income geographies relative to the percentages of the population in those geographies. As a result, the OCC provided more consideration to the distribution of deposit-taking ATMs in low-income geographies and the change in ADS use over the evaluation period in determining the accessibility of the bank's service delivery systems.

| | Low-income Geographies | | Moderate-income Geographies | |
|---------------------------|------------------------|-------------|-----------------------------|-------------|
| | ATMs (#) | % of Total | ATMs (#) | % of Total |
| Boston CSA | | | | |
| Prior to 2020 U.S. Census | 4 | 7 | 10 | 17.5 |
| After 2020 U.S. Census | 3 | 5.3 | 9 | 15.8 |
| Net Change | -1 | -1.7 | -1 | -1.7 |

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 29.9% | 9.9% |
| Mobile Banking | 71% | 46.8% |
| ATM Usage | -25.3% | -47.1% |
| Net Change Across All Channels (Averaged) | 25.2% | 3.2% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. There are no standard hours of operation for the five cafés in the Boston CSA AA. Each café has individual hours of operation. However, there were no significant differences in café hours and available services at café locations.

Community Development Services

The institution was a leader in providing CD services.

CD services were responsive to the community needs the OCC identified through community contacts. One hundred and seven bank associates provided 2,034 hours of qualified service activities to 14 organizations. Leadership was evident through board or committee participation with 27 hours of those activities to one organization. *Pro Bono* volunteer services accounted for 1,746 service hours or 86 percent of CD services. Services consisted of providing workforce development through CONA's *Pro Bono* volunteer program and financial literacy education.

Examples of CD services in the AA include:

- Fifty-six CONA associates provided 1,721 hours of workforce development services to clients of a local nonprofit organization that provides career development and academic support to low-income students through mentorship and on-hands trainings. CONA associates provided instruction to students in computer coding through Capital One's *Pro Bono* volunteer program. In addition, a CONA executive provided 27 hours of board services to the organization. These services addressed the bank-identified need for high-quality education for low-income adolescents.
- Seven CONA associates provided 50 hours of financial literacy education to students at a school located in a moderate-income geography. These services addressed the community identified need for financial literacy education.
- Twelve CONA associates provided 43 hours of financial literacy education to clients of a local chapter of a national nonprofit organization that provides career development, networking, and professional skills to women. These services addressed the community identified need for financial literacy education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Pittsfield MSA and Springfield MSA AAs was weaker than the bank's overall performance under the Service Test in the full-scope areas, due to a lower ATM distribution in low- and moderate-income geographies. The weaker performance in the Pittsfield MSA and Springfield MSA AAs had a minimal impact on the Service Test rating for the commonwealth of Massachusetts.

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: Low Satisfactory

The major factors that support this rating include:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels.
- CONA provided an adequate level of CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Michigan

CONA delineated one AA in the state of Michigan, which included the portion of the Detroit-Warren-Dearborn, MI MSA (Detroit MSA) where CONA had deposit-taking ATMs. Refer to appendix A for a complete description of the AA. CONA entered the Detroit MSA AA on May 12, 2021 through the opening of a café with three deposit-taking ATMs.

CONA had no branches, one café, three deposit-taking ATMs, and \$263.7 million of allocated internet deposits, which represented 0.1 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems within this AA. Because CONA does not have a licensed branch in Michigan, there are no deposits reported on the June 30, 2022 FDIC Deposit Market Share report. The bank originated or purchased 1.2 percent of its evaluation period lending by count and 0.6 percent by dollar volume in the portions of Michigan where CONA has its AAs.

Based on June 30, 2022 FDIC summary of deposit information, there were 17 depository institutions with branch operations in the portions of Michigan where the bank has its AA. The top three depository institutions by deposit market share were JP Morgan Chase Bank, N.A. (51.7 percent), Comerica Bank (25.6 percent), and Huntington National Bank (5.7 percent).

Detroit MSA

The following table provides a summary of the demographic information that includes housing and business information for the Detroit MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Detroit MSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 611 | 20.6 | 28.5 | 19.8 | 28.3 | 2.8 |
| Population by Geography | 1,778,969 | 16.0 | 26.5 | 22.6 | 34.4 | 0.5 |
| Housing Units by Geography | 817,593 | 18.6 | 28.0 | 21.5 | 31.1 | 0.8 |
| Owner-Occupied Units by Geography | 420,277 | 10.0 | 21.5 | 24.6 | 43.6 | 0.3 |
| Occupied Rental Units by Geography | 246,998 | 24.3 | 32.0 | 21.0 | 21.7 | 1.0 |
| Vacant Units by Geography | 150,318 | 33.0 | 39.9 | 13.6 | 11.9 | 1.6 |
| Businesses by Geography | 125,740 | 12.4 | 21.1 | 21.2 | 44.5 | 0.9 |
| Farms by Geography | 2,022 | 8.4 | 18.3 | 23.9 | 49.0 | 0.4 |
| Family Distribution by Income Level | 416,796 | 25.9 | 15.2 | 16.4 | 42.5 | 0.0 |
| Household Distribution by Income Level | 667,275 | 27.4 | 14.3 | 15.3 | 43.0 | 0.0 |
| Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI | | \$52,733 | Median Housing Value | | | \$88,250 |
| | | | Families Below Poverty Level | | | 19.9% |
| | | | Median Gross Rent | | | \$803 |
| <i>Source: 2015 ACS and 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Detroit MSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 627 | 14.2 | 27.1 | 19.9 | 28.2 | 10.5 |
| Population by Geography | 1,793,561 | 12.5 | 27.0 | 23.0 | 35.7 | 1.8 |
| Housing Units by Geography | 814,954 | 14.7 | 28.3 | 21.7 | 32.9 | 2.5 |
| Owner-Occupied Units by Geography | 434,235 | 8.1 | 21.9 | 23.8 | 45.1 | 1.2 |
| Occupied Rental Units by Geography | 260,623 | 20.6 | 32.3 | 21.7 | 21.8 | 3.6 |
| Vacant Units by Geography | 120,096 | 25.5 | 42.6 | 14.1 | 12.6 | 5.2 |
| Businesses by Geography | 131,712 | 10.1 | 21.5 | 20.4 | 43.7 | 4.3 |
| Farms by Geography | 2,130 | 6.9 | 20.5 | 23.6 | 46.9 | 2.0 |
| Family Distribution by Income Level | 416,034 | 24.3 | 15.8 | 17.6 | 42.2 | 0.0 |
| Household Distribution by Income Level | 694,858 | 26.4 | 15.0 | 16.1 | 42.5 | 0.0 |
| Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI | | \$63,896 | Median Housing Value | | | \$126,431 |
| | | | Families Below Poverty Level | | | 16.0% |
| | | | Median Gross Rent | | | \$899 |

*Source: 2020 U.S. Census and 2022 D&B Data
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.*

Economic Data

Data from Moody's Analytics over the evaluation period indicated the Detroit-Warren-Dearborn, MI area's economic recovery was inconsistent. The share of industries adding jobs fell since the start of 2022 and most industries, apart from finance and logistics, struggled to maintain momentum. Manufacturing accounted for an above-average share of jobs and nearly two-thirds of durable manufacturing payrolls were in transportation equipment production. The area was particularly vulnerable to global supply chain issues brought on by the COVID-19 pandemic, including the persistent chip shortage which impacted vehicle production. The healthcare industry was struggling largely due to labor shortages. However, the demand for healthcare services continued to increase with the area having a larger than average population of residents aged 65 and above. The area continued to lose population. The area's strengths include a concentration of auto industry headquarters, production and research and development, high housing affordability, and being well-positioned for growth in green and advanced manufacturing. Weaknesses include below average quality of life, including a high crime rate and eroding infrastructure, a challenging fiscal situation in the city of Detroit, and persistent population losses due to migration.

Based on data from the BLS, the unemployment rate was 4.2 percent in January 2020, as high as 23.8 percent in May 2020, and 3.2 percent in December 2022. Major employers in the AA included General Motors Corp, Ford Motor Co., University of Michigan, Chrysler Group LLC, and Beaumont Health System.

Community Contacts

A review was conducted of two community contacts completed during the evaluation period with organizations located throughout the area. The organizations contacted focus on affordable housing, economic mobility, economic development, and small businesses. Contacts noted that many Detroit neighborhoods are underinvested. Lower home appraisals in the AA have resulted in high loan-to-value loans that increased loan costs for borrowers. Contacts also noted a big issue for many low- and moderate-income residents was transferring home titles from a deceased family member to another relative. Many residents continue to live in homes that were owned by deceased relatives but do not have title to the property. The lack of title precludes these individuals from qualifying for programs designed to assist low- and moderate-income homeowners. Credit and community developments needs in the area including:

- Access to safe affordable housing
- Housing rehab loans
- Access to capital for contractors
- Small business loans
- Down-payment assistance programs
- Credit counseling
- Funding for nonprofit legal aid offices to assist with title issues

The area is served by several nonprofit organizations, community-based organizations, community development entities, economic development organizations, and social service organizations that provide opportunities to help meet community needs.

Scope of Evaluation in Michigan

The Detroit MSA AA received a full-scope review. CONA's strategic focus is consumer lending and small loans to businesses. There was an insufficient number of home mortgage loans and small loans to farms for a meaningful analysis. Consumer lending received a greater weight than small loans to businesses.

Due to the bank entering the AA in May 2021, the OCC provided more consideration the bank's lending performance in the 2022 period in as it represented a longer period of performance.

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 Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans | | | | | | | | |
|------------------------|---------------|----------------|------------|----------------|-----------------------|----------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Detroit MSA | 0 | 4,375 | 7 | 366,749 | 3 | 371,134 | 100.0 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 35 | 35 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 4,375 | 7 | 366,749 | 38 | 371,169 | 100.0 | 100.0 |

| Dollar Volume of Loans (\$000) | | | | | | | | |
|---------------------------------------|---------------|----------------|------------|----------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Detroit MSA | 0 | 43,958 | 40 | 526,655 | 40,716 | 611,369 | 49.0 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 637,586 | 637,586 | 51.0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 0 | 43,958 | 40 | 526,655 | 678,302 | 1,248,955 | 100.0 | 100.0 |

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$263.7 million in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of 0.3 percent and would have ranked 12th out of 18 depository institutions, placing it in the top 67 percent of depository institutions in this AA.

According to peer small business data for 2021, CONA had a market share of 6.1 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fourth out of 159 small business lenders, which placed it in the top three percent of lenders. The top lenders in this AA based on market share were American Express National Bank (17.9 percent), JP Morgan Chase Bank, N.A. (15.1 percent), and Bank of America, N.A. (8.6 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 199.7 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q 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.

Based on the data in the tables the overall geographic distribution of small loans to businesses was excellent.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table U in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in both low- and moderate-income geographies approximated the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed small business and consumer 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 any of the full-scope areas 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.

Small Loans to Businesses

Refer to Table R 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was below the percentages of businesses with revenues of \$1 million or less located in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentages of those households.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of consumer loans to low-income borrowers exceeded the percentages of those households.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made three CD loans totaling \$40.7 million, which represented 168.2 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 59.3 percent funded affordable housing and 40.7 percent funded economic development activities.

The following are examples of the bank's CD loans that illustrate the complexity or responsiveness of the bank's CD lending:

- CONA provided NMTC financing in the amount of \$16.6 million to a local food bank for the acquisition and rehabilitation of a warehouse into a high-capacity hub for food distribution operations. The food bank distributes food to low- and moderate-income individuals and families via 660 partner food pantries, soup kitchens, shelters, and other organizations, as well as direct-to-client initiatives, including food drop-offs at schools. CONA's financing enabled the organization to sustain pandemic-level activity through increased space and greater efficiency. It also addressed shortfalls in the food ecosystem that limit the ability to provide low- and moderate-income families with access to healthy food.
- A \$13.7 million loan to finance the acquisition of a 193-unit LIHTC property. All units are covered by HUD rental subsidies, with 20 units reserved for households earning up to 40 percent of the AMI and 173 units reserved for households up to 60 percent of the AMI. This loan addressed the community identified need for affordable housing.
- A \$10.5 million loan for the construction of a multifamily LIHTC property. All 45 units are restricted to tenants earning less than 50 percent of the AMI. This loan addressed the community identified need for affordable housing.

Broader Statewide and Regional Area

In addition, CONA made 35 CD loans totaling \$637.6 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. Twenty-eight loans provided financing for affordable housing, five loans were for revitalization and stabilization efforts, and two loans were for community services benefiting low- and moderate-income individuals.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 16,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices during the evaluation period further supported the Lending Test rating.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|---------------|----------------|---------------|-----------|--------------|---------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Detroit MSA | 2 | 3,731 | 11 | 15,733 | 13 | 86.7 | 19,464 | 74.9 | 0 | 0 |
| Statewide | 2 | 6,521 | 0 | 0 | 2 | 13.3 | 6,521 | 25.1 | 0 | 0 |
| Total | 4 | 10,252 | 11 | 15,733 | 15 | 100.0 | 25,985 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.
 ** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 80.4 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services to low- and moderate-income individuals or supported economic development. By dollar volume, 98.7 percent of total investments and grants supported affordable housing, 0.8 percent supported economic development, and less than one percent funded community services to low- and moderate-income individuals.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included one LIHTC project, which was complex and required more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$15.2 million in LIHTC equity for the new construction of a mixed-use development that will include 45 units of affordable and permanent supportive housing for at-risk and homeless young adults and their families. All units will be restricted to low-income households earning up to 50 percent of the AMI. This complex investment responded to the identified need for permanent and affordable housing. CONA demonstrated multi-faceted support by also providing a \$10.5 million loan for this project.
- Grants totaling \$100,000 to support a local nonprofit organization whose mission is to improve the quality of life for residents in underserved neighborhoods. The grants supported the organization's programs, including a business loan fund that provides access to capital for historically underserved populations, and for populations located in low- and moderate-income areas that have not had full access to traditional or alternative capital sources. This grant addressed the identified need for support for aspiring entrepreneurs and microenterprises.

- A grant of \$50,500 to support the local chapter of a nonprofit CDFI that strives to create resilient and inclusive communities of opportunity across America. CONA demonstrated leadership by funding the local pilot of the organization's innovative small business coaching program that connects small and micro-business owners with personal financial coaching and business development services. The grant was focused on helping businesses recover from the pandemic, an identified community need.

Broader Statewide and Regional Area

In addition, CONA made two prior-period investments totaling \$6.5 million in the broader statewide area whose purpose, mandate, or function included serving CONA's AA. These investments supported affordable housing. Investments in the broader statewide area further supported the Outstanding rating.

SERVICE TEST

The bank's performance under the Service Test in Michigan is rated Low satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Detroit MSA AA was adequate.

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online, and mobile banking.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.

CONA had one café with three deposit-taking ATMs. CONA's café was in an upper-income geography. CONA opened one café during the evaluation period.

| ATM Distribution | | | | | | | | | |
|--------------------|-----------|------------------------------------|-----|-----|-----|---------------------------------------|-----|-----|------|
| Assessment Area | # of ATMs | ATMs | | | | Population | | | |
| | | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Detroit MSA | 3 | 0 | 0 | 0 | 100 | 12.5 | 27 | 23 | 35.7 |

As there were no ATMs installed in low- and moderate-income geographies during the evaluation period, the OCC provided more consideration to the growth in ADS use (including online and mobile banking) by bank customers residing in low- and moderate-income geographies over the evaluation period to assess the effectiveness of the bank's ADS to deliver retail banking services to low- and moderate-income geographies and individuals. CONA did not install any additional ATMs or remove any ATMs in the AA during the evaluation period.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census did not change the income-level designations of the upper-income geographies where CONA had deposit-taking ATMs.

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 151.6% | 63.1% |
| Mobile Banking | 222.5% | 127.9% |
| ATM Usage | 76.8% | 13.8% |
| Net Change Across All Channels (Averaged) | 150.3% | 68.2% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Café hours and available services did not vary as there was one café location in the AA. The café hours of operation were 7:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturdays.

Community Development Services

The institution provided an adequate level of CD services.

CD services were responsive to the community needs the institution identified through community contacts. Eleven bank associates provided 21 hours of qualified service activities to two organizations. Financial literacy education accounted for 17 service hours or 81 percent of CD services. Examiners considered the limited number of employees in the AA available to provide volunteer services and the amount of time CONA operated in the AA when evaluating CD services for this AA.

Examples of CD services in the AA include:

- Five CONA associates provided 17 hours of financial literacy education for clients of an organization that provides essential needs such as food, clothing, case management, and emergency relief to women and children. These services addressed a bank-identified community need for providing financial literacy education.
- Six CONA associates provided four hours of workforce development and career preparation services to clients of a nonprofit organization that provides job coaching, resume building, assistance accessing income support, job training, and access to community support services. Services consisted of providing mock interviews through Capital One's *Pro Bono* volunteer program. These services addressed the bank-identified community need for workforce development for low- and moderate-income populations, including those with special needs.

State of Minnesota

CRA rating for the State of Minnesota: 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:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were accessible to geographies and individuals of different income levels.
- CONA was a leader in providing CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Minnesota

CONA delineated two AAs in the state of Minnesota. They included the portions of the Minneapolis-St. Paul-Bloomington, MN-WI MSA and St. Cloud, MN MSA where CONA had deposit-taking ATMs. Refer to appendix A for a complete description of the AA. During the evaluation period, CONA expanded their presence in the Minneapolis MSA to include Hennepin County with the addition of a café with two deposit-taking ATMs on August 25, 2021.

CONA has no branches, two cafés, four deposit-taking ATMs, and \$1.5 billion of allocated internet deposits, which represented 0.4 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems within these AAs. Because CONA does not have a licensed branch in Minnesota, there are no deposits reported on the June 30, 2022 FDIC Deposit Market Share report. The bank originated or purchased 0.7 percent of its evaluation period lending by count and 0.8 percent by dollar volume in the portions of Minnesota where CONA has AAs.

Based on June 30, 2022 FDIC summary of deposit information, there were 98 depository institutions with branch operations in the portions of Minnesota where the bank has AAs. The top three depository institutions by deposit market share were Wells Fargo Bank, N.A. (31 percent), U.S. Bank, N.A. (27.4 percent), and Ameriprise Bank, FSB (10.9 percent).

Minneapolis CSA

The following table provides a summary of the demographic information that includes housing and business information for the Minneapolis CSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Minneapolis CSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 348 | 8.9 | 19.8 | 44.3 | 26.1 | 0.9 |
| Population by Geography | 1,479,993 | 7.9 | 17.6 | 44.8 | 29.3 | 0.4 |
| Housing Units by Geography | 630,082 | 7.3 | 17.9 | 45.9 | 28.2 | 0.7 |
| Owner-Occupied Units by Geography | 383,162 | 2.7 | 13.1 | 48.7 | 35.4 | 0.1 |
| Occupied Rental Units by Geography | 210,505 | 15.2 | 26.3 | 40.6 | 16.2 | 1.6 |
| Vacant Units by Geography | 36,415 | 10.0 | 20.2 | 46.2 | 22.2 | 1.3 |
| Businesses by Geography | 179,657 | 6.3 | 14.8 | 44.0 | 34.4 | 0.5 |
| Farms by Geography | 4,150 | 2.2 | 9.4 | 60.4 | 27.9 | 0.1 |
| Family Distribution by Income Level | 354,717 | 21.4 | 16.7 | 20.8 | 41.1 | 0.0 |
| Household Distribution by Income Level | 593,667 | 25.4 | 16.2 | 17.7 | 40.7 | 0.0 |
| Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA | | \$84,589 | Median Housing Value | | | \$235,892 |
| Median Family Income MSA - 41060 St. Cloud, MN MSA | | \$69,359 | Median Gross Rent | | | \$953 |
| | | | Families Below Poverty Level | | | 7.9% |
| <i>Source: 2015 ACS and 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|----------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Minneapolis CSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 395 | 6.8 | 20.0 | 39.2 | 31.6 | 2.3 |
| Population by Geography | 1,578,419 | 6.1 | 18.7 | 39.9 | 33.5 | 1.8 |
| Housing Units by Geography | 655,960 | 5.6 | 19.0 | 40.9 | 33.2 | 1.4 |
| Owner-Occupied Units by Geography | 400,498 | 2.4 | 13.9 | 44.2 | 39.3 | 0.2 |
| Occupied Rental Units by Geography | 222,243 | 11.0 | 28.1 | 34.8 | 22.6 | 3.4 |
| Vacant Units by Geography | 33,219 | 7.5 | 18.7 | 41.9 | 29.9 | 2.0 |
| Businesses by Geography | 212,218 | 4.2 | 15.8 | 36.5 | 41.8 | 1.8 |
| Farms by Geography | 4,570 | 1.7 | 11.1 | 49.6 | 37.2 | 0.4 |
| Family Distribution by Income Level | 366,556 | 19.7 | 17.5 | 21.1 | 41.8 | 0.0 |
| Household Distribution by Income Level | 622,741 | 24.2 | 16.5 | 18.1 | 41.1 | 0.0 |
| Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA | | \$103,977 | Median Housing Value | | | \$293,349 |

| | | | |
|--|----------|------------------------------|---------|
| Median Family Income MSA - 41060 St. Cloud, MN MSA | \$80,403 | Median Gross Rent | \$1,146 |
| | | Families Below Poverty Level | 5.7% |
| <i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | |

Economic Data

Minneapolis-St. Paul-Bloomington, MN-WI MSA

Data from Moody's Analytics over the evaluation period indicated the strengths of the Minneapolis-St. Paul-Bloomington, MN-WI area's labor demand was elevated with job postings well above their pre-pandemic level, which was on par with other large midwestern metro areas. House prices were falling, although not as sharply as nationally. According to the Minneapolis Downtown Council, nearly two-thirds of employees at firms based in downtown Minneapolis came to the office at least once per week in 2022, up from just over 40 percent the prior year. While consumer services, particularly retail, were stuck in neutral, healthcare and manufacturing grew at an above-average clip. The area's factory base was relatively diverse, but chemicals and electronics stand out, representing more than a third of factory payrolls compared to one-quarter nationally.

Two of the largest medical technology firms, Medtronic, and Boston Scientific, were headquartered in the area and were rapidly expanding. As physician shortages persist, hospitals increasingly turned to medical devices to improve efficiency and fill the labor gap, solidifying the industry's leading role in local manufacturing. The area's strengths include major research institutions and corporate headquarters that foster innovation, a highly educated workforce, healthy consumer balance sheets, and positive population trends. Weaknesses include a cold climate, weakening migration trends, and a relatively high tax burden for businesses.

Based on data from the BLS, the unemployment rate for the Minneapolis-St. Paul-Bloomington, MN-WI area was 3.2 percent in January 2020, as high as 11.9 percent in April 2020, and 2.6 percent in December 2022. Major employers in the AA included Fairview Health System, Allina Health System, Target Corp, University of Minnesota, and Health Partners.

St. Cloud, MN MSA

Data from Moody's Analytics over the evaluation period indicated the St. Cloud, MN area's economy grew sporadically which prevented the area from completely recovering from the pandemic. Payroll growth rose in the second half of 2022 compared to the beginning of the year, driven by retail, healthcare, and the public sector. The area's strengths included a strong housing market, even distribution of incomes and wealth, improving quality of workforce, good population growth compared to the surrounding region, and a cost advantage relative to the Twin Cities. Weaknesses included fewer jobs in high-tech and other technology-based industries and low per-capita income.

Based on data from the BLS, the unemployment rate for the St. Cloud area was 4.5 percent in January 2020, as high as 10.5 percent in May 2020, and 3.3 percent in December 2022. Major employers in the AA included St. Cloud Hospital/CentraCare Health, St. Cloud Veteran's Administration Health Care System, and Fulfillment Distribution Center.

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 economic development, affordable housing, and community development. Contacts stated that the local economy has improved and stabilized since the pandemic. Most businesses in the area have improved with some businesses expanding or starting up; however, employers struggled to hire skilled workers. Affordable rental housing has been in short supply for quite some time, and it became more challenging to find landlords willing to accept Section 8 vouchers. While the unemployment rate was generally low, in some communities in the area finding employment that is easily accessible was challenging as many low-income households do not have access to reliable transportation. Credit and Community development needs identified include:

- Small business loans
- Affordable rental housing
- Down payment assistance programs
- Agricultural loans
- Grant support for small business

The area is served by many nonprofit organizations, community-based organizations, CDFIs, economic development organizations, and community development organizations that provide opportunities to help meet community needs. Opportunities for support include creating products that utilize alternative underwriting for individuals with thin or no credit files, supporting loan funds that provide gap financing for small businesses, and increasing the use of technology to improve the speed in which credit applications for small businesses are processed.

Scope of Evaluation in Minnesota

The Minneapolis CSA AA received a full-scope review. CONA's strategic focus is consumer lending and small loans to businesses. There was an insufficient number of home mortgage loans for a meaningful analysis. For the 2020 through 2021 period there was an insufficient number of small loans to farms for a meaningful analysis and as a result the OCC evaluated the bank's small loans to farms based on 2022 lending data. Consumer lending received a greater weight than small loans to businesses and small loans to farms.

Prior to entering Hennepin County in August 2021, the bank's AA contained no low-income geographies and only five moderate-income geographies resulting in limited opportunities to lend to low- and moderate-income geographies during the 2020 through 2021 period. The addition of Hennepin County resulted in 31 low-income geographies and 64 additional moderate-income geographies. Due to the impact of these changes on the bank's ability to lend to low- and moderate-income geographies in its AA, the OCC provided more consideration to the bank's lending performance in the 2022 period when evaluating the bank's geographic distribution of lending.

After entering Hennepin County in 2021, the 2020 U.S. Census changed the income-level classification of four low-income geographies resulting in 27 low-income geographies as of the end of the evaluation period. U.S. Census changes further resulted in the addition of 10 moderate-income geographies, totaling 79 moderate-income geographies, as of the end of the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans | | | | | | | | |
|------------------------|---------------|----------------|------------|----------------|-----------------------|----------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Minneapolis CSA | 0 | 4,912 | 41 | 210,556 | 3 | 215,512 | 100.0 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 3 | 3 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 8 | 8 | 0 | 0 |
| Total | 0 | 4,912 | 41 | 210,556 | 14 | 215,523 | 100.0 | 100.0 |

| Dollar Volume of Loans (\$000) | | | | | | | | |
|---------------------------------------|---------------|----------------|------------|----------------|-----------------------|----------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Minneapolis CSA | 0 | 68,587 | 476 | 683,813 | 37,000 | 789,876 | 100.0 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 34,495 | 34,495 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 66,534 | 66,534 | 0 | 0 |
| Total | 0 | 68,587 | 476 | 683,813 | 138,029 | 890,905 | 100.0 | 100.0 |

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$1.5 billion in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of one percent and would have ranked 10th out of 99 depository institutions, placing it in the top 11 percent of depository institutions in this AA.

According to peer small business data for 2021, CONA had a market share of 5.8 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fifth out of 190 small business lenders, which placed it in the top three percent of lenders. The top lenders in this AA based on market share were U.S. Bank, N.A. (17.8 percent), American Express National Bank (17.4 percent), and Wells Fargo Bank, N.A. (15.9 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 47.1 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

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

Based on the data in the tables the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were two PPP loans totaling \$18,000 to small businesses in moderate-income geographies that provided support during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in low-income geographies was well below both the percentages of businesses located in low-income geographies and the aggregate percentages of all reporting lenders. The percentages of small loans to businesses in moderate-income geographies exceeded both the percentages of businesses located in moderate-income geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was stronger than the 2020 through 2021 period. The percentages of small loans to businesses in low-income geographies exceeded the percentages of businesses located in low-income geographies.

Small Loans to Farms

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

For 2020 through 2021, there was an insufficient number of small loans to farms for a meaningful analysis. As there was an insufficient number of small loans to farms originated or purchased in the 2020-2021 period, examiners evaluated the bank's performance based on 2022 lending data.

Based on the bank's 2022 lending data, the overall geographic distribution of small loans to farms was very poor.

The bank did not originate or purchase any small loans to farms in low- or moderate-income geographies in the 2022 period.

Consumer Loans

Refer to Table U in the state of Minnesota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in low-income geographies was well below, and in moderate-income geographies approximated, the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed small business, small farm, and consumer 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 any of the full-scope areas 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 and farms of different sizes.

Small Loans to Businesses

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

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were two PPP loans totaling \$18,000 that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less located in the AA and was near to the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables, the overall borrower distribution of small loans to farms was poor.

For 2020 through 2021, there was an insufficient number of small loans to farms for a meaningful analysis. As there was an insufficient number of small loans to farms originated or purchased in the 2020-2021 period, examiners evaluated the bank's performance based on 2022 lending data.

For the 2022 period, the percentages of small loans to farms with revenues of \$1 million or less was well below the percentages of farms with revenues of \$1 million or less in the AA. No aggregate market data was available for the 2022 period.

Consumer Loans

Refer to Table V in the state of Minnesota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made three CD loans totaling \$37 million, which represented 27.8 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 56.8 percent funded affordable housing and 43.2 percent funded economic development activities.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- A \$16 million line of credit to a small business auto dealership located in a moderate-income geography. The loan promoted economic development by creating and maintaining jobs for low- and moderate-income wage earners, given that the median annual salary for new-car salespersons is 67 percent of the AMI. The line of credit addressed the community identified need for small business loans.
- An \$8 million loan to help fund the new construction of a 71-unit mixed-income housing development. Sixty-three of 71 units were to be restricted to low- and moderate-income households earning at or below 60 percent of the AMI. In addition to funding from CONA, this very complex development received funds from the Greater Minnesota Housing Fund, Brooklyn Park Economic Development Authority, and Hennepin County Housing and Redevelopment Authority. The development's tax credit application required it to maintain a sponsor, nonprofit leader, general contractor, architect or management agent, or partner with an entity that is a minority- or women-owned business enterprise. This loan addressed the community identified need for affordable

housing. CONA demonstrated multi-faceted support by also providing a \$10 million LIHTC equity investment.

- A \$13 million loan to provide financing for the construction of a multifamily LIHTC property. All 52 units were restricted to tenants earning less than 60 percent of the AMI. This loan addressed the community identified need for affordable housing.

Broader Statewide and Regional Area

In addition, CONA made 11 qualified loans totaling \$101 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. Eight loans provided financing for affordable housing, one loan was for revitalization and stabilization efforts, and two loans were for community services benefiting low- and moderate-income individuals.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 7,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices during the evaluation period further supported the Lending Test rating.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|------------------------|---------------|---------------|----------------|---------------|-----------|--------------|---------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Minneapolis CSA | 8 | 19,736 | 36 | 27,733 | 44 | 83.0 | 47,469 | 69.5 | 0 | 0 |
| Regional | 3 | 1,371 | 1 | 8,400 | 4 | 7.5 | 9,771 | 14.3 | 0 | 0 |
| Statewide | 3 | 6,017 | 2 | 5,025 | 5 | 9.4 | 11,042 | 16.2 | 0 | 0 |
| Total | 14 | 27,124 | 39 | 41,158 | 53 | 100.0 | 68,282 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 35.6 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services or affordable housing to primarily low- and moderate-income individuals. By dollar volume, 98.9 percent of total investments and grants supported affordable housing, 0.7 percent funded community services to low- and moderate-income individuals, and less than 1 percent supported economic development.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included two LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$14.4 million in LIHTC equity to help finance the new construction of a 52-unit affordable housing development. All units will be restricted to low- and moderate-income households earning up to 30 percent, 50 percent, and 60 percent of the AMI (31, 10, and 11 units, respectively). CONA demonstrated multi-faceted support by also providing a \$13 million loan for this project. This investment addressed the community identified need for affordable housing.
- An investment of \$3.8 million in LIHTC equity to help finance the construction of a new 175-unit affordable housing development. All units are for low- and moderate-income households with incomes up to 60 percent of the AMI. This investment addressed the community identified need for affordable housing.
- Grants totaling \$75,000 to support a nonprofit organization that provides affordable housing for low- and moderate-income families. A portion of CONA's grants supported the organization's general operations during the COVID-19 pandemic, and the remainder supported the construction of a residential property. These grants addressed the community identified need for affordable housing.

Broader Statewide and Regional Area

In addition, CONA made nine investments totaling \$20.8 million in the broader statewide area whose purpose, mandate, or function included serving CONA's AA. These investments included eight current- and prior-period investments totaling \$20.8 million that supported affordable housing and one grant totaling \$25,000 for community services to low- and moderate-income individuals. Investments in the broader statewide area further supported the Outstanding rating.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online, and mobile banking.

Retail Banking Services

Service delivery systems were accessible to geographies and individuals of different income levels in the bank’s AA.

CONA had two cafés with four deposit-taking ATMs. CONA had one café in a middle-income geography and one café in a geography with no income classification. During the evaluation period, CONA opened one café in a moderate-income geography, however the 2020 U.S. Census changed the income-level designation of the moderate-income geography to a middle-income geography.

| ATM Distribution | | | | | | | | | |
|------------------------|-----------|------------------------------------|-----|------|-----|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Minneapolis CSA | 4 | 0.0 | 0.0 | 50.0 | 0.0 | 6.1 | 18.7 | 39.9 | 33.5 |

NOTE: The number of ATMs includes two ATMs in geographies with no income designation.

During the evaluation period, CONA installed two deposit-taking ATMs in a moderate-income geography as part of the café opening, however as stated above the 2020 U.S. Census changed the income-level designation to a middle-income geography.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of two moderate-income and two upper-income geographies where CONA had deposit-taking ATMs. The U.S. Census changed the income-designation of both moderate-income geographies to middle-income geographies. The U.S. Census changes to the income-level designation of the moderate-income geographies resulted in a significant decrease in the total number of deposit-taking ATMs in those geographies and had a significant impact on the distribution of deposit-taking ATMs in those geographies relative to the percentages of the population in those geographies. As a result, the OCC provided more consideration to the change in ADS use over the evaluation period in determining the accessibility of the bank’s service delivery systems.

| | Low-income Geographies | | Moderate-income Geographies | |
|---------------------------|------------------------|------------|-----------------------------|------------|
| | ATMs (#) | % of Total | ATMs (#) | % of Total |
| Minneapolis CSA | | | | |
| Prior to 2020 U.S. Census | 0 | 0 | 2 | 50 |
| After 2020 U.S. Census | 0 | 0 | 0 | 0 |
| Net Change | - | - | -2 | -50 |

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 38.9% | 12.2% |
| Mobile Banking | 104.4% | 61.7% |
| ATM Usage | -16.3% | -46.4% |
| Net Change Across All Channels (Averaged) | 42.4% | 9.2% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Each café has individual hours of operation. One café is in a large shopping center and its hours of operation are based on the shopping center hours of operation. This café's hours of operation were 10:00 a.m. to 8:00 p.m. Monday through Thursday, 9:00 a.m. to 9:00 p.m. Fridays and Saturdays, and 10:00 a.m. to 7:00 p.m. on Sundays. The other café's hours of operation were 7:30 a.m. to 5:00 p.m. Monday through Friday.

Community Development Services

The institution was a leader in providing CD services.

CD services were responsive to the community needs the institution identified through community contacts. Twenty-four bank associates provided 281 hours of qualified service activities to four organizations. Leadership was evident through board and committee participation with 15 hours of board service to one organization. Financial literacy education accounted for 208 service hours or 74 percent of all CD services. Services consisted of providing financial education and technical assistance to small businesses and nonprofit organizations.

CONA associates also provided 50 hours to two organizations that meet the definition of CD in the broader statewide area. *Pro Bono* services accounted for 27 service hours or 53 percent of broader statewide CD services.

Examples of CD services in the AA include:

- A CONA associate provided 15 hours of board services to a nonprofit organization that partners with parents or guardians, volunteers, and others in the community to create and support one-to-one mentoring relationships with children and teens. Board services included four hours where the CONA associate served as the treasurer for the board of directors. The services addressed the bank-identified community needs for support for low- and moderate-income children and teens.
- Fifteen CONA associates provided 193 hours of financial literacy education to seven schools in the AA that primarily serve students from low- and moderate-income families. These services addressed the bank-identified community needs for financial education for low- and moderate-income individuals.

State of Nevada

CRA rating for the State of Nevada: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels.
- CONA provided a relatively high level of CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Nevada

CONA delineated one AA in the state of Nevada, which was the entirety of the Las Vegas-Henderson-Paradise, NV MSA (Las Vegas MSA). Refer to appendix A for a complete description of the AA. CONA entered the Las Vegas MSA AA on November 3, 2021 through the opening of a café with two deposit-taking ATMs.

CONA had no branches, one café, two deposit-taking ATMs, and \$821.3 million of allocated internet deposits, which represented 0.3 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems within this AA. Because CONA does not operate a licensed branch in Nevada, there are no deposits reported on the June 30, 2022 FDIC Deposit Market Share report. The bank originated or purchased 1.2 percent of its evaluation period lending by count and 0.9 percent by dollar volume in the portion of Nevada where CONA has AAs.

Based on June 30, 2022 FDIC summary of deposit information, there were 42 depository institutions with licensed branches in the portions of Nevada where the bank has delineated its AA. The top three depository institutions by deposit market share were Bank of America, N.A. (16.7 percent), Wells Fargo Bank, N.A. (16.1 percent), and Wells Fargo National Bank West (13.3 percent).

Las Vegas MSA

The following table provides a summary of the demographic information that includes housing and business information for the Las Vegas MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: Las Vegas MSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 487 | 5.7 | 26.3 | 37.2 | 30.6 | 0.2 |
| Population by Geography | 2,035,572 | 5.0 | 25.3 | 39.2 | 30.3 | 0.2 |
| Housing Units by Geography | 857,131 | 5.6 | 24.9 | 38.7 | 30.6 | 0.2 |
| Owner-Occupied Units by Geography | 380,425 | 1.9 | 16.9 | 41.7 | 39.5 | 0.0 |
| Occupied Rental Units by Geography | 344,021 | 8.7 | 33.0 | 36.9 | 21.1 | 0.2 |
| Vacant Units by Geography | 132,685 | 8.1 | 27.0 | 34.8 | 29.5 | 0.6 |
| Businesses by Geography | 137,264 | 3.8 | 20.8 | 38.7 | 36.1 | 0.6 |
| Farms by Geography | 1,912 | 2.1 | 19.7 | 39.9 | 38.2 | 0.2 |
| Family Distribution by Income Level | 465,442 | 20.7 | 18.4 | 20.5 | 40.5 | 0.0 |
| Household Distribution by Income Level | 724,446 | 22.6 | 17.0 | 18.8 | 41.6 | 0.0 |
| Median Family Income MSA - 29820 Las Vegas-Henderson-Paradise, NV MSA | | \$59,993 | Median Housing Value | | | \$169,213 |
| | | | Families Below Poverty Level | | | 11.9% |
| | | | Median Gross Rent | | | \$1,032 |
| <i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|---|-----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| Assessment Area: Las Vegas MSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 535 | 6.9 | 23.9 | 39.1 | 29.5 | 0.6 |
| Population by Geography | 2,265,461 | 6.8 | 23.8 | 39.7 | 29.5 | 0.2 |
| Housing Units by Geography | 912,465 | 6.9 | 24.4 | 39.1 | 29.4 | 0.2 |
| Owner-Occupied Units by Geography | 443,247 | 2.4 | 15.7 | 42.7 | 39.0 | 0.2 |
| Occupied Rental Units by Geography | 365,779 | 11.7 | 33.7 | 36.8 | 17.6 | 0.2 |
| Vacant Units by Geography | 103,439 | 8.7 | 29.1 | 31.8 | 29.9 | 0.4 |
| Businesses by Geography | 226,379 | 3.5 | 25.1 | 34.1 | 37.0 | 0.3 |
| Farms by Geography | 2,529 | 3.4 | 23.4 | 35.5 | 37.6 | 0.1 |
| Family Distribution by Income Level | 516,891 | 20.9 | 18.0 | 20.2 | 40.9 | 0.0 |
| Household Distribution by Income Level | 809,026 | 23.1 | 17.1 | 18.2 | 41.6 | 0.0 |
| Median Family Income MSA - 29820 Las Vegas-Henderson-Paradise, NV MSA | | \$71,896 | Median Housing Value | | | \$282,327 |
| | | | Families Below Poverty Level | | | 9.8% |
| | | | Median Gross Rent | | | \$1,203 |

*Source: 2020 U.S. Census and 2022 D&B Data
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.*

Economic Data

Data from Moody's Analytics over the evaluation period indicated the Las Vegas-Henderson-Paradise, NV MSA area's economy outperformed the West. Employment growth was strong across many private sector industries, but healthcare and leisure and hospitality were leading job creation. The industries' outperformance was fueled by strong demographics and favorable trends in domestic travel. The jobless rate was low and within 1 percent of its pre-pandemic level despite upward pressure from workers quickly returning to the workforce. The housing market was experiencing its first decline in single-family house prices in two years as the overvalued market began its correction.

The area's strengths include gaming and entertainment infrastructure, no personal income tax, strong migration trends, and a high concentration of prime-age workers. Weaknesses include an over reliance on consumer spending, high employment volatility, relatively low educational attainment, and single-family housing that was overvalued. Las Vegas had one of the most overvalued housing markets in the country. The seller's market that developed during the pandemic has turned.

Based on data from the BLS, the unemployment rate was 4.6 percent in January 2020, as high as 34 percent in April 2020, and 5.4 percent in December 2022. Major employers in the AA included Nellis Air Force Base, Mandalay Bay Resort and Casino, Las Vegas Sands Corp., Caesars Entertainment Corp., and MGM Resorts International.

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 economic development and affordable housing. Contacts noted that the COVID-19 pandemic had a devastating effect on the local economy as the main economic driver in the area is travel and tourism, including leisure, hospitality, and business conventions. These industries included many low-wage service employees who were already struggling prior to the pandemic. Credit and community development needs identified include:

- Affordable housing
- Low-cost debt and equity financing for housing and other community development related projects
- Flexible loan products for low- and moderate-income homebuyers
- Grant support for local nonprofit organizations

The area is served by several nonprofit organizations, community-based organizations, economic development organizations, and community development organizations that provide opportunities to help meet community needs. Opportunities for support include unrestricted funding for nonprofits to support capacity building and human capital needed to address increasing demand for services; and volunteer and technical assistance support, such as board service.

Scope of Evaluation in Nevada

The Las Vegas MSA AA received a full-scope review. CONA's strategic focus is consumer lending and small loans to businesses. There was an insufficient number of home mortgage loans and small loans to farms for a meaningful analysis. Consumer lending received a greater weight than small loans to businesses.

Due to the bank entering the AA in November 2021, there was insufficient lending data during the 2020-2021 period to perform a meaningful analysis of the bank's lending performance. As such, the OCC evaluated the bank's lending performance based on lending data for the 2022 period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEVADA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Las Vegas MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans | | | | | | | | |
|----------------------|---------------|----------------|------------|----------------|-----------------------|----------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Las Vegas MSA | 2 | 4,886 | 7 | 368,613 | 4 | 373,512 | 100.0 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 3 | 3 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 0 |
| Total | 2 | 4,886 | 7 | 368,613 | 8 | 373,516 | 100.0 | 100.0 |

| Dollar Volume of Loans (\$000) | | | | | | | | |
|--------------------------------|---------------|----------------|------------|----------------|-----------------------|----------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Las Vegas MSA | 60,089 | 66,782 | 302 | 637,939 | 34,659 | 799,771 | 93.1 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 53,757 | 53,757 | 6.3 | 0 |
| Regional | 0 | 0 | 0 | 0 | 5,213 | 5,213 | 0.6 | 0 |
| Total | 60,089 | 66,782 | 302 | 637,939 | 93,629 | 858,741 | 100.0 | 100.0 |

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$821.3 million in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated

deposit market share of less than 1 percent and would have ranked 15th out of 43 depository institutions, placing it in the top 35 percent of depository institutions in this AA.

According to peer small business data for 2021, CONA had a market share of 4.1 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked seventh out of 250 small business lenders, which placed it in the top three percent of lenders. The top lenders in this AA based on market share were American Express National Bank (19.5 percent), Bank of America, N.A. (13.7 percent), and JP Morgan Chase Bank, N.A. (13.2 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 77.7 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of Nevada 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.

Based on the bank's 2022 lending data, the overall geographic distribution of small loans to businesses was excellent.

For 2022, the percentages of small loans to businesses in low-income geographies equaled, and in moderate-income geographies exceeded, the percentages of businesses located in those geographies.

Consumer Loans

Refer to Table U in the state of Nevada section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the bank's 2022 lending data, the overall geographic distribution of consumer loans was excellent.

For 2022, the percentages of consumer loans in low-income geographies was near to, and in moderate-income geographies exceeded, the percentages of households located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed small business and consumer 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 any of the full-scope areas 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.

Small Loans to Businesses

Refer to Table R in the state of Nevada 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.

Based on the bank's 2022 lending data, the overall borrower distribution of small loans to businesses was poor.

For 2022, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less located in the AA.

Consumer Loans

Refer to Table V in the state of Nevada section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the bank's 2022 lending data, the overall borrower distribution of consumer loans was excellent.

For 2022, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made four CD loans totaling \$34.7 million, which represented 46 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 100 percent funded affordable housing.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- A \$1.7 million loan to finance the new construction of a 171-unit senior affordable housing development. One hundred and thirty out of 171 units were reserved for low-income households earning up to 50 percent of the AMI and 40 units had rents affordable to moderate-income households earning up to 70 percent of the AMI. This loan addressed the community identified need for affordable housing.

- A loan of \$11 million to refinance a mortgage held by another bank on a multifamily property. The property included 138 units, 137 of which were considered affordable to low- and moderate-income households earning less than 80 percent of the AMI. Seventy-three of 137 units were restricted to low-income tenants and benefitted from HUD rental subsidies. This loan addressed the community identified need for affordable housing.

Broader Statewide and Regional Area

In addition, CONA made four qualified loans totaling \$59 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. Three loans provided financing for affordable housing and one loan was for community services benefiting low- and moderate-income individuals.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 18,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices during the evaluation period further supported the Lending Test rating.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Las Vegas MSA AA was excellent.

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|--------------|----------------|---------------|-----------|--------------|---------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Las Vegas MSA | 4 | 3,891 | 17 | 6,265 | 21 | 48.8 | 10,156 | 70.3 | 0 | 0 |
| Statewide | 1 | 13 | 21 | 4,285 | 22 | 51.2 | 4,298 | 29.7 | 0 | 0 |
| Total | 5 | 3,904 | 38 | 10,550 | 43 | 100.0 | 14,454 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 13.5 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that

provided needed community services to primarily low- and moderate-income individuals. By dollar volume, 98.1 percent of total investments and grants supported affordable housing and 1.9 percent funded community services to low- and moderate-income individuals.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included two LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$4 million in LIHTC equity to help finance the new construction of a 156-unit affordable housing development. All units are restricted to low- and moderate-income households and eight units are set aside and accessible for tenants with sensory impairments. This complex investment included public funding from the state, county, and municipal government agencies and responded to the community identified need for affordable housing.
- An investment of \$2 million in LIHTC equity to help finance the new construction of a 171-unit senior affordable housing development. One hundred and thirty units were reserved for low-income households earning up to 50 percent AMI and 40 units were reserved for moderate-income households earning up to 70 percent AMI. This complex investment included public funding from several sources and is responsive to the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$1.7 million loan for this project.
- Grants totaling \$330,000 to a nonprofit organization whose goal is to help low- and moderate-income individuals and families obtain affordable housing. The organization pursues this goal by creating homeownership opportunities through the development of affordable housing, homeownership education, and neighborhood revitalization. CONA's funding supported the organization's maintenance and renovation of two of its rental properties and responded to the identified need for affordable housing.

Broader Statewide and Regional Area

In addition, CONA made 22 current- and prior-period investments totaling \$4.3 million in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. These investments included one prior-period investment for \$13,454 that supported affordable housing, one current-period investment totaling \$4 million that supported affordable housing, 16 grants totaling \$263,500 to organizations providing community services to primarily low- and moderate-income individuals, and four grants totaling \$40,000 that supported affordable housing. Investments in the broader statewide and regional area further supported the Outstanding rating.

SERVICE TEST

The bank's performance under the Service Test in Nevada is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Las Vegas MSA AA was adequate.

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online, and mobile banking.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.

CONA had one café with two deposit-taking ATMs. CONA's café was in a middle-income geography. CONA opened one café during the evaluation period.

| ATM Distribution | | | | | | | | | |
|----------------------|-----------|------------------------------------|-----|-------|-----|---------------------------------------|------|------|------|
| Assessment Area | # of ATMs | ATMs | | | | Population | | | |
| | | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Las Vegas MSA | 2 | 0.0 | 0.0 | 100.0 | 0.0 | 6.8 | 23.8 | 39.7 | 29.5 |

As there were no ATMs in low- and moderate-income geographies during the evaluation period, the OCC provided more consideration to the growth in ADS use (including online and mobile banking) by bank customers residing in low- and moderate-income geographies over the evaluation period to assess the effectiveness of the bank's ADS to deliver retail banking services to low- and moderate-income geographies and individuals. CONA did not install any additional ATMs or remove any ATMs in the AA during the evaluation period.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census did not change the income-level designations of the middle-income geographies where CONA had deposit-taking ATMs.

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 119.1% | 53.5% |
| Mobile Banking | 202% | 118.6% |
| ATM Usage | 1.3% | -49% |
| Net Change Across All Channels (Averaged) | 107.5% | 41% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Café hours and available services did not vary as there was one café location in the AA. The café hours of operation were 9:00 a.m. to 9:00 p.m. Monday through Saturday and 10:00 a.m. to 7:00 p.m. on Sundays.

Community Development Services

The institution provided a relatively high level of CD services.

CD services were responsive to the community needs the institution identified through community contacts. Sixty-seven bank associates provided 235 hours of qualified service activities to four organizations. *Pro Bono* services accounted for 162 service hours or 69 percent of CD services. Services consisted of providing workforce development through CONA's *Pro Bono* volunteer program and financial literacy education. Examiners considered the limited amount of time the bank operated in the AA when evaluating the level of CD services in the AA.

CONA associates also provided an additional 321 hours of service to six organizations that meet the definition of CD in the broader statewide area that were responsive to bank-identified community needs.

Examples of CD services in the AA include:

- Fourteen CONA associates provided 99 hours of workforce development and career training to clients of a nonprofit organization located in a moderate-income geography. The nonprofit organization provides training for entry-level technology jobs. The services addressed the bank-identified community need for technology workforce training for low- and moderate-income populations.
- Forty-two CONA associates provided 77 hours of workforce development and career preparation services to clients of an organization that assists low- and moderate-income families and individuals in overcoming barriers and attaining self-sufficiency through direct services, training, and referrals to community resources. CONA's associates aided with mock interviewing and resume writing. The services addressed the bank-identified community need for career development training for low- and moderate-income populations.

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: Low Satisfactory

The major factors that support this rating include:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.
- CONA provided a relatively high level of CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Ohio

CONA delineated two AAs in the state of Ohio. They included the portions of the Cincinnati, OH-KY-IN MSA (Cincinnati MSA) and the Columbus, OH MSA (Columbus MSA) where CONA had deposit-taking ATMs. Refer to appendix A for a complete description of the AAs. CONA entered the Cincinnati MSA AA on October 27, 2021 through the opening of a café with two deposit-taking ATMs. CONA entered the Columbus MSA AA on March 16, 2022 through the opening of a café with two deposit-taking ATMs.

CONA had no branches, two cafés, four deposit-taking ATMs, and \$627.1 million of allocated internet deposits, which represented 0.2 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems within these AAs. Because CONA does not have a licensed branch in Ohio, there are no deposits reported on the June 30, 2022 FDIC Deposit Market Share report. The bank originated or purchased 0.7 percent of its evaluation period lending by count and 0.6 percent by dollar volume in the portions of Ohio where CONA has AAs.

Based on June 30, 2022 FDIC summary of deposit information, there were 56 depository institutions with branch operations in the portions of Ohio where the bank has an AA. The top three depository institutions by deposit market share were US Bank, N.A. (38.5 percent), Fifth Third Bank, N.A. (19.2 percent), and Huntington National Bank (16.8 percent).

Cincinnati MSA

The following table provides a summary of the demographic information that includes housing and business information for the Cincinnati MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Cincinnati MSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 222 | 18.5 | 25.7 | 27.9 | 26.6 | 1.4 |
| Population by Geography | 804,194 | 13.8 | 23.0 | 30.5 | 31.9 | 0.9 |
| Housing Units by Geography | 377,126 | 16.4 | 23.8 | 30.2 | 29.2 | 0.5 |
| Owner-Occupied Units by Geography | 193,184 | 6.1 | 19.0 | 34.2 | 40.5 | 0.2 |
| Occupied Rental Units by Geography | 138,454 | 25.3 | 29.9 | 26.5 | 17.7 | 0.7 |
| Vacant Units by Geography | 45,488 | 32.7 | 25.3 | 24.9 | 16.0 | 1.1 |
| Businesses by Geography | 65,300 | 8.7 | 22.6 | 26.4 | 40.7 | 1.6 |
| Farms by Geography | 1,267 | 6.1 | 18.2 | 34.1 | 41.4 | 0.3 |
| Family Distribution by Income Level | 194,047 | 26.9 | 15.9 | 18.0 | 39.3 | 0.0 |
| Household Distribution by Income Level | 331,638 | 30.6 | 15.8 | 15.7 | 38.0 | 0.0 |
| Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA | | \$69,949 | Median Housing Value | | | \$157,571 |
| | | | Median Gross Rent | | | \$723 |
| | | | Families Below Poverty Level | | | 13.8% |
| <i>Source: 2015 ACS and 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|---|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Cincinnati MSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 226 | 13.7 | 27.4 | 28.3 | 25.2 | 5.3 |
| Population by Geography | 830,639 | 10.2 | 28.6 | 29.2 | 28.9 | 3.0 |
| Housing Units by Geography | 380,100 | 11.6 | 29.1 | 28.4 | 27.3 | 3.6 |
| Owner-Occupied Units by Geography | 201,607 | 5.1 | 24.1 | 33.1 | 36.3 | 1.4 |
| Occupied Rental Units by Geography | 142,981 | 18.2 | 35.5 | 23.7 | 17.2 | 5.5 |
| Vacant Units by Geography | 35,512 | 22.1 | 31.3 | 21.0 | 17.1 | 8.5 |
| Businesses by Geography | 124,535 | 7.4 | 22.7 | 28.3 | 39.5 | 2.2 |
| Farms by Geography | 2,023 | 5.0 | 21.9 | 32.6 | 38.6 | 1.8 |
| Family Distribution by Income Level | 197,916 | 24.9 | 17.4 | 19.5 | 38.2 | 0.0 |
| Household Distribution by Income Level | 344,588 | 29.3 | 16.2 | 16.8 | 37.7 | 0.0 |
| Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA | | \$84,990 | Median Housing Value | | | \$183,676 |
| | | | Median Gross Rent | | | \$850 |
| | | | Families Below Poverty Level | | | 10.3% |

*Source: 2020 U.S. Census and 2022 D&B Data
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.*

Economic Data

Data from Moody's Analytics over the evaluation period indicated the Cincinnati, OH-KY-IN MSA area's labor market was sputtering, with nonfarm employment flattening since early 2022. Employment in finance, leisure and hospitality, and administrative services all registered job losses in the third quarter of 2022. Growth in manufacturing slowed, but the industry remained one of the strongest performers. Cincinnati ranked in the bottom quartile of metro areas in job growth since the COVID-19 pandemic. Persistent labor shortages contributed to weak net hiring. While healthcare payrolls backtracked in Cincinnati, much of the softness in hiring resulted from staffing difficulties. The unemployment rate fell to historical lows with employers quickly absorbing workers entering the labor force. High inflation and the dearth of available labor promoted wage gains, with hourly earnings rising at their fastest pace on record. The area's strengths include a highly educated and skilled workforce, a strong transportation network and presence of multinational firms, low living costs with affordable housing, and comparatively low business costs. Weaknesses include population growth that is only a quarter of that in Columbus, and exposure to tariffs and other changes in trade policy.

Based on data from the BLS, the unemployment rate was 4.3 percent in January 2020, as high as 13.1 percent in April 2020, and 3 percent in December 2022. Major employers in the AA included Kroger Co., Cincinnati Children's Hospital Medical Center, TriHealth Inc., St. Elizabeth's Healthcare, and University of Cincinnati.

Community Contacts

A review was conducted of three community contacts completed during the evaluation period with organizations located throughout the area. One community contact included a listening session with representatives from multiple organizations. The organizations contacted focus on affordable housing, community development and economic development, and financial capability. Contacts noted that the city is highly segregated by income as well as race. There was an affordable housing crisis prior to the COVID-19 pandemic and the pandemic worsened housing affordability. Credit and community development needs identified include:

- Funding for housing rehab and weatherization
- Affordable car loans
- Financial education, including use of credit cards and fintech products
- Access to traditional brick and mortar branches in low-income neighborhoods
- Small dollar mortgage products
- Affordable housing preservation

The area is served by many nonprofit organizations, community-based organizations, CDFIs, economic development organizations, and community development organizations that provide opportunities to help meet community needs. Opportunities for support include establishing long-term financial and service relationships between financial institutions and nonprofit organizations, greater engagement with

communities, and support for wraparound services related to workforce development, including skill building, financial education, transportation, and childcare.

Scope of Evaluation in Ohio

In evaluating the bank's performance in the state of Ohio, the Cincinnati MSA AA received a full-scope review, and the Columbus MSA AA received a limited-scope review. The Cincinnati MSA AA had 46.4 percent of the lending and 39.1 percent of the deposits (allocated internet deposits only) in the state of Ohio.

We based our ratings primarily on the results of the area that received a full-scope review. CONA's strategic focus is consumer lending and small loans to businesses. Consumer loans received a significantly greater weight than small loans to businesses. There was an insufficient number of home mortgage loans and small loans to farms for a meaningful analysis. The bank did not make any PPP loans in this AA as the bank did not enter the AA until after the PPP ended. In the Columbus MSA AA, the bank did not originate or purchase a sufficient number of home mortgage loans or small loans to farms for a meaningful analysis.

Due to the bank entering the AA in October 2021, there was insufficient lending data during the 2020-2021 period to perform a meaningful analysis of the bank's lending performance. As such, the OCC evaluated the bank's lending performance based on lending data for the 2022 period.

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 Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans* | | | | | | | | |
|-----------------------|---------------|----------------|------------|----------------|-----------------------|----------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Cincinnati MSA | 2 | 1,436 | 2 | 97,941 | 4 | 99,385 | 46.4 | 39.1 |
| Columbus MSA | 3 | 1,584 | 1 | 113,187 | 3 | 114,778 | 53.6 | 60.9 |
| Statewide | 0 | 0 | 0 | 0 | 17 | 17 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 27 | 27 | 0 | 0 |
| Total | 5 | 3,020 | 3 | 211,128 | 51 | 214,207 | 100 | 100 |

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

| Dollar Volume of Loans (\$000)* | | | | | | | | |
|--|---------------|----------------|------------|----------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Cincinnati MSA | 8,950 | 21,143 | 20 | 209,020 | 31,200 | 270,333 | 22.3 | 39.1 |
| Columbus MSA | 53,937 | 23,857 | 4 | 250,387 | 30,801 | 358,986 | 29.6 | 60.9 |
| Statewide | 0 | 0 | 0 | 0 | 274,219 | 274,219 | 22.6 | 0 |
| Regional | 0 | 0 | 0 | 0 | 307,458 | 307,458 | 25.4 | 0 |
| Total | 62,887 | 45,000 | 24 | 459,407 | 643,678 | 1,210,996 | 100 | 100 |

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

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$245.2 million in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of less than one percent and would have ranked 12th out of 38 depository institutions, placing it in the top 32 percent of depository institutions in this AA.

According to peer small business data for 2021, CONA had a market share of 4.7 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked seventh out of 138 small business lenders, which placed it in the top six percent of lenders. The top lenders in this AA based on market share were American Express National Bank (18.8 percent), US Bank, N.A. (14.7 percent), and JP Morgan Chase Bank, N.A. (8.8 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 85.2 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q 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.

Based on the bank's 2022 lending data, the overall geographic distribution of small loans to businesses was excellent.

For 2022, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded the percentages of businesses located in those geographies.

Consumer Loans

Refer to Table U in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the bank's 2022 lending data, the overall geographic distribution of consumer loans was excellent.

For 2022, the percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed small business and consumer 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 any of the full-scope areas 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.

Small Loans to Businesses

Refer to Table R 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.

Based on the bank's 2022 lending data, the overall borrower distribution of small loans to businesses was poor.

For 2022, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less located in the AA.

Consumer Loans

Refer to Table V in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the bank's 2022 lending data, the overall borrower distribution of consumer loans was excellent.

For 2022, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made four CD loans totaling \$31.2 million, which represented 138.7 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 28.7 percent funded affordable housing and 71.3 percent funded economic development activities.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- CONA provided NMTC financing in the amount of \$15.6 million for the expansion of a university medical center's emergency department. The financing facilitated the addition of a new emergency department space, the renovation of the existing 30,000 square-foot space, and the creation of an ICU and an observation unit. The project is expected to retain 131 existing full-time employees, create an additional 42 full-time roles, and create 150 full-time construction jobs. This complex financing addressed the bank-identified community need for expanded healthcare for low- and moderate-income families and the creation and retention of living-wage jobs.
- Two loans totaling \$8.9 million to finance the acquisition of two adjoining affordable housing properties. One hundred and eighty-four of 189 units were affordable to low- and moderate-income individuals with incomes up to 80 percent of the AMI. These loans addressed the community identified need for affordable housing.

Broader Statewide and Regional Area

In addition, CONA made 44 qualified loans totaling \$581.7 million and one qualified lease totaling \$1 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AAs. Thirty-eight loans provided financing for affordable housing, one loan was for revitalization and stabilization efforts, and five loans were for economic development. The qualified lease supported community services benefiting low- and moderate-income individuals.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 4,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices during the evaluation period further supported the Lending Test rating.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Columbus MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope area.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cincinnati MSA was excellent.

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|--------------|----------------|--------------|-----------|--------------|--------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Cincinnati MSA | 0 | 0 | 8 | 1,381 | 8 | 47.1 | 1,381 | 15.6 | 0 | 0 |
| Columbus MSA | 0 | 0 | 6 | 1,554 | 6 | 35.3 | 1,554 | 17.6 | 0 | 0 |
| Regional | 2 | 5,258 | 0 | 0 | 2 | 11.8 | 5,258 | 59.6 | 0 | 0 |
| Statewide | 1 | 635 | 0 | 0 | 1 | 5.9 | 635 | 7.2 | 0 | 0 |
| Total | 3 | 5,893 | 14 | 2,935 | 17 | 100.0 | 8,828 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Considering the limited amount of time the bank was in the AA, the limited number of investment opportunities in the AA, and the competition from local, regional, and national institutions and private investors, the bank had an excellent level of qualified CD investments and grants and was often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period investments represented 6.1 percent of tier 1 capital allocated to the AA. The bank did not have any prior period investments in the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. A substantial majority of the dollar volume of the bank's current period investment transactions involved one LIHTC and one MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services or affordable housing to primarily low- and moderate-income individuals. By dollar volume, 95 percent of total investments and grants supported affordable housing, 3.6 percent funded community services to low- and moderate-income individuals, and 1.4 percent supported economic development.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included one LIHTC project, which was complex and required more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$1 million in LIHTC equity to help finance the new construction and rehabilitation of a 48-unit affordable housing development. All units are restricted to low- and moderate-income households earning up to 70 percent of the AMI. In addition to funding from CONA, this complex development involved federal and state historic tax credits and a tax-increment financing loan from the municipal government. This investment was responsive to the community identified need for affordable housing.
- A \$15,000 grant to a CDFI that provides loans and capacity building to other CDFIs around the nation. CONA's funds were used to help the organization develop a homeownership preservation

program to benefit low- and moderate-income homeowners in the Cincinnati area. This grant addressed the community identified need for affordable housing.

- A \$20,000 grant to a nonprofit organization that partners with people living in poverty to assist them in advancing to economic self-sufficiency through employment. The organization helps low- and moderate-income individuals obtain quality employment and build financial wellness through training, barrier removal, and personalized one-on-one coaching. The grant covered costs associated with the organization's core program, which helps clients achieve job readiness. This grant addressed the bank-identified community needs for financial literacy education, family wealth, and stability.

Broader Statewide and Regional Area

In addition, CONA made three prior-period investments totaling \$5.9 million in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AAs. All investments supported affordable housing. Investments in the broader statewide and regional area further supported the Outstanding rating.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Columbus MSA AA 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 Ohio is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cincinnati MSA was adequate.

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online, and mobile banking.

In evaluating the bank's performance under the Service Test, the OCC considered the community identified need for access to traditional brick and mortar branches in low-income neighborhoods.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.

CONA had one café with two deposit-taking ATMs. CONA's café was in a middle-income geography. CONA opened one café during the evaluation period.

| ATM Distribution | | | | | | | | | |
|-----------------------|-----------|------------------------------------|-----|-----|-----|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Cincinnati MSA | 2 | 0 | 0 | 100 | 0 | 10.2 | 28.6 | 29.2 | 28.9 |
| Columbus MSA | 2 | 0 | 0 | 100 | 0 | 13.2 | 22.6 | 33.4 | 28.9 |

As there were no ATMs in low- and moderate-income geographies during the evaluation period, the OCC provided more consideration to the growth in ADS use (including online and mobile banking) by bank customers residing in low- and moderate-income geographies over the evaluation period to assess the effectiveness of the bank's ADS to deliver retail banking services to low- and moderate-income geographies and individuals. CONA did not install any additional ATMs in the AA during the evaluation period.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census did not change the income-level designations of the middle-income geographies where CONA had deposit-taking ATMs.

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 89.9% | 31.9% |
| Mobile Banking | 161.7% | 92.7% |
| ATM Usage | 32.7% | -33.3% |
| Net Change Across All Channels (Averaged) | 94.8% | 30.4% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. There was one café location in the AA. The café hours of operation were 10:00 a.m. to 8:00 p.m. Monday through Thursday, 10:00 a.m. to 9:00 p.m. on Fridays and Saturdays, and 11:00 a.m. to 6:00 p.m. on Sundays.

Community Development Services

The institution provided a relatively high level of CD services.

CD services were responsive to the community needs the institution identified through community contacts. Seven bank associates provided qualified service activities to one organization. *Pro Bono* services, in the form of technical assistance to a nonprofit organization, accounted for all the CD services. Examiners considered the limited number of employees in the AA available to provide

volunteer services and the amount of time the bank was in the AA when evaluating the level of CD services in the AA.

An example of CD services in this AA was:

- Seven CONA associates provided 168 hours of technical assistance to a nonprofit organization located in a moderate-income geography whose mission is to promote individual self-sufficiency and community economic development by stimulating and supporting entrepreneurship among low- and moderate-income populations. CONA associates provided technical assistance with data management, data design, and data reporting on the organization's data project.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Columbus MSA AA was consistent with the bank's overall performance under the Service Test in the full-scope area.

State of Oregon

CRA rating for the State of Oregon: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels.
- CONA provided an adequate level of CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Oregon

CONA delineated one AA in the state of Oregon, which was the portion of the Portland-Vancouver-Hillsboro, OR-WA MSA (Portland MSA), where CONA had deposit-taking ATMs. Refer to appendix A for a complete description of the AA.

CONA had no branches, one café, three deposit-taking ATMs, and \$495.1 million of allocated internet deposits, which represented 0.2 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems in this AA. Because CONA does not operate a licensed branch in Oregon, there are no deposits reported on the June 30, 2022 FDIC Deposit Market Share report. The bank originated or purchased 0.6 percent of its evaluation period lending by count and 0.8 percent by dollar volume in the portions of Oregon where CONA has its AA.

Based on June 30, 2022 FDIC summary of deposit information, there were 24 depository institutions with branch operations in the portions of Oregon where the bank has its AA. The top three depository institutions by deposit market share were Bank of America, N.A. (23.5 percent), U.S. Bank, N.A. (22.3 percent), and Wells Fargo Bank, N.A. (14.8 percent).

Portland MSA

The following table provides a summary of the demographic information that includes housing and business information for the Portland MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Portland MSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 171 | 2.3 | 29.2 | 38.0 | 29.2 | 1.2 |
| Population by Geography | 768,418 | 2.4 | 33.9 | 38.4 | 24.9 | 0.4 |
| Housing Units by Geography | 329,504 | 2.2 | 30.5 | 38.7 | 28.0 | 0.6 |
| Owner-Occupied Units by Geography | 167,110 | 1.2 | 27.3 | 41.2 | 30.2 | 0.1 |
| Occupied Rental Units by Geography | 143,559 | 3.4 | 33.9 | 36.7 | 24.8 | 1.2 |
| Vacant Units by Geography | 18,835 | 2.2 | 31.8 | 31.5 | 33.8 | 0.7 |
| Businesses by Geography | 121,969 | 1.6 | 23.7 | 37.6 | 32.0 | 5.1 |
| Farms by Geography | 1,906 | 1.5 | 23.8 | 42.9 | 29.6 | 2.2 |
| Family Distribution by Income Level | 169,156 | 24.9 | 17.5 | 19.4 | 38.3 | 0.0 |
| Household Distribution by Income Level | 310,669 | 28.8 | 16.4 | 17.1 | 37.7 | 0.0 |
| Median Family Income MSA - 38900 Portland-Vancouver-Hillsboro, OR-WA MSA | | \$73,089 | Median Housing Value | | | \$307,055 |
| | | | Median Gross Rent | | | \$995 |
| | | | Families Below Poverty Level | | | 12.0% |
| <i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Portland MSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 197 | 4.6 | 23.4 | 39.1 | 32.0 | 1.0 |
| Population by Geography | 815,428 | 4.8 | 27.0 | 40.3 | 27.7 | 0.2 |
| Housing Units by Geography | 353,735 | 4.6 | 24.3 | 40.5 | 30.3 | 0.3 |
| Owner-Occupied Units by Geography | 182,072 | 3.1 | 23.4 | 40.2 | 33.2 | 0.1 |
| Occupied Rental Units by Geography | 152,777 | 6.3 | 25.8 | 40.6 | 26.7 | 0.6 |
| Vacant Units by Geography | 18,886 | 4.8 | 20.4 | 42.2 | 32.2 | 0.4 |
| Businesses by Geography | 141,227 | 3.5 | 17.4 | 39.7 | 38.3 | 1.0 |
| Farms by Geography | 2,089 | 3.5 | 18.4 | 48.3 | 29.4 | 0.4 |
| Family Distribution by Income Level | 179,054 | 23.2 | 17.9 | 19.3 | 39.6 | 0.0 |
| Household Distribution by Income Level | 334,849 | 27.0 | 16.7 | 17.4 | 38.8 | 0.0 |
| Median Family Income MSA - 38900 Portland-Vancouver-Hillsboro, OR-WA MSA | | \$94,727 | Median Housing Value | | | \$448,033 |
| | | | Median Gross Rent | | | \$1,335 |
| | | | Families Below Poverty Level | | | 8.2% |

*Source: 2020 U.S. Census and 2022 D&B Data
 Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.*

Economic Data

Data from Moody's Analytics over the evaluation period indicated the Portland-Vancouver-Hillsboro, OR-WA MSA area's professional services and manufacturing were the main sources of strength. Construction of a large new semi-conductor plant also led to a burst of hiring in contractor positions. Employment in the area was rising much more rapidly than in the state, region, and nation. Although the unemployment rate rose somewhat, the labor market remained tight. As a result, wage growth far outpaced that in the nation. House prices were falling rapidly; although this is occurring nationwide, Portland's decline was more severe. Portland boasted a high percentage of residents with a bachelor's degree or higher. Furthermore, the metro area is home to many universities, most notably Oregon Health & Science University. The high educational attainment rate provided a strong pool of labor for the area's tech, professional services, and healthcare industries. Along with homegrown talent from the universities, population growth was also particularly strong. The area's strengths include a diversified economy and skilled workforce, favorable job mix with high incomes, a high quality of life, and low poverty rate. Weaknesses include being vulnerable in terms of trade, exposure to volatile technology and resource manufacturing, and an expensive housing market.

Based on data from the BLS, the unemployment rate was 3.6 percent in January 2020, as high as 13.2 percent in April 2020, and 3.6 percent in December 2022. Major employers in the AA included Intel Corp., Providence Health Systems, Oregon Health & Science university, and Nike Inc.

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 affordable housing, economic mobility, economic development, and small businesses. Credit and community development needs identified include:

- Affordable rental and single-family housing
- Affordable housing tax credits
- Affordable home loans
- Small business counseling
- Financial literacy education
- Economic development
- Homeless/Supportive & transitional housing
- Workforce Development

Opportunities for participation by financial institutions include the following:

- Affordable mortgage lending
- Investment in affordable housing
- Funding community organizations
- Lending and investment in micro and small businesses

- Supporting community development services such as financial literacy
- Working with the area's community development network
- Various state and local government partnership opportunities

Scope of Evaluation in Oregon

The Portland MSA AA received a full-scope review. CONA's strategic focus is consumer lending and small loans to businesses. Consumer lending received a greater weight small loans to businesses. There was an insufficient number of home mortgage loans and small loans to farms for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OREGON

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans | | | | | | | | |
|---------------------|---------------|----------------|------------|----------------|-----------------------|----------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Portland MSA | 4 | 3,302 | 15 | 173,683 | 7 | 177,011 | 100.0 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 5 | 5 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 4 | 3,302 | 15 | 173,683 | 12 | 177,016 | 100 | 100 |

| Dollar Volume of Loans (\$000)* | | | | | | | | |
|---------------------------------|----------------|----------------|------------|----------------|-----------------------|----------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Portland MSA | 151,394 | 43,805 | 80 | 536,822 | 74,273 | 806,374 | 90.3 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 87,008 | 87,008 | 9.7 | 0 |
| Regional | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 151,394 | 43,805 | 80 | 536,822 | 161,281 | 893,382 | 100 | 100 |

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$495.1 million in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of 1.2 percent and would have ranked 10th out of 25 depository institutions, placing it in the top 40 percent of depository institutions in this AA.

According to peer small business data for 2021, CONA had a market share of 4.5 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked sixth out of 141 small business lenders, which placed it in the top 5 percent of lenders. The top lenders in this AA based on market share were U.S. Bank, N.A. (15 percent), JP Morgan Chase Bank, N.A. (14.3 percent), and American Express National Bank (12.7 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 108.4 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of Oregon 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 15 PPP loans totaling \$218,000 to small businesses that provided support during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table U in the state of Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

The bank's lending performance was consistent with the 2020 through 2021 performance.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed small business and consumer 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 any of the full-scope areas 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.

Small Loans to Businesses

Refer to Table R in the state of Oregon 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 15 PPP loans totaling \$218,000 that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less located in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the state of Oregon section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made seven CD loans totaling \$74.3 million, which represented 163.5 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 59.1 percent of the loans funded affordable housing and 40.9 percent funded economic development activities.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- CONA provided NMTC financing in the amount of \$21.6 million for the construction of a new residential addiction center to replace an existing aging facility. The new facility included 70 adult treatment beds, 24 youth treatment beds, and 24 medical withdrawal management beds. The majority of residential patients served by the nonprofit organization were eligible for free health coverage from the state based on income and other requirements. This financing created or retained at least 170 jobs and addressed the bank-identified community need for providing community services, including substance abuse and mental health treatment, to low- and moderate-income individuals.
- CONA provided NMTC financing in the amount of \$8.8 million for the construction of a mixed-use commercial and retail development for a nonprofit organization located in a moderate-income geography. The development was part of an urban renewal plan managed by the City of Gresham's Redevelopment Commission. The development was expected to create an estimated 112 jobs. The bank's financing helped to address bank-identified community needs including the creation or retention of jobs for low- and moderate-income individuals.

Broader Statewide and Regional Area

In addition, CONA made five qualified loans totaling \$87 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving its AAs. Four loans provided financing for affordable housing and one loan was for community services benefiting low- and moderate-income individuals.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 8,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices further supported the Lending Test rating.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|--------------|----------------|---------------|-----------|--------------|---------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Portland MSA | 7 | 1,309 | 33 | 23,751 | 40 | 97.6 | 25,060 | 91.2 | 0 | 0 |
| Statewide | 1 | 2,412 | 0 | 0 | 1 | 2.4 | 2,412 | 8.8 | 0 | 0 |
| Total | 8 | 3,721 | 33 | 23,751 | 41 | 100.0 | 27,472 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 55.2 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services or affordable housing to primarily low- and moderate-income individuals. By dollar volume, 99 percent of total investments and grants supported affordable housing, 0.9 percent funded community services to low- and moderate-income individuals and 0.1 percent supported economic development.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included two LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$14.9 million in LIHTC equity for the new construction of a 56-unit affordable housing development for low- and moderate-income households earning 30 to 60 percent of the AMI. This transaction was complex with many layers of financing from state, local and municipal sources. In addition, the transaction was innovative as it was only the second in the country to combine Indian Housing Block Grant and LIHTC funding in the same development. This investment responded to several bank-identified community needs including affordable housing targeted to the Native American population, use of green building techniques, transit-oriented developments, and social services that include self-sufficiency training for low- and moderate-income individuals. CONA demonstrated multi-faceted support by also providing a \$12.1 million construction loan for this project.
- Grants totaling \$82,500 to a local CDC that provides affordable housing, home ownership support, economic advancement, and educational opportunities. A portion of CONA's funds supported a program that provides one-on-one business support services including access to capital, financial coaching, branding, marketing, and connections to direct sales opportunities. CONA's funding addressed the community identified needs for providing small business counseling, funding community organizations, working with the area's community development network, and providing financial literacy education.

- Grants totaling \$35,000 to an organization that supports youth aged 17-24 who have experienced poverty, violence, hunger, or loss. A portion of CONA’s grants were flexible and funded general operations related to the organization’s COVID-19 response program. CONA’s funding addressed the community identified need for providing funding to community organizations and supporting community development services.

Broader Statewide and Regional Area

In addition, CONA made one prior-period investment totaling \$2.4 million in the broader statewide area whose purpose, mandate, or function included serving CONA’s AA. This investment supported affordable housing. The investment in the broader statewide area further supported the Outstanding rating.

SERVICE TEST

The bank’s performance under the Service Test in Oregon is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Portland MSA AA was adequate.

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online, and mobile banking.

Retail Banking Services

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank’s AA.

CONA had one café with three deposit-taking ATMs. CONA’s café was in an upper-income geography. CONA did not open any additional cafés during the evaluation period.

| ATM Distribution | | | | | | | | | |
|---------------------|-----------|------------------------------------|-----|-----|-----|---------------------------------------|-----|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Portland MSA | 3 | 0 | 0 | 0 | 100 | 4.8 | 27 | 40.3 | 27.7 |

As there were no ATMs in low- and moderate-income geographies during the evaluation period, the OCC provided more consideration to the growth in ADS use (including online and mobile banking) by bank customers residing in low- and moderate-income geographies over the evaluation period to assess the effectiveness of the bank’s ADS to deliver retail banking services to low- and moderate-income geographies and individuals. During the evaluation period, CONA removed one ATM from a geography with no income designation.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census did not change the income-level designations of the upper-income geographies where CONA had deposit-taking ATMs.

ADS Usage

| Change in ADS use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 52.7% | 24.9% |
| Mobile Banking | 124.9% | 66.8% |
| ATM Usage | -34.4% | -52.8% |
| Net Change Across All Channels (Averaged) | 47.7% | 12.9% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. There was one café location in the AA. The café hours of operation were 7:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturdays and Sundays.

Community Development Services

The institution provided an adequate level of CD services.

CD services were responsive to the community needs the OCC identified through community contacts. Fourteen bank associates provided 47 hours of qualified service activities to five organizations. Financial literacy education was identified as a community need in the AA and accounted for 39 service hours or 83 percent of CD services. Services consisted of providing workforce development through CONA's *Pro Bono* volunteer program and financial education.

Examples of CD services in the AA include:

- Five CONA associates provided 22 hours of financial literacy education to clients of a nonprofit organization that empowers women to achieve economic independence by providing a network of support, professional attire, and development tools to help women thrive in work and in life. These services addressed the community identified need for financial literacy education.
- Five CONA associates provided 10 hours of workforce development services to the clients of a nonprofit organization that provides career development and free job training to low-income and underserved populations. CONA associates provided free credit workshops, mock interviews, and assistance with job searches. These services addressed the community identified need for workforce development.

State of Texas

CRA rating for the State of Texas: 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:

- A good geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were accessible to geographies and individuals of different income levels.
- CONA was a leader in providing CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Texas

CONA delineated seven AAs in the state of Texas. They included the portions of the Austin-Round Rock-Georgetown, TX MSA (Austin MSA), Beaumont-Port Arthur, TX MSA (Beaumont MSA), Dallas-Plano-Irving, TX MD, Fort Worth-Arlington, TX MD (collectively, the Dallas-Fort Worth-Arlington, TX MSA), Houston-The Woodlands-Sugar Land, TX MSA (Houston MSA), Texarkana, TX-AR MSA (Texarkana MSA), and the entirety of the Tyler, TX MSA (Tyler MSA). Refer to appendix A for a complete description of the AAs.

In October 2020, CONA made a business decision to exit its Longview, TX MSA AA which consisted of Gregg and Harrison counties. In April 2021, CONA also exited Anderson and Angelina counties, both are part of the Texas non-metropolitan AA. The impact of CONA's exits in these markets was minimal given CONA's limited presence in these areas. In August 2022, CONA opened a café with deposit-taking ATMs in Bexar County in the San Antonio-New Braunfels, TX MSA, which created the San Antonio MSA AA. The San Antonio MSA AA was not included in this evaluation because the bank was in this market for less than six months and the data was not sufficient for a meaningful analysis.

CONA had 36 branches, three cafés, 225 deposit-taking ATMs, and \$23.5 billion of deposits (including allocated internet deposits) within these AAs, which represented 7.3 percent of the bank's total domestic deposits. The bank originated or purchased 14.9 percent of its evaluation period lending by count and 13 percent by dollar volume in the portions of Texas where CONA has AAs.

Based on June 30, 2022 FDIC summary of deposit information, CONA ranked 12th out of 245 FDIC-insured depository institutions with a 0.9 percent deposit market share. The top three depository institutions by deposit market share were Charles Schwab Bank, SSB (29.7 percent), JP Morgan Chase Bank, N.A. (23.1 percent), and Bank of America, N.A. (13.3 percent).

Austin MSA

The following table provides a summary of the demographic information that includes housing and business information for the Austin MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Austin MSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 332 | 11.1 | 20.2 | 36.4 | 30.4 | 1.8 |
| Population by Geography | 1,772,799 | 10.7 | 20.4 | 36.6 | 31.1 | 1.2 |
| Housing Units by Geography | 703,773 | 10.7 | 18.7 | 37.7 | 32.0 | 0.9 |
| Owner-Occupied Units by Geography | 371,405 | 4.1 | 15.8 | 39.5 | 40.5 | 0.2 |
| Occupied Rental Units by Geography | 279,968 | 19.1 | 22.5 | 35.4 | 21.2 | 1.8 |
| Vacant Units by Geography | 52,400 | 13.2 | 19.2 | 36.5 | 29.4 | 1.7 |
| Businesses by Geography | 247,638 | 6.4 | 11.6 | 33.5 | 47.2 | 1.2 |
| Farms by Geography | 4,850 | 4.9 | 13.2 | 38.5 | 43.0 | 0.4 |
| Family Distribution by Income Level | 401,265 | 22.1 | 16.5 | 19.7 | 41.7 | 0.0 |
| Household Distribution by Income Level | 651,373 | 23.3 | 16.4 | 18.0 | 42.3 | 0.0 |
| Median Family Income MSA - 12420 Austin-Round Rock-Georgetown, TX MSA | | \$78,997 | Median Housing Value | | | \$240,486 |
| | | | Families Below Poverty Level | | | 9.4% |
| | | | Median Gross Rent | | | \$1,074 |
| <i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Austin MSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 471 | 7.0 | 23.4 | 34.4 | 31.4 | 3.8 |
| Population by Geography | 2,140,272 | 6.7 | 22.3 | 36.1 | 32.4 | 2.5 |
| Housing Units by Geography | 810,882 | 7.0 | 23.1 | 36.2 | 32.0 | 1.7 |
| Owner-Occupied Units by Geography | 436,410 | 2.8 | 17.6 | 39.1 | 40.0 | 0.5 |
| Occupied Rental Units by Geography | 319,958 | 12.2 | 30.5 | 32.7 | 21.4 | 3.1 |
| Vacant Units by Geography | 54,514 | 9.5 | 23.1 | 33.9 | 30.2 | 3.3 |
| Businesses by Geography | 425,918 | 2.8 | 12.6 | 33.0 | 45.6 | 6.0 |
| Farms by Geography | 7,581 | 2.2 | 14.3 | 34.7 | 44.9 | 3.9 |
| Family Distribution by Income Level | 467,283 | 20.7 | 17.4 | 21.0 | 40.9 | 0.0 |
| Household Distribution by Income Level | 756,368 | 22.4 | 16.9 | 18.4 | 42.4 | 0.0 |
| Median Family Income MSA - 12420 Austin-Round Rock-Georgetown, TX MSA | | \$100,215 | Median Housing Value | | | \$342,615 |
| | | | Families Below Poverty Level | | | 6.4% |
| | | | Median Gross Rent | | | \$1,352 |
| <i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Economic Data

Data from Moody's Analytics over the evaluation period indicated the Austin-Round Rock, TX MSA's economy was above the U.S. average, with significant job growth in private services such as healthcare and hospitality. The area had a shortage in qualified labor in the construction and government employment sectors. Rising mortgage rates led to a decline in single-family homebuilding, an increase in multifamily construction, and an overall decrease in affordable housing. The area's strengths include strong population growth and a well-educated labor force that attracts technology businesses. Weaknesses include cyclical volatility of their economy due to high tech jobs and a high cost of living.

Based on data from the BLS, the unemployment rate was 2.7 percent in January 2020, as high as 11.4 percent in April 2020, and 2.8 percent in December 2022. Major employers in the AA included the University of Texas at Austin, Dell Inc., Seton Healthcare Network, Walmart Inc., and St. David's Healthcare.

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 small business and economic development. Contacts noted that the lack of affordable housing has impacted economic

development. They have seen an increase in demand for small business loans and affordable mortgage loans. Credit and community development needs identified include:

- Small business loan funds
- Small business credit
- Affordable mortgage loans
- Lending and investment in economic development and workforce development

Dallas MSA

The following table provides a summary of the demographic information that includes housing and business information for the Dallas MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Dallas MSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 1,264 | 13.1 | 25.3 | 27.8 | 33.2 | 0.6 |
| Population by Geography | 6,513,057 | 11.1 | 24.6 | 29.6 | 34.6 | 0.1 |
| Housing Units by Geography | 2,484,171 | 11.5 | 23.5 | 30.1 | 34.8 | 0.2 |
| Owner-Occupied Units by Geography | 1,364,457 | 5.2 | 18.8 | 31.1 | 44.8 | 0.1 |
| Occupied Rental Units by Geography | 931,237 | 19.0 | 29.5 | 29.2 | 22.0 | 0.3 |
| Vacant Units by Geography | 188,477 | 20.1 | 27.3 | 27.2 | 25.1 | 0.3 |
| Businesses by Geography | 774,788 | 6.9 | 17.4 | 27.3 | 47.7 | 0.7 |
| Farms by Geography | 13,822 | 4.5 | 15.1 | 31.9 | 48.0 | 0.4 |
| Family Distribution by Income Level | 1,590,139 | 23.3 | 16.5 | 18.1 | 42.2 | 0.0 |
| Household Distribution by Income Level | 2,295,694 | 23.7 | 16.5 | 17.7 | 42.1 | 0.0 |
| Median Family Income MSA - 19124 Dallas-Plano-Irving, TX | | \$71,149 | Median Housing Value | | | \$177,919 |
| Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX | | \$69,339 | Median Gross Rent | | | \$982 |
| | | | Families Below Poverty Level | | | 11.3% |
| <i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Dallas MSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 1,640 | 9.2 | 26.0 | 29.6 | 33.7 | 1.5 |
| Population by Geography | 7,323,489 | 8.6 | 25.2 | 30.6 | 34.8 | 0.8 |
| Housing Units by Geography | 2,715,664 | 9.2 | 25.1 | 31.2 | 33.6 | 0.9 |
| Owner-Occupied Units by Geography | 1,489,984 | 4.3 | 19.8 | 32.5 | 43.1 | 0.3 |
| Occupied Rental Units by Geography | 1,030,508 | 15.5 | 32.1 | 29.8 | 21.1 | 1.5 |
| Vacant Units by Geography | 195,172 | 14.2 | 28.7 | 28.6 | 26.8 | 1.8 |
| Businesses by Geography | 1,130,439 | 4.5 | 17.5 | 30.8 | 46.2 | 0.9 |
| Farms by Geography | 18,727 | 3.2 | 16.7 | 33.5 | 46.1 | 0.6 |
| Family Distribution by Income Level | 1,737,333 | 21.9 | 17.3 | 19.3 | 41.5 | 0.0 |
| Household Distribution by Income Level | 2,520,492 | 22.8 | 16.9 | 18.0 | 42.3 | 0.0 |
| Median Family Income MSA - 19124 Dallas-Plano-Irving, TX | | \$88,315 | Median Housing Value | | | \$248,790 |
| Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX | | \$82,649 | Median Gross Rent | | | \$1,228 |
| | | | Families Below Poverty Level | | | 8.2% |
| <i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Economic Data

Dallas-Plano-Irving, TX MD

Data from Moody's Analytics over the evaluation period indicated the Dallas-Plano-Irving, TX area's job growth was decelerating, but the pace of job growth remained nearly twice the national average year-over-year. The percentage gains in the metro division's major industries were greater than their corresponding industries nationwide. Financial and professional services were standouts, with the latter up at a double-digit pace during the past year. The unemployment rate was stable since June 2022, essentially reflecting full employment, and labor force growth was well above average. However, the housing market weakened measurably due to rising interest rates. As mortgage interest rates rose past seven percent, affordability dropped by a third in 2022. Single-family homes declined with new permits having fallen by 36 percent since peaking in early 2021. In contrast, multifamily construction remained elevated at a near-record pace. Rising demand from rapid job growth and migration of young professionals encouraged developers. Additionally, the erosion of single-family affordability boosted rental demand. The area's strengths included a stable demand for professional services because of many corporate headquarters, a well-positioned distribution center for the Southwestern region of the U.S. for international trade, and favorable migration trends and age structure. Weaknesses include an exposure to volatile high-tech industry, which is sensitive to the business cycle and diminished housing affordability.

Based on data from the BLS, the unemployment rate for the Dallas-Plano-Irving, TX area was 3.2 percent in January 2020, as high as 12 percent in April 2020, and 3.3 percent in December 2022. Major

employers in the AA included Walmart Inc., American Airlines, Baylor Scott & White Health, Lockheed Martin, UT Southwestern Medical Center, and AT&T.

Fort Worth-Arlington-Grapevine, TX MD

Data from Moody's Analytics over the evaluation period indicated the Fort Worth-Arlington-Grapevine, TX area advanced faster than the national average in late 2022, and job growth was nearly two percentage points higher. Private services led the way, particularly healthcare and hospitality. By comparison, manufacturing underperformed as supply-chain issues limited production. Government employment declined slightly as employees increasingly opted for better pay in the private sector. Average hourly earnings rose at twice the national average pace during 2022 and was higher than the national average for the first time in seven years. Home prices stopped rising in June 2022 amid climbing mortgage rates, following a rapid 20 percent spike in 2021. The combination of elevated prices and more expensive credit reduced home affordability by 36 percent. New permits for single-family homes fell but the decline was much smaller than in neighboring Dallas. The area's strengths include its location near Latin America that supports the distribution industry, and a relatively high housing affordability that attracts homebuyers employed in Dallas. Weaknesses include a large military procurement industry that is sensitive to political winds, and exposure to motor vehicle and energy industries that adds to cyclical volatility.

Based on data from the BLS, the unemployment rate for the Fort Worth-Arlington, TX area was 3.3 percent in January 2020, as high as 12.3 percent in April 2020, and 3.4 percent in December 2022. Major employers in the AA included American Airlines, Lockheed Martin, Texas Health Resources, NAS-Fort Worth-JRB, and Arlington ISD.

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 affordable housing and economic development. Credit and community development needs identified include:

- Affordable rental housing
- Affordable for-sale housing
- Small business lending/micro business loans for start-up companies/micro lines of credit
- Flexible credit analysis
- Access to credit for both consumers and businesses
- Financial literacy education
- Business deposit products for small businesses
- Bank investment in smaller nonprofits

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development
- Supporting community development services such as financial literacy
- Providing technical support for nonprofits to help them expand their reach

Scope of Evaluation in Texas

In evaluating the bank's performance in the state of Texas, the Austin MSA AA and the Dallas MSA AA received full-scope reviews and the Beaumont MSA AA, Houston MSA AA, Texarkana MSA AA, and Tyler MSA AA received limited-scope reviews.

The Austin MSA AA had 11.5 percent of the lending, 10.9 percent of the deposits (including allocated internet deposits), and 5.6 percent of the branches in the state. During the evaluation period, CONA closed two branches within this AA. CONA's deposit market share and deposit market share ranking, volume of lending, and the number of branch closures were the primary reasons this AA was selected for a full-scope review.

The Dallas MSA AA had 45.5 percent of the lending, 32.5 percent of the deposits (including allocated internet deposits), and 33.3 percent of the branches in the state. During the evaluation period, CONA closed 13 branches within this AA. CONA's deposit market share and deposit market ranking, volume of lending, and the number of branch closures were the primary reasons this AA was selected for a full-scope review.

We based our ratings primarily on the results of the areas that received full-scope reviews. CONA's strategic focus is consumer loans and small loans to businesses. Consumer loans received greater weight than small loans to businesses and small loans to farms. In the full-scope Austin MSA AA, there was an insufficient number of home mortgage loans for a meaningful analysis. In the limited-scope Beaumont MSA AA, the bank did not originate or purchase a sufficient number of home mortgage loans and small loans to farms for a meaningful analysis. In the limited-scope Texarkana MSA AA and limited-scope Tyler MSA AA, the bank did not originate or purchase any home mortgage loans and did not originate or purchase a sufficient number of small loans to farms for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Austin MSA AA and Dallas MSA AA was excellent.

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans* | | | | | | | | |
|-------------------------|---------------|----------------|------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Austin MSA | 13 | 10,039 | 49 | 528,653 | 23 | 538,777 | 11.5 | 10.9 |
| Dallas MSA | 59 | 33,008 | 150 | 2,099,847 | 82 | 2,133,146 | 45.5 | 32.5 |
| Beaumont MSA | 1 | 907 | 8 | 53,557 | 6 | 54,479 | 1.2 | 2.5 |
| Houston MSA | 36 | 27,972 | 95 | 1,847,702 | 75 | 1,875,880 | 40.0 | 50.3 |
| Texarkana MSA | 0 | 342 | 5 | 25,658 | 3 | 26,008 | 0.6 | 0.8 |
| Tyler MSA | 0 | 1,302 | 11 | 62,232 | 0 | 63,545 | 1.4 | 3.0 |
| Statewide | 0 | 0 | 0 | 0 | 49 | 49 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 2 | 2 | 0 | 0 |
| Total | 109 | 73,570 | 318 | 4,617,649 | 240 | 4,691,886 | 100 | 100 |

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

| Dollar Volume of Loans (\$000)* | | | | | | | | |
|--|------------------|------------------|--------------|------------------|-----------------------|-------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Austin MSA | 186,309 | 156,588 | 485 | 1,254,153 | 135,894 | 1,733,429 | 12.0 | 10.9 |
| Dallas MSA | 1,523,198 | 456,878 | 1,446 | 3,737,836 | 1,266,484 | 6,985,842 | 48.4 | 32.5 |
| Beaumont MSA | 10,852 | 18,209 | 48 | 64,578 | 1,763 | 95,450 | 0.7 | 2.5 |
| Houston MSA | 632,845 | 430,010 | 782 | 2,975,059 | 608,832 | 4,647,528 | 32.2 | 50.3 |
| Texarkana MSA | 0 | 4,842 | 40 | 32,528 | 135,000 | 172,410 | 1.2 | 0.8 |
| Tyler MSA | 0 | 16,693 | 202 | 94,668 | 0 | 111,563 | 0.8 | 3.0 |
| Statewide | 0 | 0 | 0 | 0 | 652,041 | 652,041 | 4.5 | 0 |
| Regional | 0 | 0 | 0 | 0 | 23,098 | 23,098 | 0.2 | 0 |
| Total | 2,353,204 | 1,083,220 | 3,003 | 8,158,822 | 2,823,112 | 14,421,361 | 100 | 100 |

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

Austin MSA

CONA ranked 17th out of 67 FDIC-insured depository institutions with a 0.9 percent deposit market share. The top three depository institutions by deposit market share were JP Morgan Chase Bank, N.A. (19.8 percent), Wells Fargo Bank, N.A. (18.7 percent), and Bank of America, N.A. (13.4 percent).

Lending levels reflected excellent responsiveness to AA credit needs.

According to peer small business data for 2021, CONA had a market share of 4.9 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fifth out of 268 small business lenders, which placed it in the top two percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (21.8 percent), American Express National Bank (19.9 percent), and Bank of America, N.A. (8.9 percent).

According to peer small farm data for 2021, CONA had a market share of 4.4 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked seventh out of 29

small farm lenders, which placed it in the top 25 percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (30.2 percent), Wells Fargo Bank, N.A. (15.5 percent), and Cadence Bank (14.7 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 202.8 percent of total deposits.

Dallas MSA

CONA ranked 19th out of 164 FDIC-insured depository institutions with a 0.4 percent deposit market share. The top three depository institutions by deposit market share were Charles Schwab Bank, SSB (45.5 percent), Bank of America, N.A. (15.8 percent), and JP Morgan Chase Bank, N.A. (11.8 percent).

Lending levels reflected excellent responsiveness to AA credit needs.

According to peer mortgage data for 2022, CONA had a market share of less than 1 percent based on the number of home mortgage loans originated or purchased in this AA. The bank also ranked 515th among 1,211 home mortgage lenders in this AA, which placed it in the top 43 percent of lenders. The top lenders in this AA based on market share were Rocket Mortgage (4 percent), Wells Fargo Bank, N.A. (3.4 percent), and Bank of America, N.A. (3 percent).

According to peer small business data for 2021, CONA had a market share of 5 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked sixth out of 351 small business lenders, which placed it in the top 2 percent of lenders. The top lenders in this AA based on market share were American Express National Bank (17.6 percent), JP Morgan Chase Bank, N.A. (17.1 percent), and Bank of America, N.A. (10.2 percent).

According to peer small farm data for 2021, CONA had a market share of 4.1 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked seventh out of 63 small farm lenders, which placed it in the top 12 percent of lenders. The top lenders in this AA based on market share were JP Morgan Chase Bank, N.A. (24.4 percent), Wells Fargo Bank, N.A. (11.6 percent), and John Deere Financial FSB (8.2 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 126 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs.

Austin MSA

Small Loans to Businesses

Refer to Table Q in the state of Texas 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 45 PPP loans totaling \$2.9 million to small businesses in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table S in the state of Texas 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 farms.

Based on the data in the tables, the overall geographic distribution of small loans to farms was excellent.

For 2020 through 2021, the percentages of small loans to farms in low-income geographies was below, and to farms in moderate-income geographies exceeded, the percentages of farms located in those geographies. The percentages of small loans to farms in low-income geographies exceeded, and to farms in moderate-income geographies was near to, the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of small loans to farms in low-income geographies exceeded the percentages of farms located in those geographies.

Consumer Loans

Refer to Table U in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in low-income geographies was near to, and in moderate-income geographies exceeded, the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Dallas MSA

Home Mortgage Loans

Refer to Table O in the state of Texas 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.

Based on the data in the tables, the overall geographic distribution of home mortgage loans was excellent.

For 2020 through 2021, the percentages of home mortgage loans in both low- and moderate-income geographies exceeded both the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Businesses

Refer to Table Q in the state of Texas 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were 215 PPP loans totaling \$10.4 million to small businesses in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table S in the state of Texas 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 farms.

Based on the data in the tables, the overall geographic distribution of small loans to farms was good.

For 2020 through 2021, the percentages of small loans to farms in low-income geographies was significantly below, and to farms in moderate-income geographies approximated, the percentages of farms located in those geographies. The percentages of small loans to farms in both low- and moderate-income geographies exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was weaker than the 2020 through 2021 period. There were no small loans to farms originated or purchased in low-income geographies.

Consumer Loans

Refer to Table U in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was good.

For 2020 through 2021, the percentages of consumer loans in low-income geographies was near to, and in moderate-income geographies approximated, the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was stronger than the 2020 through 2021 period. The percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage, small business, small farm, and consumer 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 any of the full-scope areas 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 and farms of different sizes.

Austin MSA

Small Loans to Businesses

Refer to Table R in the state of Texas 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 138 PPP loans totaling \$2.8 million that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less located in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was adequate.

For 2020 through 2021, the percentages of small loans to farms was well below the percentages of farms with revenues of \$1 million or less located in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 performance.

Consumer Loans

Refer to Table V in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Dallas MSA

Home Mortgage Loans

The bank's home mortgage lending was limited to multifamily loans for which borrower income was not applicable. Therefore, no analysis of the borrower distribution of home mortgage loans was completed.

Small Loans to Businesses

Refer to Table R in the state of Texas 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 629 PPP loans totaling \$13.7 million that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less located in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was adequate.

For 2020 through 2021, the percentages of small loans to farms was well below the percentages of farms with revenues of \$1 million or less located in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Austin MSA

The institution was a leader in making CD loans.

The level of CD lending was excellent. CONA made 23 CD loans totaling \$135.9 million, which represented 57.5 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 98.9 percent of these loans funded affordable housing, and 0.8 percent funded community services, 0.2 percent funded revitalization and stabilization efforts, and 0.1 percent funded economic development activities.

The following are examples of the bank's CD loans that illustrate the complexity or responsiveness of CONA's CD lending:

- A loan of \$9.5 million to help finance the transformation of an old car dealership into the new construction of an 80-unit affordable housing development. All units were reserved for low- and

moderate-income households earning up to 80 percent of the AMI. The development received significant public financing, including a \$3.7 million soft subordinate loan from the City of Austin Rental Housing Development Assistance Program and a \$3 million construction loan from the Texas State Affordable Housing Corporation. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$16.7 million in LIHTC equity in the project.

- A construction loan in the amount of \$8.4 million for the new construction of a 56-unit mixed-income affordable housing development. In addition, CONA provided a permanent loan of \$2.5 million. Fifty-one of 56 units were set aside for low- and moderate-income residents. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$10.8 million in LIHTC equity in the project.

Dallas MSA

The institution was a leader in making CD loans.

The level of CD lending was excellent. CONA made 82 CD loans totaling \$1.3 billion, which represented 180.3 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 93.4 percent of these loans funded affordable housing, 6.5 percent funded economic development activities, and 0.1 percent funded revitalization and stabilization efforts.

The following are examples of the bank's CD loans that illustrate the complexity or responsiveness of CONA's CD lending:

- CONA provided a \$7 million loan to help finance a 150-unit, mixed-income housing development. Ninety-three units were reserved for households earning up to 60 percent of the AMI with the remaining 57 units provided at the market rate. This transaction included additional financing in the form of a loan from HUD. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$7 million in LIHTC equity investment in the project.
- CONA provided \$18.7 million for the construction of a new facility to support victims of domestic abuse. The new center increased the organization's overall capacity by 40 percent. The new center was estimated to create 40 or more new jobs and retain 30 or more current jobs. This financing addressed the bank-identified community need of providing crisis intervention and long-term solutions for women and children who were survivors of domestic violence. CONA demonstrated multi-faceted support by also providing \$60,000 in grants to support the center's general operating expense.
- A \$25.5 million loan for the construction of a 130-unit, mixed-income affordable housing development. One hundred and four of 130 units were set aside for low- and moderate-income households earning up to 60 percent of the AMI. In addition to CONA's financing, the development's complex financial structure involved a \$7.6 million grant from the municipal government. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$15.8 million LIHTC equity investment in the project.

Broader Statewide and Regional Area

In addition, CONA made 51 CD loans totaling \$675.1 million to organizations in the broader statewide and regional area whose purpose, mandate, or function included serving CONA's AA. Forty-four loans provided financing for affordable housing, two loans were for revitalization and stabilization efforts, and five loans were for economic development.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs in the Austin MSA AA and the Dallas MSA AA.

During the evaluation period, CONA issued more than 27,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies in the Austin MSA AA and more than 134,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies in the Dallas MSA AA. CONA's flexible lending practices further supported the Lending Test rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Houston MSA AA and Texarkana MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the Beaumont MSA and Tyler MSA AAs was weaker than the bank's overall performance under the Lending Test in the full-scope areas. The weaker performance in the Beaumont MSA AA was due to a lower volume of lending to households in low-income geographies. The weaker performance in the Tyler MSA AA was due to a lower level of CD lending. The weaker performance in the Beaumont MSA and Tyler MSA AAs had a minimal impact on the bank's overall Lending Test rating for the state of Texas.

Refer to Tables O through V in the state of Texas section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Austin MSA AA and Dallas MSA AA was excellent.

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|----------------|----------------|----------------|------------|--------------|----------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Austin MSA | 18 | 61,213 | 94 | 81,092 | 112 | 14.3 | 142,305 | 19.9 | 0 | 0 |
| Dallas MSA | 16 | 65,888 | 276 | 120,599 | 292 | 37.4 | 186,487 | 26.1 | 0 | 0 |
| Beaumont MSA | 7 | 13,339 | 33 | 9,684 | 40 | 5.1 | 23,023 | 3.2 | 0 | 0 |
| Houston MSA | 33 | 115,685 | 187 | 75,275 | 220 | 28.2 | 190,960 | 26.8 | 0 | 0 |
| Texarkana MSA | 1 | 1,229 | 7 | 131 | 8 | 1.0 | 1,360 | 0.2 | 0 | 0 |
| Tyler MSA | 3 | 10,095 | 14 | 963 | 17 | 2.2 | 11,058 | 1.5 | 0 | 0 |
| Regional | 1 | 3,020 | 8 | 2,036 | 9 | 1.2 | 5,056 | 0.7 | 0 | 0 |
| Statewide | 56 | 103,493 | 27 | 50,098 | 83 | 10.6 | 153,591 | 21.5 | 0 | 0 |
| Total | 135 | 373,962 | 646 | 339,878 | 781 | 100.0 | 713,840 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Austin MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 60.2 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services to primarily low- and moderate-income individuals or supported economic development. By dollar volume, 99.2 percent of total investments and grants supported affordable housing, and less than one percent funded community services to low- and moderate-income individuals and economic development.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included five LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$18 million in LIHTC equity to help finance the construction of a 307-unit affordable housing development, with all units restricted to low- and moderate-income households. This complex investment involved federal tax-exempt financing from the City of Austin's Housing Authority. This investment addressed the community identified need for affordable housing.
- An investment of \$15 million in LIHTC equity to help finance the construction of a 280-unit affordable housing development. Two hundred and twenty-seven of 280 units are dedicated to low- and moderate-income households. This investment addressed the community identified need for affordable housing.
- A \$100,000 grant for COVID-19 pandemic relief to a nonprofit organization to employ displaced hourly workers in the hospitality industry to perform shifts for hunger-relief focused nonprofit

organizations that needed to replace their volunteers during the pandemic. This grant responded to the bank-identified community needs for providing COVID-19 pandemic recovery and food security.

Dallas MSA

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 26.6 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services to primarily low- and moderate-income individuals or supported economic development. By dollar volume, 95.8 percent of total investments and grants supported affordable housing, 3.4 percent funded community services to low- and moderate-income individuals, and less than one percent supported economic development.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included five LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$15.8 million in LIHTC equity to help finance the construction of a 99-unit, mixed income development that includes 89 units set aside for low- and moderate-income households. Tenants receive supportive services, including income tax preparation, an annual health fair, food pantry, and other services. This investment addressed the community identified need for affordable housing and the bank-identified community need of providing supportive social services for low- and moderate-income households. CONA demonstrated multi-faceted support by also providing two construction loans totaling \$15.6 million for this project.
- An investment of \$7.2 million in LIHTC equity to help finance the acquisition and rehabilitation of a 50-unit affordable housing development. All units are restricted to low- and moderate-income households. This investment addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing a \$2.8 million loan for this project.
- Grants totaling \$70,000 to a CDC dedicated to the redevelopment of predominantly low- and moderate-income geographies. Funding supported the CDC's homebuyer counseling program and general operations, and responded to the needs for homebuyer education, affordable housing for low- and moderate-income households, and revitalization of low- and moderate-income neighborhoods.

Broader Statewide and Regional Area

In addition, CONA made 92 current- and prior-period investments totaling \$158.7 million in the broader statewide and regional area whose purpose, mandate, or function included serving its AAs. These

investments included 57 prior-period investments totaling \$106.5 million that supported affordable housing, eight current-period investments totaling \$51.6 million that supported affordable housing, 20 grants totaling \$438,944 primarily to organizations providing community services to low- and moderate-income individuals, four grants totaling \$81,760 for economic development, and three grants totaling \$50,000 that supported affordable housing. Investments in the broader statewide and regional area further supported the Outstanding rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Beaumont MSA AA, Houston MSA AA, Texarkana MSA AA, and Tyler MSA AA 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 Texas is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Austin MSA AA was good and the bank's performance in the Dallas MSA AA was excellent. The weaker performance in the limited-scope AAs had a negative impact on the overall Service Test rating for the state of Texas.

Retail Banking Services

| Distribution of Branch Delivery System | | | | | | | | | | | |
|--|--|--------------------|--------------------------------|---|-------|-------|-------|---------------------------------------|------|------|------|
| Assessment Area | Deposits % of Rated Area Deposits in AA | # of BANK Branches | % of Rated Area Branches in AA | Branches | | | | Population | | | |
| | | | | Location of Branches by Income of Geographies (%) | | | | % of Population within Each Geography | | | |
| | | | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Austin MSA | 10.9 | 2 | 5.6 | 50.0 | 0.0 | 50.0 | 0.0 | 6.7 | 22.3 | 36.1 | 32.4 |
| Dallas MSA | 32.5 | 12 | 33.3 | 16.7 | 33.3 | 16.7 | 33.3 | 8.6 | 25.2 | 30.6 | 34.8 |
| Beaumont MSA | 2.5 | 2 | 5.6 | 0.0 | 100.0 | 0.0 | 0.0 | 7.5 | 30.5 | 23.7 | 31.2 |
| Houston MSA | 50.3 | 18 | 50.0 | 22.2 | 5.6 | 22.2 | 44.4 | 10.8 | 23.5 | 28.5 | 35.5 |
| Texarkana MSA* | 0.8 | 1 | 2.8 | 0.0 | 0.0 | 100.0 | 0.0 | 5.3 | 14.4 | 47.7 | 32.5 |
| Tyler MSA | 3.0 | 1 | 2.8 | 0.0 | 0.0 | 0.0 | 100.0 | 1.9 | 25.7 | 43.0 | 28.5 |

NOTE: The number of bank branches includes one branch in a geography with no income designation.

Austin MSA

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.

Based on the table above, the bank's distribution of branches in low-income geographies exceeded the percentages of the population in low-income geographies. There were no branches located in moderate-income geographies.

| Distribution of Branch Openings/Closings | | | | | | |
|--|----------------------|----------------------|---|-----|-----|-----|
| Assessment Area | # of Branch Openings | # of Branch Closings | Branch Openings/Closings | | | |
| | | | Net change in Location of Branches (+ or -) | | | |
| | | | Low | Mod | Mid | Upp |
| Austin MSA | 0 | 2 | 0 | 0 | 0 | -2 |
| Dallas MSA | 0 | 13 | 0 | -1 | -5 | -7 |
| Beaumont MSA | 0 | 1 | 0 | 0 | -1 | 0 |
| Houston MSA | 0 | 16 | -2 | -2 | -5 | -7 |
| Texarkana MSA | 0 | 0 | 0 | 0 | 0 | 0 |
| Tyler MSA | 0 | 0 | 0 | 0 | 0 | 0 |

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. The institution did not open or close any branches in low- and moderate-income geographies during the evaluation period. The institution closed two branches in upper-income geographies.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census did not change the income-level designations of the low-income and middle-income geographies where CONA had branches.

| | Low-income Geographies | | Moderate-income Geographies | |
|----------------------------------|------------------------|------------|-----------------------------|------------|
| | Branches (#) | % of Total | Branches (#) | % of Total |
| Austin MSA | | | | |
| Prior to 2020 U.S. Census Change | 1 | 50 | 0 | 0 |
| After 2020 U.S. Census Change | 1 | 50 | 0 | 0 |
| Net Change | - | - | - | - |

ADS Usage

CONA had several ADS, including ATMs, online banking, and mobile banking options. These ADS provided additional access to retail banking services to low- and moderate-income geographies or individuals. CONA's ADS had a positive impact on the Service Test conclusion.

| ATM Distribution | | | | | | | | | |
|-------------------|-----------|------------------------------------|------|------|------|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Austin MSA | 29 | 24.1 | 13.8 | 44.8 | 3.4 | 6.7 | 22.3 | 36.1 | 32.4 |
| Dallas MSA | 86 | 8.1 | 25.6 | 27.9 | 37.2 | 8.6 | 25.2 | 30.6 | 34.8 |
| Beaumont MSA | 8 | 0 | 100 | 0 | 0 | 7.5 | 30.5 | 23.7 | 31.2 |
| Houston MSA | 91 | 16.5 | 7.7 | 27.5 | 45.1 | 10.8 | 23.5 | 28.5 | 35.5 |
| Texarkana MSA | 6 | 0 | 16.7 | 83.3 | 0 | 5.3 | 14.4 | 47.7 | 32.5 |
| Tyler MSA | 5 | 0 | 0 | 40 | 60 | 1.9 | 25.7 | 43.0 | 28.5 |

NOTE: The number of ATMs in the Austin MSA includes four ATMs in geographies with no income designation.

NOTE: The number of ATMs in the Dallas MSA includes one ATM in a geography with no income designation.

Based on the table above, the distribution of ATMs in low-income geographies exceeded, and in moderate-income geographies was below, the percentages of the population in those geographies. During the evaluation period, CONA removed seven ATMs from upper-income geographies and three ATMs from middle-income geographies.

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 63.1% | 31% |
| Mobile Banking | 91.1% | 66.1% |
| ATM Usage | -26.2% | -49.5% |
| Net Change Across All Channels (Averaged) | 42.7% | 15.9% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals. Branch hours of operation were 9:00 a.m. to 5:00 p.m. Monday through Friday, and 9:00 a.m. to 1:00 p.m. on Saturdays for both branches. Both branches were also limited-service branches. The bank does not operate any full-service branches in this AA.

Dallas MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

Based on the table above, the bank's distribution of branches in both low- and moderate-income geographies exceeded the percentages of the population living in those geographies.

| 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 |
| Austin MSA | 0 | 2 | 0 | 0 | 0 | -2 |
| Dallas MSA | 0 | 13 | 0 | -1 | -5 | -7 |
| Beaumont MSA | 0 | 1 | 0 | 0 | -1 | 0 |
| Houston MSA | 0 | 16 | -2 | -2 | -5 | -7 |
| Texarkana MSA | 0 | 0 | 0 | 0 | 0 | 0 |
| Tyler MSA | 0 | 0 | 0 | 0 | 0 | 0 |

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. The institution did not open any branches and closed one branch, that was in a moderate-income geography, during the evaluation period. Factors that contributed to the branch closure in the moderate-income geography included declining branch teller transactions and underperformance in key performance metrics.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census did not change the income-level designations of the low-income, moderate-income, middle-income, and upper-income geographies where CONA had branches.

| | Low-income Geographies | | Moderate-income Geographies | |
|----------------------------------|------------------------|------------|-----------------------------|------------|
| | Branches (#) | % of Total | Branches (#) | % of Total |
| Dallas MSA | | | | |
| Prior to 2020 U.S. Census Change | 2 | 16.7 | 4 | 33.3 |
| After 2020 U.S. Census Change | 2 | 16.7 | 4 | 33.3 |
| Net Change | - | - | - | - |

ADS Usage

CONA had several ADS, including ATMs, online banking, and mobile banking options. These ADS provided additional access to retail banking services to low- and moderate-income geographies or individuals, or both. CONA's ADS had a positive impact on the Service Test conclusion.

| ATM Distribution | | | | | | | | | |
|-------------------|-----------|------------------------------------|-------|------|------|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Austin MSA | 29 | 24.1 | 13.8 | 44.8 | 3.4 | 6.7 | 22.3 | 36.1 | 32.4 |
| Dallas MSA | 86 | 8.1 | 25.6 | 27.9 | 37.2 | 8.6 | 25.2 | 30.6 | 34.8 |
| Beaumont MSA | 8 | 0.0 | 100.0 | 0.0 | 0.0 | 7.5 | 30.5 | 23.7 | 31.2 |
| Houston MSA | 91 | 16.5 | 7.7 | 27.5 | 45.1 | 10.8 | 23.5 | 28.5 | 35.5 |
| Texarkana MSA | 6 | 0.0 | 16.7 | 83.3 | 0.0 | 5.3 | 14.4 | 47.7 | 32.5 |
| Tyler MSA | 5 | 0.0 | 0.0 | 40.0 | 60.0 | 1.9 | 25.7 | 43.0 | 28.5 |

Based on the table above, the distribution of ATMs in low-income geographies approximated, and in moderate-income geographies exceeded, the percentages of the population in those geographies. During the evaluation period, CONA installed one ATM in a low-income geography and two ATMs in middle-income geographies. CONA removed one ATM from a low-income geography, two ATMs from moderate-income geographies, 16 ATMs from middle-income geographies, and 19 ATMs from upper-income geographies.

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 85.4% | 40.3% |
| Mobile Banking | 117.5% | 77.9% |
| ATM Usage | -17% | -41.5% |
| Net Change Across All Channels (Averaged) | 62% | 25.6% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Generally, branch hours of operation were 9:00 a.m. to 5:00 p.m. Monday through Friday. Five of 12 branches were open 9:00 a.m. to 1:00 p.m. on Saturdays, including three branches that were in moderate-income geographies. There were no limited-service branches in the AA.

Community Development Services

Austin MSA

The institution provided a relatively high level of CD services.

CD services were responsive to the community needs the institution identified through community contacts. Seventy bank associates provided 1,172 hours of qualified service activities to 15 organizations. Strong leadership was evident through board or committee participation in three of those activities with eight employees providing more than 43 board service hours. *Pro Bono* services

accounted for 881 service hours or 75 percent of CD services. Services consisted of providing legal aid services through CONA's *Pro Bono* volunteer program, financial literacy education, and technical assistance to small businesses and nonprofit organizations.

Examples of CD services in the AA include:

- A CONA associate provided 18 hours of board service on the Advisory Board of a nonprofit membership association of CDCs. The organization provides policy and economic research, advocacy, training, and networking opportunities to member CDC organizations. These services addressed the bank-identified community need to strengthen and build the capacity of CDCs.
- CONA associates provided 671 hours of community services, provided through the *Pro Bono Volunteer Program*, to benefit the clients of a nonprofit organization located in a moderate-income geography that focuses on immigration advocacy and provides attorney mentorship, immigration law training, and community education services. CONA's associates helped families gain asylum and resident status. These services addressed the bank-identified community needs of providing legal assistance for new immigrants.

Dallas MSA

The institution was a leader in providing CD services.

CD services were responsive to the community needs the institution identified through community contacts. Seven hundred and fifty-three bank associates provided 8,648 hours of qualified service activities to 35 organizations. Strong leadership was evident through 474 hours in board or committee participation in seven of those activities. Services consisted of providing workforce development through CONA's *Pro Bono* volunteer program, financial literacy education, and technical assistance to small businesses and nonprofit organizations.

Examples of CD services in the AA include:

- CONA associates provided 230 hours of technology education to support the local chapter of a national nonprofit organization located in a moderate-income geography that provides community-based youth programs. These programs include financial and economic literacy, career preparation, college readiness, and education. CONA associates taught participants website development and coding. In addition, a CONA executive provided eight hours serving on the chapter's board of directors as the chairperson of the board. These services addressed the community identified need for supporting community development services, including financial literacy education.
- CONA associates provided 127 hours of workforce development and career readiness services for the local chapter of a national nonprofit organization that provides job training and career development services to low- and moderate-income individuals. The services consisted of providing mock interviews and resume building workshops. In addition, CONA associates provided nine hours of technology education in JAVA and SQL applications. These services addressed the bank-identified community needs of workforce development and increasing self-sufficiency for the low- and moderate-income population.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Beaumont MSA, Houston MSA, Texarkana MSA, and Tyler MSA AAs was weaker than the bank's overall performance under the Service Test in the full-scope areas. The weaker performance in these AAs was primarily due to a lower branch distribution in low- and moderate-income geographies and had a negative impact on the Service Test rating for the state of Texas.

Commonwealth of Virginia

CRA rating for the Commonwealth of Virginia²: 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:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels.
- CONA was a leader in providing CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Virginia

CONA delineated one AA in the commonwealth of Virginia, which was the portion of the Richmond, VA MSA (Richmond MSA), where CONA had deposit-taking ATMs. The commonwealth of Virginia rating does not include the counties included in the Washington, DC CSA AA analyses. Refer to appendix A for a complete description of the AA.

CONA had no branches, two cafés, 20 deposit-taking ATMs, and \$1.2 billion of allocated internet deposits, which represented 0.4 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems in this AA. Because CONA does not operate a licensed branch in this AA, there are no deposits reported on the June 30, 2022, FDIC Deposit Market Share report. The bank originated or purchased 1 percent of its evaluation period lending by count and 1 percent by dollar volume in the Richmond MSA AA.

Based on June 30, 2022 FDIC summary of deposit information, there were 27 depository institutions with licensed branches in the Richmond MSA AA. The top three depository institutions by deposit market share were Capital One Bank (USA), N.A. (60.9 percent), Bank of America, N.A. (17.8 percent), and Truist Bank (7.6 percent).

Capital One Bank (USA), N.A. (COBNA) was an affiliate of Capital One, N.A. and a subsidiary of CONA's bank holding company, Capital One Financial Corporation. On October 1, 2022, COBNA merged with CONA which resulted in the dissolution of COBNA's bank charter and reallocation of COBNA's reported deposits.

² This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Richmond MSA

The following table provides a summary of the demographic information that includes housing and business information for the Richmond MSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Richmond MSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 234 | 12.0 | 22.2 | 33.3 | 31.6 | 0.9 |
| Population by Geography | 1,001,351 | 8.8 | 20.8 | 35.1 | 34.9 | 0.4 |
| Housing Units by Geography | 415,194 | 9.3 | 21.9 | 35.1 | 33.6 | 0.1 |
| Owner-Occupied Units by Geography | 246,264 | 4.3 | 15.9 | 38.6 | 41.2 | 0.0 |
| Occupied Rental Units by Geography | 135,063 | 16.9 | 31.2 | 29.9 | 21.9 | 0.2 |
| Vacant Units by Geography | 33,867 | 15.4 | 28.8 | 30.3 | 25.2 | 0.4 |
| Businesses by Geography | 131,313 | 6.4 | 21.1 | 32.1 | 40.0 | 0.3 |
| Farms by Geography | 2,872 | 3.1 | 14.9 | 38.9 | 43.1 | 0.0 |
| Family Distribution by Income Level | 242,946 | 19.9 | 17.4 | 19.9 | 42.8 | 0.0 |
| Household Distribution by Income Level | 381,327 | 22.6 | 16.4 | 18.0 | 42.9 | 0.0 |
| Median Family Income MSA - 40060 Richmond, VA MSA | | \$75,183 | Median Housing Value | | | \$229,947 |
| | | | Median Gross Rent | | | \$1,000 |
| | | | Families Below Poverty Level | | | 8.3% |
| <i>Source: 2015 ACS and 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|---|-----------|-----------------------|----------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Richmond MSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 271 | 9.2 | 23.2 | 35.4 | 30.3 | 1.8 |
| Population by Geography | 1,078,423 | 7.1 | 19.5 | 38.8 | 33.5 | 1.0 |
| Housing Units by Geography | 430,875 | 7.5 | 20.4 | 39.8 | 31.2 | 1.0 |
| Owner-Occupied Units by Geography | 265,498 | 3.3 | 14.3 | 43.8 | 38.1 | 0.5 |
| Occupied Rental Units by Geography | 138,202 | 14.9 | 30.9 | 32.6 | 19.7 | 1.9 |
| Vacant Units by Geography | 27,175 | 11.0 | 26.8 | 37.6 | 22.9 | 1.8 |
| Businesses by Geography | 162,460 | 5.6 | 17.5 | 38.7 | 36.6 | 1.6 |
| Farms by Geography | 3,327 | 3.1 | 12.8 | 42.7 | 40.7 | 0.7 |
| Family Distribution by Income Level | 255,650 | 19.8 | 17.8 | 20.4 | 41.9 | 0.0 |
| Household Distribution by Income Level | 403,700 | 22.9 | 16.6 | 17.3 | 43.2 | 0.0 |
| Median Family Income MSA - 40060 Richmond, VA MSA | | \$91,165 | Median Housing Value | | | \$269,121 |

| | | |
|--|------------------------------|---------|
| | Median Gross Rent | \$1,164 |
| | Families Below Poverty Level | 6.4% |
| <i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | |

Economic Data

Data from Moody’s Analytics over the evaluation period indicated the Richmond, VA MSA’s economy stalled in late 2022. Leisure and hospitality were the only industries that stood out as a driver, whereas all other private industries, along with the public sector, were underwhelming their peers nationally. Single-family house price appreciation moderated significantly. During the pandemic, house prices outran per capita wage and salary income to an even greater extent than in the U.S. and Virginia. As a result, a higher-than-average share of single-family listings experienced cuts to their list price. Multifamily starts skyrocketed from 2,600 units in 2021 to 4,800 units in 2022. The area’s strengths include above-average per capita income, lower business costs, and higher housing affordability than Washington, DC which attracts firms and households to the area, and stable, positive net migration. Weaknesses include sensitivity to strength of the Washington, DC economy, structural deficits, a reliance on state government, and a low rate of business formation.

Based on data from the BLS, the unemployment rate was three percent in January 2020, as high as 11.5 percent in April 2020, and 2.6 percent in December 2022. Major employers in the AA included Fort Lee, VCU Health System, HCA Inc., and Bon Secours Richmond Health System.

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 affordable housing, community development and economic development, and financial capability. Contacts noted that there are pockets of concentrated poverty in South Richmond, the East End, and Petersburg. There was an acute shortage of rental units for low- and moderate-income households and starter homes. Areas that have historically served people with lower incomes have become targets for gentrification. Credit and community development needs identified include:

- Affordable rental housing for low- and moderate-income households
- Loans for home repair and rehabilitation
- Access to capital for small businesses including start-up capital and lines of credit for working capital

The area is served by several nonprofit organizations, community-based organizations, CDFIs, economic development organizations, and community development organizations that provide opportunities to help meet community needs.

Scope of Evaluation in Virginia

The Richmond MSA AA received a full-scope review. CONA's strategic focus is consumer lending. Consumer lending received a greater weight than small loans to businesses and small loans to farms. There was an insufficient number of home mortgage loans for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans | | | | | | | | |
|------------------------|---------------|----------------|------------|----------------|-----------------------|----------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Richmond MSA | 6 | 6,080 | 32 | 306,636 | 26 | 312,780 | 100.0 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 6 | 6,080 | 32 | 306,636 | 26 | 312,780 | 100 | 100 |

| Dollar Volume of Loans (\$000) | | | | | | | | |
|---------------------------------------|----------------|----------------|------------|----------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Richmond MSA | 145,124 | 73,538 | 256 | 684,212 | 315,122 | 1,218,252 | 100.0 | 100.0 |
| Statewide | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 145,124 | 73,538 | 256 | 684,212 | 315,122 | 1,218,252 | 100.0 | 100.0 |

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$1.2 billion in deposits based on customer addresses. Based on these deposits (and excluding COBNA), CONA would have had an estimated deposit market share of 2.1 percent and would have ranked sixth out of 27 depository institutions, placing it in the top 23 percent of depository institutions in this AA.

According to peer small business data for 2021, CONA had a market share of 7.2 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked fifth out of 167 small business lenders, which placed it in the top three percent of lenders. The top lenders in this

AA based on market share were American Express National Bank (18.5 percent), Wells Fargo Bank, N.A. (11.2 percent), and Truist Bank (9.3 percent).

According to peer small farm data for 2021, CONA had a market share of 8.2 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked sixth out of 16 small farm lenders, which placed it in the top 38 percent of lenders. The top lenders in this AA based on market share were Wells Fargo Bank, N.A. (19.2 percent), John Deere Financial FSB (19.2 percent), and First Bank and Trust Company (13.7 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data is not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 59.1 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the commonwealth of Virginia 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were four PPP loans totaling \$922,000 to small businesses in moderate-income geographies that provided support during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table S in the commonwealth of Virginia 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 farms.

Based on the data in the tables, the overall geographic distribution of small loans to farms was adequate.

For 2020 through 2021, the bank did not originate or purchase any small loans to farms in low-income geographies. The percentages of small loans to farms in moderate-income geographies exceeded both the percentages of farms located in moderate-income geographies and the aggregate percentages of all reporting lenders.

The bank did not originate or purchase a sufficient number of small loans to farms in the 2022 period to perform a meaningful analysis.

Consumer Loans

Refer to Table U in the commonwealth of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in low-income geographies approximated, and in moderate-income geographies exceeded, the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed small business, small farm, and consumer 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 any of the full-scope areas 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 and farms of different sizes.

Small Loans to Businesses

Refer to Table R in the commonwealth of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 29 PPP loans totaling \$458,000 that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less located in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the commonwealth of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was adequate.

For 2020 through 2021, the percentages of small loans to farms with revenues of \$1 million or less was well below the percentages of farms with revenues of \$1 million or less located in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank did not originate or purchase a sufficient number of small loans to farms in the 2022 period to perform a meaningful analysis.

Consumer Loans

Refer to Table V in the commonwealth of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made 26 CD loans totaling \$315.1 million, which represented 296.4 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 90.3 percent funded affordable housing, 1.3 percent funded community services, 0.9 percent funded revitalization and stabilization efforts, and 7.5 percent funded economic development activities.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- CONA provided \$21.7 million in financing for the purchase and rehabilitation of an existing 152-unit family affordable housing development. CONA's financing included a purchase loan of \$15 million and a line of credit of \$6.7 million. All units were restricted to low-income households with incomes up to 50 percent of the AMI and included HUD rental subsidies effectively limiting rent to no more than 30 percent of the household income. This financing addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$6.7 million in LIHTC equity.
- A \$29.4 million loan to finance the rehabilitation of a 216-unit affordable housing development. All units were restricted to low- and moderate-income households earning up to 60 percent of the AMI. The property was part of an extremely large fund that included 35 other properties and 18 other

equity investors; in addition, tax-exempt bond financing was provided by the county government. This loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$2.1 million in LIHTC equity.

- CONA provided a \$8.7 million loan for NMTC financing. This financing provided for the expansion of a school campus to include additional classrooms, a gym, and a community center. The development was expected to create 15 new jobs and expand after-school programming. The school was in a low-income geography and served low- and moderate-income students. This financing addressed the bank-identified community needs for education and after-school programs for low- and moderate-income youth, transforming a blighted vacant lot into a productive community facility, and revitalization efforts.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 17,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices further supported the Lending Test rating.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|---------------|----------------|----------------|------------|--------------|----------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Richmond MSA | 33 | 70,772 | 206 | 112,473 | 239 | 100.0 | 183,245 | 100.0 | 0 | 0 |
| Total | 33 | 70,772 | 206 | 112,473 | 239 | 100.0 | 183,245 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 172.4 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services to low- and moderate-income individuals or supported economic development. By dollar volume, 96.3 percent of total investments and grants supported affordable housing, 2.9 percent funded community services to low- and moderate-income

individuals, 0.8 percent supported economic development, and less than one percent supported revitalization and stabilization efforts.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included 13 LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$18 million in LIHTC equity in two transactions to help finance the rehabilitation of 204 public housing units. The public housing was converted into affordable units under the LIHTC program. All units are reserved for low-income families and benefit from housing assistance that limits rent to 30 percent of resident income. These properties are part of a national multi-investor fund containing 20 other properties around the country, and 10 other investors, further increasing the level of complexity. This investment addressed the community identified needs for affordable housing and the bank-identified community needs of supportive services for low-income residents, and affordable units for larger families.
- An investment of \$11.2 million in LIHTC equity to help finance the rehabilitation of a 114-unit affordable housing development. The property is one of 19 properties included in a multi-investor fund. All 114 units are restricted to low- and moderate-income households and benefit from housing assistance that limits rent to 30 percent of resident income. This complex transaction involved 19 properties and five other investors. This investment addressed the community identified need for maintaining affordable housing for low- and moderate-income households.
- Grants totaling \$600,000 to a nonprofit community-based organization that works to ensure availability of affordable housing for low- and moderate-income residents of metropolitan Richmond. CONA's funds enabled the organization to provide three years of free internet access and related training for all 823 senior residents of one of its affordable housing communities and supportive services to residents in another housing development. These grants addressed the bank-identified community needs of increasing online access for low- and moderate-income seniors, and providing comprehensive support services for low- and moderate-income households.

SERVICE TEST

The bank's performance under the Service Test in Virginia is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online, and mobile banking.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

CONA had two cafés accessible to the public with seven deposit-taking ATMs. Both of CONA's cafés were in upper-income geographies. CONA had 13 additional deposit-taking ATMs at various locations throughout the AA. CONA did not open or close any cafés during the evaluation period.

| ATM Distribution | | | | | | | | | |
|---------------------|-----------|------------------------------------|-----|-----|-----|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Richmond MSA | 20 | 5 | 5 | 50 | 40 | 7.1 | 19.5 | 38.8 | 33.5 |

Based on the table above, the distribution of ATMs in low-income geographies was near to, and in moderate-income geographies was well below, the percentages of the population in those geographies. During the evaluation period, CONA removed two ATMs from moderate-income geographies and six ATMs from upper-income geographies.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of one moderate-income and three upper-income geographies where CONA had deposit-taking ATMs. The U.S. Census did not change the income-level designation of any middle-income geographies. The U.S. Census changed the income-designation of the moderate-income geography to a low-income geography. The U.S. Census changes to the income-level designation of the moderate-income geographies resulted in a significant decrease in the total number of deposit-taking ATMs in those geographies and a significant increase in the total number of deposit-taking ATMs in low-income geographies. These changes had a significant impact on the distribution of deposit-taking ATMs in each of those geographies relative to the percentages of the population in those respective geographies. As a result, the OCC provided more consideration to the change in ADS use over the evaluation period in determining the accessibility of the bank's service delivery systems.

| Richmond MSA | Low-income Geographies | | Moderate-income Geographies | |
|---------------------------|------------------------|------------|-----------------------------|------------|
| | ATMs (#) | % of Total | ATMs (#) | % of Total |
| Prior to 2020 U.S. Census | 0 | 0 | 2 | 10 |
| After 2020 U.S. Census | 1 | 5 | 1 | 5 |
| Net Change | 1 | 5 | -1 | -5 |

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 74.9% | 39.7% |
| Mobile Banking | 117.8% | 78.4% |
| ATM Usage | -14% | -28.6% |
| Net Change Across All Channels (Averaged) | 59.6% | 29.8% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. Each café has individual hours of operation. One café is in a retail shopping center and its hours of operation are based on the shopping center's hours of operation. This café's hours of operation were 11:00 a.m. to 8:00 p.m. Monday through Thursday, 10:00 a.m. to 8:00 p.m. Fridays and Saturdays, and 11:00 a.m. to 6:00 p.m. on Sundays. The other café's hours of operation were 8:00 a.m. to 7:00 p.m. Monday through Saturday and 9:00 a.m. to 4:00 p.m. on Sundays.

Community Development Services

The institution was a leader in providing CD services.

CD services were responsive to the community needs the institution identified through community contacts. Over 1,600 bank associates provided 25,490 hours of qualified service activities to 69 organizations. Strong leadership was evident through board or committee participation with 111 employees providing more than 1,721 service hours to 24 organizations. *Pro Bono* services accounted for 16,477 service hours or 65 percent of CD services. Services consisted of providing legal aid services, technical assistance to small businesses, workforce development services through CONA's *Pro Bono* volunteer program, and financial literacy education.

Examples of CD services in the AA include:

- Twenty-three CONA associates provided 192 hours of financial literacy education to students of a public school located in a moderate-income geography. These services addressed the bank-identified community need for financial literacy education.
- Thirty-five CONA associates provided 506 hours of technical assistance to small business clients of a nonprofit organization located in a moderate-income geography. The nonprofit organization provides free entrepreneurial education, workspaces, and connects startup businesses with mentors and access to potential investors and corporate partners. In addition, 23 CONA associates provided 402 hours of consulting, technical support, and product assistance through Capital One's *Pro Bono* volunteer program. These services addressed the bank-identified community need for providing technical assistance to small businesses and nonprofit organizations. CONA demonstrated leadership by serving as a founding board member of the nonprofit organization.

State of Washington

CRA rating for the State of Washington: 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:

- An excellent geographic distribution of loans.
- An excellent borrower distribution of loans.
- CONA was a leader in making CD loans.
- CONA had an excellent level of qualified CD investments and grants that were complex or responsive to AA needs.
- Service delivery systems were readily accessible to geographies and individuals of different income levels.
- CONA provided an adequate level of CD services that were responsive to identified needs in the AA.

Description of Institution's Operations in Washington

CONA delineated six AAs in the state of Washington. They included the entirety of the Bellingham, WA MSA (Bellingham MSA), Bremerton-Silverdale-Port Orchard, WA MSA, Mount Vernon-Anacortes, WA MSA, Olympia-Lacey-Tumwater, WA MSA, Seattle-Bellevue-Everett, WA MD, and Tacoma-Lakewood, WA MD where CONA had deposit-taking ATMs. Refer to appendix A for a complete description of the AAs.

CONA had no branches, two cafés, 34 deposit-taking ATMs and \$3.6 billion of allocated internet deposits, which represented 1.1 percent of the bank's total domestic deposits. CONA provides access to banking products and services primarily through digital delivery systems within these AAs. Because CONA does not operate a licensed branch in Washington, there are no deposits reported on the June 30, 2022 FDIC Deposit Market Share report. The bank originated or purchased 3 percent of its evaluation period lending by count and 3.7 percent by dollar volume in the portions of Washington where CONA has AAs.

Based on June 30, 2022 FDIC summary of deposit information, there were 56 depository institutions with branch operations in the portions of Washington where the bank has an AA. The top three depository institutions by deposit market share were Bank of America, N.A. (25.6 percent), JP Morgan Chase Bank, N.A. (15.8 percent), and Wells Fargo Bank, N.A. (11.7 percent).

Seattle CSA

The following table provides a summary of the demographics that include housing and business information for the Seattle CSA AA.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Seattle CSA (2020-2021 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 856 | 4.9 | 22.2 | 44.7 | 27.1 | 1.1 |
| Population by Geography | 4,251,868 | 5.0 | 22.4 | 45.1 | 27.3 | 0.2 |
| Housing Units by Geography | 1,768,819 | 4.9 | 22.1 | 45.0 | 27.8 | 0.1 |
| Owner-Occupied Units by Geography | 999,591 | 2.3 | 17.4 | 48.0 | 32.2 | 0.0 |
| Occupied Rental Units by Geography | 644,623 | 8.9 | 28.9 | 40.4 | 21.6 | 0.3 |
| Vacant Units by Geography | 124,605 | 5.7 | 24.4 | 44.8 | 25.0 | 0.1 |
| Businesses by Geography | 460,424 | 5.0 | 18.3 | 40.8 | 35.3 | 0.6 |
| Farms by Geography | 9,880 | 3.0 | 17.1 | 47.6 | 31.5 | 0.9 |
| Family Distribution by Income Level | 1,042,703 | 21.0 | 17.7 | 21.0 | 40.3 | 0.0 |
| Household Distribution by Income Level | 1,644,214 | 23.5 | 16.3 | 18.5 | 41.7 | 0.0 |
| Median Family Income MSA - 14740 Bremerton-Silverdale-Port Orchard, WA MSA | | \$75,652 | Median Housing Value | | | \$333,093 |
| Median Family Income MSA - 34580 Mount Vernon-Anacortes, WA MSA | | \$65,272 | Median Gross Rent | | | \$1,171 |
| Median Family Income MSA - 45104 Tacoma-Lakewood, WA | | \$71,304 | Families Below Poverty Level | | | 7.6% |
| Median Family Income MSA - 36500 Olympia-Lacey-Tumwater, WA MSA | | \$74,420 | | | | |
| Median Family Income MSA - 42644 Seattle-Bellevue-Kent, WA | | \$92,317 | | | | |
| <i>Source: 2015 ACS and 2021 D&B Data</i> | | | | | | |
| <i>Due to rounding, totals may not equal 100.0%</i> | | | | | | |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|-----------|-----------------------|----------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Seattle CSA (2022 Period) | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 1,027 | 4.1 | 21.8 | 44.1 | 28.0 | 1.9 |
| Population by Geography | 4,718,689 | 4.2 | 22.3 | 44.0 | 28.5 | 1.0 |
| Housing Units by Geography | 1,903,862 | 4.3 | 21.7 | 43.9 | 29.0 | 1.1 |
| Owner-Occupied Units by Geography | 1,101,825 | 1.9 | 17.5 | 47.5 | 32.8 | 0.3 |
| Occupied Rental Units by Geography | 695,394 | 8.1 | 28.1 | 38.2 | 23.3 | 2.3 |
| Vacant Units by Geography | 106,643 | 4.7 | 22.9 | 44.1 | 27.0 | 1.4 |
| Businesses by Geography | 605,079 | 4.4 | 18.8 | 41.1 | 34.6 | 1.1 |
| Farms by Geography | 11,829 | 2.7 | 18.6 | 48.5 | 29.7 | 0.5 |
| Family Distribution by Income Level | 1,142,136 | 20.1 | 18.0 | 22.0 | 40.0 | 0.0 |
| Household Distribution by Income Level | 1,797,219 | 22.9 | 16.9 | 18.9 | 41.3 | 0.0 |
| Median Family Income MSA - 14740 Bremerton-Silverdale-Port Orchard, WA MSA | | \$93,126 | Median Housing Value | | | \$499,847 |
| Median Family Income MSA - 34580 Mount Vernon-Anacortes, WA MSA | | \$82,149 | Median Gross Rent | | | \$1,565 |

| | | | |
|--|-----------|------------------------------|------|
| Median Family Income MSA - 36500 Olympia-Lacey-Tumwater, WA MSA | \$91,125 | Families Below Poverty Level | 5.5% |
| Median Family Income MSA - 42644 Seattle-Bellevue-Kent, WA | \$116,853 | | |
| Median Family Income MSA - 45104 Tacoma-Lakewood, WA | \$88,892 | | |
| <i>Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | |

Economic Data

Seattle-Bellevue-Everett, WA MD

Data from Moody's Analytics over the evaluation period indicated the Seattle-Bellevue-Everett, WA area had an economy that was holding steady amid a heightened risk of overheating. Employment growth ticked up in the third quarter of 2022, outpacing the regional average. While the labor force was near a record high, the unemployment rate was in line with its pre-pandemic low. The high-tech sector slowed markedly from the start of 2022, but manufacturing weathered higher interest rates better than elsewhere, and factory payrolls grew faster than the national average. The housing market declined due to higher mortgage rates, with prices falling faster than average during the third quarter of 2022. Higher home prices during 2020-2021 caused home values to diverge from what economic fundamentals, including income, supported. The area's strengths include being a global center for cloud-computing and software development, having a highly trained and well-educated workforce, a large port with connections to emerging Asian markets, and relatively high per capita income. Weaknesses include tech exposed to discretionary spending and high business costs compared with emerging tech hubs.

Based on data from the BLS, the unemployment rate for the Seattle-Bellevue-Everett, WA area was 2.4 percent in January 2020, as high as 16.9 percent in April 2020, and 3.3 percent in December 2022. Major employers in the AA included Amazon, Boeing Co., Microsoft Corp., University of Washington, and Providence Health and Services.

Tacoma-Lakewood, WA MD

Data from Moody's Analytics over the evaluation period indicated that the Tacoma-Lakewood, WA area's economy trailed its peers. Employment increased sporadically and was below its pre-pandemic peak in Tacoma. Statewide employment in Washington recovered. Transportation contributed most of the net new job additions in the second half of 2022. The unemployment rate was below its pre-pandemic level; however, the pool of available workers shrank. Housing peaked, and prices declined faster than the national average. Soaring prices during 2020-2021 caused Tacoma's real estate market to be overvalued.

Based on data from the BLS, the unemployment rate for the Tacoma-Lakewood, WA area was 5 percent in January 2020, as high as 18.5 percent in April 2020, and 4.8 percent in December 2022. Major employers in the AA included Joint Base Lewis-McChord, Multicare Health System, Franciscan Health System, Tacoma Public Utilities, and Safeway Stores.

Bremerton-Silverdale-Port Orchard, WA MSA

Data from Moody's Analytics over the evaluation period indicated that the Bremerton-Silverdale-Port Orchard, WA area's economy stalled with non-farm employment growth flattening due to a lack of

available workers. The unemployment rate decreased to below four percent for the first time since 1990. Labor shortages have impacted consumer industries, and the housing market has slowed. Growth in housing prices fell below the U.S. average despite the limited supply of homes in the area and rise in population. The area's strengths included a stable foundation provided by the presence of U.S. Navy, proximity to the Seattle job market, and an above-average educational attainment. Weaknesses included a dependence on a ferry system for transportation, a heavy reliance on the federal government for the local economy and job growth, and limited private sector growth.

Based on data from the BLS, the unemployment rate for the Bremerton area was 4.3 percent in January 2020, as high as 14.8 percent in April 2020, and 4.1 percent in December 2022. Major employers in the AA included Naval Base Kitsap, St. Michael Medical Center, and Olympic College.

Mount Vernon-Anacortes, WA MSA

Data from Moody's Analytics over the evaluation period indicated that the Mount Vernon-Anacortes, WA area's economy was stable with non-farm employment trending lower towards the end of 2022. Payrolls growth was mixed with increases in manufacturing payrolls offset by losses in retail trade. Year-over-year appreciation in housing prices reached a record high in the first quarter of 2022 exacerbating home affordability issues. The median family income was below the level required to qualify for a typical mortgage on a median-priced single-family home for the first time since the Great Recession. The area's strengths included a proximity to Seattle and Vancouver, a favorable cost structure, a diverse manufacturing industry, and strong agriculture and timber industries. Weaknesses included high employment volatility, high flood insurance premiums, fewer high-wage jobs, and a below average educational attainment.

Based on data from the BLS, the unemployment rate for the Mount Vernon-Anacortes, WA area was 6 percent in January 2020, as high as 19.4 percent in April 2020, and 5.1 percent in December 2022. Major employers in the AA included Skagit Valley Health, Draper Valley Farms Inc., Island Hospital, and Janicki Industries.

Olympia-Lacey-Tumwater, WA MSA

Data from Moody's Analytics over the evaluation period indicated that the Olympia-Lacey-Tumwater, WA area's economic expansion slowed due to lower growth in payroll employment year-over-year. The Olympia area's labor force grew at a higher rate than the national average and continued hiring reduced the jobless rate to below its pre-pandemic rate. Single-family house appreciation was better than the national average, however, permits for single-family housing weakened. The area's strengths included favorable living and business costs relative to the Seattle area, an above-average educational attainment, and favorable trends in migration. Weaknesses included an overexposure and reliance on state government, a below-average per-capita income, and fewer high-tech jobs.

Based on data from the BLS, the unemployment rate for the Olympia area was 4.7 percent in January 2020, as high as 16.2 percent in April 2020, and 4.3 percent in December 2022. Major employers in the AA included Providence Hospital, Safeway, Walmart Inc., and Lucky Eagle Casino.

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 affordable housing,

community development and economic development, and small businesses. Credit and community development needs identified include:

- Affordable housing, including affordable rental housing
- Volunteers for board service
- Micro-loans and small business loans
- Lending for affordable home construction
- Lending to preserve and improve existing stock of affordable housing
- Facilitating volunteer opportunities for bank employees to serve on community boards
- Facilitating or providing donations or sponsorships to support hunger relief

Scope of Evaluation in Washington

In evaluating the bank's performance in the state of Washington, the Seattle CSA AA received a full-scope review, and the Bellingham MSA AA received a limited-scope review. The Seattle CSA AA had 95.4 percent of the lending and 96.1 percent of the deposits (allocated internet deposits only) in the state of Washington. We based our ratings primarily on the results of the area that received a full-scope review.

CONA's strategic focus is consumer lending. Consumer lending received a greater weight than small loans to businesses and small loans to farms. There was an insufficient number of home mortgage loans for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

| Number of Loans* | | | | | | | | |
|-------------------------|---------------|----------------|------------|----------------|-----------------------|----------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Seattle CSA | 25 | 14,354 | 77 | 890,953 | 32 | 905,441 | 95.4 | 96.1 |
| Bellingham MSA | 1 | 1,012 | 20 | 42,454 | 2 | 43,489 | 4.6 | 3.9 |
| Statewide | 0 | 0 | 0 | 0 | 4 | 4 | 0 | 0 |
| Regional | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 26 | 15,366 | 97 | 933,407 | 38 | 948,934 | 100 | 100 |

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

| Dollar Volume of Loans (\$000)* | | | | | | | | |
|--|----------------|----------------|------------|------------------|-----------------------|------------------|---------------------|------------------------|
| Assessment Area: | Home Mortgage | Small Business | Small Farm | Consumer | Community Development | Total | % Rating Area Loans | % Rating Area Deposits |
| Seattle CSA | 277,064 | 199,693 | 730 | 2,701,004 | 240,976 | 3,419,467 | 94.2 | 96.1 |
| Bellingham MSA | 6,782 | 13,915 | 149 | 135,420 | 27,321 | 183,587 | 5.0 | 3.9 |
| Statewide | 0 | 0 | 0 | 0 | 28,553 | 28,553 | 0.8 | 0 |
| Regional | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 283,846 | 213,608 | 879 | 2,836,424 | 296,850 | 3,631,607 | 100 | 100 |

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

As CONA did not operate a licensed branch in this AA, CONA maintained an estimated \$3.5 billion in deposits based on customer addresses. Based on these deposits, CONA would have had an estimated deposit market share of two percent and would have ranked 10th out of 57 depository institutions, placing it in the top 18 percent of depository institutions in this AA.

According to peer small business data for 2021, CONA had a market share of 4.1 percent based on the number of small loans to businesses originated or purchased in this AA. The bank ranked seventh out of 217 small business lenders, which placed it in the top four percent of lenders. The top lenders in this AA based on market share were Bank of America, N.A. (19.7 percent), American Express National Bank (13.5 percent), and JP Morgan Chase Bank, N.A. (13.1 percent).

According to peer small farm data for 2021, CONA had a market share of 3.9 percent based on the number of small loans to farms originated or purchased in this AA. The bank ranked ninth out of 23 small farm lenders, which placed it in the top 40 percent of lenders. The top lenders in this AA based on market share were Bank of America, N.A. (20.8 percent), U.S. Bank, NA (19.4 percent), and JP Morgan Chase Bank, N.A. (12.3 percent).

Lenders do not report data on their consumer lending activities for each AA and because market share data was not available, examiners compared the bank's level of consumer lending against its deposits in the AA. In this AA, consumer lending represented 78 percent of total deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Small Loans to Businesses

Refer to Table Q in the state of Washington 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.

Based on the data in the tables, the overall geographic distribution of small loans to businesses was excellent. Included in this analysis were seven PPP loans totaling \$188,000 to small businesses in low- and moderate-income geographies that provided support during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses in both low- and moderate-income geographies exceeded both the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table S in the state of Washington 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 farms.

Based on the data in the tables, the overall geographic distribution of small loans to farms was adequate.

For 2020 through 2021, the bank did not originate or purchase any small loans to farms in low-income geographies. The percentages of small loans to farms in moderate-income geographies exceeded both the percentages of farms located in moderate-income geographies and the aggregate percentages of all reporting lenders.

The bank's lending performance in the 2022 period was weaker than the 2020 through 2021 period. The percentages of small loans to farms in moderate-income geographies was near to the percentages of farms located in moderate-income geographies.

Consumer Loans

Refer to Table U in the state of Washington section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall geographic distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans in both low- and moderate-income geographies exceeded the percentages of households located in those geographies.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage, small business, small farm, and consumer 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 any of the full-scope areas 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 and farms of different sizes.

Small Loans to Businesses

Refer to Table R in the state of Washington 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.

Based on the data in the tables, the overall borrower distribution of small loans to businesses was adequate. Included in this analysis were 43 PPP loans totaling \$837,000 that helped support small businesses during the COVID-19 pandemic.

For 2020 through 2021, the percentages of small loans to businesses with revenues of \$1 million or less was well below the percentages of businesses with revenues of \$1 million or less located in the AA and exceeded the aggregate percentages of all reporting lenders.

The bank's lending performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Small Loans to Farms

Refer to Table T in the state of Washington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables, the overall borrower distribution of small loans to farms was adequate.

For 2020 through 2021, the percentages of small loans to farms with revenues of \$1 million or less was well below the percentages of farms with revenues of \$1 million or less located in the AA and was near to the aggregate percentages of all reporting lenders.

The bank's performance against the demographics in the 2022 period was consistent with the 2020 through 2021 period.

Consumer Loans

Refer to Table V in the state of Washington section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Based on the data in the tables, the overall borrower distribution of consumer loans was excellent.

For 2020 through 2021, the percentages of consumer loans to both low- and moderate-income borrowers exceeded the percentages of those households.

The bank's lending performance in the 2022 period was consistent with the 2020 through 2021 period.

Community Development Lending

The institution was a leader in making CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the bank'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. CONA made 32 CD loans totaling \$241 million, which represented 75.8 percent of allocated tier 1 capital. CONA utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs. By dollar volume, 99.9 percent funded affordable housing and less than one percent funded revitalization and stabilization efforts.

The following are examples of the bank's CD loans that illustrate the complexity, leadership, or responsiveness of the bank's CD lending:

- A construction loan of \$12.8 million for the new construction of a 60-unit affordable housing development for low-income individuals. All unit rents were subsidized and affordable to individuals with incomes up to 50 percent of the AMI. The loan addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$14 million in LIHTC equity in the project. In addition to CONA's loan and LIHTC investment, there were four additional sources of financing from federal, state, and municipal sources.
- Two construction loans totaling \$23.4 million for the construction of a six-story, mixed-use development providing 156 units of affordable housing for low- and moderate-income residents. Ninety-two units were reserved for very low-income residents with incomes up to 30 percent of the AMI, supported by development-based rental subsidies and 64 units were reserved for residents with incomes up to 60 percent of the AMI. These loans addressed the community identified need for affordable housing. CONA demonstrated multi-faceted support by also providing \$21.5 million in LIHTC equity. This transaction involved public financing from federal, state and city levels as well as three private financial institutions (including CONA).
- A \$3.9 million loan to refinance a 266-unit LIHTC housing development. Two hundred and sixty-three of 266 units were reserved for low- and moderate-income households earning up to 60 percent of the AMI. This loan addressed the community identified need for affordable housing.

Broader Statewide and Regional Area

In addition, CONA made four qualified loans totaling \$28.5 million and one qualified lease totaling \$1.7 million to organizations in the broader statewide and regional area whose purpose, mandate, or function

included serving CONA's AAs. Two loans provided financing for affordable housing and two loans were for economic development. The qualified lease supported community services benefiting low- and moderate-income individuals.

Product Innovation and Flexibility

The bank used flexible lending practices to serve AA credit needs. During the evaluation period, CONA issued more than 38,000 secured credit cards to low- and moderate-income individuals and/or individuals residing in low- or moderate-income geographies. CONA's flexible lending practices further supported the Lending Test rating.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Bellingham MSA AA was consistent with the bank's overall performance under the Lending Test in the full-scope area. Performance in the limited-scope area supported the overall Lending Test conclusion for the state of Washington.

Refer to Tables O through V in the state of Washington section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Qualified Investments

| Qualified Investments | | | | | | | | | | |
|-----------------------|---------------|---------------|----------------|---------------|-----------|--------------|----------------|---------------|------------------------|-----------|
| Assessment Area | Prior Period* | | Current Period | | Total | | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | % of Total # | \$(000's) | % of Total \$ | # | \$(000's) |
| Seattle CSA | 18 | 55,355 | 66 | 74,388 | 84 | 84.8 | 129,743 | 92.9 | 0 | 0 |
| Bellingham MSA | 2 | 127 | 6 | 1,092 | 8 | 8.1 | 1,219 | 0.9 | 0 | 0 |
| Statewide | 4 | 7,957 | 3 | 805 | 7 | 7.1 | 8,762 | 6.3 | 0 | 0 |
| Total | 24 | 63,439 | 75 | 76,285 | 99 | 100.0 | 139,724 | 100.0 | 0 | 0 |

* Prior Period Investments' means investments made in a prior evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

The bank had an excellent level of qualified CD investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The dollar volume of current-period and prior-period investments represented 40.8 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. All the bank's current and prior period investment transactions involved LIHTCs and MBS that supported

affordable housing, a primary need in the AA. A substantial majority of the grants supported organizations that provided needed community services to low- and moderate-income individuals or supported economic development. By dollar volume, 99.3 percent of total investments and grants supported affordable housing, and 0.5 percent funded community services to low- and moderate-income individuals and less than one percent funded economic development.

The bank made extensive use of innovative or complex investments to support CD initiatives. Current period investments included five LIHTC projects, which are complex and require more expertise to execute.

The following examples demonstrate the bank's use of complex investments or the bank's responsiveness:

- An investment of \$16.4 million in LIHTC equity for the new construction of 103 units of permanent supportive housing for the homeless. Three of 103 units are reserved for a resident manager and case workers, and the remaining 100 units are set aside for low-income households earning up to 50 percent of the AMI. This complex transaction also included financing from Seattle and Washington State and a grant from the Federal Home Loan Bank. The bank's investment responded to the identified need for the development of permanent supportive housing for the homeless. CONA demonstrated multi-faceted support by also providing an \$11.7 million construction loan for this project.
- An investment of \$14.4 million in LIHTC equity to finance the new construction of a 275-unit affordable housing development with all units restricted to low- and moderate-income households. This complex transaction involved multiple layers of financing, including equity funded by the federal 4 percent LIHTC program, primary debt funded by Washington State tax-exempt housing bonds, and subordinate debt funded by a local foundation. The bank's investment responded to the identified need for affordable housing with social services for low- and moderate-income households, including low-income residents, the disabled, and large families, and community redevelopment. CONA demonstrated multi-faceted support by also providing an \$8.3 million loan for this project.
- Grants totaling \$65,000 to a nonprofit organization whose mission is to empower individuals with limited resources to improve their lives through small business ownership. The bank's grants supported the organization's COVID-19 response program, general operations, and technical assistance program. CONA's funding responded to the bank-identified community need for small business support, including those started by low- and moderate-income entrepreneurs.

Broader Statewide and Regional Area

In addition, CONA made seven current- and prior-period investments totaling \$8.8 million in the broader statewide area whose purpose, mandate, or function included serving its AAs. These investments included four prior-period investments totaling \$8 million that supported affordable housing, one grant totaling \$775,000 for community services to low- and moderate-income individuals, one grant totaling \$20,000 for economic development, and one grant totaling \$10,000 that supported affordable housing. Investments in the broader statewide area further supported the Outstanding rating.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Bellingham MSA AA was consistent with the bank's overall performance under the Investment Test in the full-scope area. Performance in the limited-scope area supported the overall Investment Test conclusion for the state of Washington.

SERVICE TEST

The bank's performance under the Service Test in Washington is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

As this was a digital market for the bank, the bank delivered retail banking services exclusively through ADS including deposit-taking ATMs, online, and mobile banking.

Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

CONA had two cafés with six deposit-taking ATMs. Both of CONA's cafés were in upper-income geographies. CONA had 27 additional deposit-taking ATMs at various locations throughout the AA. CONA did not open or close any cafés during the evaluation period.

| ATM Distribution | | | | | | | | | |
|------------------|-----------|------------------------------------|------|------|------|---------------------------------------|------|------|------|
| Assessment Area | ATMs | | | | | Population | | | |
| | # of ATMs | % of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Seattle CSA | 33 | 6.1 | 24.2 | 33.3 | 36.4 | 4.2 | 22.3 | 44 | 28.5 |
| Bellingham MSA | 1 | 0 | 100 | 0 | 0 | 0.9 | 21.5 | 52.8 | 23 |

Based on the table above, the distribution of ATMs in both low- and moderate-income geographies exceeded the percentages of the population in those geographies. During the evaluation period, CONA removed two ATMs from upper-income geographies.

Impact of U.S. Census Changes on Retail Banking Services

The 2020 U.S. Census changed the income-level designations of four moderate-income and six middle-income geographies where CONA had deposit-taking ATMs. The U.S. Census did not change the income-level designation of any low- and upper-income geographies. The U.S. Census changed the income-designation of all four moderate-income geographies to middle-income geographies. The U.S. Census also changed the income-level designation of two of six middle-income geographies to moderate-income geographies. The U.S. Census changes to the income-level designation of the

moderate-income geographies resulted in a decrease in the total number of deposit-taking ATMs in those geographies but had a minimal impact on the distribution of deposit-taking ATMs in those geographies relative to the percentages of the population in those geographies.

| Seattle CSA | Low-income Geographies | | Moderate-income Geographies | |
|----------------------------------|------------------------|------------|-----------------------------|------------|
| | ATMs (#) | % of Total | ATMs (#) | % of Total |
| Prior to 2020 U.S. Census Change | 2 | 6.1 | 10 | 30.3 |
| After 2020 U.S. Census Change | 2 | 6.1 | 8 | 24.2 |
| Net Change | - | - | -2 | -6.1 |

ADS Usage

| Change in ADS Use, by channel | | |
|---|-----------|-----------|
| ADS Channel | LMI Usage | MUI Usage |
| Online Banking | 46.7% | 24.4% |
| Mobile Banking | 96.7% | 67.2% |
| ATM Usage | -8% | -33.4% |
| Net Change Across All Channels (Averaged) | 45.1% | 19.4% |

Based on the table above, the percentages of customers accessing retail banking services through ADS in low- and moderate-income geographies increased at a higher rate than in middle- and upper-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals. There were no significant differences in café hours, and available services at the café locations were the same regardless of geographic location. Each café had individual hours of operation. One café's hours of operation were 7:00 a.m. to 6:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturdays. The other café's hours of operation were 8:00 a.m. to 7:00 p.m. Monday through Saturday and 10:00 a.m. to 6:00 p.m. on Sundays.

Community Development Services

The institution provided an adequate level of CD services.

CD services were responsive to the community needs the institution identified through community contacts. Twenty-nine bank associates provided 171 hours of qualified service activities to six organizations. Services consisted of providing financial literacy education, workforce development through CONA's *Pro Bono* volunteer program, and technical assistance to small businesses.

Examples of CD services in the AA include:

- Eleven CONA associates provided 82 hours of financial literacy education to clients of a nonprofit organization that provides low- and moderate-income individuals with career development, professional networking, and access to professional attire. During the evaluation period, CONA provided financial literacy education to 36 women. These services addressed the bank-identified community need of employment support and financial literacy education.

- Ten CONA associates provided 64 hours of financial literacy education services through two programs to students of schools that service low- and moderate-income families. Forty-six of the 64 hours consisted of financial literacy education provided to an elementary school where the majority of students were eligible for free and reduced meal program and the remaining 18 hours were provided to students of an educational program targeted to immigrants and refugee families. These services addressed the bank-identified community need of financial literacy education for low- and moderate-income children, including immigrants and refugees.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Bellingham MSA AA was consistent with the bank's overall performance under the Service Test in the full-scope area. Performance in the limited-scope area supported the overall Service Test conclusion for the state of Washington.

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: | 01/01/2020 to 12/31/2022 | |
| Bank Products Reviewed: | Home mortgage, small loans to businesses, small loans to farms, consumer loans, community development loans, qualified investments, community development services | |
| Affiliates | Affiliate Relationship | Products Reviewed |
| Capital One Public Funding, LLC | Subsidiary | CD Loans and Leases |
| Capital One Community Development Corp. | Subsidiary | CD Investments |
| Capital One, N.A. LIHTC, Inc. | Subsidiary | CD Investments |
| Capital One Foundation, Inc. | Affiliate | CD Investments (Grants) |
| COCRF Investor Fund 144, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 150, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 164, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 167, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 170-179, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 181-182, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 184-188, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 190-207, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 209-214, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 216-222, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 224, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 226-230, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 232-234, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 237-241, LLC | Subsidiary | CD Loans |
| COCRF Investor Fund 243, LLC | Subsidiary | CD Loans |
| COCRF SubCDE 92, LLC | Subsidiary | CD Loans |
| COCRF SubCDE 94-95, LLC | Subsidiary | CD Loans |
| COCRF SubCDE 98, LLC | Subsidiary | CD Loans |
| COCRF SubCDE 100, LLC | Subsidiary | CD Loans |
| COCRF SubCDE 104-109, LLC | Subsidiary | CD Loans |
| COCRF SubCDE 111, LLC | Subsidiary | CD Loans |
| COCRF SubCDE 115, LLC | Subsidiary | CD Loans |
| COCRF SubCDE 119, LLC | Subsidiary | CD Loans |
| COCRF SubCDE 122-125, LLC | Subsidiary | CD Loans |
| List of Assessment Areas and Type of Examination | | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| MMSAs | | |
| New York-Newark, NY-NJ-CT-PA Combined Statistical Area (New York CSA) | Full-scope | CT: Fairfield County NJ: Bergen, Essex, Hudson, Middlesex, Monmouth, Morris, Ocean, Passaic, Somerset, and Union counties |

| | | |
|--|---------------|---|
| | | NY: Bronx, Kings, Nassau, New York, Queens, Richmond, Rockland, Suffolk, and Westchester counties |
| Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate Metropolitan Statistical Area (Philadelphia MMSA) | Full-scope | DE: New Castle County NJ: Burlington, Camden, and Gloucester counties PA: Bucks, Chester, Delaware, Montgomery, and Philadelphia counties |
| Washington-Baltimore-Arlington, DC-MD-VA-WV-PA Combined Statistical Area (Washington CSA) | Full-scope | DC: District of Columbia MD: Anne Arundel, Baltimore, Carroll, Charles, Frederick, Howard, Montgomery, and Prince George's counties and Baltimore City VA: Arlington, Fairfax, Fauquier, Loudoun, Prince William, and Stafford counties and Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park cities |
| States | | |
| Arizona | | |
| Phoenix-Mesa-Chandler, AZ Metropolitan Statistical Area (Phoenix MSA) | Full-scope | Maricopa County |
| California | | |
| Los Angeles-Long Beach, CA Combined Statistical Area (Los Angeles CSA) | Full-scope | Los Angeles, Orange, and San Bernardino counties |
| San Diego-Chula Vista-Carlsbad, CA Metropolitan Statistical Area (San Diego MSA) | Full-scope | San Diego County |
| Sacramento-Roseville-Folsom, CA Metropolitan Statistical Area (Sacramento MSA) | Limited-scope | Placer County |
| San Jose-San Francisco-Oakland, CA Combined Statistical Area (San Jose CSA) | Limited-scope | Alameda, Contra Costa, Marin, Napa, San Benito, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma counties |
| Colorado | | |
| Denver-Aurora, CO Combined Statistical Area (Denver CSA) | Full-scope | Adams, Arapahoe, Boulder, Denver, Douglas, and Jefferson counties |
| Florida | | |
| Miami-Fort Lauderdale-Pompano Beach, FL Metropolitan Statistical Area (Miami MSA) | Full-scope | Broward, Miami-Dade, and Palm Beach counties |
| Tampa-St. Petersburg-Clearwater, FL Metropolitan Statistical Area (Tampa MSA) | Full-scope | Hillsborough County |
| Georgia | | |
| Atlanta-Sandy Springs-Alpharetta, GA Metropolitan Statistical Area (Atlanta MSA) | Full-scope | Fulton County |
| Illinois | | |

| | | |
|---|---------------|--|
| Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area (Chicago MSA) | Full-scope | Cook County |
| Louisiana | | |
| New Orleans-Metairie-Hammond, LA-MS Combined Statistical Area (New Orleans CSA) | Full-scope | Jefferson, Orleans, St. Bernard, St. Charles, St. John the Baptist, St. Tammany, Tangipahoa, and Washington Parishes |
| Shreveport-Bossier City-Minden, LA Combined Statistical Area (Shreveport CSA) | Full-scope | Bossier, Caddo, and Webster Parishes |
| Alexandria, LA Metropolitan Statistical Area (Alexandria MSA) | Limited-scope | Rapides Parish |
| Baton Rouge, LA Metropolitan Statistical Area (Baton Rouge MSA) | Limited-scope | Ascension, Assumption, East Baton Rouge, Livingston, and West Baton Rouge Parishes |
| Houma-Thibodaux, LA Metropolitan Statistical Area (Houma MSA) | Limited-scope | Lafourche and Terrebonne Parishes |
| Lafayette-Opelousas-Morgan City, LA Combined Statistical Area (Lafayette CSA) | Limited-scope | Iberia, Lafayette, St. Mary, and Vermilion Parishes |
| Lake Charles-Jennings, LA Combined Statistical Area (Lake Charles CSA) | Limited-scope | Calcasieu, Cameron, and Jefferson Davis Parishes |
| Monroe, LA Metropolitan Statistical Area (Monroe MSA) | Limited-scope | Morehouse and Ouachita Parishes |
| Louisiana Non-Metropolitan Statistical Area | Limited-scope | Allen, Avoyelles, Claiborne, East Carroll, and Madison Parishes |
| Massachusetts | | |
| Boston-Worcester-Providence, MA-RI-NH-CT Combined Statistical Area (Boston CSA) | Full-scope | Bristol, Essex, Middlesex, Norfolk, Plymouth, Suffolk, and Worcester counties |
| Pittsfield, MA Metropolitan Statistical Area (Pittsfield MSA) | Limited-scope | Berkshire County |
| Springfield, MA Metropolitan Statistical Area (Springfield MSA) | Limited-scope | Hampden and Hampshire counties |
| Michigan | | |
| Detroit-Warren-Dearborn, MI Metropolitan Statistical Area (Detroit MSA) | Full-scope | Wayne County |
| Minnesota | | |
| Minneapolis-St. Paul, MN-WI Combined Statistical Area (Minneapolis CSA) | Full-scope | Benton, Hennepin, Sherburne, and Stearns counties |
| Nevada | | |
| Las Vegas-Henderson-Paradise, NV Metropolitan Statistical Area (Las Vegas MSA) | Full-scope | Clark County |
| Ohio | | |
| Cincinnati, OH-KY-IN Metropolitan Statistical Area (Cincinnati MSA) | Full-scope | Hamilton County |

| | | |
|--|---------------|---|
| Columbus, OH Metropolitan Statistical Area (Columbus MSA) | Limited-scope | Franklin County |
| Oregon | | |
| Portland-Vancouver-Hillsboro, OR-WA Metropolitan Statistical Area (Portland MSA) | Full-scope | Multnomah County |
| Texas | | |
| Austin-Round Rock-Georgetown, TX Metropolitan Statistical Area (Austin MSA) | Full-scope | Hays, Travis, and Williamson counties |
| Dallas-Fort Worth-Arlington, TX Metropolitan Statistical Area (Dallas MSA) | Full-scope | Collin, Dallas, Denton, Ellis, Johnson, Parker, Rockwall, and Tarrant counties |
| Beaumont-Port Arthur, TX Metropolitan Statistical Area (Beaumont MSA) | Limited-scope | Jefferson County |
| Houston-The Woodlands-Sugar Land, TX Metropolitan Statistical Area (Houston MSA) | Limited-scope | Brazoria, Fort Bend, Galveston, Harris, and Montgomery counties |
| Texarkana, TX-AR Metropolitan Statistical Area (Texarkana MSA) | Limited-scope | Bowie County |
| Tyler, TX Metropolitan Statistical Area (Tyler MSA) | Limited-scope | Smith County |
| Virginia | | |
| Richmond, VA Metropolitan Statistical Area (Richmond MSA) | Full-scope | Chesterfield, Goochland, Hanover, and Henrico counties and Colonial Heights and Richmond Cities |
| Washington | | |
| Seattle-Tacoma, WA Combined Statistical Area (Seattle CSA) | Full-scope | King, Kitsap, Pierce, Skagit, Snohomish, and Thurston counties |
| Bellingham, WA Metropolitan Statistical Area (Bellingham MSA) | Limited-scope | Whatcom County |

Appendix B: Summary of MMSA and State Ratings

| RATINGS Capital One, National Association | | | | |
|---|----------------------|------------------------|---------------------|--------------------------------------|
| Overall Bank: | Lending Test Rating* | Investment Test Rating | Service Test Rating | Overall Bank/State/Multistate Rating |
| | Outstanding | Outstanding | Outstanding | Outstanding |
| MMSA or State: | | | | |
| New York CSA | Outstanding | Outstanding | Outstanding | Outstanding |
| Philadelphia MMSA | Outstanding | Outstanding | High Satisfactory | Outstanding |
| Washington, DC CSA | Outstanding | Outstanding | Outstanding | Outstanding |
| State of Arizona | Outstanding | Outstanding | High Satisfactory | Outstanding |
| State of California | Outstanding | Outstanding | High Satisfactory | Outstanding |
| State of Colorado | Outstanding | Outstanding | High Satisfactory | Outstanding |
| State of Florida | Outstanding | Outstanding | High Satisfactory | Outstanding |
| State of Georgia | Outstanding | Outstanding | High Satisfactory | Outstanding |
| State of Illinois | Outstanding | Outstanding | High Satisfactory | Outstanding |
| State of Louisiana | Outstanding | Outstanding | Outstanding | Outstanding |
| Commonwealth of Massachusetts | Outstanding | Outstanding | High Satisfactory | Outstanding |
| State of Michigan | Outstanding | Outstanding | Low Satisfactory | Outstanding |
| State of Minnesota | Outstanding | Outstanding | High Satisfactory | Outstanding |
| State of Nevada | Outstanding | Outstanding | Low Satisfactory | Outstanding |
| State of Ohio | Outstanding | Outstanding | Low Satisfactory | Outstanding |
| State of Oregon | Outstanding | Outstanding | Low Satisfactory | Outstanding |
| State of Texas | Outstanding | Outstanding | High Satisfactory | Outstanding |
| Commonwealth of Virginia | Outstanding | Outstanding | Outstanding | Outstanding |
| State of Washington | Outstanding | Outstanding | Outstanding | 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 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): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §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 investments, and branch distribution).

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

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 rating area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the bank's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the bank will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the bank will receive a rating for the multi-state metropolitan statistical area.

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

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

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased 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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|---------------------------|------------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| New York CSA | 219 | 3,791,967 | 100.0 | 665,289 | 3.1 | 17.4 | 3.7 | 13.9 | 35.6 | 13.7 | 37.0 | 25.6 | 35.5 | 45.9 | 21.0 | 47.0 | 0.1 | 0.5 | 0.1 |
| Total | 219 | 3,791,967 | 100.0 | 665,289 | 3.1 | 17.4 | 3.7 | 13.9 | 35.6 | 13.7 | 37.0 | 25.6 | 35.5 | 45.9 | 21.0 | 47.0 | 0.1 | 0.5 | 0.1 |

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2020-21 |
|---|---------------------------|------------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| New York CSA | 219 | 3,791,967 | 100.0 | 665,289 | 25.4 | 0.0 | 3.5 | 15.5 | 0.0 | 13.3 | 17.1 | 0.0 | 20.9 | 42.0 | 0.0 | 48.1 | 0.0 | 100.0 | 14.1 |
| Total | 219 | 3,791,967 | 100.0 | 665,289 | 25.4 | 0.0 | 3.5 | 15.5 | 0.0 | 13.3 | 17.1 | 0.0 | 20.9 | 42.0 | 0.0 | 48.1 | 0.0 | 100.0 | 14.1 |

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|------------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Business | % Bank Loans | Aggregate | % Business | % Bank Loans | Aggregate | % Business | % Bank Loans | Aggregate | % Business | % Bank Loans | Aggregate | % Business | % Bank Loans | Aggregate | |
| New York CSA | 66,550 | 1,768,016 | 100.0 | 836,958 | 7.8 | 8.6 | 7.2 | 17.5 | 18.7 | 17.3 | 29.7 | 34.4 | 30.4 | 43.9 | 37.6 | 44.1 | 1.1 | 0.7 | 1.1 | |
| Total | 66,550 | 1,768,016 | 100.0 | 836,958 | 7.8 | 8.6 | 7.2 | 17.5 | 18.7 | 17.3 | 29.7 | 34.4 | 30.4 | 43.9 | 37.6 | 44.1 | 1.1 | 0.7 | 1.1 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|------------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | |
| New York CSA | 66,550 | 1,768,016 | 100.0 | 836,958 | 91.1 | 51.7 | 38.9 | 3.5 | 20.0 | 5.3 | 28.3 | | |
| Total | 66,550 | 1,768,016 | 100.0 | 836,958 | 91.1 | 51.7 | 38.9 | 3.5 | 20.0 | 5.3 | 28.3 | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|----------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | |
| New York CSA | 99 | 1,552 | 100.0 | 906 | 5.3 | 4.0 | 1.7 | 16.6 | 18.2 | 12.6 | 33.8 | 31.3 | 32.7 | 43.9 | 45.5 | 53.0 | 0.3 | 1.0 | 0.1 | |
| Total | 99 | 1,552 | 100.0 | 906 | 5.3 | 4.0 | 1.7 | 16.6 | 18.2 | 12.6 | 33.8 | 31.3 | 32.7 | 43.9 | 45.5 | 53.0 | 0.3 | 1.0 | 0.1 | |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|---|----------------------|--------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | | |
| New York CSA | 99 | 1,552 | 100.0 | 906 | 97.0 | 52.5 | 60.8 | 1.8 | 23.2 | 1.2 | 24.2 | | |
| Total | 99 | 1,552 | 100.0 | 906 | 97.0 | 52.5 | 60.8 | 1.8 | 23.2 | 1.2 | 24.2 | | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|------------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| New York CSA | 3,417,408 | 5,947,387 | 100.0 | 11.1 | 13.9 | 21.6 | 26.7 | 31.6 | 34.5 | 35.6 | 24.8 | 0.1 | 0.1 | |
| Total | 3,417,408 | 5,947,387 | 100.0 | 11.1 | 13.9 | 21.6 | 26.7 | 31.6 | 34.5 | 35.6 | 24.8 | 0.1 | 0.1 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|------------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| New York CSA | 3,417,408 | 5,947,387 | 100.0 | 27.4 | 34.3 | 14.3 | 28.2 | 15.8 | 17.5 | 42.5 | 11.9 | 0.0 | 8.1 | |
| Total | 3,417,408 | 5,947,387 | 100.0 | 27.4 | 34.3 | 14.3 | 28.2 | 15.8 | 17.5 | 42.5 | 11.9 | 0.0 | 8.1 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------|------------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | | |
| Philadelphia MMSA | 67 | 1,781,719 | 100.0 | 318,181 | 3.6 | 3.0 | 2.1 | 18.4 | 34.3 | 16.1 | 41.5 | 31.3 | 41.8 | 36.5 | 29.9 | 39.9 | 0.0 | 1.5 | 0.0 | | |
| Total | 67 | 1,781,719 | 100.0 | 318,181 | 3.6 | 3.0 | 2.1 | 18.4 | 34.3 | 16.1 | 41.5 | 31.3 | 41.8 | 36.5 | 29.9 | 39.9 | 0.0 | 1.5 | 0.0 | | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------|------------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | | |
| Philadelphia MMSA | 67 | 1,781,719 | 100.0 | 318,181 | 22.0 | 0.0 | 7.1 | 17.2 | 0.0 | 17.8 | 20.0 | 0.0 | 21.2 | 40.8 | 0.0 | 36.0 | 0.0 | 100.0 | 17.9 | | |
| Total | 67 | 1,781,719 | 100.0 | 318,181 | 22.0 | 0.0 | 7.1 | 17.2 | 0.0 | 17.8 | 20.0 | 0.0 | 21.2 | 40.8 | 0.0 | 36.0 | 0.0 | 100.0 | 17.9 | | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Philadelphia MMSA | 14,677 | 137,958 | 100.0 | 177,582 | 4.5 | 4.6 | 3.5 | 19.3 | 20.5 | 17.9 | 37.2 | 39.7 | 39.6 | 38.5 | 34.9 | 38.6 | 0.5 | 0.3 | 0.4 | |
| Total | 14,677 | 137,958 | 100.0 | 177,582 | 4.5 | 4.6 | 3.5 | 19.3 | 20.5 | 17.9 | 37.2 | 39.7 | 39.6 | 38.5 | 34.9 | 38.6 | 0.5 | 0.3 | 0.4 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|----------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | |
| Philadelphia MMSA | 14,677 | 137,958 | 100.0 | 177,582 | 90.1 | 57.8 | 44.3 | 3.6 | 18.6 | 6.3 | 23.7 | | |
| Total | 14,677 | 137,958 | 100.0 | 177,582 | 90.1 | 57.8 | 44.3 | 3.6 | 18.6 | 6.3 | 23.7 | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|----------------------|------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | |
| Philadelphia MMSA | 53 | 468 | 100.0 | 749 | 2.1 | 0.0 | 0.7 | 14.5 | 15.1 | 19.4 | 45.5 | 50.9 | 46.9 | 37.8 | 34.0 | 33.1 | 0.1 | 0.0 | 0.0 | |
| Total | 53 | 468 | 100.0 | 749 | 2.1 | 0.0 | 0.7 | 14.5 | 15.1 | 19.4 | 45.5 | 50.9 | 46.9 | 37.8 | 34.0 | 33.1 | 0.1 | 0.0 | 0.0 | |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|---|----------------------|------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | | |
| Philadelphia MMSA | 53 | 468 | 100.0 | 749 | 95.7 | 54.7 | 62.5 | 2.8 | 20.8 | 1.5 | 24.5 | | |
| Total | 53 | 468 | 100.0 | 749 | 95.7 | 54.7 | 62.5 | 2.8 | 20.8 | 1.5 | 24.5 | | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|------------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Philadelphia MMSA | 1,025,729 | 1,717,705 | 100.0 | 6.3 | 7.1 | 22.8 | 27.2 | 38.9 | 40.0 | 31.9 | 25.6 | 0.2 | 0.1 | |
| Total | 1,025,729 | 1,717,705 | 100.0 | 6.3 | 7.1 | 22.8 | 27.2 | 38.9 | 40.0 | 31.9 | 25.6 | 0.2 | 0.1 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|------------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Philadelphia MMSA | 1,025,729 | 1,717,705 | 100.0 | 25.2 | 32.2 | 15.6 | 28.5 | 17.0 | 18.8 | 42.3 | 12.7 | 0.0 | 7.8 | |
| Total | 1,025,729 | 1,717,705 | 100.0 | 25.2 | 32.2 | 15.6 | 28.5 | 17.0 | 18.8 | 42.3 | 12.7 | 0.0 | 7.8 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------|------------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Washington DC CSA | 75 | 2,055,862 | 100.0 | 588,197 | 4.3 | 8.0 | 3.6 | 16.9 | 49.3 | 14.6 | 37.2 | 33.3 | 37.7 | 41.4 | 6.7 | 44.0 | 0.1 | 2.7 | 0.2 | |
| Total | 75 | 2,055,862 | 100.0 | 588,197 | 4.3 | 8.0 | 3.6 | 16.9 | 49.3 | 14.6 | 37.2 | 33.3 | 37.7 | 41.4 | 6.7 | 44.0 | 0.1 | 2.7 | 0.2 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------|------------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| Washington DC CSA | 75 | 2,055,862 | 100.0 | 588,197 | 22.1 | 0.0 | 7.0 | 16.7 | 0.0 | 17.2 | 20.0 | 0.0 | 20.4 | 41.2 | 0.0 | 32.7 | 0.0 | 100.0 | 22.7 | |
| Total | 75 | 2,055,862 | 100.0 | 588,197 | 22.1 | 0.0 | 7.0 | 16.7 | 0.0 | 17.2 | 20.0 | 0.0 | 20.4 | 41.2 | 0.0 | 32.7 | 0.0 | 100.0 | 22.7 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Washington DC CSA | 29,411 | 639,340 | 100.0 | 258,690 | 5.4 | 5.7 | 5.0 | 18.4 | 19.4 | 17.6 | 35.6 | 34.9 | 36.3 | 40.0 | 39.6 | 40.7 | 0.6 | 0.4 | 0.4 | |
| Total | 29,411 | 639,340 | 100.0 | 258,690 | 5.4 | 5.7 | 5.0 | 18.4 | 19.4 | 17.6 | 35.6 | 34.9 | 36.3 | 40.0 | 39.6 | 40.7 | 0.6 | 0.4 | 0.4 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|----------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | |
| Washington DC CSA | 29,411 | 639,340 | 100.0 | 258,690 | 89.4 | 55.6 | 47.3 | 3.7 | 18.9 | 6.9 | 25.5 | | |
| Total | 29,411 | 639,340 | 100.0 | 258,690 | 89.4 | 55.6 | 47.3 | 3.7 | 18.9 | 6.9 | 25.5 | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|----------------------|------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | |
| Washington DC CSA | 103 | 726 | 100.0 | 828 | 3.3 | 1.0 | 0.8 | 16.1 | 8.7 | 10.1 | 40.0 | 39.8 | 46.6 | 40.5 | 50.5 | 42.4 | 0.1 | 0.0 | 0.0 | |
| Total | 103 | 726 | 100.0 | 828 | 3.3 | 1.0 | 0.8 | 16.1 | 8.7 | 10.1 | 40.0 | 39.8 | 46.6 | 40.5 | 50.5 | 42.4 | 0.1 | 0.0 | 0.0 | |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|---|----------------------|------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | | |
| Washington DC CSA | 103 | 726 | 100.0 | 828 | 95.7 | 47.6 | 50.4 | 2.5 | 9.7 | 1.8 | 42.7 | | |
| Total | 103 | 726 | 100.0 | 828 | 95.7 | 47.6 | 50.4 | 2.5 | 9.7 | 1.8 | 42.7 | | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|------------------|-------------------|--------------------------|---------------------|-------------------------------|---------------------|-----------------------------|---------------------|----------------------------|---------------------|------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Washington DC CSA | 1,302,433 | 2,553,804 | 100.0 | 9.3 | 10.0 | 21.2 | 25.8 | 35.1 | 37.8 | 34.1 | 26.2 | 0.4 | 0.3 | |
| Total | 1,302,433 | 2,553,804 | 100.0 | 9.3 | 10.0 | 21.2 | 25.8 | 35.1 | 37.8 | 34.1 | 26.2 | 0.4 | 0.3 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|------------------|-------------------|-----------------------------|---------------------|----------------------------------|---------------------|--------------------------------|---------------------|-------------------------------|---------------------|---------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Washington DC CSA | 1,302,433 | 2,553,804 | 100.0 | 23.7 | 43.1 | 16.2 | 26.4 | 18.2 | 13.7 | 41.9 | 9.1 | 0.0 | 7.7 | |
| Total | 1,302,433 | 2,553,804 | 100.0 | 23.7 | 43.1 | 16.2 | 26.4 | 18.2 | 13.7 | 41.9 | 9.1 | 0.0 | 7.7 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | | 2020-21 |
|---|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|----------------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Phoenix MSA | 5 | 240,643 | 100.0 | 383,319 | 4.6 | 0.0 | 3.6 | 18.8 | 20.0 | 14.4 | 34.7 | 60.0 | 34.9 | 41.9 | 20.0 | 46.6 | 0.0 | 0.0 | 0.5 | |
| Total | 5 | 240,643 | 100.0 | 383,319 | 4.6 | 0.0 | 3.6 | 18.8 | 20.0 | 14.4 | 34.7 | 60.0 | 34.9 | 41.9 | 20.0 | 46.6 | 0.0 | 0.0 | 0.5 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|----------------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| Phoenix MSA | 5 | 240,643 | 100.0 | 383,319 | 21.8 | 0.0 | 5.2 | 16.9 | 0.0 | 16.0 | 19.2 | 0.0 | 20.1 | 42.2 | 0.0 | 40.2 | 0.0 | 100.0 | 18.5 | |
| Total | 5 | 240,643 | 100.0 | 383,319 | 21.8 | 0.0 | 5.2 | 16.9 | 0.0 | 16.0 | 19.2 | 0.0 | 20.1 | 42.2 | 0.0 | 40.2 | 0.0 | 100.0 | 18.5 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Phoenix MSA | 6,611 | 84,508 | 100.0 | 133,594 | 7.0 | 7.6 | 6.6 | 15.2 | 16.9 | 16.2 | 29.5 | 29.2 | 27.7 | 47.8 | 45.7 | 48.9 | 0.5 | 0.7 | 0.7 | |
| Total | 6,611 | 84,508 | 100.0 | 133,594 | 7.0 | 7.6 | 6.6 | 15.2 | 16.9 | 16.2 | 29.5 | 29.2 | 27.7 | 47.8 | 45.7 | 48.9 | 0.5 | 0.7 | 0.7 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|---------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | |
| Phoenix MSA | 6,611 | 84,508 | 100.0 | 133,594 | 92.1 | 56.7 | 48.0 | 1.8 | 21.9 | 6.1 | 21.4 | | |
| Total | 6,611 | 84,508 | 100.0 | 133,594 | 92.1 | 56.7 | 48.0 | 1.8 | 21.9 | 6.1 | 21.4 | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|---|----------------------|------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate |
| Phoenix MSA | 15 | 100 | 100.0 | 475 | 7.2 | 6.7 | 1.7 | 18.5 | 6.7 | 14.5 | 28.9 | 46.7 | 28.0 | 45.1 | 40.0 | 55.4 | 0.3 | 0.0 | 0.4 |
| Total | 15 | 100 | 100.0 | 475 | 7.2 | 6.7 | 1.7 | 18.5 | 6.7 | 14.5 | 28.9 | 46.7 | 28.0 | 45.1 | 40.0 | 55.4 | 0.3 | 0.0 | 0.4 |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 |
|---|----------------------|------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|----------------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | |
| Phoenix MSA | 15 | 100 | 100.0 | 475 | 96.7 | 60.0 | 51.2 | 2.0 | 13.3 | 1.3 | 26.7 | |
| Total | 15 | 100 | 100.0 | 475 | 96.7 | 60.0 | 51.2 | 2.0 | 13.3 | 1.3 | 26.7 | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|----------------|-------------------|--------------------------|---------------------|-------------------------------|---------------------|-----------------------------|---------------------|----------------------------|---------------------|------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Phoenix MSA | 557,399 | 923,179 | 100.0 | 9.5 | 9.5 | 23.0 | 22.9 | 33.3 | 35.8 | 34.0 | 31.5 | 0.1 | 0.3 | |
| Total | 557,399 | 923,179 | 100.0 | 9.5 | 9.5 | 23.0 | 22.9 | 33.3 | 35.8 | 34.0 | 31.5 | 0.1 | 0.3 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|----------------|-------------------|-----------------------------|---------------------|----------------------------------|---------------------|--------------------------------|---------------------|-------------------------------|---------------------|---------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Phoenix MSA | 557,399 | 923,179 | 100.0 | 23.3 | 23.2 | 16.3 | 32.0 | 17.7 | 20.7 | 42.7 | 18.8 | 0.0 | 5.3 | |
| Total | 557,399 | 923,179 | 100.0 | 23.3 | 23.2 | 16.3 | 32.0 | 17.7 | 20.7 | 42.7 | 18.8 | 0.0 | 5.3 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------|------------------|--------------|------------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Los Angeles CSA | 72 | 1,505,332 | 60.5 | 784,825 | 2.7 | 6.9 | 2.6 | 18.3 | 33.3 | 16.7 | 29.2 | 34.7 | 28.7 | 49.7 | 25.0 | 51.6 | 0.1 | 0.0 | 0.4 | |
| San Diego MSA | 29 | 170,329 | 24.4 | 215,863 | 2.8 | 27.6 | 2.8 | 15.1 | 55.2 | 14.2 | 35.5 | 17.2 | 34.0 | 46.6 | 0.0 | 49.0 | 0.0 | 0.0 | 0.0 | |
| Sacramento MSA | 0 | 0 | 0.0 | 39,964 | 0.0 | 0.0 | 0.0 | 6.3 | 0.0 | 6.0 | 33.7 | 0.0 | 24.0 | 60.0 | 0.0 | 70.0 | 0.0 | 0.0 | 0.0 | |
| San Jose CSA | 18 | 264,823 | 15.1 | 507,929 | 4.0 | 27.8 | 4.0 | 17.0 | 44.4 | 16.6 | 37.3 | 22.2 | 37.0 | 41.6 | 5.6 | 42.3 | 0.1 | 0.0 | 0.2 | |
| Total | 119 | 1,940,484 | 100.0 | 1,548,581 | 3.1 | 15.1 | 3.0 | 17.2 | 40.3 | 16.0 | 32.7 | 28.6 | 32.1 | 46.9 | 16.0 | 48.6 | 0.1 | 0.0 | 0.3 | |

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------|------------------|--------------|------------------|----------------------|--------------|------------|---------------------------|--------------|------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| Los Angeles CSA | 72 | 1,505,332 | 60.5 | 784,825 | 24.4 | 0.0 | 3.2 | 16.4 | 0.0 | 8.3 | 17.3 | 0.0 | 17.3 | 41.9 | 0.0 | 53.1 | 0.0 | 100.0 | 18.1 | |
| San Diego MSA | 29 | 170,329 | 24.4 | 215,863 | 23.6 | 0.0 | 3.1 | 16.9 | 0.0 | 9.4 | 17.8 | 0.0 | 18.4 | 41.7 | 0.0 | 49.9 | 0.0 | 100.0 | 19.2 | |
| Sacramento MSA | 0 | 0 | 0.0 | 39,964 | 16.1 | 0.0 | 2.9 | 13.5 | 0.0 | 8.7 | 18.2 | 0.0 | 19.3 | 52.2 | 0.0 | 54.5 | 0.0 | 0.0 | 14.6 | |
| San Jose CSA | 18 | 264,823 | 15.1 | 507,929 | 24.0 | 0.0 | 5.0 | 16.1 | 0.0 | 12.7 | 18.4 | 0.0 | 20.4 | 41.5 | 0.0 | 50.5 | 0.0 | 100.0 | 11.4 | |
| Total | 119 | 1,940,484 | 100.0 | 1,548,581 | 24.0 | 0.0 | 3.8 | 16.3 | 0.0 | 9.9 | 17.7 | 0.0 | 18.5 | 41.9 | 0.0 | 51.9 | 0.0 | 100.0 | 16.0 | |

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|----------------|--------------|------------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Los Angeles CSA | 33,475 | 335,261 | 60.0 | 664,345 | 5.0 | 5.5 | 4.8 | 20.0 | 21.4 | 20.5 | 25.5 | 27.4 | 26.3 | 47.8 | 44.3 | 47.1 | 1.7 | 1.3 | 1.4 | |
| San Diego MSA | 7,144 | 83,473 | 12.8 | 118,477 | 5.6 | 6.4 | 5.2 | 14.7 | 15.5 | 14.3 | 34.7 | 35.6 | 34.6 | 44.9 | 42.5 | 45.9 | 0.1 | 0.1 | 0.1 | |
| Sacramento MSA | 25 | 213 | 0.0 | 14,411 | 0.0 | 0.0 | 0.0 | 10.1 | 12.0 | 9.7 | 33.2 | 48.0 | 29.3 | 56.7 | 40.0 | 61.0 | 0.0 | 0.0 | 0.0 | |
| San Jose CSA | 15,140 | 165,523 | 27.1 | 276,632 | 9.1 | 9.8 | 8.6 | 18.8 | 20.7 | 19.4 | 32.2 | 33.8 | 33.7 | 39.5 | 35.3 | 37.9 | 0.6 | 0.4 | 0.4 | |
| Total | 55,784 | 584,470 | 100.0 | 1,073,865 | 6.1 | 6.8 | 5.7 | 18.9 | 20.5 | 19.4 | 28.6 | 30.2 | 29.1 | 45.3 | 41.6 | 44.8 | 1.2 | 0.9 | 1.0 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|----------------|--------------|------------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | |
| Los Angeles CSA | 33,475 | 335,261 | 60.0 | 664,345 | 90.4 | 55.0 | 45.3 | 3.8 | 23.7 | 5.8 | 21.3 | | |
| San Diego MSA | 7,144 | 83,473 | 12.8 | 118,477 | 90.1 | 54.5 | 46.4 | 3.7 | 23.4 | 6.3 | 22.1 | | |
| Sacramento MSA | 25 | 213 | 0.0 | 14,411 | 89.1 | 56.0 | 47.3 | 3.6 | 36.0 | 7.3 | 8.0 | | |
| San Jose CSA | 15,140 | 165,523 | 27.1 | 276,632 | 88.7 | 51.8 | 47.7 | 4.3 | 23.8 | 7.0 | 24.4 | | |
| Total | 55,784 | 584,470 | 100.0 | 1,073,865 | 89.9 | 54.1 | 46.1 | 3.9 | 23.7 | 6.2 | 22.2 | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|----------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate |
| Los Angeles CSA | 57 | 569 | 33.9 | 780 | 3.7 | 3.5 | 1.2 | 19.4 | 21.1 | 17.1 | 28.3 | 22.8 | 25.3 | 47.8 | 50.9 | 55.3 | 0.8 | 1.8 | 1.3 |
| San Diego MSA | 25 | 318 | 14.9 | 385 | 4.1 | 0.0 | 1.6 | 17.2 | 16.0 | 13.8 | 37.6 | 36.0 | 37.4 | 41.1 | 48.0 | 46.8 | 0.0 | 0.0 | 0.5 |
| Sacramento MSA | 1 | 33 | 0.6 | 112 | 0.0 | 0.0 | 0.0 | 8.3 | 0.0 | 1.8 | 30.0 | 0.0 | 27.7 | 61.7 | 100.0 | 70.5 | 0.0 | 0.0 | 0.0 |
| San Jose CSA | 85 | 956 | 50.6 | 1,165 | 5.8 | 2.4 | 3.1 | 19.1 | 12.9 | 15.3 | 39.0 | 54.1 | 43.3 | 36.0 | 30.6 | 38.3 | 0.2 | 0.0 | 0.0 |
| Total | 168 | 1,876 | 100.0 | 2,442 | 4.4 | 2.4 | 2.1 | 18.6 | 16.1 | 15.0 | 33.7 | 40.5 | 35.9 | 42.8 | 40.5 | 46.5 | 0.4 | 0.6 | 0.5 |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 |
|--|----------------------|--------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|---------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | |
| Los Angeles CSA | 57 | 569 | 33.9 | 780 | 95.0 | 43.9 | 60.5 | 2.7 | 36.8 | 2.3 | 19.3 | |
| San Diego MSA | 25 | 318 | 14.9 | 385 | 95.4 | 36.0 | 67.0 | 2.8 | 44.0 | 1.8 | 20.0 | |
| Sacramento MSA | 1 | 33 | 0.6 | 112 | 95.8 | 0.0 | 58.0 | 1.8 | 100.0 | 2.3 | 0.0 | |
| San Jose CSA | 85 | 956 | 50.6 | 1,165 | 95.0 | 51.8 | 61.8 | 3.1 | 21.2 | 2.0 | 27.1 | |
| Total | 168 | 1,876 | 100.0 | 2,442 | 95.1 | 46.4 | 62.0 | 2.8 | 30.4 | 2.1 | 23.2 | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|------------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | | |
| Los Angeles CSA | 2,113,288 | 3,418,751 | 61.9 | 7.3 | 7.6 | 26.3 | 30.4 | 27.6 | 30.9 | 38.5 | 30.9 | 0.4 | 0.3 | | |
| San Diego MSA | 442,810 | 811,005 | 13.0 | 7.7 | 9.3 | 21.6 | 25.7 | 34.2 | 35.6 | 36.6 | 29.4 | 0.0 | 0.0 | | |
| Sacramento MSA | 1,307 | 4,056 | 0.0 | 0.0 | 0.0 | 9.3 | 10.4 | 37.7 | 31.5 | 53.0 | 58.1 | 0.0 | 0.0 | | |
| San Jose CSA | 854,760 | 1,990,042 | 25.1 | 8.9 | 10.6 | 21.2 | 27.0 | 36.0 | 37.6 | 33.6 | 24.6 | 0.4 | 0.2 | | |
| Total | 3,412,165 | 6,223,854 | 100.0 | 7.7 | 8.5 | 23.9 | 28.9 | 31.1 | 33.2 | 37.0 | 29.1 | 0.3 | 0.3 | | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|------------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|--------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | | |
| Los Angeles CSA | 2,113,288 | 3,418,751 | 61.9 | 25.6 | 25.6 | 15.5 | 28.3 | 16.3 | 20.8 | 42.5 | 17.8 | 0.0 | 7.4 | | |
| San Diego MSA | 442,810 | 811,005 | 13.0 | 24.8 | 31.4 | 15.7 | 28.5 | 17.1 | 18.3 | 42.4 | 14.1 | 0.0 | 7.7 | | |
| Sacramento MSA | 1,307 | 4,056 | 0.0 | 19.3 | 20.5 | 13.1 | 24.2 | 16.3 | 23.5 | 51.3 | 30.7 | 0.0 | 1.1 | | |
| San Jose CSA | 854,760 | 1,990,042 | 25.1 | 25.8 | 38.7 | 15.0 | 26.9 | 16.6 | 13.5 | 42.6 | 11.4 | 0.0 | 9.6 | | |
| Total | 3,412,165 | 6,223,854 | 100.0 | 25.5 | 29.7 | 15.4 | 27.9 | 16.5 | 18.7 | 42.7 | 15.7 | 0.0 | 8.0 | | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Denver CSA | 3 | 140,390 | 100.0 | 291,487 | 4.6 | 0.0 | 4.4 | 19.2 | 66.7 | 18.1 | 35.0 | 33.3 | 34.0 | 41.1 | 0.0 | 43.4 | 0.0 | 0.0 | 0.0 | |
| Total | 3 | 140,390 | 100.0 | 291,487 | 4.6 | 0.0 | 4.4 | 19.2 | 66.7 | 18.1 | 35.0 | 33.3 | 34.0 | 41.1 | 0.0 | 43.4 | 0.0 | 0.0 | 0.0 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| Denver CSA | 3 | 140,390 | 100.0 | 291,487 | 21.7 | 0.0 | 7.9 | 17.5 | 0.0 | 18.5 | 20.3 | 0.0 | 22.1 | 40.5 | 0.0 | 34.1 | 0.0 | 100.0 | 17.3 | |
| Total | 3 | 140,390 | 100.0 | 291,487 | 21.7 | 0.0 | 7.9 | 17.5 | 0.0 | 18.5 | 20.3 | 0.0 | 22.1 | 40.5 | 0.0 | 34.1 | 0.0 | 100.0 | 17.3 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Denver CSA | 9,785 | 120,101 | 100.0 | 113,370 | 6.6 | 8.7 | 7.4 | 20.5 | 21.8 | 20.4 | 32.2 | 32.6 | 31.3 | 40.3 | 36.6 | 40.6 | 0.3 | 0.4 | 0.3 | |
| Total | 9,785 | 120,101 | 100.0 | 113,370 | 6.6 | 8.7 | 7.4 | 20.5 | 21.8 | 20.4 | 32.2 | 32.6 | 31.3 | 40.3 | 36.6 | 40.6 | 0.3 | 0.4 | 0.3 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|----------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|--|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | | |
| Denver CSA | 9,785 | 120,101 | 100.0 | 113,370 | 92.5 | 54.0 | 47.6 | 2.4 | 20.6 | 5.1 | 25.4 | | | |
| Total | 9,785 | 120,101 | 100.0 | 113,370 | 92.5 | 54.0 | 47.6 | 2.4 | 20.6 | 5.1 | 25.4 | | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|---|----------------------|------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate |
| Denver CSA | 41 | 249 | 100.0 | 488 | 7.5 | 4.9 | 2.9 | 20.8 | 9.8 | 7.6 | 32.0 | 36.6 | 38.9 | 39.4 | 48.8 | 50.0 | 0.3 | 0.0 | 0.6 |
| Total | 41 | 249 | 100.0 | 488 | 7.5 | 4.9 | 2.9 | 20.8 | 9.8 | 7.6 | 32.0 | 36.6 | 38.9 | 39.4 | 48.8 | 50.0 | 0.3 | 0.0 | 0.6 |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 |
|---|----------------------|------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|----------------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | |
| Denver CSA | 41 | 249 | 100.0 | 488 | 96.8 | 70.7 | 67.0 | 1.7 | 12.2 | 1.6 | 17.1 | |
| Total | 41 | 249 | 100.0 | 488 | 96.8 | 70.7 | 67.0 | 1.7 | 12.2 | 1.6 | 17.1 | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|------------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Denver CSA | 498,592 | 1,027,760 | 100.0 | 8.3 | 8.4 | 24.1 | 26.9 | 34.8 | 36.0 | 32.8 | 28.6 | 0.0 | 0.0 | |
| Total | 498,592 | 1,027,760 | 100.0 | 8.3 | 8.4 | 24.1 | 26.9 | 34.8 | 36.0 | 32.8 | 28.6 | 0.0 | 0.0 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|------------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Denver CSA | 498,592 | 1,027,760 | 100.0 | 23.9 | 36.8 | 16.5 | 28.7 | 17.9 | 15.8 | 41.7 | 11.0 | 0.0 | 7.7 | |
| Total | 498,592 | 1,027,760 | 100.0 | 23.9 | 36.8 | 16.5 | 28.7 | 17.9 | 15.8 | 41.7 | 11.0 | 0.0 | 7.7 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate |
| Miami MSA | 3 | 40,662 | 100.0 | 258,889 | 2.6 | 66.7 | 2.1 | 23.2 | 33.3 | 19.1 | 32.9 | 0.0 | 32.4 | 41.2 | 0.0 | 46.0 | 0.2 | 0.0 | 0.4 |
| Tampa MSA | 0 | 0 | 0.0 | 82,570 | 3.3 | 0.0 | 2.8 | 17.8 | 0.0 | 14.4 | 31.8 | 0.0 | 30.0 | 46.9 | 0.0 | 52.7 | 0.2 | 0.0 | 0.1 |
| Total | 3 | 40,662 | 100.0 | 341,459 | 2.7 | 66.7 | 2.3 | 22.2 | 33.3 | 17.9 | 32.7 | 0.0 | 31.8 | 42.3 | 0.0 | 47.6 | 0.2 | 0.0 | 0.3 |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2020-21 |
|---|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate |
| Miami MSA | 3 | 40,662 | 100.0 | 258,889 | 23.1 | 0.0 | 2.4 | 17.0 | 0.0 | 9.5 | 17.7 | 0.0 | 18.0 | 42.2 | 0.0 | 52.3 | 0.0 | 100.0 | 17.8 |
| Tampa MSA | 0 | 0 | 0.0 | 82,570 | 21.9 | 0.0 | 3.3 | 16.8 | 0.0 | 13.5 | 17.7 | 0.0 | 19.4 | 43.6 | 0.0 | 43.4 | 0.0 | 0.0 | 20.4 |
| Total | 3 | 40,662 | 100.0 | 341,459 | 22.9 | 0.0 | 2.6 | 17.0 | 0.0 | 10.5 | 17.7 | 0.0 | 18.3 | 42.4 | 0.0 | 50.1 | 0.0 | 100.0 | 18.4 |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Miami MSA | 22,471 | 209,118 | 87.9 | 395,476 | 4.1 | 5.0 | 4.4 | 22.2 | 24.6 | 23.5 | 28.3 | 30.4 | 28.5 | 44.1 | 39.1 | 42.4 | 1.2 | 0.9 | 1.2 | |
| Tampa MSA | 3,083 | 28,847 | 12.1 | 53,633 | 6.6 | 7.7 | 7.0 | 19.5 | 21.0 | 20.5 | 27.7 | 28.4 | 27.7 | 45.6 | 42.4 | 44.3 | 0.6 | 0.5 | 0.5 | |
| Total | 25,554 | 237,965 | 100.0 | 449,109 | 4.5 | 5.3 | 4.7 | 21.9 | 24.2 | 23.1 | 28.2 | 30.1 | 28.4 | 44.3 | 39.5 | 42.6 | 1.1 | 0.8 | 1.1 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|----------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | |
| Miami MSA | 22,471 | 209,118 | 87.9 | 395,476 | 94.4 | 61.9 | 42.9 | 1.9 | 18.4 | 3.7 | 19.7 | | |
| Tampa MSA | 3,083 | 28,847 | 12.1 | 53,633 | 92.7 | 59.3 | 44.2 | 2.2 | 18.9 | 5.1 | 21.8 | | |
| Total | 25,554 | 237,965 | 100.0 | 449,109 | 94.2 | 61.6 | 43.0 | 1.9 | 18.4 | 3.9 | 20.0 | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|---|----------------------|------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate |
| Miami MSA | 59 | 423 | 75.6 | 849 | 5.1 | 5.1 | 3.1 | 25.2 | 3.4 | 10.6 | 29.6 | 22.0 | 30.7 | 39.7 | 69.5 | 55.5 | 0.4 | 0.0 | 0.1 |
| Tampa MSA | 19 | 147 | 24.4 | 155 | 4.6 | 0.0 | 1.9 | 19.7 | 21.1 | 18.1 | 34.0 | 47.4 | 36.1 | 41.4 | 31.6 | 43.9 | 0.3 | 0.0 | 0.0 |
| Total | 78 | 570 | 100.0 | 1,004 | 5.0 | 3.8 | 2.9 | 24.1 | 7.7 | 11.8 | 30.5 | 28.2 | 31.6 | 40.1 | 60.3 | 53.7 | 0.4 | 0.0 | 0.1 |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 |
|---|----------------------|------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|----------------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | |
| Miami MSA | 59 | 423 | 75.6 | 849 | 97.5 | 67.8 | 68.8 | 1.5 | 8.5 | 0.9 | 23.7 | |
| Tampa MSA | 19 | 147 | 24.4 | 155 | 96.9 | 26.3 | 56.8 | 2.0 | 26.3 | 1.1 | 47.4 | |
| Total | 78 | 570 | 100.0 | 1,004 | 97.4 | 57.7 | 66.9 | 1.6 | 12.8 | 1.0 | 29.5 | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|------------------|-------------------|--------------------------|---------------------|-------------------------------|---------------------|-----------------------------|---------------------|----------------------------|---------------------|------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Miami MSA | 1,251,172 | 1,863,917 | 86.1 | 5.5 | 5.7 | 28.3 | 30.9 | 31.8 | 34.4 | 34.1 | 28.6 | 0.3 | 0.4 | |
| Tampa MSA | 201,980 | 331,334 | 13.9 | 7.6 | 7.5 | 21.6 | 23.0 | 32.2 | 33.3 | 38.3 | 35.9 | 0.4 | 0.3 | |
| Total | 1,453,152 | 2,195,251 | 100.0 | 5.9 | 6.0 | 27.0 | 29.8 | 31.9 | 34.2 | 34.9 | 29.6 | 0.3 | 0.4 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|------------------|-------------------|-----------------------------|---------------------|----------------------------------|---------------------|--------------------------------|---------------------|-------------------------------|---------------------|---------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Miami MSA | 1,251,172 | 1,863,917 | 86.1 | 25.1 | 20.4 | 15.7 | 27.5 | 16.6 | 24.3 | 42.6 | 21.3 | 0.0 | 6.5 | |
| Tampa MSA | 201,980 | 331,334 | 13.9 | 22.8 | 22.6 | 14.9 | 30.0 | 16.9 | 23.2 | 45.4 | 19.0 | 0.0 | 5.2 | |
| Total | 1,453,152 | 2,195,251 | 100.0 | 24.7 | 20.7 | 15.5 | 27.9 | 16.7 | 24.2 | 43.1 | 21.0 | 0.0 | 6.3 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Atlanta MSA | 6 | 202,631 | 100.0 | 66,883 | 7.9 | 16.7 | 8.3 | 15.0 | 33.3 | 13.3 | 13.7 | 16.7 | 15.0 | 63.3 | 33.3 | 63.1 | 0.1 | 0.0 | 0.2 | |
| Total | 6 | 202,631 | 100.0 | 66,883 | 7.9 | 16.7 | 8.3 | 15.0 | 33.3 | 13.3 | 13.7 | 16.7 | 15.0 | 63.3 | 33.3 | 63.1 | 0.1 | 0.0 | 0.2 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| Atlanta MSA | 6 | 202,631 | 100.0 | 66,883 | 23.4 | 0.0 | 3.5 | 13.2 | 0.0 | 11.2 | 14.5 | 0.0 | 15.8 | 48.9 | 0.0 | 51.4 | 0.0 | 100.0 | 18.1 | |
| Total | 6 | 202,631 | 100.0 | 66,883 | 23.4 | 0.0 | 3.5 | 13.2 | 0.0 | 11.2 | 14.5 | 0.0 | 15.8 | 48.9 | 0.0 | 51.4 | 0.0 | 100.0 | 18.1 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Atlanta MSA | 4,750 | 43,451 | 100.0 | 60,008 | 10.1 | 11.6 | 8.5 | 16.0 | 17.0 | 15.2 | 13.5 | 14.6 | 13.6 | 58.9 | 56.0 | 61.5 | 1.5 | 0.9 | 1.1 | |
| Total | 4,750 | 43,451 | 100.0 | 60,008 | 10.1 | 11.6 | 8.5 | 16.0 | 17.0 | 15.2 | 13.5 | 14.6 | 13.6 | 58.9 | 56.0 | 61.5 | 1.5 | 0.9 | 1.1 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|--|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | | |
| Atlanta MSA | 4,750 | 43,451 | 100.0 | 60,008 | 92.0 | 67.4 | 40.4 | 2.6 | 14.3 | 5.4 | 18.3 | | | |
| Total | 4,750 | 43,451 | 100.0 | 60,008 | 92.0 | 67.4 | 40.4 | 2.6 | 14.3 | 5.4 | 18.3 | | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|---|----------------------|-----------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate |
| Atlanta MSA | 8 | 36 | 100.0 | 53 | 11.3 | 12.5 | 5.7 | 14.9 | 0.0 | 7.5 | 16.4 | 25.0 | 15.1 | 56.9 | 62.5 | 71.7 | 0.6 | 0.0 | 0.0 |
| Total | 8 | 36 | 100.0 | 53 | 11.3 | 12.5 | 5.7 | 14.9 | 0.0 | 7.5 | 16.4 | 25.0 | 15.1 | 56.9 | 62.5 | 71.7 | 0.6 | 0.0 | 0.0 |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 |
|---|----------------------|-----------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|----------------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | |
| Atlanta MSA | 8 | 36 | 100.0 | 53 | 96.1 | 75.0 | 67.9 | 1.8 | 0.0 | 2.1 | 25.0 | |
| Total | 8 | 36 | 100.0 | 53 | 96.1 | 75.0 | 67.9 | 1.8 | 0.0 | 2.1 | 25.0 | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | | 2020-21 |
|--|----------------------|----------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|--------------|----------------|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Atlanta MSA | 181,256 | 313,194 | 100.0 | 16.0 | 16.4 | 18.5 | 22.8 | 13.6 | 18.8 | 51.4 | 41.5 | 0.6 | 0.5 | |
| Total | 181,256 | 313,194 | 100.0 | 16.0 | 16.4 | 18.5 | 22.8 | 13.6 | 18.8 | 51.4 | 41.5 | 0.6 | 0.5 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | | 2020-21 |
|--|----------------------|----------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|--------------|----------------|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Atlanta MSA | 181,256 | 313,194 | 100.0 | 26.5 | 25.8 | 14.8 | 28.3 | 15.3 | 21.1 | 43.4 | 16.1 | 0.0 | 8.6 | |
| Total | 181,256 | 313,194 | 100.0 | 26.5 | 25.8 | 14.8 | 28.3 | 15.3 | 21.1 | 43.4 | 16.1 | 0.0 | 8.6 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Chicago MSA | 15 | 34,508 | 100.0 | 241,306 | 6.9 | 46.7 | 5.4 | 24.2 | 20.0 | 19.3 | 32.0 | 6.7 | 29.7 | 36.7 | 26.7 | 45.4 | 0.2 | 0.0 | 0.2 | |
| Total | 15 | 34,508 | 100.0 | 241,306 | 6.9 | 46.7 | 5.4 | 24.2 | 20.0 | 19.3 | 32.0 | 6.7 | 29.7 | 36.7 | 26.7 | 45.4 | 0.2 | 0.0 | 0.2 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| Chicago MSA | 15 | 34,508 | 100.0 | 241,306 | 28.0 | 0.0 | 5.9 | 17.0 | 0.0 | 15.6 | 17.7 | 0.0 | 20.6 | 37.2 | 0.0 | 41.4 | 0.0 | 100.0 | 16.4 | |
| Total | 15 | 34,508 | 100.0 | 241,306 | 28.0 | 0.0 | 5.9 | 17.0 | 0.0 | 15.6 | 17.7 | 0.0 | 20.6 | 37.2 | 0.0 | 41.4 | 0.0 | 100.0 | 16.4 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|----------------|--------------|----------------|-------------------|--------------|-------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Chicago MSA | 11,876 | 102,126 | 100.0 | 188,404 | 8.6 | 8.9 | 10.0 | 21.7 | 25.3 | 25.1 | 24.6 | 28.8 | 26.6 | 44.3 | 36.4 | 37.8 | 0.7 | 0.5 | 0.5 | |
| Total | 11,876 | 102,126 | 100.0 | 188,404 | 8.6 | 8.9 | 10.0 | 21.7 | 25.3 | 25.1 | 24.6 | 28.8 | 26.6 | 44.3 | 36.4 | 37.8 | 0.7 | 0.5 | 0.5 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|----------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|---------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | |
| Chicago MSA | 11,876 | 102,126 | 100.0 | 188,404 | 87.5 | 61.0 | 41.9 | 4.7 | 18.4 | 7.8 | 20.6 | | |
| Total | 11,876 | 102,126 | 100.0 | 188,404 | 87.5 | 61.0 | 41.9 | 4.7 | 18.4 | 7.8 | 20.6 | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|----------------------|-----------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate |
| Chicago MSA | 6 | 37 | 100.0 | 153 | 7.2 | 0.0 | 3.3 | 23.4 | 16.7 | 23.5 | 29.2 | 50.0 | 24.2 | 40.0 | 33.3 | 48.4 | 0.2 | 0.0 | 0.7 |
| Total | 6 | 37 | 100.0 | 153 | 7.2 | 0.0 | 3.3 | 23.4 | 16.7 | 23.5 | 29.2 | 50.0 | 24.2 | 40.0 | 33.3 | 48.4 | 0.2 | 0.0 | 0.7 |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 |
|--|----------------------|-----------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|---------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | |
| Chicago MSA | 6 | 37 | 100.0 | 153 | 95.1 | 33.3 | 69.9 | 2.6 | 0.0 | 2.3 | 66.7 | |
| Total | 6 | 37 | 100.0 | 153 | 95.1 | 33.3 | 69.9 | 2.6 | 0.0 | 2.3 | 66.7 | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|------------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Chicago MSA | 886,035 | 1,425,346 | 100.0 | 12.9 | 13.9 | 27.6 | 33.6 | 27.2 | 30.1 | 31.8 | 22.1 | 0.5 | 0.3 | |
| Total | 886,035 | 1,425,346 | 100.0 | 12.9 | 13.9 | 27.6 | 33.6 | 27.2 | 30.1 | 31.8 | 22.1 | 0.5 | 0.3 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|------------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Chicago MSA | 886,035 | 1,425,346 | 100.0 | 29.2 | 30.3 | 15.8 | 28.8 | 16.7 | 21.6 | 38.2 | 11.4 | 0.0 | 7.8 | |
| Total | 886,035 | 1,425,346 | 100.0 | 29.2 | 30.3 | 15.8 | 28.8 | 16.7 | 21.6 | 38.2 | 11.4 | 0.0 | 7.8 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|----------------------------------|---------------|-------------------|-----------------------|--|---------------------|------------------|--|---------------------|------------------|--|---------------------|------------------|--|---------------------|------------------|--|---------------------|------------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| New Orleans CSA | 0 | 0 | 0.0 | 57,219 | 4.9 | 0.0 | 4.8 | 19.4 | 0.0 | 15.0 | 40.5 | 0.0 | 37.8 | 34.7 | 0.0 | 41.8 | 0.4 | 0.0 | 0.6 | |
| Shreveport CSA | 1 | 1,286 | 25.0 | 17,690 | 7.5 | 100.0 | 1.8 | 14.6 | 0.0 | 7.5 | 36.0 | 0.0 | 31.2 | 41.9 | 0.0 | 59.5 | 0.0 | 0.0 | 0.0 | |
| Alexandria MSA | 0 | 0 | 0.0 | 4,205 | 4.5 | 0.0 | 1.5 | 8.5 | 0.0 | 6.8 | 45.0 | 0.0 | 40.2 | 42.0 | 0.0 | 51.5 | 0.0 | 0.0 | 0.0 | |
| Baton Rouge MSA | 1 | 32,825 | 25.0 | 35,158 | 4.0 | 0.0 | 1.3 | 18.6 | 100.0 | 12.8 | 38.0 | 0.0 | 37.2 | 39.4 | 0.0 | 48.8 | 0.0 | 0.0 | 0.0 | |
| Houma MSA | 0 | 0 | 0.0 | 5,897 | 0.0 | 0.0 | 0.0 | 14.0 | 0.0 | 10.6 | 64.5 | 0.0 | 60.0 | 21.6 | 0.0 | 29.4 | 0.0 | 0.0 | 0.0 | |
| Lafayette CSA | 0 | 0 | 0.0 | 15,774 | 3.2 | 0.0 | 1.5 | 16.0 | 0.0 | 9.4 | 46.0 | 0.0 | 39.0 | 34.9 | 0.0 | 50.1 | 0.0 | 0.0 | 0.0 | |
| Lake Charles CSA | 0 | 0 | 0.0 | 8,390 | 2.4 | 0.0 | 1.3 | 16.5 | 0.0 | 13.7 | 40.3 | 0.0 | 38.8 | 40.9 | 0.0 | 46.2 | 0.0 | 0.0 | 0.0 | |
| Monroe MSA | 2 | 16,875 | 50.0 | 6,146 | 11.3 | 0.0 | 4.5 | 14.3 | 0.0 | 6.3 | 27.7 | 50.0 | 25.8 | 46.7 | 50.0 | 63.4 | 0.0 | 0.0 | 0.0 | |
| Louisiana Non-Metro MSA | 0 | 0 | 0.0 | 1,665 | 1.6 | 0.0 | 0.2 | 29.6 | 0.0 | 30.2 | 61.8 | 0.0 | 61.0 | 7.0 | 0.0 | 8.6 | 0.0 | 0.0 | 0.0 | |
| Total | 4 | 50,986 | 100.0 | 152,144 | 4.6 | 25.0 | 2.7 | 17.5 | 25.0 | 12.4 | 41.7 | 25.0 | 37.8 | 36.1 | 25.0 | 46.9 | 0.1 | 0.0 | 0.2 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|----------------------------------|---------------|-------------------|-----------------------|-----------------------------|---------------------|------------------|----------------------------------|---------------------|------------------|--------------------------------|---------------------|------------------|-------------------------------|---------------------|------------------|---------------------------------------|---------------------|------------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| New Orleans CSA | 0 | 0 | 0.0 | 57,219 | 25.2 | 0.0 | 4.1 | 15.8 | 0.0 | 13.9 | 17.3 | 0.0 | 18.2 | 41.8 | 0.0 | 40.7 | 0.0 | 0.0 | 23.1 | |
| Shreveport CSA | 1 | 1,286 | 25.0 | 17,690 | 24.8 | 0.0 | 3.7 | 15.7 | 0.0 | 12.4 | 16.8 | 0.0 | 16.6 | 42.6 | 0.0 | 34.6 | 0.0 | 100.0 | 32.7 | |
| Alexandria MSA | 0 | 0 | 0.0 | 4,205 | 23.8 | 0.0 | 4.2 | 16.4 | 0.0 | 13.2 | 17.9 | 0.0 | 18.6 | 41.9 | 0.0 | 38.4 | 0.0 | 0.0 | 25.6 | |
| Baton Rouge MSA | 1 | 32,825 | 25.0 | 35,158 | 23.2 | 0.0 | 6.5 | 16.0 | 0.0 | 18.2 | 17.8 | 0.0 | 18.8 | 43.0 | 0.0 | 35.3 | 0.0 | 100.0 | 21.3 | |
| Houma MSA | 0 | 0 | 0.0 | 5,897 | 22.7 | 0.0 | 5.4 | 16.2 | 0.0 | 16.2 | 18.7 | 0.0 | 19.6 | 42.4 | 0.0 | 33.9 | 0.0 | 0.0 | 24.8 | |
| Lafayette CSA | 0 | 0 | 0.0 | 15,774 | 23.4 | 0.0 | 5.9 | 15.1 | 0.0 | 15.8 | 17.2 | 0.0 | 19.0 | 44.3 | 0.0 | 37.5 | 0.0 | 0.0 | 21.8 | |
| Lake Charles CSA | 0 | 0 | 0.0 | 8,390 | 23.5 | 0.0 | 4.6 | 16.4 | 0.0 | 13.5 | 17.6 | 0.0 | 17.6 | 42.6 | 0.0 | 36.7 | 0.0 | 0.0 | 27.5 | |
| Monroe MSA | 2 | 16,875 | 50.0 | 6,146 | 26.2 | 0.0 | 3.1 | 16.3 | 0.0 | 10.9 | 15.8 | 0.0 | 16.6 | 41.7 | 0.0 | 40.0 | 0.0 | 100.0 | 29.4 | |
| Louisiana Non-Metro MSA | 0 | 0 | 0.0 | 1,665 | 26.7 | 0.0 | 4.0 | 17.8 | 0.0 | 12.2 | 16.9 | 0.0 | 18.2 | 38.7 | 0.0 | 46.5 | 0.0 | 0.0 | 19.2 | |
| Total | 4 | 50,986 | 100.0 | 152,144 | 24.3 | 0.0 | 4.8 | 15.9 | 0.0 | 14.8 | 17.4 | 0.0 | 18.2 | 42.4 | 0.0 | 37.9 | 0.0 | 100.0 | 24.2 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| New Orleans CSA | 7,532 | 170,733 | 45.2 | 49,785 | 8.7 | 9.0 | 8.7 | 20.6 | 22.3 | 20.1 | 31.3 | 31.1 | 30.4 | 38.3 | 36.6 | 39.8 | 1.1 | 0.9 | 1.1 | |
| Shreveport CSA | 1,422 | 19,586 | 8.5 | 10,342 | 14.6 | 19.1 | 15.5 | 20.0 | 20.8 | 19.1 | 28.1 | 26.2 | 29.8 | 37.2 | 33.8 | 35.6 | 0.1 | 0.1 | 0.1 | |
| Alexandria MSA | 389 | 7,509 | 2.3 | 2,901 | 9.8 | 14.4 | 8.1 | 10.5 | 12.9 | 10.0 | 45.0 | 41.1 | 47.4 | 34.3 | 31.4 | 34.4 | 0.3 | 0.3 | 0.2 | |
| Baton Rouge MSA | 3,295 | 77,209 | 19.8 | 23,274 | 6.1 | 6.9 | 5.0 | 20.8 | 22.8 | 20.0 | 30.4 | 30.5 | 30.7 | 42.6 | 39.9 | 44.3 | 0.0 | 0.0 | 0.0 | |
| Houma MSA | 980 | 24,445 | 5.9 | 5,675 | 0.0 | 0.0 | 0.0 | 18.8 | 28.6 | 20.9 | 55.5 | 46.1 | 54.0 | 25.7 | 25.3 | 25.1 | 0.0 | 0.0 | 0.0 | |
| Lafayette CSA | 1,530 | 19,090 | 9.2 | 14,856 | 5.7 | 8.1 | 5.9 | 14.7 | 17.2 | 13.1 | 41.2 | 37.7 | 42.6 | 38.3 | 37.0 | 38.4 | 0.1 | 0.0 | 0.0 | |
| Lake Charles CSA | 690 | 10,646 | 4.1 | 6,175 | 4.2 | 6.7 | 5.1 | 23.4 | 27.2 | 23.2 | 32.1 | 29.9 | 29.9 | 40.1 | 36.2 | 41.7 | 0.2 | 0.0 | 0.1 | |
| Monroe MSA | 572 | 7,918 | 3.4 | 5,104 | 19.0 | 22.9 | 20.5 | 13.3 | 16.4 | 12.0 | 22.6 | 17.0 | 21.2 | 45.0 | 43.7 | 46.2 | 0.2 | 0.0 | 0.1 | |
| Louisiana Non-Metro MSA | 263 | 1,819 | 1.6 | 1,536 | 1.4 | 0.4 | 3.6 | 41.7 | 50.6 | 41.1 | 51.1 | 36.1 | 48.8 | 5.8 | 12.9 | 6.4 | 0.0 | 0.0 | 0.0 | |
| Total | 16,673 | 338,955 | 100.0 | 119,648 | 8.2 | 9.2 | 8.0 | 19.7 | 22.4 | 19.0 | 33.3 | 31.8 | 33.3 | 38.3 | 36.1 | 39.2 | 0.5 | 0.4 | 0.5 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 |
|--|--|----------------|-------------------|-----------------------|---|---------------------|------------------|--|---------------------|---|---------------------|----------------|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | |
| New Orleans CSA | 7,532 | 170,733 | 45.2 | 49,785 | 91.2 | 56.5 | 37.6 | 2.6 | 14.7 | 6.2 | 28.8 | |
| Shreveport CSA | 1,422 | 19,586 | 8.5 | 10,342 | 88.8 | 47.5 | 33.2 | 2.9 | 13.2 | 8.2 | 39.3 | |
| Alexandria MSA | 389 | 7,509 | 2.3 | 2,901 | 85.4 | 49.9 | 39.9 | 3.8 | 13.6 | 10.8 | 36.5 | |
| Baton Rouge MSA | 3,295 | 77,209 | 19.8 | 23,274 | 90.1 | 51.4 | 34.9 | 2.8 | 16.2 | 7.2 | 32.4 | |
| Houma MSA | 980 | 24,445 | 5.9 | 5,675 | 87.3 | 38.4 | 27.5 | 4.0 | 14.6 | 8.7 | 47.0 | |
| Lafayette CSA | 1,530 | 19,090 | 9.2 | 14,856 | 88.9 | 52.0 | 32.9 | 3.6 | 13.7 | 7.5 | 34.3 | |
| Lake Charles CSA | 690 | 10,646 | 4.1 | 6,175 | 87.9 | 51.4 | 32.2 | 3.0 | 14.2 | 9.2 | 34.3 | |
| Monroe MSA | 572 | 7,918 | 3.4 | 5,104 | 88.7 | 46.9 | 26.4 | 3.4 | 12.8 | 7.8 | 40.4 | |
| Louisiana Non-Metro MSA | 263 | 1,819 | 1.6 | 1,536 | 86.4 | 40.7 | 29.3 | 2.6 | 7.2 | 11.0 | 52.1 | |
| Total | 16,673 | 338,955 | 100.0 | 119,648 | 89.8 | 52.3 | 34.8 | 2.9 | 14.5 | 7.3 | 33.2 | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|--|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | |
| New Orleans CSA | 29 | 213 | 20.3 | 213 | 5.3 | 0.0 | 1.9 | 18.5 | 17.2 | 18.8 | 43.7 | 51.7 | 46.5 | 32.0 | 31.0 | 31.9 | 0.6 | 0.0 | 0.9 | |
| Shreveport CSA | 5 | 16 | 3.5 | 146 | 7.4 | 0.0 | 4.8 | 14.5 | 0.0 | 11.0 | 36.8 | 20.0 | 45.2 | 41.3 | 80.0 | 38.4 | 0.0 | 0.0 | 0.7 | |
| Alexandria MSA | 6 | 42 | 4.2 | 75 | 1.9 | 0.0 | 0.0 | 4.1 | 16.7 | 1.3 | 44.1 | 50.0 | 52.0 | 49.9 | 33.3 | 46.7 | 0.0 | 0.0 | 0.0 | |
| Baton Rouge MSA | 14 | 104 | 9.8 | 104 | 3.5 | 0.0 | 1.9 | 16.3 | 35.7 | 19.2 | 37.6 | 50.0 | 48.1 | 42.7 | 14.3 | 30.8 | 0.0 | 0.0 | 0.0 | |
| Houma MSA | 8 | 104 | 5.6 | 56 | 0.0 | 0.0 | 0.0 | 11.8 | 0.0 | 7.1 | 64.7 | 100.0 | 80.4 | 23.5 | 0.0 | 12.5 | 0.0 | 0.0 | 0.0 | |
| Lafayette CSA | 10 | 40 | 7.0 | 152 | 2.7 | 0.0 | 1.3 | 12.1 | 30.0 | 15.8 | 50.0 | 60.0 | 67.1 | 35.3 | 10.0 | 15.8 | 0.0 | 0.0 | 0.0 | |
| Lake Charles CSA | 19 | 536 | 13.3 | 200 | 2.1 | 0.0 | 0.5 | 11.8 | 10.5 | 5.0 | 39.8 | 52.6 | 45.0 | 46.3 | 36.8 | 49.5 | 0.0 | 0.0 | 0.0 | |
| Monroe MSA | 17 | 333 | 11.9 | 154 | 5.4 | 0.0 | 7.8 | 14.3 | 35.3 | 19.5 | 35.4 | 29.4 | 48.7 | 44.8 | 35.3 | 24.0 | 0.1 | 0.0 | 0.0 | |
| Louisiana Non-Metro MSA | 35 | 1,143 | 24.5 | 239 | 0.9 | 0.0 | 1.3 | 47.8 | 60.0 | 58.2 | 48.1 | 40.0 | 38.1 | 3.1 | 0.0 | 2.5 | 0.0 | 0.0 | 0.0 | |
| Total | 143 | 2,531 | 100.0 | 1,339 | 4.0 | 0.0 | 2.3 | 16.7 | 30.1 | 21.2 | 43.1 | 48.3 | 49.1 | 36.0 | 21.7 | 27.2 | 0.2 | 0.0 | 0.2 | |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | 2020-21 |
|---|-----------------------------|--------------|-------------------|-----------------------|--------------------------------------|---------------------|------------------|-------------------------------------|---------------------|--|---------------------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans |
| New Orleans CSA | 29 | 213 | 20.3 | 213 | 97.3 | 62.1 | 66.2 | 1.4 | 10.3 | 1.4 | 27.6 |
| Shreveport CSA | 5 | 16 | 3.5 | 146 | 98.1 | 60.0 | 38.4 | 0.9 | 0.0 | 1.0 | 40.0 |
| Alexandria MSA | 6 | 42 | 4.2 | 75 | 96.1 | 66.7 | 46.7 | 2.4 | 0.0 | 1.5 | 33.3 |
| Baton Rouge MSA | 14 | 104 | 9.8 | 104 | 98.1 | 57.1 | 49.0 | 1.2 | 7.1 | 0.7 | 35.7 |
| Houma MSA | 8 | 104 | 5.6 | 56 | 97.2 | 12.5 | 44.6 | 1.8 | 12.5 | 1.0 | 75.0 |
| Lafayette CSA | 10 | 40 | 7.0 | 152 | 97.2 | 40.0 | 40.8 | 1.9 | 0.0 | 0.8 | 60.0 |
| Lake Charles CSA | 19 | 536 | 13.3 | 200 | 98.4 | 68.4 | 45.0 | 0.8 | 5.3 | 0.8 | 26.3 |
| Monroe MSA | 17 | 333 | 11.9 | 154 | 98.5 | 58.8 | 45.5 | 0.9 | 23.5 | 0.5 | 17.6 |
| Louisiana Non-Metro MSA | 35 | 1,143 | 24.5 | 239 | 97.2 | 37.1 | 43.5 | 1.5 | 14.3 | 1.2 | 48.6 |
| Total | 143 | 2,531 | 100.0 | 1,339 | 97.6 | 51.7 | 47.3 | 1.4 | 10.5 | 1.0 | 37.8 |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|----------------|-------------------|--------------------------|---------------------|-------------------------------|---------------------|-----------------------------|---------------------|----------------------------|---------------------|------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| New Orleans CSA | 244,282 | 375,878 | 39.6 | 9.7 | 9.6 | 23.6 | 24.5 | 36.0 | 38.7 | 29.9 | 26.5 | 0.8 | 0.6 | |
| Shreveport CSA | 63,293 | 81,767 | 10.3 | 11.2 | 9.2 | 20.2 | 19.5 | 34.1 | 34.3 | 34.5 | 37.0 | 0.0 | 0.0 | |
| Alexandria MSA | 17,392 | 22,066 | 2.8 | 8.5 | 5.2 | 11.9 | 11.1 | 43.5 | 46.2 | 36.0 | 37.5 | 0.0 | 0.0 | |
| Baton Rouge MSA | 130,336 | 199,396 | 21.1 | 7.5 | 5.8 | 22.5 | 22.2 | 33.6 | 35.6 | 36.4 | 36.3 | 0.0 | 0.0 | |
| Houma MSA | 28,802 | 42,191 | 4.7 | 0.0 | 0.0 | 16.0 | 16.9 | 64.3 | 64.1 | 19.7 | 19.0 | 0.0 | 0.0 | |
| Lafayette CSA | 60,478 | 81,240 | 9.8 | 4.8 | 4.3 | 18.9 | 18.0 | 44.3 | 42.8 | 32.0 | 34.9 | 0.0 | 0.0 | |
| Lake Charles CSA | 35,084 | 48,147 | 5.7 | 4.5 | 3.8 | 22.2 | 22.3 | 36.2 | 37.0 | 37.1 | 37.0 | 0.0 | 0.0 | |
| Monroe MSA | 26,630 | 31,476 | 4.3 | 18.1 | 14.6 | 14.6 | 14.4 | 26.2 | 26.4 | 41.1 | 44.6 | 0.0 | 0.0 | |
| Louisiana Non-Metro MSA | 11,135 | 12,757 | 1.8 | 3.2 | 2.1 | 34.1 | 36.2 | 56.4 | 53.7 | 6.4 | 8.0 | 0.0 | 0.0 | |
| Total | 617,432 | 894,918 | 100.0 | 8.3 | 7.4 | 21.4 | 21.8 | 38.0 | 39.1 | 32.0 | 31.5 | 0.3 | 0.2 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|---|----------------------|----------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|--------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| New Orleans CSA | 244,282 | 375,878 | 39.6 | 26.7 | 26.6 | 15.0 | 27.4 | 15.4 | 21.0 | 42.9 | 18.7 | 0.0 | 6.3 | |
| Shreveport CSA | 63,293 | 81,767 | 10.3 | 25.3 | 20.9 | 15.9 | 23.8 | 15.6 | 24.9 | 43.2 | 25.9 | 0.0 | 4.5 | |
| Alexandria MSA | 17,392 | 22,066 | 2.8 | 26.3 | 23.4 | 14.7 | 25.1 | 16.6 | 22.9 | 42.5 | 23.7 | 0.0 | 4.9 | |
| Baton Rouge MSA | 130,336 | 199,396 | 21.1 | 25.4 | 26.8 | 14.5 | 28.9 | 15.9 | 20.5 | 44.3 | 18.1 | 0.0 | 5.7 | |
| Houma MSA | 28,802 | 42,191 | 4.7 | 25.7 | 26.7 | 15.3 | 25.7 | 17.1 | 22.1 | 42.0 | 20.2 | 0.0 | 5.2 | |
| Lafayette CSA | 60,478 | 81,240 | 9.8 | 25.4 | 23.8 | 14.0 | 27.4 | 15.3 | 20.4 | 45.3 | 23.7 | 0.0 | 4.6 | |
| Lake Charles CSA | 35,084 | 48,147 | 5.7 | 25.2 | 23.6 | 15.4 | 24.8 | 15.8 | 22.3 | 43.6 | 24.2 | 0.0 | 5.1 | |
| Monroe MSA | 26,630 | 31,476 | 4.3 | 27.2 | 17.0 | 14.9 | 24.7 | 15.2 | 24.7 | 42.7 | 29.0 | 0.0 | 4.6 | |
| Louisiana Non-Metro MSA | 11,135 | 12,757 | 1.8 | 28.8 | 17.9 | 16.1 | 23.2 | 15.0 | 23.4 | 40.1 | 30.5 | 0.0 | 4.9 | |
| Total | 617,432 | 894,918 | 100.0 | 26.1 | 24.9 | 14.9 | 26.9 | 15.6 | 21.6 | 43.4 | 21.0 | 0.0 | 5.6 | |

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Boston CSA | 9 | 104,857 | 69.2 | 348,692 | 3.5 | 0.0 | 4.4 | 14.3 | 22.2 | 14.6 | 43.0 | 66.7 | 40.9 | 39.1 | 11.1 | 39.9 | 0.1 | 0.0 | 0.1 | |
| Pittsfield MSA | 0 | 0 | 0.0 | 4,922 | 3.1 | 0.0 | 3.8 | 10.2 | 0.0 | 7.9 | 55.5 | 0.0 | 52.5 | 31.2 | 0.0 | 35.8 | 0.0 | 0.0 | 0.0 | |
| Springfield MSA | 4 | 77,689 | 30.8 | 24,532 | 4.7 | 25.0 | 6.2 | 12.4 | 0.0 | 13.8 | 35.2 | 25.0 | 34.5 | 47.6 | 50.0 | 45.5 | 0.0 | 0.0 | 0.0 | |
| Total | 13 | 182,546 | 100.0 | 378,146 | 3.6 | 7.7 | 4.5 | 14.0 | 15.4 | 14.5 | 42.6 | 53.8 | 40.6 | 39.7 | 23.1 | 40.2 | 0.1 | 0.0 | 0.1 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| Boston CSA | 9 | 104,857 | 69.2 | 348,692 | 23.5 | 0.0 | 5.3 | 16.3 | 0.0 | 17.8 | 19.4 | 0.0 | 22.8 | 40.9 | 0.0 | 39.7 | 0.0 | 100.0 | 14.4 | |
| Pittsfield MSA | 0 | 0 | 0.0 | 4,922 | 21.3 | 0.0 | 9.0 | 17.6 | 0.0 | 18.6 | 20.5 | 0.0 | 19.6 | 40.6 | 0.0 | 39.4 | 0.0 | 0.0 | 13.5 | |
| Springfield MSA | 4 | 77,689 | 30.8 | 24,532 | 24.7 | 0.0 | 6.2 | 15.7 | 0.0 | 22.4 | 17.9 | 0.0 | 23.2 | 41.8 | 0.0 | 31.6 | 0.0 | 100.0 | 16.7 | |
| Total | 13 | 182,546 | 100.0 | 378,146 | 23.5 | 0.0 | 5.4 | 16.3 | 0.0 | 18.1 | 19.3 | 0.0 | 22.8 | 40.9 | 0.0 | 39.1 | 0.0 | 100.0 | 14.6 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Boston CSA | 15,908 | 161,541 | 89.3 | 180,922 | 7.8 | 9.2 | 7.9 | 15.3 | 17.0 | 16.2 | 35.9 | 39.5 | 37.1 | 40.4 | 34.1 | 38.4 | 0.6 | 0.3 | 0.5 | |
| Pittsfield MSA | 366 | 2,846 | 2.1 | 2,700 | 14.2 | 18.3 | 11.2 | 6.5 | 8.7 | 7.2 | 41.8 | 37.7 | 40.7 | 37.4 | 35.2 | 40.9 | 0.0 | 0.0 | 0.0 | |
| Springfield MSA | 1,538 | 12,462 | 8.6 | 14,704 | 14.3 | 16.3 | 12.8 | 15.2 | 15.4 | 14.9 | 28.8 | 30.0 | 30.2 | 41.1 | 38.0 | 41.9 | 0.8 | 0.3 | 0.2 | |
| Total | 17,812 | 176,849 | 100.0 | 198,326 | 8.4 | 10.0 | 8.3 | 15.1 | 16.7 | 16.0 | 35.5 | 38.6 | 36.6 | 40.4 | 34.4 | 38.7 | 0.6 | 0.3 | 0.5 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|----------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|---------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | |
| Boston CSA | 15,908 | 161,541 | 89.3 | 180,922 | 87.1 | 47.4 | 42.8 | 4.9 | 19.2 | 8.1 | 33.4 | | |
| Pittsfield MSA | 366 | 2,846 | 2.1 | 2,700 | 84.5 | 44.5 | 44.3 | 4.7 | 20.8 | 10.8 | 34.7 | | |
| Springfield MSA | 1,538 | 12,462 | 8.6 | 14,704 | 85.0 | 44.9 | 45.1 | 4.7 | 17.2 | 10.2 | 37.9 | | |
| Total | 17,812 | 176,849 | 100.0 | 198,326 | 86.9 | 47.2 | 43.0 | 4.8 | 19.1 | 8.3 | 33.8 | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|----------------------|------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate |
| Boston CSA | 87 | 588 | 82.1 | 506 | 4.0 | 2.3 | 2.8 | 11.1 | 5.7 | 8.5 | 41.2 | 48.3 | 40.3 | 43.5 | 43.7 | 48.2 | 0.1 | 0.0 | 0.2 |
| Pittsfield MSA | 2 | 4 | 1.9 | 27 | 2.1 | 0.0 | 0.0 | 4.2 | 0.0 | 7.4 | 48.4 | 50.0 | 40.7 | 45.4 | 50.0 | 51.9 | 0.0 | 0.0 | 0.0 |
| Springfield MSA | 17 | 164 | 16.0 | 83 | 3.1 | 0.0 | 1.2 | 5.9 | 0.0 | 4.8 | 31.7 | 52.9 | 27.7 | 59.2 | 47.1 | 66.3 | 0.0 | 0.0 | 0.0 |
| Total | 106 | 756 | 100.0 | 616 | 3.8 | 1.9 | 2.4 | 10.3 | 4.7 | 8.0 | 40.4 | 49.1 | 38.6 | 45.3 | 44.3 | 50.8 | 0.1 | 0.0 | 0.2 |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 |
|--|----------------------|------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|---------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | |
| Boston CSA | 87 | 588 | 82.1 | 506 | 95.9 | 49.4 | 59.7 | 2.3 | 9.2 | 1.8 | 41.4 | |
| Pittsfield MSA | 2 | 4 | 1.9 | 27 | 96.1 | 50.0 | 59.3 | 2.5 | 0.0 | 1.4 | 50.0 | |
| Springfield MSA | 17 | 164 | 16.0 | 83 | 96.7 | 58.8 | 55.4 | 1.7 | 5.9 | 1.6 | 35.3 | |
| Total | 106 | 756 | 100.0 | 616 | 96.0 | 50.9 | 59.1 | 2.2 | 8.5 | 1.8 | 40.6 | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|------------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Boston CSA | 953,236 | 1,841,877 | 87.8 | 9.8 | 12.8 | 19.8 | 23.8 | 39.0 | 39.6 | 31.1 | 23.7 | 0.2 | 0.2 | |
| Pittsfield MSA | 18,220 | 32,613 | 1.7 | 9.6 | 11.3 | 12.0 | 12.5 | 50.7 | 55.3 | 27.7 | 21.0 | 0.0 | 0.0 | |
| Springfield MSA | 114,470 | 172,681 | 10.5 | 13.5 | 16.7 | 15.6 | 21.6 | 34.0 | 32.9 | 36.7 | 28.7 | 0.1 | 0.1 | |
| Total | 1,085,926 | 2,047,171 | 100.0 | 10.2 | 13.2 | 19.2 | 23.4 | 38.8 | 39.1 | 31.6 | 24.1 | 0.2 | 0.2 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|------------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Boston CSA | 953,236 | 1,841,877 | 87.8 | 26.6 | 40.6 | 14.4 | 27.8 | 16.3 | 14.0 | 42.7 | 9.5 | 0.0 | 8.1 | |
| Pittsfield MSA | 18,220 | 32,613 | 1.7 | 25.2 | 39.4 | 15.3 | 28.9 | 17.3 | 16.5 | 42.2 | 8.6 | 0.0 | 6.6 | |
| Springfield MSA | 114,470 | 172,681 | 10.5 | 27.1 | 33.8 | 14.5 | 29.9 | 15.5 | 17.7 | 42.9 | 11.4 | 0.0 | 7.1 | |
| Total | 1,085,926 | 2,047,171 | 100.0 | 26.6 | 39.9 | 14.4 | 28.1 | 16.2 | 14.4 | 42.7 | 9.7 | 0.0 | 8.0 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|---------------|--------------|----------------|-------------------|--------------|-------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Detroit MSA | 1,632 | 12,903 | 100.0 | 38,834 | 12.4 | 13.6 | 11.7 | 21.1 | 26.3 | 20.9 | 21.2 | 24.1 | 21.9 | 44.5 | 35.5 | 44.8 | 0.9 | 0.5 | 0.7 | |
| Total | 1,632 | 12,903 | 100.0 | 38,834 | 12.4 | 13.6 | 11.7 | 21.1 | 26.3 | 20.9 | 21.2 | 24.1 | 21.9 | 44.5 | 35.5 | 44.8 | 0.9 | 0.5 | 0.7 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | |
| Detroit MSA | 1,632 | 12,903 | 100.0 | 38,834 | 87.1 | 64.5 | 44.9 | 4.3 | 14.3 | 8.6 | 21.1 | | |
| Total | 1,632 | 12,903 | 100.0 | 38,834 | 87.1 | 64.5 | 44.9 | 4.3 | 14.3 | 8.6 | 21.1 | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|----------------------|-----------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | |
| Detroit MSA | 3 | 14 | 100.0 | 79 | 8.4 | 0.0 | 3.8 | 18.3 | 66.7 | 22.8 | 23.9 | 0.0 | 10.1 | 49.0 | 33.3 | 63.3 | 0.4 | 0.0 | 0.0 | |
| Total | 3 | 14 | 100.0 | 79 | 8.4 | 0.0 | 3.8 | 18.3 | 66.7 | 22.8 | 23.9 | 0.0 | 10.1 | 49.0 | 33.3 | 63.3 | 0.4 | 0.0 | 0.0 | |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|---|----------------------|-----------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | | |
| Detroit MSA | 3 | 14 | 100.0 | 79 | 96.1 | 66.7 | 64.6 | 2.0 | 33.3 | 1.9 | 0.0 | | |
| Total | 3 | 14 | 100.0 | 79 | 96.1 | 66.7 | 64.6 | 2.0 | 33.3 | 1.9 | 0.0 | | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|----------------|-------------------|--------------------------|---------------------|-------------------------------|---------------------|-----------------------------|---------------------|----------------------------|---------------------|------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Detroit MSA | 150,538 | 206,044 | 100.0 | 15.3 | 15.0 | 25.4 | 25.1 | 23.3 | 27.2 | 35.5 | 32.3 | 0.6 | 0.4 | |
| Total | 150,538 | 206,044 | 100.0 | 15.3 | 15.0 | 25.4 | 25.1 | 23.3 | 27.2 | 35.5 | 32.3 | 0.6 | 0.4 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|----------------|-------------------|-----------------------------|---------------------|----------------------------------|---------------------|--------------------------------|---------------------|-------------------------------|---------------------|---------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Detroit MSA | 150,538 | 206,044 | 100.0 | 27.4 | 19.6 | 14.3 | 28.3 | 15.3 | 23.2 | 43.0 | 21.9 | 0.0 | 6.9 | |
| Total | 150,538 | 206,044 | 100.0 | 27.4 | 19.6 | 14.3 | 28.3 | 15.3 | 23.2 | 43.0 | 21.9 | 0.0 | 6.9 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Minneapolis CSA | 1,653 | 17,804 | 100.0 | 44,273 | 6.3 | 3.5 | 6.7 | 14.8 | 16.2 | 15.1 | 44.0 | 58.6 | 42.3 | 34.4 | 21.5 | 35.6 | 0.5 | 0.1 | 0.3 | |
| Total | 1,653 | 17,804 | 100.0 | 44,273 | 6.3 | 3.5 | 6.7 | 14.8 | 16.2 | 15.1 | 44.0 | 58.6 | 42.3 | 34.4 | 21.5 | 35.6 | 0.5 | 0.1 | 0.3 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | |
| Minneapolis CSA | 1,653 | 17,804 | 100.0 | 44,273 | 87.3 | 46.7 | 48.5 | 4.9 | 22.0 | 7.8 | 31.3 | | |
| Total | 1,653 | 17,804 | 100.0 | 44,273 | 87.3 | 46.7 | 48.5 | 4.9 | 22.0 | 7.8 | 31.3 | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|----------------------|------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate |
| Minneapolis CSA | 15 | 158 | 100.0 | 473 | 2.2 | 0.0 | 1.1 | 9.4 | 0.0 | 2.3 | 60.4 | 93.3 | 78.6 | 27.9 | 6.7 | 18.0 | 0.1 | 0.0 | 0.0 |
| Total | 15 | 158 | 100.0 | 473 | 2.2 | 0.0 | 1.1 | 9.4 | 0.0 | 2.3 | 60.4 | 93.3 | 78.6 | 27.9 | 6.7 | 18.0 | 0.1 | 0.0 | 0.0 |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 |
|--|----------------------|------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|---------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | |
| Minneapolis CSA | 15 | 158 | 100.0 | 473 | 96.4 | 46.7 | 58.8 | 1.9 | 26.7 | 1.7 | 26.7 | |
| Total | 15 | 158 | 100.0 | 473 | 96.4 | 46.7 | 58.8 | 1.9 | 26.7 | 1.7 | 26.7 | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|----------------|-------------------|--------------------------|---------------------|-------------------------------|---------------------|-----------------------------|---------------------|----------------------------|---------------------|------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Minneapolis CSA | 77,238 | 172,277 | 100.0 | 7.1 | 4.3 | 17.8 | 17.0 | 45.8 | 60.1 | 28.6 | 18.4 | 0.6 | 0.3 | |
| Total | 77,238 | 172,277 | 100.0 | 7.1 | 4.3 | 17.8 | 17.0 | 45.8 | 60.1 | 28.6 | 18.4 | 0.6 | 0.3 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|----------------|-------------------|-----------------------------|---------------------|----------------------------------|---------------------|--------------------------------|---------------------|-------------------------------|---------------------|---------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Minneapolis CSA | 77,238 | 172,277 | 100.0 | 25.4 | 35.0 | 16.2 | 30.1 | 17.7 | 17.7 | 40.7 | 12.9 | 0.0 | 4.4 | |
| Total | 77,238 | 172,277 | 100.0 | 25.4 | 35.0 | 16.2 | 30.1 | 17.7 | 17.7 | 40.7 | 12.9 | 0.0 | 4.4 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Business | % Bank Loans | Aggregate | % Business | % Bank Loans | Aggregate | % Business | % Bank Loans | Aggregate | % Business | % Bank Loans | Aggregate | % Business | % Bank Loans | Aggregate | |
| Las Vegas MSA | 596 | 8,610 | 100.0 | 73,338 | 3.8 | 2.5 | 3.0 | 20.8 | 19.6 | 18.4 | 38.7 | 38.4 | 38.8 | 36.1 | 39.1 | 39.4 | 0.6 | 0.3 | 0.4 | |
| Total | 596 | 8,610 | 100.0 | 73,338 | 3.8 | 2.5 | 3.0 | 20.8 | 19.6 | 18.4 | 38.7 | 38.4 | 38.8 | 36.1 | 39.1 | 39.4 | 0.6 | 0.3 | 0.4 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|--------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | |
| Las Vegas MSA | 596 | 8,610 | 100.0 | 73,338 | 86.8 | 53.9 | 43.6 | 4.3 | 23.0 | 8.9 | 23.2 | | |
| Total | 596 | 8,610 | 100.0 | 73,338 | 86.8 | 53.9 | 43.6 | 4.3 | 23.0 | 8.9 | 23.2 | | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|---------------|-------------------|--------------------------|---------------------|-------------------------------|---------------------|-----------------------------|---------------------|----------------------------|---------------------|------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Las Vegas MSA | 50,917 | 84,129 | 100.0 | 5.1 | 3.7 | 24.5 | 22.4 | 39.4 | 43.2 | 30.8 | 30.6 | 0.1 | 0.1 | |
| Total | 50,917 | 84,129 | 100.0 | 5.1 | 3.7 | 24.5 | 22.4 | 39.4 | 43.2 | 30.8 | 30.6 | 0.1 | 0.1 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|---------------|-------------------|-----------------------------|---------------------|----------------------------------|---------------------|--------------------------------|---------------------|-------------------------------|---------------------|---------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Las Vegas MSA | 50,917 | 84,129 | 100.0 | 22.6 | 22.2 | 17.0 | 28.3 | 18.8 | 25.6 | 41.6 | 21.5 | 0.0 | 2.4 | |
| Total | 50,917 | 84,129 | 100.0 | 22.6 | 22.2 | 17.0 | 28.3 | 18.8 | 25.6 | 41.6 | 21.5 | 0.0 | 2.4 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------|--------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Cincinnati MSA | 2 | 8,950 | 100.0 | 43,474 | 6.1 | 0.0 | 5.9 | 19.0 | 100.0 | 17.8 | 34.2 | 0.0 | 33.6 | 40.5 | 0.0 | 42.5 | 0.2 | 0.0 | 0.2 | |
| Columbus MSA | 0 | 0 | 0.0 | 71,286 | 7.7 | 0.0 | 7.6 | 22.6 | 0.0 | 20.4 | 29.3 | 0.0 | 28.2 | 40.3 | 0.0 | 43.8 | 0.0 | 0.0 | 0.1 | |
| Total | 2 | 8,950 | 100.0 | 114,760 | 7.0 | 0.0 | 6.9 | 21.1 | 100.0 | 19.4 | 31.4 | 0.0 | 30.2 | 40.4 | 0.0 | 43.3 | 0.1 | 0.0 | 0.1 | |

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------|--------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| Cincinnati MSA | 2 | 8,950 | 100.0 | 43,474 | 26.9 | 0.0 | 8.4 | 15.9 | 0.0 | 19.5 | 18.0 | 0.0 | 20.0 | 39.3 | 0.0 | 37.0 | 0.0 | 100.0 | 15.2 | |
| Columbus MSA | 0 | 0 | 0.0 | 71,286 | 24.8 | 0.0 | 8.0 | 17.5 | 0.0 | 19.9 | 19.0 | 0.0 | 20.3 | 38.6 | 0.0 | 35.3 | 0.0 | 0.0 | 16.6 | |
| Total | 2 | 8,950 | 100.0 | 114,760 | 25.7 | 0.0 | 8.2 | 16.9 | 0.0 | 19.7 | 18.6 | 0.0 | 20.1 | 38.9 | 0.0 | 35.9 | 0.0 | 100.0 | 16.0 | |

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2020-21

| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|------------------|---------------------------------|--------------|--------------|----------------|-------------------|--------------|-------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| | # | \$ | % of Total | Overall Market | % Business | % Bank Loans | Aggregate | % Business | % Bank Loans | Aggregate | % Business | % Bank Loans | Aggregate | % Business | % Bank Loans | Aggregate | % Business | % Bank Loans | Aggregate |
| Cincinnati MSA | 195 | 3,164 | 100.0 | 20,421 | 8.7 | 8.2 | 9.5 | 22.6 | 22.1 | 22.8 | 26.4 | 29.2 | 26.5 | 40.7 | 40.0 | 40.0 | 1.6 | 0.5 | 1.1 |
| Columbus MSA | 0 | 0 | 0.0 | 31,768 | 12.1 | 0.0 | 11.4 | 20.5 | 0.0 | 19.7 | 25.2 | 0.0 | 23.9 | 41.5 | 0.0 | 44.6 | 0.7 | 0.0 | 0.4 |
| Total | 195 | 3,164 | 100.0 | 52,189 | 10.8 | 8.2 | 10.7 | 21.3 | 22.1 | 20.9 | 25.7 | 29.2 | 24.9 | 41.2 | 40.0 | 42.8 | 1.1 | 0.5 | 0.7 |

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2020-21

| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | |
|------------------|---------------------------------|--------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans |
| Cincinnati MSA | 195 | 3,164 | 100.0 | 20,421 | 81.3 | 53.3 | 48.0 | 6.5 | 19.5 | 12.2 | 27.2 |
| Columbus MSA | 0 | 0 | 0.0 | 31,768 | 83.6 | 0.0 | 43.7 | 5.1 | 0.0 | 11.3 | 0.0 |
| Total | 195 | 3,164 | 100.0 | 52,189 | 82.7 | 53.3 | 45.4 | 5.7 | 19.5 | 11.6 | 27.2 |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|---|----------------------|---------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|--------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Cincinnati MSA | 14,693 | 27,749 | 100.0 | 14.1 | 11.8 | 23.6 | 26.6 | 30.9 | 36.8 | 31.0 | 24.6 | 0.4 | 0.2 | |
| Columbus MSA | 0 | 0 | 0.0 | 14.2 | 0.0 | 26.4 | 0.0 | 27.6 | 0.0 | 31.6 | 0.0 | 0.3 | 0.0 | |
| Total | 14,693 | 27,749 | 100.0 | 14.2 | 11.8 | 25.2 | 26.6 | 28.9 | 36.8 | 31.4 | 24.6 | 0.3 | 0.2 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|---|----------------------|---------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|--------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Cincinnati MSA | 14,693 | 27,749 | 100.0 | 30.6 | 29.9 | 15.8 | 32.6 | 15.7 | 19.8 | 38.0 | 14.9 | 0.0 | 2.9 | |
| Columbus MSA | 0 | 0 | 0.0 | 26.2 | 0.0 | 17.1 | 0.0 | 17.6 | 0.0 | 39.2 | 0.0 | 0.0 | 0.0 | |
| Total | 14,693 | 27,749 | 100.0 | 28.0 | 29.9 | 16.5 | 32.6 | 16.8 | 19.8 | 38.7 | 14.9 | 0.0 | 2.9 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | | 2020-21 |
|---|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|----------------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Portland MSA | 1 | 14,530 | 100.0 | 50,693 | 1.2 | 0.0 | 1.4 | 27.3 | 0.0 | 27.9 | 41.2 | 100.0 | 41.3 | 30.2 | 0.0 | 29.3 | 0.1 | 0.0 | 0.1 | |
| Total | 1 | 14,530 | 100.0 | 50,693 | 1.2 | 0.0 | 1.4 | 27.3 | 0.0 | 27.9 | 41.2 | 100.0 | 41.3 | 30.2 | 0.0 | 29.3 | 0.1 | 0.0 | 0.1 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|----------------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| Portland MSA | 1 | 14,530 | 100.0 | 50,693 | 24.9 | 0.0 | 5.9 | 17.5 | 0.0 | 18.3 | 19.4 | 0.0 | 23.7 | 38.3 | 0.0 | 39.6 | 0.0 | 100.0 | 12.6 | |
| Total | 1 | 14,530 | 100.0 | 50,693 | 24.9 | 0.0 | 5.9 | 17.5 | 0.0 | 18.3 | 19.4 | 0.0 | 23.7 | 38.3 | 0.0 | 39.6 | 0.0 | 100.0 | 12.6 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Portland MSA | 1,919 | 20,569 | 100.0 | 26,494 | 1.6 | 2.9 | 1.8 | 23.7 | 26.8 | 23.9 | 37.6 | 40.4 | 38.4 | 32.0 | 27.5 | 31.7 | 5.1 | 2.4 | 4.2 | |
| Total | 1,919 | 20,569 | 100.0 | 26,494 | 1.6 | 2.9 | 1.8 | 23.7 | 26.8 | 23.9 | 37.6 | 40.4 | 38.4 | 32.0 | 27.5 | 31.7 | 5.1 | 2.4 | 4.2 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | |
| Portland MSA | 1,919 | 20,569 | 100.0 | 26,494 | 90.7 | 54.6 | 49.4 | 3.2 | 20.6 | 6.1 | 24.8 | | |
| Total | 1,919 | 20,569 | 100.0 | 26,494 | 90.7 | 54.6 | 49.4 | 3.2 | 20.6 | 6.1 | 24.8 | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|----------------------|-----------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | |
| Portland MSA | 8 | 48 | 100.0 | 119 | 1.5 | 0.0 | 0.0 | 23.8 | 25.0 | 20.2 | 42.9 | 37.5 | 33.6 | 29.6 | 37.5 | 43.7 | 2.2 | 0.0 | 2.5 | |
| Total | 8 | 48 | 100.0 | 119 | 1.5 | 0.0 | 0.0 | 23.8 | 25.0 | 20.2 | 42.9 | 37.5 | 33.6 | 29.6 | 37.5 | 43.7 | 2.2 | 0.0 | 2.5 | |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|---|----------------------|-----------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | | |
| Portland MSA | 8 | 48 | 100.0 | 119 | 96.2 | 75.0 | 66.4 | 2.4 | 12.5 | 1.5 | 12.5 | | |
| Total | 8 | 48 | 100.0 | 119 | 96.2 | 75.0 | 66.4 | 2.4 | 12.5 | 1.5 | 12.5 | | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | | 2020-21 |
|--|-----------------------------|----------------|-------------------|--------------------------|---------------------|-------------------------------|---------------------|-----------------------------|---------------------|----------------------------|---------------------|------------------------------------|---------------------|----------------|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Portland MSA | 98,386 | 200,862 | 100.0 | 2.2 | 2.4 | 30.4 | 36.1 | 39.1 | 40.0 | 27.7 | 21.1 | 0.6 | 0.4 | |
| Total | 98,386 | 200,862 | 100.0 | 2.2 | 2.4 | 30.4 | 36.1 | 39.1 | 40.0 | 27.7 | 21.1 | 0.6 | 0.4 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | | 2020-21 |
|--|-----------------------------|----------------|-------------------|-----------------------------|---------------------|----------------------------------|---------------------|--------------------------------|---------------------|-------------------------------|---------------------|---------------------------------------|---------------------|----------------|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Portland MSA | 98,386 | 200,862 | 100.0 | 28.8 | 37.5 | 16.4 | 28.7 | 17.1 | 15.7 | 37.7 | 9.9 | 0.0 | 8.2 | |
| Total | 98,386 | 200,862 | 100.0 | 28.8 | 37.5 | 16.4 | 28.7 | 17.1 | 15.7 | 37.7 | 9.9 | 0.0 | 8.2 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|----------------------------------|----------------|-------------------|-----------------------|--|---------------------|------------------|--|---------------------|------------------|--|---------------------|------------------|--|---------------------|------------------|--|---------------------|------------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Austin MSA | 10 | 133,354 | 17.2 | 152,493 | 4.1 | 30.0 | 3.6 | 15.8 | 20.0 | 12.7 | 39.5 | 20.0 | 42.8 | 40.5 | 30.0 | 40.7 | 0.2 | 0.0 | 0.2 | |
| Dallas MSA | 35 | 741,919 | 60.3 | 370,578 | 5.2 | 20.0 | 2.7 | 18.8 | 45.7 | 11.1 | 31.1 | 20.0 | 32.0 | 44.8 | 14.3 | 53.9 | 0.1 | 0.0 | 0.2 | |
| Beaumont MSA | 0 | 0 | 0.0 | 6,296 | 5.9 | 0.0 | 2.3 | 24.6 | 0.0 | 8.3 | 38.5 | 0.0 | 46.4 | 30.9 | 0.0 | 43.0 | 0.0 | 0.0 | 0.0 | |
| Houston MSA | 13 | 112,407 | 22.4 | 298,169 | 5.4 | 30.8 | 2.7 | 21.0 | 23.1 | 12.2 | 28.6 | 23.1 | 26.4 | 44.9 | 23.1 | 58.6 | 0.1 | 0.0 | 0.1 | |
| Texarkana MSA | 0 | 0 | 0.0 | 2,761 | 0.0 | 0.0 | 0.0 | 12.4 | 0.0 | 6.8 | 63.2 | 0.0 | 59.5 | 24.4 | 0.0 | 33.7 | 0.0 | 0.0 | 0.0 | |
| Tyler MSA | 0 | 0 | 0.0 | 9,368 | 0.9 | 0.0 | 0.5 | 19.9 | 0.0 | 12.2 | 40.9 | 0.0 | 40.8 | 38.3 | 0.0 | 46.4 | 0.0 | 0.0 | 0.0 | |
| Total | 58 | 987,680 | 100.0 | 839,665 | 5.0 | 24.1 | 2.8 | 19.4 | 36.2 | 11.8 | 31.6 | 20.7 | 32.3 | 43.8 | 19.0 | 52.9 | 0.1 | 0.0 | 0.1 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|----------------------------------|----------------|-------------------|-----------------------|-----------------------------|---------------------|------------------|----------------------------------|---------------------|------------------|--------------------------------|---------------------|------------------|-------------------------------|---------------------|------------------|---------------------------------------|---------------------|------------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| Austin MSA | 10 | 133,354 | 17.2 | 152,493 | 22.1 | 0.0 | 3.1 | 16.5 | 0.0 | 12.4 | 19.7 | 0.0 | 18.3 | 41.7 | 0.0 | 45.9 | 0.0 | 100.0 | 20.3 | |
| Dallas MSA | 35 | 741,919 | 60.3 | 370,578 | 23.3 | 0.0 | 3.2 | 16.5 | 0.0 | 12.5 | 18.1 | 0.0 | 18.5 | 42.2 | 0.0 | 43.6 | 0.0 | 100.0 | 22.2 | |
| Beaumont MSA | 0 | 0 | 0.0 | 6,296 | 24.5 | 0.0 | 2.1 | 17.4 | 0.0 | 10.5 | 18.5 | 0.0 | 18.0 | 39.6 | 0.0 | 42.9 | 0.0 | 0.0 | 26.5 | |
| Houston MSA | 13 | 112,407 | 22.4 | 298,169 | 24.4 | 0.0 | 2.6 | 16.0 | 0.0 | 11.9 | 17.0 | 0.0 | 18.6 | 42.6 | 0.0 | 44.4 | 0.0 | 100.0 | 22.5 | |
| Texarkana MSA | 0 | 0 | 0.0 | 2,761 | 22.4 | 0.0 | 2.1 | 16.1 | 0.0 | 9.0 | 18.8 | 0.0 | 19.6 | 42.6 | 0.0 | 40.9 | 0.0 | 0.0 | 28.4 | |
| Tyler MSA | 0 | 0 | 0.0 | 9,368 | 21.9 | 0.0 | 4.2 | 17.7 | 0.0 | 15.2 | 18.7 | 0.0 | 19.9 | 41.7 | 0.0 | 39.3 | 0.0 | 0.0 | 21.4 | |
| Total | 58 | 987,680 | 100.0 | 839,665 | 23.6 | 0.0 | 3.0 | 16.3 | 0.0 | 12.3 | 17.9 | 0.0 | 18.5 | 42.2 | 0.0 | 44.2 | 0.0 | 100.0 | 22.0 | |

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % Busines sses | % Bank Loans | Aggre gate | % Busines sses | % Bank Loans | Aggre gate | % Busines sses | % Bank Loans | Aggre gate | % Busines sses | % Bank Loans | Aggre gate | % Busines sses | % Bank Loans | Aggre gate |
| Austin MSA | 5,724 | 80,727 | 13.6 | 70,992 | 6.4 | 7.7 | 7.0 | 11.6 | 14.4 | 13.1 | 33.5 | 36.4 | 34.8 | 47.2 | 40.7 | 44.2 | 1.2 | 0.7 | 0.9 |
| Dallas MSA | 18,833 | 240,741 | 44.9 | 231,232 | 6.9 | 7.6 | 7.1 | 17.4 | 19.3 | 18.2 | 27.3 | 27.6 | 26.4 | 47.7 | 44.9 | 47.7 | 0.7 | 0.6 | 0.6 |
| Beaumont MSA | 581 | 11,905 | 1.4 | 5,560 | 6.2 | 8.3 | 6.6 | 24.0 | 27.2 | 22.0 | 44.2 | 38.7 | 43.9 | 25.5 | 25.8 | 27.4 | 0.1 | 0.0 | 0.0 |
| Houston MSA | 15,902 | 237,499 | 37.9 | 231,405 | 9.3 | 10.5 | 9.5 | 17.7 | 19.0 | 18.3 | 22.7 | 25.5 | 24.0 | 50.2 | 44.7 | 48.0 | 0.2 | 0.2 | 0.1 |
| Texarkana MSA | 187 | 2,240 | 0.4 | 2,111 | 0.0 | 0.0 | 0.0 | 21.5 | 24.1 | 16.4 | 52.1 | 54.0 | 55.5 | 26.5 | 21.9 | 28.1 | 0.0 | 0.0 | 0.0 |
| Tyler MSA | 727 | 6,728 | 1.7 | 6,951 | 6.2 | 8.5 | 5.8 | 17.3 | 20.2 | 17.6 | 34.9 | 30.5 | 33.4 | 41.5 | 40.6 | 42.9 | 0.2 | 0.1 | 0.3 |
| Total | 41,954 | 579,840 | 100.0 | 548,251 | 7.7 | 8.7 | 8.0 | 16.8 | 18.7 | 17.6 | 26.8 | 28.3 | 26.8 | 48.2 | 43.8 | 47.1 | 0.5 | 0.4 | 0.4 |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 |
|---|---------------------------------|----------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|---------|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | |
| Austin MSA | 5,724 | 80,727 | 13.6 | 70,992 | 89.4 | 56.0 | 45.3 | 3.0 | 23.1 | 7.6 | 20.9 | |
| Dallas MSA | 18,833 | 240,741 | 44.9 | 231,232 | 88.5 | 56.5 | 43.0 | 3.5 | 20.9 | 8.0 | 22.5 | |
| Beaumont MSA | 581 | 11,905 | 1.4 | 5,560 | 82.9 | 42.9 | 39.2 | 4.4 | 24.8 | 12.7 | 32.4 | |
| Houston MSA | 15,902 | 237,499 | 37.9 | 231,405 | 88.3 | 58.1 | 42.2 | 4.0 | 20.1 | 7.7 | 21.8 | |
| Texarkana MSA | 187 | 2,240 | 0.4 | 2,111 | 81.1 | 44.9 | 46.4 | 4.6 | 27.3 | 14.3 | 27.8 | |
| Tyler MSA | 727 | 6,728 | 1.7 | 6,951 | 86.1 | 47.6 | 46.5 | 3.9 | 23.2 | 10.0 | 29.2 | |
| Total | 41,954 | 579,840 | 100.0 | 548,251 | 88.4 | 56.6 | 43.0 | 3.7 | 21.0 | 7.9 | 22.3 | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|----------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate |
| Austin MSA | 29 | 291 | 17.0 | 364 | 4.9 | 3.4 | 1.9 | 13.2 | 17.2 | 19.0 | 38.5 | 51.7 | 46.4 | 43.0 | 27.6 | 32.7 | 0.4 | 0.0 | 0.0 |
| Dallas MSA | 74 | 541 | 43.3 | 1,192 | 4.5 | 1.4 | 1.2 | 15.1 | 14.9 | 9.9 | 31.9 | 35.1 | 40.0 | 48.0 | 48.6 | 48.6 | 0.4 | 0.0 | 0.3 |
| Beaumont MSA | 6 | 35 | 3.5 | 65 | 4.1 | 0.0 | 0.0 | 14.3 | 0.0 | 4.6 | 38.7 | 83.3 | 18.5 | 42.8 | 16.7 | 76.9 | 0.0 | 0.0 | 0.0 |
| Houston MSA | 55 | 353 | 32.2 | 875 | 5.4 | 0.0 | 3.0 | 15.4 | 9.1 | 11.3 | 28.5 | 45.5 | 36.3 | 50.7 | 45.5 | 49.3 | 0.1 | 0.0 | 0.1 |
| Texarkana MSA | 2 | 10 | 1.2 | 185 | 0.0 | 0.0 | 0.0 | 9.7 | 0.0 | 8.1 | 62.7 | 100.0 | 62.7 | 27.5 | 0.0 | 29.2 | 0.0 | 0.0 | 0.0 |
| Tyler MSA | 5 | 113 | 2.9 | 210 | 1.8 | 0.0 | 0.5 | 15.3 | 0.0 | 13.8 | 43.7 | 80.0 | 58.1 | 39.2 | 20.0 | 27.6 | 0.0 | 0.0 | 0.0 |
| Total | 171 | 1,343 | 100.0 | 2,891 | 4.8 | 1.2 | 1.7 | 14.8 | 12.3 | 11.5 | 32.5 | 45.0 | 42.0 | 47.6 | 41.5 | 44.7 | 0.3 | 0.0 | 0.2 |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 |
|--|----------------------|--------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|---------|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | |
| Austin MSA | 29 | 291 | 17.0 | 364 | 97.0 | 65.5 | 55.2 | 1.6 | 13.8 | 1.4 | 20.7 | |
| Dallas MSA | 74 | 541 | 43.3 | 1,192 | 96.2 | 64.9 | 55.3 | 2.0 | 2.7 | 1.8 | 32.4 | |
| Beaumont MSA | 6 | 35 | 3.5 | 65 | 99.2 | 83.3 | 69.2 | 0.6 | 0.0 | 0.2 | 16.7 | |
| Houston MSA | 55 | 353 | 32.2 | 875 | 95.7 | 63.6 | 58.3 | 2.2 | 7.3 | 2.1 | 29.1 | |
| Texarkana MSA | 2 | 10 | 1.2 | 185 | 94.9 | 0.0 | 56.2 | 3.0 | 50.0 | 2.1 | 50.0 | |
| Tyler MSA | 5 | 113 | 2.9 | 210 | 96.6 | 40.0 | 72.9 | 1.8 | 20.0 | 1.6 | 40.0 | |
| Total | 171 | 1,343 | 100.0 | 2,891 | 96.2 | 63.7 | 57.8 | 2.0 | 7.0 | 1.8 | 29.2 | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|------------------|-------------------|--------------------------|---------------------|-------------------------------|---------------------|-----------------------------|---------------------|----------------------------|---------------------|------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Austin MSA | 312,737 | 596,324 | 11.3 | 10.5 | 9.5 | 18.7 | 20.1 | 37.7 | 43.9 | 32.2 | 26.2 | 0.9 | 0.4 | |
| Dallas MSA | 1,257,295 | 1,915,893 | 45.5 | 10.8 | 9.9 | 23.1 | 22.9 | 30.3 | 33.6 | 35.6 | 33.3 | 0.2 | 0.3 | |
| Beaumont MSA | 30,771 | 35,615 | 1.1 | 7.8 | 6.4 | 27.8 | 27.1 | 39.4 | 42.0 | 25.0 | 24.5 | 0.0 | 0.0 | |
| Houston MSA | 1,110,615 | 1,595,263 | 40.2 | 11.7 | 9.2 | 24.7 | 24.5 | 26.8 | 31.2 | 36.6 | 35.0 | 0.3 | 0.2 | |
| Texarkana MSA | 14,962 | 17,533 | 0.5 | 0.0 | 0.0 | 19.2 | 15.1 | 60.5 | 63.5 | 20.3 | 21.5 | 0.0 | 0.0 | |
| Tyler MSA | 37,290 | 49,880 | 1.3 | 1.8 | 1.5 | 24.3 | 24.2 | 40.4 | 40.8 | 33.6 | 33.6 | 0.0 | 0.0 | |
| Total | 2,763,670 | 4,210,508 | 100.0 | 10.9 | 9.3 | 23.3 | 23.3 | 30.4 | 34.1 | 35.2 | 33.0 | 0.3 | 0.2 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|-----------------------------|------------------|-------------------|-----------------------------|---------------------|----------------------------------|---------------------|--------------------------------|---------------------|-------------------------------|---------------------|---------------------------------------|---------------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Austin MSA | 312,737 | 596,324 | 11.3 | 23.3 | 32.7 | 16.4 | 29.5 | 18.0 | 16.4 | 42.3 | 13.8 | 0.0 | 7.6 | |
| Dallas MSA | 1,257,295 | 1,915,893 | 45.5 | 23.7 | 27.5 | 16.5 | 29.0 | 17.7 | 21.0 | 42.1 | 15.9 | 0.0 | 6.6 | |
| Beaumont MSA | 30,771 | 35,615 | 1.1 | 27.5 | 18.8 | 15.6 | 25.3 | 16.6 | 23.5 | 40.3 | 26.9 | 0.0 | 5.5 | |
| Houston MSA | 1,110,615 | 1,595,263 | 40.2 | 24.8 | 23.8 | 15.9 | 29.5 | 16.8 | 21.9 | 42.5 | 17.9 | 0.0 | 6.9 | |
| Texarkana MSA | 14,962 | 17,533 | 0.5 | 24.6 | 18.4 | 15.2 | 28.3 | 16.6 | 24.6 | 43.5 | 23.7 | 0.0 | 5.1 | |
| Tyler MSA | 37,290 | 49,880 | 1.3 | 23.8 | 24.1 | 16.6 | 27.8 | 17.2 | 22.1 | 42.4 | 20.5 | 0.0 | 5.5 | |
| Total | 2,763,670 | 4,210,508 | 100.0 | 24.2 | 26.4 | 16.2 | 29.2 | 17.3 | 20.9 | 42.3 | 16.7 | 0.0 | 6.8 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Richmond MSA | 3 | 64,815 | 100.0 | 79,057 | 4.3 | 0.0 | 3.9 | 15.9 | 33.3 | 13.9 | 38.6 | 66.7 | 35.3 | 41.2 | 0.0 | 46.9 | 0.0 | 0.0 | 0.0 | |
| Total | 3 | 64,815 | 100.0 | 79,057 | 4.3 | 0.0 | 3.9 | 15.9 | 33.3 | 13.9 | 38.6 | 66.7 | 35.3 | 41.2 | 0.0 | 46.9 | 0.0 | 0.0 | 0.0 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2020-21 | |
|--|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| Richmond MSA | 3 | 64,815 | 100.0 | 79,057 | 19.9 | 0.0 | 6.9 | 17.4 | 0.0 | 19.0 | 19.9 | 0.0 | 20.5 | 42.8 | 0.0 | 34.8 | 0.0 | 100.0 | 18.8 | |
| Total | 3 | 64,815 | 100.0 | 79,057 | 19.9 | 0.0 | 6.9 | 17.4 | 0.0 | 19.0 | 19.9 | 0.0 | 20.5 | 42.8 | 0.0 | 34.8 | 0.0 | 100.0 | 18.8 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|---------------------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | |
| Richmond MSA | 3,371 | 32,756 | 100.0 | 29,765 | 6.4 | 7.1 | 5.1 | 21.1 | 21.3 | 19.0 | 32.1 | 32.1 | 32.8 | 40.0 | 39.4 | 42.8 | 0.3 | 0.1 | 0.2 | |
| Total | 3,371 | 32,756 | 100.0 | 29,765 | 6.4 | 7.1 | 5.1 | 21.1 | 21.3 | 19.0 | 32.1 | 32.1 | 32.8 | 40.0 | 39.4 | 42.8 | 0.3 | 0.1 | 0.2 | |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|--|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|----------------|--|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | | |
| Richmond MSA | 3,371 | 32,756 | 100.0 | 29,765 | 89.0 | 57.1 | 49.3 | 3.2 | 20.5 | 7.8 | 22.4 | | |
| Total | 3,371 | 32,756 | 100.0 | 29,765 | 89.0 | 57.1 | 49.3 | 3.2 | 20.5 | 7.8 | 22.4 | | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|----------------------|------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | |
| Richmond MSA | 20 | 147 | 100.0 | 146 | 3.1 | 0.0 | 0.0 | 14.9 | 20.0 | 5.5 | 38.9 | 65.0 | 47.9 | 43.1 | 15.0 | 46.6 | 0.0 | 0.0 | 0.0 | |
| Total | 20 | 147 | 100.0 | 146 | 3.1 | 0.0 | 0.0 | 14.9 | 20.0 | 5.5 | 38.9 | 65.0 | 47.9 | 43.1 | 15.0 | 46.6 | 0.0 | 0.0 | 0.0 | |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|---|----------------------|------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | | |
| Richmond MSA | 20 | 147 | 100.0 | 146 | 96.7 | 65.0 | 55.5 | 1.7 | 10.0 | 1.6 | 25.0 | | |
| Total | 20 | 147 | 100.0 | 146 | 96.7 | 65.0 | 55.5 | 1.7 | 10.0 | 1.6 | 25.0 | | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|----------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Richmond MSA | 187,243 | 353,227 | 100.0 | 8.8 | 8.7 | 21.3 | 23.4 | 35.5 | 37.6 | 34.3 | 30.3 | 0.1 | 0.1 | |
| Total | 187,243 | 353,227 | 100.0 | 8.8 | 8.7 | 21.3 | 23.4 | 35.5 | 37.6 | 34.3 | 30.3 | 0.1 | 0.1 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | 2020-21 | |
|--|----------------------|----------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|----------------|--|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Richmond MSA | 187,243 | 353,227 | 100.0 | 22.6 | 32.1 | 16.4 | 28.8 | 18.0 | 19.5 | 42.9 | 12.5 | 0.0 | 7.1 | |
| Total | 187,243 | 353,227 | 100.0 | 22.6 | 32.1 | 16.4 | 28.8 | 18.0 | 19.5 | 42.9 | 12.5 | 0.0 | 7.1 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | | 2020-21 |
|---|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|----------------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | |
| Seattle CSA | 18 | 204,979 | 100.0 | 356,297 | 2.3 | 22.2 | 2.1 | 17.4 | 16.7 | 17.3 | 48.0 | 44.4 | 48.4 | 32.2 | 16.7 | 32.1 | 0.0 | 0.0 | 0.0 | |
| Bellingham MSA | 0 | 0 | 0.0 | 14,900 | 1.0 | 0.0 | 1.2 | 4.1 | 0.0 | 4.5 | 77.8 | 0.0 | 80.3 | 17.0 | 0.0 | 13.9 | 0.1 | 0.0 | 0.2 | |
| Total | 18 | 204,979 | 100.0 | 371,197 | 2.2 | 22.2 | 2.0 | 16.8 | 16.7 | 16.8 | 49.5 | 44.4 | 49.7 | 31.5 | 16.7 | 31.4 | 0.0 | 0.0 | 0.0 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|----------------|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | |
| Seattle CSA | 18 | 204,979 | 100.0 | 356,297 | 21.0 | 0.0 | 4.7 | 17.7 | 0.0 | 15.4 | 21.0 | 0.0 | 23.2 | 40.3 | 0.0 | 41.8 | 0.0 | 100.0 | 14.9 | |
| Bellingham MSA | 0 | 0 | 0.0 | 14,900 | 20.8 | 0.0 | 3.2 | 17.1 | 0.0 | 13.3 | 22.5 | 0.0 | 22.9 | 39.6 | 0.0 | 47.8 | 0.0 | 0.0 | 12.7 | |
| Total | 18 | 204,979 | 100.0 | 371,197 | 21.0 | 0.0 | 4.6 | 17.7 | 0.0 | 15.3 | 21.1 | 0.0 | 23.1 | 40.2 | 0.0 | 42.1 | 0.0 | 100.0 | 14.8 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 |
|--|---------------------------------|----------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|
| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate |
| Seattle CSA | 8,397 | 97,124 | 93.6 | 126,401 | 5.0 | 6.1 | 5.6 | 18.3 | 20.5 | 19.8 | 40.8 | 44.0 | 41.4 | 35.3 | 29.3 | 32.9 | 0.6 | 0.2 | 0.3 |
| Bellingham MSA | 571 | 5,403 | 6.4 | 6,187 | 1.7 | 3.3 | 1.3 | 5.3 | 7.5 | 5.7 | 72.3 | 73.6 | 74.2 | 15.3 | 10.5 | 13.8 | 5.4 | 5.1 | 5.0 |
| Total | 8,968 | 102,527 | 100.0 | 132,588 | 4.8 | 5.9 | 5.4 | 17.6 | 19.6 | 19.1 | 42.4 | 45.8 | 42.9 | 34.3 | 28.1 | 32.0 | 0.9 | 0.5 | 0.5 |

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

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues | | | | | | | | | | | | 2020-21 |
|---|---------------------------------|----------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|---------|
| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | | |
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans | |
| Seattle CSA | 8,397 | 97,124 | 93.6 | 126,401 | 89.8 | 50.2 | 48.9 | 3.3 | 24.4 | 6.9 | 25.4 | |
| Bellingham MSA | 571 | 5,403 | 6.4 | 6,187 | 90.1 | 48.5 | 45.0 | 3.5 | 21.0 | 6.4 | 30.5 | |
| Total | 8,968 | 102,527 | 100.0 | 132,588 | 89.8 | 50.1 | 48.8 | 3.3 | 24.2 | 6.9 | 25.7 | |

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

| Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2020-21 | |
|---|----------------------|------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | Aggregate | |
| Seattle CSA | 48 | 479 | 76.2 | 839 | 3.0 | 0.0 | 1.3 | 17.1 | 18.8 | 13.3 | 47.6 | 41.7 | 46.6 | 31.5 | 39.6 | 38.7 | 0.9 | 0.0 | 0.0 | |
| Bellingham MSA | 15 | 103 | 23.8 | 216 | 1.0 | 0.0 | 1.4 | 2.3 | 0.0 | 0.0 | 81.1 | 73.3 | 78.2 | 15.0 | 26.7 | 20.4 | 0.5 | 0.0 | 0.0 | |
| Total | 63 | 582 | 100.0 | 1,055 | 2.8 | 0.0 | 1.3 | 15.5 | 14.3 | 10.6 | 51.1 | 49.2 | 53.1 | 29.7 | 36.5 | 35.0 | 0.9 | 0.0 | 0.0 | |

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

| Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues | | | | | | | | | | | | 2020-21 | |
|---|----------------------|------------|--------------|----------------|----------------------------|--------------|-------------|---------------------------|--------------|-----------------------------------|--------------|----------------|--|
| Assessment Area: | Total Loans to Farms | | | | Farms with Revenues <= 1MM | | | Farms with Revenues > 1MM | | Farms with Revenues Not Available | | | |
| | # | \$ | % of Total | Overall Market | % Farms | % Bank Loans | Aggregate | % Farms | % Bank Loans | % Farms | % Bank Loans | | |
| Seattle CSA | 48 | 479 | 76.2 | 839 | 96.3 | 52.1 | 58.4 | 2.1 | 18.8 | 1.7 | 29.2 | | |
| Bellingham MSA | 15 | 103 | 23.8 | 216 | 96.6 | 53.3 | 44.9 | 2.1 | 26.7 | 1.3 | 20.0 | | |
| Total | 63 | 582 | 100.0 | 1,055 | 96.3 | 52.4 | 55.6 | 2.1 | 20.6 | 1.6 | 27.0 | | |

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

| Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography | | | | | | | | | | | | | | 2020-21 |
|--|----------------------|------------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|--------------|----------------|
| Assessment Area: | Total Consumer Loans | | | Low-Income Tracts | | Moderate-Income Tracts | | Middle-Income Tracts | | Upper-Income Tracts | | Not Available-Income Tracts | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Seattle CSA | 526,298 | 1,061,762 | 95.8 | 4.9 | 5.8 | 21.9 | 26.1 | 45.0 | 47.6 | 28.0 | 20.4 | 0.1 | 0.1 | |
| Bellingham MSA | 22,979 | 44,792 | 4.2 | 3.8 | 2.9 | 7.5 | 8.1 | 73.1 | 77.3 | 14.7 | 10.8 | 1.0 | 0.9 | |
| Total | 549,277 | 1,106,554 | 100.0 | 4.8 | 5.7 | 21.3 | 25.3 | 46.3 | 48.9 | 27.4 | 20.0 | 0.2 | 0.2 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

| Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower | | | | | | | | | | | | | | 2020-21 |
|--|----------------------|------------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|--------------|----------------|
| Assessment Area: | Total Consumer Loans | | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Not Available-Income Borrowers | | |
| | # | \$ | % of Total | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | % of Households | % Bank Loans | |
| Seattle CSA | 526,298 | 1,061,762 | 95.8 | 23.5 | 33.9 | 16.3 | 28.3 | 18.5 | 17.4 | 41.7 | 12.8 | 0.0 | 7.6 | |
| Bellingham MSA | 22,979 | 44,792 | 4.2 | 25.4 | 29.0 | 15.8 | 28.3 | 17.0 | 19.8 | 41.9 | 17.0 | 0.0 | 5.8 | |
| Total | 549,277 | 1,106,554 | 100.0 | 23.6 | 33.7 | 16.3 | 28.3 | 18.5 | 17.5 | 41.7 | 13.0 | 0.0 | 7.5 | |

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*