

PUBLIC DISCLOSURE

March 8, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

East West Bank

RSSD # 197478

**135 North Los Robles Avenue, 7th Floor
Pasadena, California 91101**

Federal Reserve Bank of San Francisco

101 Market Street

San Francisco, California 94105

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 the safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

Institution’s Community Reinvestment Act (CRA) Rating

East West Bank is rated "OUTSTANDING"

The following table shows the performance level of East West Bank with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	LENDING TEST*	INVESTMENT TEST	SERVICE TEST
OUTSTANDING	X	X	
HIGH SATISFACTORY			X
LOW SATISFACTORY			
NEEDS TO IMPROVE			
SUBSTANTIAL NONCOMPLIANCE			

* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

The major factors supporting the institution’s rating include:

- Lending levels that reflect excellent responsiveness to assessment area credit needs, especially in areas where the bank has a significant presence and areas most affected by the economic impacts of the Covid-19 Pandemic.
- Overall excellent geographic and borrower distribution of loans driven by the strong distribution of small business loans and loans from the bank’s special mortgage lending programs within the bank’s primary markets.
- Leadership in making community development loans that helped stabilize areas that were severely impacted by the Pandemic.
- Excellent levels of qualified investments that benefited the assessment areas as well as broader statewide and regional areas that include the assessment areas.
- Reasonably accessible retail banking services, including low- and moderate-income areas and relatively high levels of community development services that benefited low- and moderate-income individuals and small businesses.
- Innovative and strategic partnerships with non-profits that enhanced overall performance.

INSTITUTION

Description of Institution

East West Bank (EWB), with \$52.2 billion in total assets as of December 31, 2020, is a minority-owned depository institution (MDI) that is wholly owned by and the principal subsidiary of East West Bancorp. Both entities are headquartered in Pasadena, California. EWB opened in 1973 as a federally chartered savings institution with a core mission to serve the Chinese American and Chinese immigrant population. Today, the bank's customer base also includes immigrants from other countries who lack the traditional documentation needed at most financial institutions to open bank accounts and obtain credit. The bank converted to a state chartered commercial bank in 1995 and in September 2004, it became a member of the Federal Reserve System. Since its formation, EWB has grown through a combination of organic growth and a series of acquisitions. As of June 2020, the bank operated 104 branches in seven states – 77 in California, 11 in Texas, six in New York, four in Washington, three in Georgia, two in Massachusetts, and one in Nevada. EWB also has four full-service branches in Greater China – one in Hong Kong, Shanghai, Shantou, and Shenzhen. In addition, the bank has four representative offices in Greater China located in Beijing, Chongqing, Guangzhou, and Xiamen.

EWB is a full-service commercial bank serving consumers and businesses throughout the United States and in China. Currently, the bank provides a wide range of personal and commercial banking services. Commercial real estate continues to be the bank's primary focus, while loans secured by multi-family properties is a niche product in several of the bank's markets. The bank also offers a range of commercial loan products, Small Business Administration (SBA) loans, and commercial and residential construction loans. Consumer purpose loans include home purchase and home mortgage refinance loans as well as home equity lines of credit, credit cards and auto loans. EWB does not originate subprime home mortgage loans or loans with non-traditional features, such as interest-only periods, teaser rates, or negative amortization.

Exhibit 1 represents the loan portfolio as of December 31, 2019 and reflects the bank's commercial focus.

EXHIBIT 1 LOANS AND LEASES AS OF DECEMBER 31, 2019		
Loan Type	\$ ('000s)	%
Commercial/Industrial & Non-Farm Non-Residential Real Estate	19,394,960	58.1
Secured by 1-4 Family Residential Real Estate	8,982,915	26.9
Multi-Family Residential Real Estate	2,669,429	8.0
All Other	1,627,366	4.9
Construction & Land Development	661,130	2.0
Consumer Loans & Credit Cards	27,188	0.1
Farmland & Agriculture	23,572	0.1
Total (Gross)	33,386,560	100.0

EWB's assessment areas have not changed since the previous examination and include 11 assessment areas in seven states as follows:

- **Southern California** – comprised of Los Angeles, Orange, and San Bernardino Counties in their entirety. Los Angeles County comprises the Los Angeles-Long Beach-Glendale Metropolitan Division (MD) and Orange County comprises the Anaheim-Santa Ana-Irvine MD. Together, these two counties make up the Los Angeles-Long Beach-Anaheim Metropolitan Statistical Area (MSA). San Bernardino County is part of the Riverside-San Bernardino-Ontario MSA. Each of these counties are also part of the Los Angeles-Long Beach Combined Statistical Area (CSA).
- **San Francisco Bay Area (Bay Area)** – comprised of Alameda, San Francisco, San Mateo, and Santa Clara counties in their entirety. San Francisco and San Mateo counties make up the San Francisco-San Mateo-Redwood City MD. Alameda County is one of two counties that constitute the Oakland-Berkeley-Livermore MD. In addition, the three counties are all part of the San Francisco-Oakland-Berkeley MSA. Santa Clara County is one of two counties forming the San Jose-Sunnyvale-Santa Clara MSA. All counties in the assessment area are part of the San Jose-San Francisco-Oakland Combined Statistical Area (CSA).
- **Sacramento** – comprised of Sacramento County in its entirety is one of four counties that constitute the Sacramento-Roseville-Folsom MSA.
- **San Diego** – comprised of San Diego County in its entirety, constitutes the San Diego-Chula Vista-Carlsbad MSA.
- **New York** – comprised of Bronx, Kings, New York, Queens, and Richmond counties in their entirety. These counties represent the five New York City boroughs and are part of the New York-Jersey City-White Plains MD, which is part of the multi-state New York-Newark- Jersey City MSA.
- **Houston** – comprised of Fort Bend and Harris counties in their entirety are part of the Houston-The Woodlands-Sugar Land MSA.
- **Dallas** – comprised of Collin and Dallas counties in their entirety are part of the Dallas-Plano-Irving MD and Dallas-Fort Worth-Arlington MSA.
- **Washington** – comprised of King County in its entirety. King is one of two counties in the Seattle-Bellevue-Kent MD, which is part of the Seattle-Tacoma-Bellevue MSA.
- **Georgia** – comprised of 15 the 29 counties in the Atlanta-Sandy Springs-Alpharetta MSA. The 15 counties include Barrow, Bartow, Cherokee, Clayton, Cobb, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding, Rockdale, and Spalding counties.
- **Massachusetts** – comprised of Middlesex, Norfolk, and Suffolk counties in their entirety. Norfolk and Suffolk Counties are part of the Boston MD and Middlesex County is part of the Cambridge-Newton-Framingham MD. The three counties are also part of the multi-state Boston-Cambridge-Newton MSA.
- **Nevada** – comprised of Clark County in its entirety constitutes the Las Vegas-Henderson-Paradise MSA.

The bank's largest presence remains in Southern California where 51 of the 104 branches are located. The bank's presence in Northern California consists of 26 branches. All but one of these branches are located in the Bay Area assessment area, which is where EWB has its second largest presence. As previously noted, EWB has a limited branch presence in each of its remaining assessment areas with no more than eight branches in any one assessment area.

EWB received a satisfactory performance rating at its January 30, 2017, CRA examination. During the review period for this examination, there were no legal or financial impediments that inhibited the bank's ability to meet the credit needs of its communities, consistent with its business strategy, size, financial capacity, and local economic conditions.

Scope of Examination

EWB's performance was assessed in accordance with the *Interagency Large Institution CRA Examination Procedures*. As such, performance was assessed under the lending, investment, and service tests. The evaluation period for the lending test was July 1, 2016 through December 31, 2019. The evaluation period for community development loans, qualified investments, and community development services was January 31, 2017 through December 31, 2020.

The lending test is weighted more heavily than either the investment or service tests. The lending test evaluation is based on the following loan products – small business loans, home mortgage loans (purchase, refinance, and home equity), loans secured by multi-family residential dwellings, community development loans, and letters of credit. The investment test is based on a review of qualified community development investments made during the review period or during a prior period that remained on the bank's books. The service test evaluation is based on a review of retail banking services and qualified community development services provided during the review period.

All of EWB's assessment areas received full-scope reviews with the exception of Sacramento and San Diego, which received limited-scope reviews given the bank's limited presence and level of activity in those areas. Although the bank's presence and activity in Washington, Georgia, Massachusetts, and Nevada is also limited, they received full-scope reviews in order to determine the overall performance and assign ratings in those states. Given the preponderance of EWB branches and concentration of deposit and lending activity in the area, the Southern California assessment area received the greatest weight followed by the Bay Area assessment area. Assessment areas are presented throughout this report in descending order based on the number of bank branches and loan volume beginning with California (Southern California and the Bay Area), followed by New York, Texas, Washington, Georgia, Massachusetts, and Nevada.

Product specific performance under the lending test is weighted according to the bank's business focus, its actual deposit and lending activity, and opportunities within each assessment area. As such, small business loans followed by home purchase loans were weighted more heavily than other loan types based on the bank's business strategy, transaction volumes and the dollar amount of loans originated or purchased.

Many of the bank's consumer products are structured with the bank's target immigrant customer profile in mind and take into account the fact that consumers in this demographic may have limited formal credit histories and lack income documentation, but may be able to demonstrate creditworthiness through alternative means. As a result, borrower income is not available for the majority of the housing-related loans originated during the review period.

Adjustments were made to the scope in individual assessment areas to reflect variances between the different areas. All loan types were used to evaluate responsiveness to assessment area credit needs based on the volume of lending. Community development loans were also assessed in all assessment

areas. Reported small business, home mortgage, and multi-family loans were evaluated in all areas where there was sufficient volume for meaningful conclusions. Home mortgage other purpose lines of credit, home mortgage other purpose closed-end loans, and home mortgage not applicable loans did not influence the overall assessment in any of the assessment areas.

While data presented for 2017, 2018, and 2019 represent full years of lending, 2016 data represent only six months based on the scope of the previous examination; as such, lending for these time periods will be of lower volume. All lending data is presented in the lending volume tables contained in Appendix E – CRA Core Tables and these tables are referenced throughout this document. The scope of the review is consistent throughout the performance evaluation, unless otherwise noted.

In addition, 16 community representatives were contacted in connection with this examination to provide information regarding credit needs and market conditions within the assessment area. Contacts represented organizations working in economic and community development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

This section of the performance evaluation contains conclusions regarding the bank's overall performance followed by specific conclusions regarding individual states and assessment areas within each of the seven states where the bank has full-service branches. In accordance with the *Interagency CRA Large Institution Examination Procedures*, at least one assessment area from each state received a full-scope review and each state earned a separate rating. However, with 69 and 86 percent of the bank's lending and deposit activity, respectively within the California assessment areas, conclusions for the state of California heavily influenced EWB's overall performance under each of the three performance tests. The overall state conclusions are based on performance within the respective assessment areas and relevant contextual information.

EWB was particularly responsive to the economic impacts of the Pandemic through lending, investment, and service activities as described below. However, the bank also assisted the community in ways that do not fit neatly into the usual CRA performance categories, but were nonetheless considered as performance context in the evaluation of the bank's overall performance. These activities as described as follows included:

- *Special Fund for Immigrants (Fund)*. For the government relief packages for Covid-19, individuals without social security numbers were not able to obtain assistance through the Coronavirus Aid Relief and Economic Security (CARES) Act. The Fund started with a goal of raising \$4 million to support immigrants and their families across California and Texas. EWB provided \$1 million in seed money to establish the Immigrant Neighbor fund.
- *Innovative assistance for Covid-19 in Alameda County*. The Treasurer- Tax Collector of Alameda County, California had to shut down offices due to Covid-19. Alameda County contacted local banks to assist taxpayers that needed to make cash payments for their taxes. In April 2020, EWB was recognized for being the only bank that responded to the call for action by providing taxpayers with a viable avenue to pay their taxes in cash in a timely manner.

Lending Test

EWB's overall performance under the lending test is outstanding. Lending within the Southern California, Bay Area, New York, Houston, Massachusetts, and Nevada assessment was excellent given the economic conditions, competitive environment, and the bank's financial capacity. Performance was also good in the remaining markets, with generally consistent performance in the limited scope assessment areas. Geographic and borrower distributions of loans were generally excellent. In addition, excellent to high levels of community development loans were noted in each assessment area.

EWB was particularly responsive to the economic impacts of the Pandemic. The bank was proactive in assisting customers and the small business owners in its communities. A large portion of the bank's customers are small business owners that were impacted by the Pandemic.

Mortgage Payment Deferrals. Although most of the bank's mortgage loans were not subject to the CARES Act, the bank proactively provided deferrals upon request. The bank offered deferrals in 90-day increments with either a longer- term repayment plan or with payments due at the end of the loan

term, depending on program and state requirements. To simplify and address the initial rush of requests, borrowers could request deferrals by phone and online. Also notable, is that the bank did not automatically deny loan requests or charge a higher interest rate to borrowers with Covid-19 related financial challenges. The bank provided 3,177 mortgage deferrals, of which 40.2 percent were in southern California and 30.8 percent in New York, two areas that were significantly impacted by the Pandemic and 26.5 percent of which are in low- and moderate-income census tracts.

Paycheck Protection Program (PPP) loans. The bank responded quickly to customers affected by the Pandemic by offering PPP loans as soon as they were available. As noted in various media reports, many small businesses were unable to obtain PPP loans because they lacked relationships with financial institutions. As an MDI, EWB helped fill that lending gap.

LENDING ACTIVITY

Overall lending levels reflect excellent responsiveness to assessment area credit needs, driven by activity in the Southern California, Bay Area, New York, Houston, and Nevada assessment areas. Loan volumes in the assessment areas were also generally comparable with the bank's share of deposits in those markets. Overall loan volumes are displayed in Exhibit 2 and volumes within the respective assessment areas are shown in Tables 1, 1A, 21, 21A, 41, 57, 57A, 77, 77A, 97, 97A, 117, and 117A.

EXHIBIT 2 SUMMARY OF LENDING ACTIVITY JULY 1, 2016 TO DECEMBER 31, 2017				
Loan Type	#	%	\$ ('000s)	%
Small Business	2,948	27.3	648,279	14.2
Total Business Related	2,948	27.3	648,279	14.2
HMDA Home Purchase	3,587	33.2	1,568,202	34.4
HMDA Home Improvement	206	1.9	89,530	2.0
HMDA Refinance	1,262	11.7	530,935	11.6
HMDA Multifamily	430	4.0	756,321	16.6
Total HMDA Related	5,485	50.8	2,944,988	64.6
Home Equity	2,370	21.9	967,660	21.2
Total Consumer Related	2,370	21.9	967,660	21.2
Total Loans	10,803	100.0	4,560,927	100.0

Note: Affiliate loans include only loans originated or purchased within the bank's assessment areas.

EXHIBIT 3 SUMMARY OF LENDING ACTIVITY JANUARY 1, 2018 TO DECEMBER 31, 2019				
Loan Type	#	%	\$ ('000s)	%
Small Business	9,279	45.0	776,649	11.2
Small Farm	2	0.0	228	0.0
Total Business Related	9,281	45.0	776,877	11.2
HMDA Home Purchase	6,856	33.2	3,150,342	45.6
HMDA Home Improvement	432	2.1	165,498	2.4
HMDA Refinance	2,619	12.7	1,249,227	18.1
HMDA Multifamily	576	2.8	1,270,634	18.4
HMDA Other Purpose Lines of Credit	402	1.9	148,233	2.1
HMDA Other Purpose Closed-End	259	1.3	105,987	1.5
HMDA Not Applicable	209	1.0	41,375	0.6
Total HMDA Related	11,353	55.0	6,131,296	88.8
Total Loans	20,634	100.0	6,908,173	100.0

ASSESSMENT AREA CONCENTRATION

A substantial majority of loans by number and dollar volume were made within the bank's assessment areas. Exhibit 3 and 4 below show the number and dollar volume of loans extended within the designated assessment areas during the review period. The tables in Appendix E contain additional information regarding assessment area-specific lending activity.

EXHIBIT 4 LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREAS JULY 1, 2016 TO DECEMBER 31, 2017								
Loan Type	Inside				Outside			
	#	%	\$ ('000s)	%	#	%	\$ ('000s)	%
Small Business	2,706	91.8	554,521	85.5	242	8.2	93,758	14.5
Total Business Related	2,706	91.8	554,521	85.5	242	8.2	93,758	14.5
HMDA Home Purchase	3,267	91.1	1,463,123	93.3	320	8.9	105,079	6.7
HMDA Home Improvement	195	94.7	86,808	97.0	11	5.3	2,722	3.0
HMDA Refinance	1,198	94.9	488,673	92.0	64	5.1	42,262	8.0
HMDA Multifamily	382	88.8	709,109	93.8	48	11.2	47,212	6.2
Total HMDA Related	5,042	91.9	2,747,713	93.3	443	8.1	197,275	6.7
Home Equity	2,219	93.6	923,426	95.4	151	6.4	44,234	4.6
Total Consumer Related	2,219	93.6	923,426	95.4	151	6.4	44,234	4.6
Total Loans	9,967	92.3	4,225,660	92.6	836	7.7	335,267	7.4

Note: Affiliate loans not included.

EXHIBIT 5 LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREAS JANUARY 1, 2018 TO DECEMBER 31, 2019								
Loan Type	Inside				Outside			
	#	%	\$ ('000s)	%	#	%	\$ ('000s)	%
Small Business	8,959	96.6	674,667	86.9	320	3.4	101,982	13.1
Small Farm	0	0.0	0	0.0	2	100.0	228	100.0
Total Business Related	8,959	96.5	674,667	86.8	322	3.5	102,210	13.2
HMDA Home Purchase	6,322	92.2	2,969,970	94.3	534	7.8	180,372	5.7
HMDA Home Improvement	408	94.4	160,600	97.0	24	5.6	4,898	3.0
HMDA Refinance	2,502	95.5	1,206,336	96.6	117	4.5	42,891	3.4
HMDA Multifamily	521	90.5	1,013,273	79.7	55	9.5	257,361	20.3
HMDA Other Purpose LOC	369	91.8	138,501	93.4	33	8.2	9,732	6.6
HMDA Other Purpose Closed-End	238	91.9	99,893	94.3	21	8.1	6,094	5.7
HMDA Not Applicable	201	96.2	39,027	94.3	8	3.8	2,348	5.7
Total HMDA Related	10,561	93.0	5,627,600	91.8	792	7.0	503,696	8.2
Total Loans	19,520	94.6	6,302,267	91.2	1,114	5.4	605,906	8.8

GEOGRAPHIC AND BORROWER DISTRIBUTION

The geographic distribution of loans and penetration among borrowers of different incomes and businesses of different sizes are excellent. These conclusions are based on a variety of contextual factors that affect the individual conclusions in the separate assessment areas. Among these are strategic partnerships with non-profit organizations that serve very small businesses and special residential mortgage lending programs targeted to low- and moderate-income individuals. The facts and data supporting the overall conclusions are presented within the separate assessment area analyses.

The performance of small business lending in certain markets was the driving factor in the overall assessment of the bank's geographic lending distribution. EWB's lending demonstrated excellent geographic dispersion in the Southern California, Bay Area, New York, Houston, Georgia, and Massachusetts markets, where performance in low- and moderate-income tracts was particularly strong. With the exception of Southern California, the dispersion of home purchase and home mortgage refinance loans was generally excellent with strong penetration within moderate-income areas. Overall lending patterns generally followed the location of the bank's branches and concentrations of local small businesses or owner-occupied housing units and did not demonstrate any unusual patterns or unexplained lending gaps.

Overall borrower distribution, which is driven by the performance of small business, home purchase, and home mortgage refinance lending, was excellent. While lending levels to small businesses were good for most of the review period, EWB's partnership with a non-profit organization that serves very small businesses substantially increased the number of small business loans in small loan amounts, thus enhancing performance. EWB's performance was also enhanced by flexible and innovative residential lending programs that paired flexible underwriting with down-payment assistance programs.

The bank uses flexible underwriting designed to accommodate its target market of recent immigrants that also accommodates other borrowers and small business owners that lack credit experience and documentation required by other financial institutions. In addition to flexible underwriting, the bank offers the following flexible lending programs.

- Fannie Mae HomeReady Mortgages are offered to low-income borrowers for first-time or repeat homebuyers that have limited cash for down payment and lower pricing for higher credit scores. Loans can be for purchase or refinance and supplemental boarder or rental income is used to qualify borrowers. For first-time home buyers, at least one borrower is required to take a homeownership class. The bank extended 80 HomeReady loans totaling \$13.2 million during the review period.
- Bridge to Home Affordable Home Loan Program was offered from June 2018 to August 2019 for low- and moderate-income borrowers who have limited credit history with no minimum credit score requirement. The program included a low interest rate and higher loan-to-value ratio and no private mortgage insurance. This program was offered in conjunction with down-payment assistance programs, including the Federal Home Loan Bank (FHLB) Workforce Initiative Subsidy for Homeownership (WISH) program as well as EWB's proprietary REACH program, both of which are forgivable down payment assistance funds. The bank extended 412 Bridge to Home loans totaling \$89.6 million during the review period.
- Credit Card Product. The bank offers a proprietary credit card product for consumers with limited credit history. The bank also offers secured cards for consumers with no credit history or prior credit issues, providing an opportunity to establish or rebuild credit. This credit card product also allows consumers without a U.S. tax identification number to establish a credit history. The bank extended 2,347 secured credit cards totaling \$7.9 million during the review period.

COMMUNITY DEVELOPMENT LENDING

EWB is a leader in making community development loans, demonstrating excellent responsiveness to the local needs within its assessment areas. Specifically, the bank extended 1,412 community development loans totaling more than \$5.4 billion throughout its assessment areas and 183 loans totaling \$495.9 million that benefited a broader statewide area that include the bank's assessment areas. Overall, community development lending was generally consistent with the bank's presence in each market. The majority of community development loans extended helped address the significant need for affordable housing. Substantial loan origination volumes also supported economic development by financing small businesses, which helped to develop or retain jobs within the assessment areas. Other loans supported non-profit organizations that provide essential social services to low- and moderate-income individuals, another identified need given the prevalence of poverty within the bank's assessment areas. The bank also financed loans that helped stabilize and revitalize low- and moderate-income areas, particularly those areas that were severely impacted by the Pandemic. These loans helped prevent the closure of a number of small businesses and address growing unemployment rates within the bank's various communities.

Investment Test

EWB’s overall performance under the investment test is outstanding. The bank made an excellent level of investments, often in a leadership position, that demonstrated excellent responsiveness to community development needs. Overall, the bank made \$905.2 million in community development investments.

The bank made over \$901.7 million in community development investments and grants directly within its assessment areas or in broader statewide or regional areas that also benefited its assessment areas. These consist of \$167.7 million in prior period investments that remain on its books, and \$734.0 million in current period investments and donations. In addition, EWB had \$99.6 million in unfunded commitments. More specifically, 1,015 prior and current period investments totaling \$767.3 million, with an additional \$72.7 million in unfunded commitments, were made directly within individual assessment areas. Investments in broader statewide or regional areas that also benefited the assessment areas include 82 prior and current period investments totaling \$134.4 million and unfunded commitments totaling \$26.9 million. Investments were made predominantly in the state of California, where the majority of the bank’s branches are located. The distributions of these investments can be found on Tables 19, 39, 55, 75, 95, 115 and 135.

In addition to these assessment area investments, the bank made two investments in nationwide funds that benefited two or more states. These investments did not directly benefit any of the assessment areas but received CRA consideration because EWB was responsive to community development needs and opportunities in its assessment areas. As such they do not appear in the tables in Appendix E. These nationwide funds amounted to \$1.6 million in current period investments and \$1.9 million in unfunded commitments.

Exhibit 5				
NATIONAL INVESTMENTS				
Area	Current Period Investments		Unfunded Commitments	
	\$(000)	#	\$(000)	#
Nationwide	2	1,641	1	1,859

EWB made a broad array of investments, the vast majority of which were in securities backed by mortgage loans that helped to develop or maintain affordable housing units for low-and moderate-income borrowers, which met a stated credit and community need. Significant sums also were invested in low-income housing tax credits (LIHTC) that facilitated the development or rehabilitation of affordable housing complexes, municipal bonds that supported the needs of low- and moderate-income individuals or geographies, and funds targeted to the needs of small businesses. A summary of the key types of investments made by EWB follows below:

- Mortgage-Backed Securities (MBS)** – EWB held \$481.8 million in MBS secured by mortgages for multi-family dwellings and to low-and moderate-income individuals during the current period and retained \$39.2 million purchased during a prior period that remain on the bank’s books. These investments are secured by 14,476 units of affordable housing for low- and moderate-income individuals within the bank’s assessment areas and in broader statewide areas that include the bank’s assessment areas. The securities are primarily backed by loans extended in the states of California, Georgia, Massachusetts, New York, Texas, and Washington.

- **LIHTC** – Influenced by expertise in commercial real estate, including multi-family properties, and the identified need for affordable housing in many of the bank’s assessment areas, LIHTCs have historically played an important role in the bank’s investment activity. The LIHTC Program is an indirect Federal subsidy used to finance the development of affordable rental housing for low-income households.

By the close of the review period, the bank held over \$136.1 million in LIHTC investments that directly benefited one of its assessment areas or a regional area that includes an assessment area. Over \$64.8 million of these LIHTCs were made during the current review period, \$71.3 million of which were invested during the prior period, with an additional \$77.4 million in unfunded commitments. In total, these investments have helped fund projects that have either created or improved over 22,771 units of affordable housing.

- **Municipal Bonds** – The bank invested in municipal bonds that primarily benefited affordable housing for low- and moderate-income individuals, and the revitalization and stabilization of low- and moderate-income geographies. During the review period, EWB invested \$176.1 million in bonds that benefited the bank’s assessment areas and broader statewide areas.
- **Small Business Investment Companies (SBICs)** – EWB also invested in a variety SBICs. The SBIC Program is a financial assistance program available through the SBA. SBICs are privately owned and managed investment funds, licensed and regulated by the SBA, that use their own capital plus funds borrowed with an SBA guarantee to make equity and debt investments in qualifying small businesses. Congress created the SBIC program to facilitate the flow of long-term capital to America’s small businesses.

During the review period, EWB invested \$30.3 million in SBICs that benefited the bank’s assessment areas and broader statewide areas. An additional \$2.0 million was invested in an SBIC that benefited two or more states.

Investments benefitting a broader statewide or regional area that include one of the bank’s assessment areas, along with specific activities benefiting only individual assessment areas, are addressed under their respective portions of the evaluation.

Service Test

EWB’s performance under the service test is high satisfactory. Retail banking services are reasonably accessible to the bank’s assessment areas. Branch hours and services do not vary in a way that inconveniences portions of the bank’s assessment areas, including geographies and individuals of different income levels. In addition, the bank provided a relatively high level of community development services in most assessment areas, with a notable level of services provided in areas where the bank maintains only a limited presence.

RETAIL BANKING SERVICES

EWB's delivery systems are reasonably accessible to essentially all portions of its assessment areas and do not vary in ways that inconvenience portions of those areas. The bank's full range of products and services are generally available at all branches. Many branches are open on Saturdays and Sundays with the bank's 12 grocery store branches in California also offering extended evening hours. Other delivery systems, such as ATMs, telephone banking and online banking, effectively provide customers with access to banking services after normal business hours. In addition, EWB offers a number of convenient services to its customers, including the following:

- East West Community Checking – These accounts are for qualified customers who reside in low- and moderate-income census tracts. The account is designed for individuals who might not otherwise be able to obtain banking services. These accounts feature a low-opening balance (\$25), no monthly maintenance fee, and unlimited check writing without per-check charges.
- Branch staff who speak languages that reflect the demographics of their communities, providing greater access to banking services for those who do not speak English. Languages include Spanish, Armenian, Vietnamese, Tagalog, Korean, and a variety of Chinese dialects.
- Internet and online banking websites that provide banking information in English, Chinese, Simplified Chinese, and Spanish.
- Telephone inquiry available 24 hours a day in English, Cantonese, Mandarin, Spanish, and Vietnamese.
- Low-fee remittance services to a variety of countries.
- Secured credit card accounts to help customers build or rebuild sound credit histories.
- Bank accounts that can be opened with alternative forms of identification.
- Foreign currency services.

A consolidation of the bank's branch network during the review period resulted in the closure of three branches, including two branches in moderate-income census tracts, and one branch in an upper-income census tract. In March of 2018, EWB sold eight Desert Community branches. EWB did not open any branches during the same period. Additionally, the sale of the Desert Community branches did not result in any branch closures and had a neutral impact to the community in terms of accessibility. Overall, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems to individuals of different income levels across its assessment areas.

COMMUNITY DEVELOPMENT SERVICES

Bank employees provided a relatively high level of community development services that were responsive to the community development needs in its assessment areas. During the review period, employees provided 689 services, totaling over 16,400 hours of community development services to a variety of organizations. Services offered fell primarily into three categories: (1) hosting financial education seminars for individuals, (2) free income tax preparation services, and (3) technical assistance to small businesses on a variety of topics. Bank staff also provided leadership and financial expertise to community-based organizations by serving on their boards of directors and other committees. While the vast majority of service hours benefited the California assessment areas, notable service hours were also provided in assessment areas where the bank has only a limited presence. Activities specific to individual assessment areas are discussed in their respective sections of this evaluation. The bank also

provided community development services that benefited more than one state through two down-payment assistance programs:

- Fifteen bank employees provided a total of 1,350 service hours to assist 135 families in accessing EWB's proprietary down-payment assistance program that was paired with a flexible mortgage loan targeted to low- and moderate-income borrowers in designated low-income, minority and disaster-impacted communities. The REACH program is EWB's down payment assistance program. During the review period, bank employees were able to assist customers across southern California, New York, Nevada, Texas, and Georgia region.
- Ten bank employees provided low- and moderate-income homebuyers technical assistance in enrolling and applying for down payment assistance from an external source. In 2019, EWB was awarded \$135,000 in WISH funds to provide down payment assistance to low- and moderate-income individuals purchasing their first home. This grant program provides \$3 for every \$1 down payment contributed by the borrower to qualifying households. Bank employees provided a total of 1,190 hours of community development services related to grant reimbursement and administration of various aspects of the WISH program for the bank.

Fair Lending or Other Illegal Practices Review

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) established the Bureau of Consumer Financial Protection (Bureau). In general, the Dodd-Frank Act gives the Bureau, among other things, primary supervisory authority over insured depository institutions with total assets of more than \$10 billion when assessing compliance with the requirements of Federal consumer financial laws. The Federal Reserve, however, retains authority to enforce EWB's compliance with the CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation from July 1, 2016 through December 31, 2020, the Federal Reserve did not cite violations involving discriminatory or other illegal credit practices that adversely affected the Federal Reserve's evaluation of the bank's CRA performance. As of the date of this report, the Federal Reserve is unaware of any violations of the Equal Credit Opportunity Act, Regulation B, or Unfair, Deceptive, or Abusive Acts or Practices identified by the Bureau.

STATE OF CALIFORNIA

CRA Rating for California

Performance in California is rated “Outstanding”

The lending test is rated: Outstanding
The investment test is rated: Outstanding
The service test is rated: High Satisfactory

The major factors supporting the institution’s rating include:

- Lending levels that reflect excellent responsiveness to assessment area credit needs that were particularly responsive to the economic impacts brought on by the Pandemic.
- Excellent distributions of loans by geography and among borrowers of different incomes and businesses of different revenue sizes.
- Partnerships with non-profit organizations and special credit programs that enhanced the bank’s lending performance.
- Excellent levels of qualified investments and grants that addressed the need for economic development and affordable housing as well as other needs.
- Reasonable access to retail banking services and high levels of community development services.

Scope of Examination

The scope of the examination for the state of California is consistent with the overall scope of the CRA examination. As previously noted, EWB has four assessment areas in California – Southern California, Bay Area, Sacramento, and San Diego. The Southern California and Bay Area assessment areas received full-scope reviews, while the Sacramento and San Diego assessment areas received limited scope reviews due to the bank’s limited presence and lower level of activity in those areas. The Southern California assessment area carried the greatest weight in the overall assessment of California because of its greater branch presence, larger share of deposits, and higher loan volumes.

All loan types were considered as part of the lending test evaluation. However, in some instances lending levels were insufficient to draw meaningful conclusions. While these loans were considered and are presented in the tables in Appendix E, they did not influence the overall assessment. In addition, as stated previously, EWB employs alternative credit standards to meet the needs of its immigrant client base and does not routinely collect borrower income information. As such, the lending test evaluation was based only on the following:

- All loan types were used to evaluate the responsiveness to assessment area credit needs based on the volume of lending within each assessment area.
- Small business loans were evaluated for geographic and borrower revenue distributions in the Southern California and Bay Area assessment areas.

- Home purchase loans were evaluated for geographic and borrower distributions in each of the four California assessment areas.
- Home improvement loans were evaluated for geographic distributions in the Southern California and Bay Area assessment areas, and for borrower distributions the Southern California assessment area only.
- Home mortgage refinance loans were evaluated for geographic and borrower distributions in all four assessment areas.
- Multi-family loans were evaluated for geographic distributions in the Southern California and Bay Area assessment areas.
- Home equity lines of credit were evaluated for geographic distributions in each of the four assessment areas in California for only 2016 and 2017, as these loan types were reported as Home Mortgage Disclosure Act (HMDA) loans beginning in 2018.

Description of Operations in California

California is EWB's predominant market, but the bank has a relatively small presence in this competitive market. As of June 30, 2020, the bank operated 82 of its 104 branches within its assessment areas in the state.¹ In addition, 86.0 percent of deposits occurred in the California assessment area.² California is a highly competitive market for financial services with a strong presence of national, regional, and non-bank lenders.³ There were 191 Federal Deposit Insurance Corporation (FDIC)-insured institutions operating branch offices in California with combined deposits totaling \$1.8 trillion as of June 30, 2020.⁴ The market was dominated by three large national banks that together held 51 percent of deposits.⁵ With deposits of \$33.5 billion, EWB had a relatively small presence in California, ranking 12th in total deposits representing a market share of 1.87 percent.⁶

California's economic growth during the review period was driven by the state's high economic vitality, but was impacted by the Pandemic and multiple years of seasonal wildfires. The primary economic drivers in the state included technology, tourism and agriculture.⁷ As the tech capital of the world, the technology industry in the area boasts some of the world's most valuable firms such as Apple and Netflix.⁸ Although, growth in the sector was seen in both the tech titans and smaller firms.⁹ Employment in technology grew by 61,195 net new jobs between 2018, and 2019, to an estimated 1.87 million jobs, and the state led the nation in the number of technology jobs and job gains in 2019.¹⁰ There was also growth in the travel industry during the review period. In 2019, the travel industry entered its ninth consecutive year of growth.¹¹ Direct travel spending in California increased an

¹ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2020; available from: <https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

² Ibid.

³ Ibid.

⁴ Ibid.

⁵ Ibid.

⁶ Ibid.

⁷ Moody's Precise Report, California, November 2020.

⁸ Moody's Precise Report, California, November 2018.

⁹ Ibid.

¹⁰ CompTIA, Cyberstates 2020; available from: <https://www.cyberstates.org/>.

¹¹ Visit California, California Travel Impacts, April 2020; available from: <https://industry.visitcalifornia.com/research/economic-impact>.

estimated 3.2 percent between 2018 and 2019, and employment grew at the same rate.¹² In 2019, Disney remained one of the top five employers in the state, and its economic impacts were pronounced in the Southern California assessment area, described below.¹³ California's agriculture industry is another primary economic driver in the state. The state's agriculture industry leads the nation in agricultural production and accounts for 13 percent of the total U.S. agricultural value.¹⁴ In 2019, farms and ranches in the state received over \$50 billion in cash receipts, which represented an increase from 2018.¹⁵

Overall, wage and salary income growth in California remained above the national average as of 2019.¹⁶ While the state was in a late expansion stage of the business cycle during the review period, low unemployment indicated labor market tightness and pushed wages higher.¹⁷ However, cost disadvantages for businesses and residents have increased movement out of state.¹⁸ Negative total net migration grew larger during the review period years of 2017 through 2019.¹⁹ After the onset of the Pandemic that brought a nationwide economic downturn driven in part by operating restrictions on nonessential businesses, employment growth in California lagged behind the U.S. average.²⁰ As of the fourth quarter of 2020, half of the jobs lost since the start of the Pandemic had been recouped and by one measure total employment was down by 8.5 percent since the year prior based on a three-month average.²¹

In the housing sector, house prices increased during the review period while housing affordability decreased or remained relatively stagnant and unaffordable compared to the U.S.²² A limited housing stock and high demand for housing contributed to California's high housing costs.²³ As of 2019, an average home costs 2.5 times the national average and average monthly rent is 50 percent higher than the rest of the country.²⁴ High housing costs have in turn driven poverty rates to 19 percent, the highest in the nation, according to the Supplemental Poverty Measure that accounts for a households' food, clothing, shelter, and utilities costs.²⁵ In addition, according to the California Association of Realtors' Housing Affordability Index, the percentage of households in California overall that can afford to purchase the median priced home in the third quarter of 2020, was 27.93 percent.²⁶

¹² Ibid.

¹³ Moody's Precis Report, California, March 2019.

¹⁴ California Department of Food and Agriculture (CDFA), California Agricultural Production Statistics, 2019 Crop Year; available from: <https://www.cdfa.ca.gov/Statistics/>.

¹⁵ Ibid.

¹⁶ Moody's Precis Report, California, March 2019.

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ Moody's Precis Report, California, November 2020.

²⁰ Ibid.

²¹ Ibid.

²² Ibid.

²³ Legislative Analyst's Office, Considerations for the Governor's Housing Plan, February 20, 2019; available from: <https://lao.ca.gov/Publications/Report/3941>.

²⁴ Ibid.

²⁵ Ibid.

²⁶ California Association of Realtors, Housing Affordability Index-Traditional, 2020 Q3 available from: <https://www.car.org/marketdata/data/haitraditional>.

The review period was also marked by multiple years of wildfire damage and devastation in California. In 2020 alone, fires burned 4.2 million acres, destroyed 11,000 structures, and resulted in 31 fatalities. By one estimate, the destruction caused \$9 billion in property damage for the year.²⁷ The most destructive fires on record for the state occurred earlier in the review period, with the 2017 Tubbs fire in Napa and Sonoma counties that destroyed over 5,000 structures and caused 22 deaths, as well as the 2018 Camp fire in Butte County that destroyed over 18,800 structures and caused 85 deaths.²⁸ Across the state, economic impacts and recovery from the wildfires during the review period were concentrated in the state's smaller regional economies rather than registering as a mark against the state's vast economy.²⁹

Based on the data referenced above, as well as input from community contacts discussed below within each assessment area analysis, high housing costs and a lack of affordable housing pose significant challenges in the state. In addition, the economic downturn discussed above was marked by a significant loss in employment and presented a number of credit needs for small businesses, also discussed further in each assessment area analyses to follow.

Conclusions with Respect to Performance Tests in California

Conclusions regarding EWB's performance in California with respect to the lending, investment, and service tests are essentially the same as the overall conclusions for the bank as a whole. Eighty-six percent of deposits and roughly 65.4 percent of loan originations occurred within California. As a result, the overall conclusions in this report were heavily influenced by the performance in the California market. The following sections of this report contain specific comments regarding the individual assessment areas within California, noting any differences in performances among the areas.

In addition to the assessment area specific activity, EWB engaged in community development lending and investment activities within California that were outside of any of its designated assessment areas. As previously mentioned, these activities were considered in the bank's overall performance assessment because the bank adequately engaged in qualified activities addressing the needs of its assessment areas.

With regard to community development lending, over \$396.3 million in community development loans either benefited a broader statewide or regional area that includes one of the California assessment areas or were accorded consideration because the bank had adequately met the needs of its assessment areas. Notable examples of community development loans that benefit broader statewide areas include the following:

- A \$20 million loan to a SBIC. The SBIC program, which is administered by the SBA, is a multi-billion investment program created to bridge the gap between entrepreneurs' need for capital and traditional sources of financing. Thus, this loan promotes economic development by providing capital to Small Businesses.

²⁷ Moody's Precis Report, California, November 2020.

²⁸ CAL FIRE, Top 20 Most Destructive California Wildfires, November 3, 2020; available from: https://www.fire.ca.gov/media/t1rdhizr/top20_destruction.pdf.

²⁹ Moody's Precis Report, California, November 2018.

- A \$15.5 million letter of credit enhancement that support affordable housing for low- and moderate-income individuals. The letter of credit supports a project for a 196-unit senior housing project in which all of the units are restricted to tenants earning 50-60 percent of area median income. This facility qualifies for Federal Home Loan Bank of San Francisco's Community Investment Program, which has express intent to fund affordable housing development for low- and moderate-income individuals.
- An \$11 million loan that finances affordable housing for low- and moderate-income individuals. The loan will fund a loan on a 157-unit apartment in a moderate-income census tract where rents are affordable to moderate-income individuals.
- A \$2.8 million SBA 504 loan that supports economic development. The loan finances the purchase of a 65-unit franchise motel by a small business that will create 17 jobs for low- and moderate-income individuals.

Similarly, \$62.7 million in qualified investments benefited a broader statewide or regional area that includes the California assessment areas. Of these, \$18.2 million remained on the bank's books from a prior period and \$44.5 million were new investments. While they served larger areas, many also had a direct and significant impact within one or more of the bank's assessment areas. The following are notable examples of these statewide or regional investments, including those where EWB played a leadership role.

- EWB played a leadership role for the following LIHTC investments by providing funding that allow the managing partner to start single property LIHTC funds.
 - A \$6.5 million investment in a LIHTC that financed an existing 160-unit property for low- and moderate-income families that benefits from Section 8 rental assistance vouchers for 59 percent of the units. The property is located in Corona, California.
 - A \$4.7 million investment in a LIHTC that supports an existing 75-unit property for low- and moderate-income seniors. Each of the units are supported by Department of Housing and Urban Development (HUD)-Section 8 rental assistance vouchers that help ensure housing costs are affordable for tenants. The property is located in Corona, California.
 - A \$2.7 million investment in a LIHTC that financed an existing 180-unit property for low- and moderate-income families that benefits from Section 8 rental assistance vouchers for 33 percent of the units. The property is located in Redding, California.
 - A \$2.2 million investment in a LIHTC that financed an existing 67-unit property for low- and moderate-income seniors that benefits from Section 8 rental assistance vouchers for 100 percent of the units. The property is located in Placerville, California.
- A \$5.7 million investment in a fund that works directly with developers to source and structure tax-exempt multi-family housing mortgage revenue bonds. The organization used the funds to purchase properties which helped attract more investor partners and more funding. EWB served in a leadership position as a catalyst for additional investments.

- A \$2.6 million investment in a LIHTC that helped financed four properties in California: 141 units in Santa Fe Springs, 150 units in Claremont, 76 units in Paso Robles, and 121 units in La Puente, California. Each of the units are income-restricted to low- and moderate-income individuals.
- A \$1 million equity investment in a real estate impact fund. This is a fund which will initially consist of ten new build projects in Los Angeles and Alameda counties with the current goal to expand with additional projects. All facilities are to benefit from Section 8 rental assistance housing vouchers. These projects are high quality, new apartment buildings that will revitalize neighborhoods by replacing dangerous, blighted buildings and vacant lots and, in some cases, homeless encampments. EWB played a leadership role in being one of the first investors in this fund with an initial commitment of \$10 million, with the first \$1 million funded during the review period.
- A \$1 million investment in a loan pool for a nonprofit CDFI organization that serves California-based small businesses. The organization provides no-cost advising services and low-cost educational programs to entrepreneurs looking to start or grow their small business. Business advisors work with entrepreneurs in one-to-one sessions in the areas of management, marketing, sales, finance, accounting, and other disciplines required for small business growth, expansion, and innovation. This investment will strengthen the organization's capital structure and leverage additional debt capital and replenish the revolving loan fund to ensure the continuation of its SBA microloan and SBA Community Advantage loan programs, which are in high demand.

Southern California Assessment Area Conclusions

**For each assessment area where a full-scope review was performed using the examination procedures.*

DESCRIPTION OF OPERATIONS IN SOUTHERN CALIFORNIA

The Southern California assessment area consists of Los Angeles, Orange, and San Bernardino counties in their entirety. Los Angeles and Orange counties are part of the Los-Angeles-Long Beach-Anaheim MSA. San Bernardino County is part of the Riverside-San Bernardino-Ontario MSA. As of 2019, the three-county assessment area was home to 15 million people.³⁰

EWB operated 55 of its 104 total branches in the Southern California assessment area, which together held deposits totaling \$28 billion as of June 30, 2020.³¹ By comparison, there were a total of 119 FDIC-insured financial institutions operating 2,552 offices in the area with deposits totaling over \$707 billion.³² EWB ranked seventh in the market, with 4.01 percent of the deposit market share.³³

Exhibit 6 on the following page presents key demographic and business information used to help develop a performance context for the assessment area.

³⁰ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2019; available from: www.census.gov/quickfacts/.

³¹ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2020; available from: <https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

³² Ibid.

³³ Ibid.

EXHIBIT 6 ASSESSMENT AREA DEMOGRAPHICS SOUTHERN CALIFORNIA ASSESSMENT AREA 2019 FFIEC CENSUS AND 2019 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	292	8.9	249,578	7.4	90,481	36.3	824,653	24.4
Moderate-income	936	28.4	919,721	27.2	201,444	21.9	553,414	16.4
Middle-income	895	27.1	943,611	27.9	102,653	10.9	584,133	17.3
Upper-income	1,117	33.9	1,261,399	37.3	57,131	4.5	1,415,727	41.9
Unknown-income	58	1.8	3,618	0.1	649	17.9	0	0.0
Total AA	3,298	100.0	3,377,927	100.0	452,358	13.4	3,377,927	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	384,075	66,576	2.7	17.3	290,677	75.7	26,822	7.0
Moderate-income	1,379,628	447,244	18.3	32.4	838,856	60.8	93,528	6.8
Middle-income	1,452,383	714,652	29.2	49.2	631,642	43.5	106,089	7.3
Upper-income	2,010,166	1,217,993	49.7	60.6	661,260	32.9	130,913	6.5
Unknown-income	21,070	2,079	0.1	9.9	15,768	74.8	3,223	15.3
Total AA	5,247,322	2,448,544	100.0	46.7	2,438,203	46.5	360,575	6.9
Income Categories	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	39,608	5.2	35,555	5.1	3,895	6.3	158	4.1
Moderate-income	158,086	20.6	143,297	20.5	14,150	22.9	639	16.5
Middle-income	203,134	26.5	183,808	26.2	18,452	29.9	874	22.6
Upper-income	353,059	46.1	328,189	46.8	22,783	36.9	2,087	54.0
Unknown-income	12,499	1.6	9,856	1.4	2,535	4.1	108	2.8
Total AA	766,386	100.0	700,705	100.0	61,815	100.0	3,866	100.0
% of Total Businesses				91.4		8.1		0.5
2020 Adjusted Median Family Income ³⁴								
Los Angeles County			\$77,300					
Orange County			\$103,000					
San Bernardino County			\$75,300					

³⁴ FFIEC Adjusted Median Family Income; available from: <https://www.ffiec.gov/Medianincome.htm>.

Economic Conditions

During the review period, the assessment area economy expanded into a late stage of the business cycle. However, in 2020, the area had a slow recovery out of recession after the onset of the Pandemic brought restrictions on non-essential businesses and resulted in a significant loss of employment.³⁵ The primary economic drivers in the area were tourism, technology, logistics, and healthcare. Late in the review period in 2019, unemployment rates were at historic lows and average hourly wages were up in San Bernardino County³⁶ as well as in Los Angeles County where average hourly earnings outpaced the nationwide average.³⁷ However, after the economic downturn in early 2020, employment remained depressed in the area. In Los Angeles and San Bernardino counties, less than half of the jobs lost since the start of the Pandemic had returned by the fourth quarter of 2020.³⁸ Economic trends in each county of the assessment area is described below.

The Los Angeles County economy is primarily driven by tourism, technology, and logistics. The tourism industry grew during the review period and in 2018, the number of visitors to the area increased for the eighth consecutive year.³⁹ The increase in visitors helped grow the hospitality industry by approximately four percent and made the industry one of the fastest growing sectors of the area's economy.⁴⁰ In addition to tourism, the technology industry drove dynamic economic growth in the area during the review period.⁴¹ Although Silicon Beach was a small portion of the economy, the sector contributed a large share of high-wage job growth and investment.⁴²

In the logistics, trade and transportation industry cluster, employment has grown for the last decade, and reached over 300,000 in 2019, representing 8 percent of the county's total employment.⁴³ Since 2010, the transportation cluster alone added nearly 35,000 jobs, primarily in airport operations and scheduled flights.⁴⁴ The ports of Los Angeles and Long Beach are a strength of the area economy, and the deep water San Pedro harbor enables the area to handle larger ships that other ports cannot accommodate.⁴⁵ In 2018, the Port of Los Angeles set a record for the most cargo it handled in a single month.⁴⁶

As previously discussed, there were a number of wildfires in California during the review period including a number in or adjacent to Los Angeles County. However, the impact on the economy was minimal as the fires largely spared business centers and tourist destinations.⁴⁷ Population growth

³⁵ Moody's Precis Report, Anaheim-Santa Ana-Irvine CA, November 2020.

³⁶ Moody's Precis Report, Riverside-San Bernardino-Ontario CA, November 2019.

³⁷ Moody's Precis Report, Los Angeles-Long Beach-Glendale CA, May 2019.

³⁸ Moody's Precis Report, Los Angeles-Long Beach-Glendale CA, November 2020; Moody's Precis Report, Riverside-San Bernardino-Ontario CA, November 2020.

³⁹ Los Angeles Business Journal, L.A. Sets New Tourism Record with 50M Visitors, January 16, 2019; available from: <https://labusinessjournal.com/news/2019/jan/16/l-sets-new-tourism-record-50m-visitors/>.

⁴⁰ Ibid.

⁴¹ Moody's Precis Report, Los Angeles-Long Beach-Glendale CA, November 2018.

⁴² Ibid.

⁴³ Los Angeles Economic Development Corporation Institute for Applied Economics, Industry Clusters in Los Angeles County, 2020; available from: <https://laedc.org/2020/12/02/industry-clusters-2020/>.

⁴⁴ Ibid.

⁴⁵ Moody's Precis Report, Los Angeles-Long Beach-Glendale CA, May 2019.

⁴⁶ Moody's Precis Report, Los Angeles-Long Beach-Glendale CA, November 2018.

⁴⁷ Moody's Precis Report, Los Angeles-Long Beach-Glendale CA, November 2018.

showed signs of weakness in a higher level of out-migration paralleled by a decline in natural growth during the review period.⁴⁸ Overall, at the end of 2020, unemployment remained elevated in the area as the Pandemic continued to limit business operations and slow the economic recovery.

In Orange County, the primary economic drivers in the area were tourism, healthcare, and technology.⁴⁹ In the tourism industry, the number of visitors to the area increased to a four-year high of 49 million people in 2017.⁵⁰ Disney's new \$1 billion theme park drove investment in the tourism sector,⁵¹ and by 2019 the theme park had helped push area payrolls to an all-time high.⁵² Overall, three quarters of net new jobs in Orange County were in the leisure and hospitality industries.⁵³ In addition to tourism, the area is a major healthcare hub with leading university hospitals.⁵⁴ Hospitals in the area expanded facilities to keep up with rising demand of care and at least one university expanded their nursing programs.⁵⁵ Although job growth in the healthcare sector slowed during the review period, the growth rate remained nearly double the national average.⁵⁶

In addition to healthcare, the area is a hub for biotechnology and information technology companies that are attracted to the skilled workforce as well as the area's lower costs in comparison to the San Francisco Bay Area.⁵⁷ Growth in the technology sector was driven by the inflow of record levels of venture capital.⁵⁸ As of 2020, the area boasts one of the country's largest clusters of tech jobs.⁵⁹ Orange County's favorable demographics were an important asset of the area's growth, particularly the highly trained, well-educated workforce.⁶⁰ The area's housing market experienced a slowdown in home sales early in the review period.⁶¹ Furthermore, home price appreciation slowed during the review period due to declining affordability in the area as single-family housing starts decreased.⁶²

The primary economic drivers in San Bernardino County are logistics and defense. In the logistics industry, employment in transportation and wholesale trade rose by nearly two thirds between 2013 and 2019, in turn increasing the industry's share of total employment and output.⁶³ Job growth in the industry, however, was not met with commensurate wage growth as of 2017.⁶⁴ On an annualized basis, wages in the logistics industry grew at a rate of less than 1 percent per year, falling below inflationary

⁴⁸ Moody's Precis Report, Los Angeles-Long Beach-Glendale CA, November 2020.

⁴⁹ Moody's Precis Report, Anaheim-Santa Ana-Irvine CA November 2020.

⁵⁰ Moody's Precis Report, Anaheim-Santa Ana-Irvine CA November 2018.

⁵¹ Moody's Precis Report, Anaheim-Santa Ana-Irvine CA November 2017.

⁵² Moody's Precis Report, Anaheim-Santa Ana-Irvine CA August 2019.

⁵³ Moody's Precis Report, Anaheim-Santa Ana-Irvine CA November 2018.

⁵⁴ Ibid.

⁵⁵ Moody's Precis Report, Anaheim-Santa Ana-Irvine CA November 2017.

⁵⁶ Moody's Precis Report, Anaheim-Santa Ana-Irvine CA November 2018.

⁵⁷ Moody's Precis Report, Anaheim-Santa Ana-Irvine CA August 2019.

⁵⁸ Moody's Precis Report, Anaheim-Santa Ana-Irvine CA November 2018.

⁵⁹ Moody's Precis Report, Anaheim-Santa Ana-Irvine CA November 2020.

⁶⁰ Ibid.

⁶¹ Moody's Precis Report, Anaheim-Santa Ana-Irvine CA November 2017.

⁶² Moody's Precis Report, Anaheim-Santa Ana-Irvine CA August 2019.

⁶³ Moody's Precis Report, Riverside-San Bernardino-Ontario CA, November 2019.

⁶⁴ San Bernardino County, the San Bernardino County Labor Market Intelligence Report; available from: <https://wp.sbcounty.gov/workforce/wp-content/uploads/sites/5/2019/02/San-Bernardino-County-Labor-Market-Intelligence-Report.pdf>.

pace and therefore resulting in real wage declines.⁶⁵ Nonetheless, the strength of the logistics industry was evident in the economic recovery in late 2020 as it recovered all jobs lost earlier in the year at the onset of the Pandemic.⁶⁶ Lower business costs and a comparative advantage in transportation, distribution and warehousing were economic strengths of the area.⁶⁷ Similarly, better housing affordability and higher levels of inventory helped attract residents from Los Angeles and coastal areas to San Bernardino.⁶⁸ In-migration drove population growth in 2019, which was nearly twice the state average.⁶⁹ However, residential construction was outpaced by this influx of new residents and as a result, single-family house prices continued to rise as of late 2019.⁷⁰ However, median house prices remained lower than in neighboring Los Angeles and Orange counties, as discussed below.

Exhibit 7 on the following page depicts loans to small businesses from banks subject to the CRA increased during the review period. There were 530,234 loans totaling \$15 billion made to small businesses in the assessment area in 2019. Lending to small businesses played a critical role in the economy given that small businesses accounted for 91.4 percent of all businesses in the assessment area, as noted in Exhibit 6. The federal Paycheck Protection Program (PPP) was launched to aid small businesses through Pandemic-associated shelter-in-place orders and resulted in increased lending to small businesses and farms in the first half of 2020.⁷¹ Nationwide, small business and farm lending by small banks grew on average by 23 percentage points, while lending by medium and large banks increased by 38 and 35 percentage points, respectively.⁷² The growth in lending suggests small businesses and farms turned to banks for funding and support in response to the Pandemic's negative effect on consumer and business activity in the first half of 2020.⁷³ In the assessment area, over 270,000 PPP loans in amounts less than \$1 million were made and approximately 1.9 million jobs were self-reported to benefit from those loans made between April 3, 2020 and August 8, 2020.⁷⁴ According to the borrower firms that elected to report their industry, most loans under \$1 million were made to businesses in the Professional, Scientific, and Technical Services industry, followed the Healthcare and Social Assistance industry.⁷⁵

⁶⁵ Ibid.

⁶⁶ Moody's Precis Report, Riverside-San Bernardino-Ontario CA, November 2020.

⁶⁷ Ibid.

⁶⁸ Moody's Precis Report, Riverside-San Bernardino-Ontario CA, November 2020.

⁶⁹ Moody's Precis Report, Riverside-San Bernardino-Ontario CA, August 2018.

⁷⁰ Moody's Precis Report, Riverside-San Bernardino-Ontario CA, November 2019.

⁷¹ Federal Reserve Bank of San Francisco, Economic Letter, Small Business Lending during Covid-19, November 23, 2020; available from: <https://www.frbsf.org/economic-research/publications/economic-letter/2020/november/small-business-lending-during-covid-19/>.

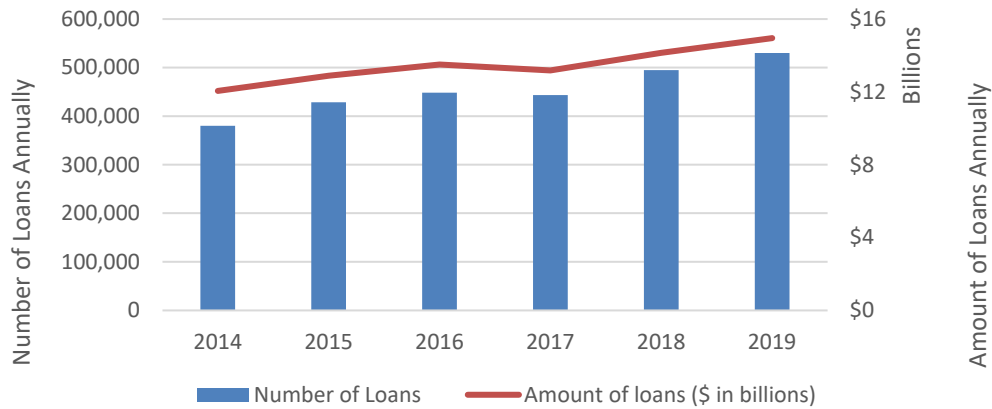
⁷² Ibid.

⁷³ Ibid.

⁷⁴ Small Business Administration, Paycheck Protection Program Loan Data; *Borrower firms self-reported data and had the option to abstain from reporting certain details of the loan application, therefore data may not capture some details of each loan made*; available from: <https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program>.

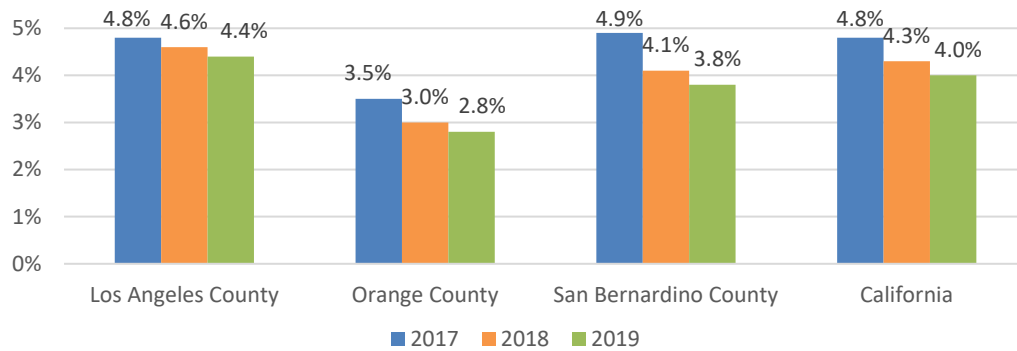
⁷⁵ Ibid.

Exhibit 7
Loans to Small Businesses in Assessment Area⁷⁶
2014-2019



As depicted in Exhibit 8, unemployment rates in the assessment area and in the state of California decreased during the review period. Unemployment rates in each county of the assessment area varied in comparison to the statewide rate. In Orange and San Bernardino counties, the unemployment rates fell below the statewide unemployment rate as of 2019, reaching the lows of 2.8 percent and 3.8 percent, respectively. The unemployment rate in Los Angeles County remained slightly above the statewide rate as of 2019, reaching 4.4 percent.

Exhibit 8
Unemployment Rate⁷⁷
2017-2019



Unemployment in the area increased from the lows described above at the onset of the Pandemic in 2020. In March 2020, the unemployment rates increased in the area to 6.6 percent in Los Angeles County, 3.7 percent in Orange County, and 5.0 percent in San Bernardino County. Rates peaked in May 2020, reaching 20.8 percent in Los Angeles County, 14.7 percent in Orange County, and

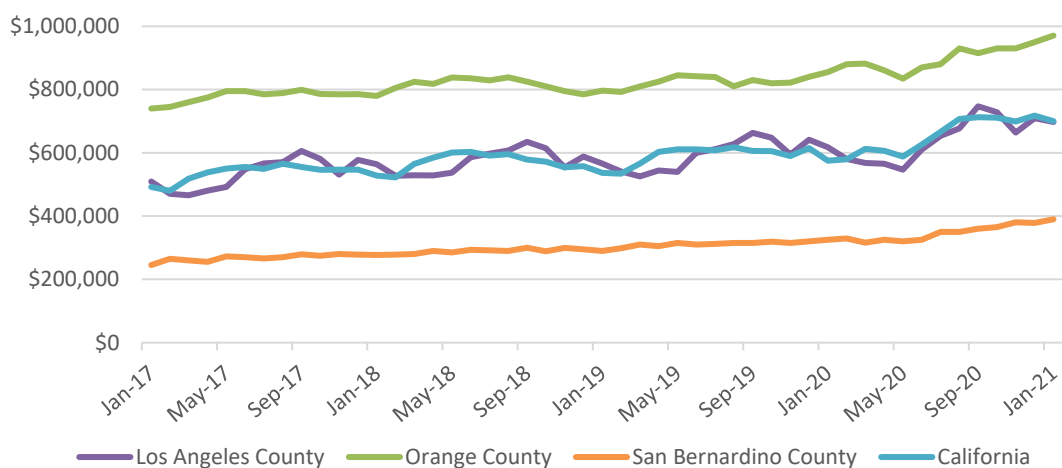
⁷⁶ Aggregate CRA Small Business data reports available from: <https://www.ffiec.gov/craadweb/aggregate.aspx>.

⁷⁷ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <https://www.bls.gov/lau/>.

14.1 percent in San Bernardino County.⁷⁸ Overall, monthly unemployment rates decreased steadily in the area through October 2020 but remained elevated compared to the rates earlier in the review period.⁷⁹

The trends in median home prices in the area are shown in Exhibit 9. Median home prices in the area increased during the review period at a similar rate for the state of California overall. Los Angeles and Orange counties had median home prices above the statewide median home price, whereas San Bernardino had a comparatively lower median home price throughout the review period. Median prices peaked in September 2020 in Los Angeles County at \$747,380, and in January 2021 at \$971,000 in Orange County and \$390,000 in San Bernardino County. The higher median home prices in Orange and Los Angeles counties compared to San Bernardino also correlated to housing affordability differences across the assessment area. According to the California Association of Realtors' Housing Affordability Index, the percentage of households that can afford to purchase the median priced home in the fourth quarter of 2020 was 24.11 percent in Los Angeles County, 21.89 percent in Orange County, and 47.83 percent in San Bernardino.⁸⁰

Exhibit 9
Median Home Prices⁸¹
January 2017-January 2021



In addition to rising costs for homeownership, rental prices also increased during the review period. The median rent for a 1-bedroom unit in Los Angeles County increased from \$1,122 in 2017 to \$1,234 in 2019.⁸² Similarly, the median rent for a 1-bedroom unit increased in Orange County from \$1,384 in 2017, to \$1,574 in 2019, and in San Bernardino from \$877 in 2017, to \$953 in 2019.⁸³ More than half of

⁷⁸ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <https://www.bls.gov/lau/>.

⁷⁹ Ibid.

⁸⁰ California Association of Realtors, Housing Affordability Index-Traditional, 2020 Q4 available from: <https://www.car.org/marketdata/data/haitraditional>.

⁸¹ California Association of Realtors, Historical Housing Data, Median Prices of Existing Detached Homes; available from: <https://www.car.org/marketdata/data/housingdata/>.

⁸² Zillow, Zillow Median Rent List Price, 1-Bedroom; available from: <https://www.zillow.com/research/data/>.

⁸³ Ibid.

the renter households in each county were cost burdened or spent more than 30 percent of their income on rent and utilities. There were 59 percent of cost burdened renter households in Los Angeles and San Bernardino counties and 58 percent in Orange County, compared to the national average of 50 percent.⁸⁴

The area comprised of Los Angeles and Orange counties had the fourth most severe shortage of rental homes available for extremely low-income households (households with incomes below 30 percent area median income) in the nation.⁸⁵ Only 20 affordable rental units were available for every 100 households with extremely low income.⁸⁶ Affordable rental homes were in even more limited supply in San Bernardino County, where there were only 18 rental homes available per 100 renter households.⁸⁷

Homelessness was a significant issue in the area during the review period. In Los Angeles County the number of people experiencing homelessness increased by 12 percent from 52,765 people in 2018, to 58,936 people in 2019.⁸⁸ Over half of the people experiencing homelessness were located in the city of Los Angeles.⁸⁹ The spike in the number of people who were homeless led to concerns of public health, demand for new housing, and a push for addressing housing affordability.⁹⁰

The trend in the poverty rates and public assistance or food stamp/Supplemental Nutrition Assistance Program (SNAP) benefit usage rates are shown in Exhibit 10 on the following page. There were higher rates of households living below the poverty level in Los Angeles and San Bernardino counties compared to Orange County and in California overall. Orange County had a lower rate of households with incomes below the poverty line compared to the statewide rate. The percentage of households receiving public assistance or food stamp/SNAP benefits in Los Angeles and Orange counties was lower than in the state of California. However, San Bernardino County had a higher percentage of households receiving public assistance or food stamp/SNAP benefits. Overall, both the rate of households living below the poverty level and the rate of households receiving public assistance or food stamp/SNAP benefits slightly decreased over the review period.

⁸⁴ Prosperity Now Scorecard, Los Angeles, Orange and San Bernardino counties, CA; available from: <https://scorecard.prosperitynow.org>.

⁸⁵ National Low-Income Housing Coalition, The Gap, March 2020; available from: <https://reports.nlihc.org/gap>.

⁸⁶ Ibid.

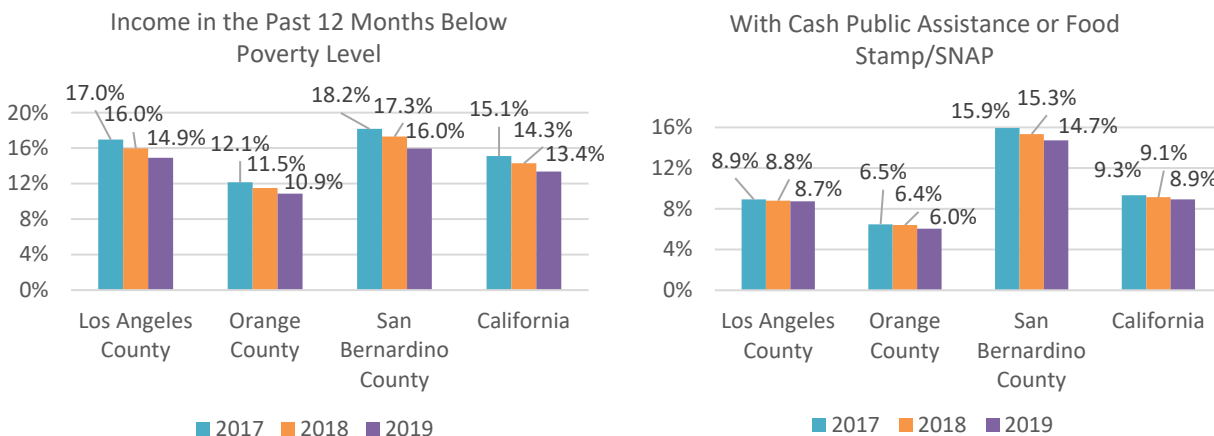
⁸⁷ Ibid.

⁸⁸ Los Angeles Times, Homelessness jumps 12% in L.A. County, June 2019; available from: <https://www.latimes.com/local/lanow/la-me-ln-homeless-count-encampment-affordable-housing-2019-results-20190604-story.html>.

⁸⁹ Ibid.

⁹⁰ Ibid.

Exhibit 10
Poverty and Food Stamp Usage Rates⁹¹
2017-2019



Credit and Community Development Needs

The economic data described above and feedback from community contacts indicate that there remains credit and community development needs in the area. As previously discussed, small business lending levels remained steady during the review period before increasing in 2020 as PPP loans were distributed to meet the credit needs of small businesses enduring the impacts of Covid-19. According to the U.S. Census Bureau’s Weekly Small Business Pulse Survey, as of January 3, 2021, 71 percent of small businesses in California received PPP loans.⁹² At that time, 38 percent of small businesses reported that obtaining financial assistance would be needed in the next six months, compared to the national average of 32 percent of businesses.⁹³ Although, 50 percent of small businesses in California reported it would take more than six months before the business returned to normal levels of operation relative to one year ago.⁹⁴ Based on the survey results, small businesses in California appeared to have ongoing credit needs and expected a lengthy amount of time to recover business operations.

The Small Business Credit Survey was conducted in September and October 2020, which was approximately six months after the onset of the Pandemic and shortly after the close of the first window of PPP lending. The point-in-time survey highlighted the Pandemic’s impact on small businesses and their credit needs. The survey results found that of the 37 percent of small businesses survey respondents that applied for credit in the prior 12 month period, 37 percent received all the financing they sought.⁹⁵ This share of applicants was a decrease from the prior year’s survey that found

⁹¹ Poverty and Food Stamp Usage Rates, U.S. Census Bureau, American Community Survey, 5-Year Estimates; available from: <https://www.census.gov/programs-surveys/acs/data.html>.

⁹² U.S. Census Bureau, Weekly Small Business Pulse Survey, Week 26; available from: https://experience.arcgis.com/experience/0a2101a6bc6d41159cb0f4ee9cf38a7f/page/page_4/.

⁹³ Ibid.

⁹⁴ Ibid.

⁹⁵ Small Business Credit Survey, Report on Employer Firms 2021; available from: <https://www.fedsmallbusiness.org/survey/2021/report-on-employer-firms>.

51 percent of applicant firms received all the financing they sought.⁹⁶ Small business applicants most often sought loans or lines of credit.⁹⁷ A majority, 58 percent, of applicant firms cited that their reason for applying for credit was to meet operating expenses.⁹⁸ Only 48 percent of firms applied for less than \$100,000, a decrease since the prior year.⁹⁹ Despite the increase in small business lending during the Pandemic described previously, the survey results indicate an unmet credit need for small businesses.

In addition to the credit gaps identified in the Small Business Credit Survey findings, community contacts noted various credit needs in the area. A community contact described small businesses need for low-cost flexible capital, in the form of lines of credit or installment loans. The contact indicated that loans with five to 10-year terms would be ideal and with rates that are under 10 percent. Loans in the amount of \$50,000 to \$150,000 are the most in demand by business owners, primarily for the use of expanding the business or to contribute to the acquisition of operating space, according to the community contact.

To support housing credit needs in the area, a community contact noted that homebuyers need down payment assistance and smaller-dollar first lien mortgages. In addition, the same community contact noted that there is only one known lender in the area that will provide first mortgages on factory-built homes that serve as a viable affordable housing option in the area for many low- and moderate-income homebuyers. The contact described that most traditional lenders are not offering mortgages for these types of homes despite the lender's opportunity to partner with Fannie Mae's secondary market product.

In addition to the needs of small businesses and homebuyers noted above, nonprofits such as CDFIs are also in need of financing to support community development activities. A community contact noted that its organization needed more funding, such as equity equivalent (EQ2) investments, from banks. The funding received by the CDFI is needed as capital to support its loan portfolio, according to the contact. Low-cost capital received by nonprofits and CDFIs enable these organizations to provide additional credit opportunities directly to small businesses and for the development of housing in the community. The high cost of living and limited affordable housing stock described previously further suggest the credit needs in the community for additional loans, investments, and services from financial institutions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTHERN CALIFORNIA

Lending Test

EWB's performance under the lending test in Southern California is excellent. The bank is a leader in making community development loans that exhibit an excellent record of serving the credit needs of low-income individuals and areas and very small businesses. EWB also demonstrated excellent geographic lending distributions and excellent penetration among borrowers of different incomes and revenue sizes.

⁹⁶ Small Business Credit Survey, Report on Employer Firms 2021; available from: <https://www.fedsmallbusiness.org/survey/2021/report-on-employer-firms>.

⁹⁷ Ibid.

⁹⁸ Ibid.

⁹⁹ Ibid.

Lending Activity

Lending levels are excellent despite the economic downturn brought on by the Pandemic during the review period. Overall, EWB extended an excellent number of loans in Southern California for all loan types, and particularly notable was the number of small business loans. In addition, the percentage of area lending is comparable to the percentage of areas deposits. Loan volume data is depicted in Table 1.

Lending Distribution by Geography

Overall lending distributions by geography are excellent. While lending volume and performance varied by product type, EWB extended loans within each of the income categories with generally strong performance in low- and moderate-income areas. Lending patterns followed the locations of EWB branches and business or housing unit concentrations and did not exhibit unusual or conspicuous gaps. Performance was enhanced by the bank's flexible and innovative loan products as well as partnerships with non-profit organizations that support very small businesses and low- and moderate-income borrowers.

Small Business Lending

Small business lending distribution by geography within the Southern California assessment area is excellent. The bank's small business lending represents excellent dispersion throughout census tracts of all income levels. Performance was particularly strong in low-and moderate-income areas with lending levels consistently exceeding the percentage of businesses in these areas as well as the performance of other lenders in the market. The bank's partnership with a non-profit organization mentioned previously enhanced the bank's performance. Table 2 contains data assessed to reach this conclusion.

Home Mortgage Lending

Geographic distributions among home mortgage products are good overall. Lending was distributed throughout the assessment area with no conspicuous lending gaps and loans were made within each of the income categories. Mortgage lending distributions and comparative data used in this assessment are presented in the tables in Appendix E, as follows: home purchase loans in Table 3, home mortgage refinance loans in Table 4, home improvement loans in Table 5, multi-family loans in Table 6, and home equity lines of credit in Table 10.

The geographic distribution of home purchase loans is adequate. Overall, EWB performed adequately in low-and moderate-income geographies, where lending was comparable, but lower than owner-occupied units and the performance of aggregate lenders. As seen on Table 3, lending levels generally followed the concentration of owner-occupied units and the bank's branch locations in middle- and upper-income census tracts. Rising home prices, as well as the relatively limited supply of owner-occupied housing units have limited lending opportunities in low- and moderate-income areas within this high-cost assessment area.

The geographic distributions of home mortgage refinance and home improvement loans are excellent overall. Lending generally exceeded the performance of aggregate lenders in low-and moderate-income geographies and the percentage of owner-occupied housing units. While rising home prices had a dampening effect on home purchase loans, increased home values provided homeowners more equity

from which to borrow. Likewise, multi-family lending distributions by geography are also excellent with relatively high percentages of lending in low- and moderate-income areas that exceed the percentage of multi-family units and performance of aggregate lenders. EWB's multi-family lending is particularly responsive to the need for affordable rental units among low- and moderate-income individuals.

Finally, the geographic distribution of home mortgage loans the bank purchased (labeled as HMDA – NA) is excellent. Loans purchased in low- and moderate-income census tracts exceeded both the percentage of owner-occupied units as well as aggregate lending. This was particularly notable in moderate-income census tracts where the bank's lending levels far exceeded both measures. Some of these loans were purchased from non-profit affordable housing organizations that assist low- and moderate-income individuals purchase homes. Purchasing loans from such organizations helps free up capital allowing them to expand their capacity to further their mission of providing affordable housing to low- and moderate-income individuals.

Lending Distribution by Borrower Income and Business Revenue

Overall distributions of borrowers reflect excellent distributions among borrowers of different incomes and businesses of different revenue sizes. This assessment is based primarily on the comparatively high levels of lending to small businesses and to low- and moderate-income borrowers. As noted previously, overall performance was enhanced by EWB's flexible and innovative loan products and services and partnerships with non-profit organizations that serve very small businesses and low- and moderate-income borrowers.

Small Business Lending

Lending levels to small businesses is excellent. The bank's lending is comparable to the percentage of small businesses and consistently exceeds aggregate lending. The percentage of loans in smaller amounts, which was identified as a credit need, is also excellent, reaching over 90 percent by the end of the review period. The bank's partnership with a non-profit organization enhanced performance, funneling much needed capital to a large number of small businesses within the assessment area.

Home Mortgage Lending

The borrower distributions of home purchase, home refinance, and home improvement loans are excellent. As shown in Tables 12, 13 and 14, income data was available only for a small percentage of total home purchase, home improvement, and home refinance loans extended by the bank. Income information was not collected or used for the home equity lines of credit. This lack of data is attributable to the bank's home mortgage loan programs that are tailored to the bank's core immigrant customers for which borrower income is not collected.

Home purchase lending distributions are excellent. Lending to low- and moderate-income borrowers were generally comparable to the percentage of low- and moderate- income families and exceeded aggregate lenders. These distributions were primarily driven by EWB's proprietary loan program designed to meet the needs of low- and moderate-income borrowers, including down payment assistance. EWB also partnered with a non-profit housing organization that helps provide affordable homes for low- and moderate-income individuals by allowing them to contribute to the purchase of the home through sweat equity. This new and innovative partnership increased the ability of this

organization to build more homes. The clients of this organization do not typically qualify for conventional mortgage loans due to low-income levels, little or no credit history, or low credit scores. Typically, these homes are funded by donations; however, an intermediary developed a process working with the local non-profit to sell mortgages on the secondary market to increase funding for more housing development projects. Through this partnership, EWB purchased 13 mortgage loans in Los Angeles County in 2019, which helped to enhance performance in the Southern California assessment area.

Performance is also excellent with regard to home improvement and home mortgage refinance lending. Lending levels to low- and moderate-income borrowers generally compared favorably to the percentage of low-income families and was above aggregate lenders.

The bank's borrower distribution of purchased loans was also excellent with all loans purchased in 2018 to low-income borrowers and nearly half of purchased loans in 2019 to low- and moderate-income borrowers. As stated previously, some of these loans were purchased from non-profit organizations that assist low- and moderate-income individuals purchase their first homes.

Community Development Lending

EWB is a leader in making community development loans in Southern California. The bank made 980 loans totaling \$3 billion during the period. This volume is comparatively higher than other peer institutions and EWB's prior performance. The majority of these loans are concentrated in Los Angeles County, but a good number were also made in San Bernardino and Orange counties. Data regarding community development lending volumes is displayed in Table 1.

The bank's lending comprised a good variety of responsive community development activities. Most of the loans financed affordable housing for low- and moderate-income individuals, followed by loans that promoted economic development by financing small businesses that created or retained jobs in the assessment area; helped stabilize low- and moderate-income areas; and supported organizations that provide community services for low- and moderate-income individuals. Notable community development loans in the Southern California assessment area include the following:

- A \$3.2 million loan to a non-profit organization that supports low- and moderate-income families as well as homeless individuals with various programs to help them obtain housing stability by securing voucher-based apartments, job training, and mental health services. The loan helped the organization sustain its services for 7,000 individuals that are helped on an annual basis as well as enabled the retention of 279 employees.
- A \$1.3 million loan to a telecom internet and voice service provider that operates in Southern California and Nevada that has as part of its mission to bridge the digital divide for low- and moderate-income families. The loan helped to preserve jobs in the organization and sustain the company's programs of donating internet services to provide educational access to children and families in underserved communities and homeless shelters. This service allowed children who are homeless or living in poverty the ability to do homework online who otherwise would not have internet access. The organization has also partnered with an organization that provides tutoring and digital learning access to children and teens in need. The organization has donated

internet to ten organizations in downtown Los Angeles and Southern Los Angeles that provide community services to low- and moderate-income individuals.

- A \$10 million PPP loan to a nonprofit mental health organization that serves 22,500 low- and moderate-income and homeless individuals in Southern California annually. With over 50 locations across Los Angeles, Orange, San Bernardino and Ventura counties, the organization provides free, low-cost, and sliding scale fee mental health services. This loan provides support to the business and enables the retention of the 1,136 employees.
- A \$500,000 loan to a non-profit organization dedicated to the care and education of low- and moderate-income individuals with intellectual/developmental disabilities. Programs include an adult residential program through group homes, which include intermediate care facilities that provide the intensive medical and training services needed by residents who require help with all aspects of daily living. These homes are funded by Medi-Cal, which is California's Medicaid program benefitting low-income individuals.
- A \$10 million revolving line of credit to a licensed SBIC, which is an entity partially funded by a government financing program managed by the SBA. The fund targets lower middle market companies who desire a mentoring partner to help them scale or professionalize their business.
- A \$2.7 million loan that supports economic development by financing a woman-owned small business that will help retain 40 employees in a moderate-income census tract. \$2.4 million PPP Loan that supports economic development by financing a small business that provides employment to 214 individuals in a moderate-income census tract. The business is a wholesaler of promotional products including bags, drinkware, writing instruments, headwear, technology, and stationary.
- A \$1.2 million SBA loan that helps stabilize a moderate-income census tract by financing the purchase of a warehouse to be occupied by the borrower's wholesale grocery business. The facility assists a new business and creates 30 permanent jobs for low- and moderate-income individuals in the area.

Investment Test

EWB's performance under the investment test in Southern California is excellent as evidenced by a high level of qualified investments and grants, coupled with a strong focus on the area's critical need for affordable housing. Investments also helped spur economic development by providing financing to local small businesses. As seen on Table 19, over \$201.9 million was invested in Southern California. This total includes \$138 million in new investments and \$63.9 million in prior-period investments that remained on the bank's books. During the review period, investments were made in LIHTCs and MBS that directly benefit the assessment area by developing or maintaining over 3,100 housing units of affordable housing for low- and moderate-income individuals. Grants and donations were also provided to numerous organizations involved in a variety of community development activities. The following are notable examples of the bank's investment activities:

- A \$1.4 million investment in a LIHTC. This fund involves rehabilitation of 354 affordable housing units in five low-income housing apartments and one senior housing apartment located in Los Angeles and Orange counties in which 100 percent of its residents are low-income.
- A \$2.3 million investment in a LIHTC. This project is a 61-unit multi-family apartment complex located in Pasadena, California. The purpose of the project is to provide decent, safe, sanitary, and affordable housing for low-income persons and families.
- A \$4.7 million investment in a municipal bond to finance a portion of the cost of the acquisition, rehabilitation and equipping of a 216-unit multi-family rental housing development in Los Angeles.

Service Test

EWB's performance in the service test in Southern California is good based on the accessibility of delivery systems and the relatively high level of community development services provided to the assessment area.

Retail Banking Services

Retail banking delivery systems are reasonably accessible throughout the Southern California assessment area and business hours and services do not vary in a way that inconveniences any portion of the area. A full array of personal and business banking products and services is offered at all locations in the area including at the ten branches located in grocery stores. Branch hours are adjusted according to the needs of the community in which the branch is located. A substantial majority of branches offer Saturday and Sunday hours, and grocery store branches offer both Sunday and extended evening hours. In addition, delivery systems include 50 ATMs, one off-site ATM, online and mobile banking, and remote deposit capture that are available to provide customers with access to banking services after normal business hours.

As seen in Table 20, EWB operates 50 branches in Southern California. During the review period, the bank closed two branches. These closures were attributable to the previously mentioned consolidation of existing EWB branches. The branch closures occurred in moderate-and upper-income census tracts. These closures did not adversely affect availability of banking services to consumers given the close proximity of the closing branches to existing EWB branches. The one branch closure in the moderate-income census tract will have little impact as the absorbing branch is within half of a mile of the closing branch. Overall accessibility to banking services in low-and moderate-income census tracts is reasonably accessible. EWB maintains 34 percent of its branches located within low-and moderate-income census tracts, which is comparable to the percentage of the population that resides in those areas at 37 percent.

Community Development Services

EWB provided a relatively high level of services in the Southern California assessment area. Employees provided 323 services totaling more than 6,800 service hours. For 26 of the organizations served, employees held leadership positions as board and committee members. These qualified services met a variety of community development needs. The majority of the service hours were for personal financial education for low- and moderate-income students and families and SBA lending product presentations

to small businesses. Significant numbers of service hours were expended toward FHLB affordable housing and community development grant programs. The following are notable examples of community development services.

- Three employees spent a total of 236 hours providing technical assistance to non-profit organizations and administering an external community development grant program. The grants provide early-stage funding for targeted economic development projects and housing initiatives that benefit low- and moderate-income communities. New in 2020, these funds were expanded to support Pandemic-related initiatives. In 2020, East West Bank received 12 applications and was awarded 4 grants totaling \$142,500. The grants were awarded to four non-profit organizations and funded programs that preserve small businesses and expand support services for the homeless and at-risk low- and moderate-income youth.
- Over the course of several months bank employees provided technical assistance on financial matters to a non-profit organization that provides re-entry and residential aftercare services to formerly incarcerated low- and moderate-income individuals and also is specialized in mental/behavioral & drug abuse/addict treatment. Three employees provided 102 hours to this organization.
- A bank employee serves on the Board as treasurer of a non-profit that provides free medical, dental, and optical care to low- and moderate-income individuals primarily in Los Angeles County through mobile medical clinics staffed by volunteer medical professionals and lay people. In May of 2020, the bank employee worked to coordinate the Covid-19 testing that subsequently followed during the summer months. The employee also coordinated a partnership with the organization and other healthcare providers to facilitate community referrals of patients and services. This employee provided a total of 603 service hours to this organization.
- In partnership with a non-profit organization, EWB hosted 48 financial literacy workshops for 2,203 students attending Title 1 schools in the Los Angeles area. Title 1 schools include schools that have at least 40 percent of students from low-income families. During the Covid-19 Pandemic, staff shifted to virtual classes. Two hundred staff members provided 1,592 service hours for these events.
- In partnership with local government and a non-profit organization, 30 EWB employees provided free tax services that helped 80 low- and moderate-income individuals obtain tax refunds. The Earned Income Tax Credit (EITC) and Volunteer Income Tax Assistance (VITA) programs assist qualified low- and moderate-income families with refund filing and free tax preparation. As the largest anti-poverty program for working families, EITC brings billions of dollars in refunds to qualified taxpayers nationwide, which ultimately helps them jumpstart their savings, pay down debt, and further drive the local economy.

- A bank employee provided 83 hours of service hours serving on the finance committee as a board-member for a non-profit organization that provides community services to youth from low- and moderate-income families.

Bay Area Assessment Area Conclusions

DESCRIPTION OF OPERATIONS IN THE BAY AREA

The Bay Area assessment area consists of Alameda, San Francisco, San Mateo, and Santa Clara counties. Alameda County is a part of the Oakland-Berkeley-Livermore, California MD. San Francisco and San Mateo counties comprise the San Francisco-San Mateo-Redwood City, California MD. Santa Clara County is part of the San Jose-Sunnyvale-Santa Clara, California MSA. As of 2019, the area was home to 5.2 million people.¹⁰⁰

EWB operated 25 branches in the area, and these branches held total deposits of \$4.9 billion as of June 30, 2020.¹⁰¹ By comparison, there were a total of 70 FDIC-insured financial institutions operating 1,074 offices within the area, with deposits totaling over \$616 billion.¹⁰² EWB ranks 14th in the market, representing 0.79 percent of the deposit market share.¹⁰³

Exhibit 11 on the following page presents key demographic and business information used to help develop a performance context for the assessment area.

¹⁰⁰ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2019; available from: www.census.gov/quickfacts/.

¹⁰¹ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2020; available from: <https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

¹⁰² Ibid.

¹⁰³ Ibid.

EXHIBIT 11 ASSESSMENT AREA DEMOGRAPHICS BAY AREA ASSESSMENT AREA 20019 FFIEC CENSUS AND 2019 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	124	11.4	107,366	9.3	24,692	23.0	284,350	24.6
Moderate-income	225	20.7	227,239	19.7	24,795	10.9	180,972	15.7
Middle-income	354	32.5	401,168	34.7	20,278	5.1	209,942	18.2
Upper-income	370	34.0	417,806	36.1	11,326	2.7	480,633	41.6
Unknown-income	15	1.4	2,318	0.2	287	12.4	0	0.0
Total AA	1,088	100.0	1,155,897	100.0	81,378	7.0	1,155,897	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	199,134	42,609	4.6	21.4	141,415	71.0	15,110	7.6
Moderate-income	378,400	146,110	15.7	38.6	213,671	56.5	18,619	4.9
Middle-income	645,552	332,315	35.7	51.5	281,775	43.6	31,462	4.9
Upper-income	658,880	407,248	43.8	61.8	218,828	33.2	32,804	5.0
Unknown-income	10,596	1,318	0.1	12.4	8,079	76.2	1,199	11.3
Total AA	1,892,562	929,600	100.0	49.1	863,768	45.6	99,194	5.2
Income Categories	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	29,360	10.8	25,762	10.4	3,475	14.4	123	10.5
Moderate-income	47,762	17.5	43,142	17.4	4,444	18.4	176	15.0
Middle-income	84,056	30.8	76,758	31.0	6,978	29.0	320	27.2
Upper-income	109,409	40.1	99,909	40.4	8,968	37.2	532	45.3
Unknown-income	2,046	0.8	1,799	0.7	223	0.9	24	2.0
Total AA	272,633	100.0	247,370	100.0	24,088	100.0	1,175	100.0
% of Total Businesses				90.7		8.8		0.4
2020 Adjusted Median Family Income ¹⁰⁴								
Alameda County			\$119,200					
San Francisco County			\$140,900					
San Mateo County			\$140,900					
Santa Clara County			\$139,800					

¹⁰⁴ FFIEC Adjusted Median Family Income; available from: <https://www.ffiec.gov/Medianincome.htm>.

Economic Conditions

During the review period, the area experienced economic growth prior to the economic downturn brought by the onset of the Pandemic. Overall, the economic drivers in the area were technology, finance, healthcare, with additional support from manufacturing and the nondefense federal government industry. As the area recovered from the Pandemic-induced recession in early 2020, job growth lagged and some parts of the assessment area were slow to recoup the jobs lost during the downturn.¹⁰⁵ The housing market in the area showed improvement through the fourth quarter of 2020 as residential construction and permit issuance rebounded.¹⁰⁶ Across the assessment area, population growth slowed late in the review period due to out-migration, particularly among low- and mid-wage earners who struggled to afford the area's high cost of living.¹⁰⁷ The economic conditions within the three geographies of the Bay Area assessment area, Alameda County in the East Bay, Santa Clara County in the South Bay, and San Francisco and San Mateo counties on the Peninsula of the Bay Area, are described below.

Alameda County's economy was in a late expansionary stage of the business cycle during the review period led by the primary economic drivers of technology, healthcare, and further supported by the nondefense federal government and logistics industry.¹⁰⁸ Somewhat lower cost compared to San Francisco, along with the skilled workforce and proximity to Silicon Valley, rendered the area a desirable alternative for tech companies looking to expand operations.¹⁰⁹ Higher wage tech jobs further advantaged the local area by supporting consumer spending.¹¹⁰ In addition to technology, healthcare was a primary employer and economic driver in Alameda County. Approximately four of the top 10 employers were in the healthcare or pharmaceutical manufacturing sectors.¹¹¹ Another large employment sector was in local and state government, which together represent approximately 15 percent of the area's total employment.¹¹² Alameda County is also home to the Port of Oakland and is supported by a multitude of logistics, distribution, warehousing, and trade sectors. The Port of Oakland is among the largest seaports in the nation; although cargo volumes slowed in 2019.¹¹³ Overall, Alameda County's diverse economy remained rooted in technology and a bright alternative for businesses looking for lower costs.

The economic drivers in Santa Clara County were technology and manufacturing. By the end of the review period, job growth in Santa Clara County outpaced the U.S. average and unemployment was at a record low, propelled by the core tech industry.¹¹⁴ Although venture capital funding was down in 2019, on par with the nationwide trend, the Bay Area received more venture capital than any other tech

¹⁰⁵ Moody's Precis Report, Oakland-Hayward-Berkeley CA, November 2020.

¹⁰⁶ Moody's Precis Report, San Francisco-Redwood City-South San Francisco CA, November 2020; Moody's Precise Report, San Jose-Sunnyvale-Santa Clara CA, November 2020; Moody's Precis Report, Oakland-Hayward-Berkeley CA, November 2020.

¹⁰⁷ Ibid.

¹⁰⁸ Moody's Precis Report, Oakland-Hayward-Berkeley CA, November 2019.

¹⁰⁹ Ibid.

¹¹⁰ Moody's Precis Report, Oakland-Hayward-Berkeley CA, November 2020.

¹¹¹ Ibid.

¹¹² Ibid.

¹¹³ Moody's Precis Report, Oakland-Hayward-Berkeley CA, November 2019.

¹¹⁴ Moody's Precise Report, San Jose-Sunnyvale-Santa Clara CA, November 2019.

hub.¹¹⁵ Technology firms in Silicon Valley remained the driving force throughout the area's economic recovery from the Pandemic-induced downturn. Population growth slowed during the review period and there was negative net migration overall between 2016 and 2019.¹¹⁶ As noted previously, as one of the least affordable places in the country, cost pressures resulted in the out migration and further tightened the housing market.¹¹⁷ In 2019, the new housing permits fell for both single-family and multi-family housing in the area.¹¹⁸

In San Francisco and San Mateo counties, the economic drivers that helped the area climb out of the Pandemic-induced recession include technology, finance, and healthcare.¹¹⁹ Earlier in the review period, technology firms were the driving force behind the economy's expansion. Employment in the high-wage professional, scientific, and technical services industry grew by 75 percent in the last decade, second only to the Austin, Texas region.¹²⁰ Firms such as Salesforce contributed to the outsize gains, however, startup firms were the fastest growing segment of the tech scene.¹²¹ In addition to technology, finance was a leading economic industry. Together, San Francisco and San Mateo counties was consistently one of the least affordable places in the country.¹²² Net migration fell early in the review period in 2018, as fewer people moved into the area and more people departed because these higher living costs grew faster than salaries.¹²³ Low housing affordability was compounded during the review period by a tight housing market with low inventory.¹²⁴ Living cost pressures remained in the area, particularly for low- and mid-wage workers, as noted previously.¹²⁵

As depicted in Exhibit 12 on the following page, small business lending showed an overall upward trend during the review period. Although loans to small businesses from banks subject to the CRA flattened between 2015 and 2017, lending rose during the review period and peaked in 2019, with 178,254 loans totaling \$5 billion made in the area. Lending to small businesses played a critical role in the economy given that small businesses accounted for 90.7 percent of all businesses in the assessment area, as noted in Exhibit 11. As described above in the discussion on loans to small businesses in the Southern California assessment area, lending to small businesses nationwide increased in the first half of 2020 as a result of the federal PPP.¹²⁶ Small banks increased lending to small businesses and farms by 23 percentage points on average, while lending by medium and large banks increased on average by more than 38 and 35 percentage points, respectively.¹²⁷ The growth in lending suggests small businesses and farms turned to banks for funding and support to respond to the Pandemic's negative effect on

¹¹⁵ Ibid.

¹¹⁶ Moody's Precise Report, San Jose-Sunnyvale-Santa Clara CA, November 2020.

¹¹⁷ Moody's Precise Report, San Jose-Sunnyvale-Santa Clara CA, November 2019.

¹¹⁸ Ibid.

¹¹⁹ Moody's Precise Report, San Francisco-Redwood City-South San Francisco CA, November 2020.

¹²⁰ Moody's Precise Report, San Francisco-Redwood City-South San Francisco CA, November 2018.

¹²¹ Ibid.

¹²² Moody's Precise Report, San Francisco-Redwood City-South San Francisco CA, November 2019.

¹²³ Moody's Precise Report, San Francisco-Redwood City-South San Francisco CA, November 2018.

¹²⁴ Moody's Precise Report, San Francisco-Redwood City-South San Francisco CA, November 2019.

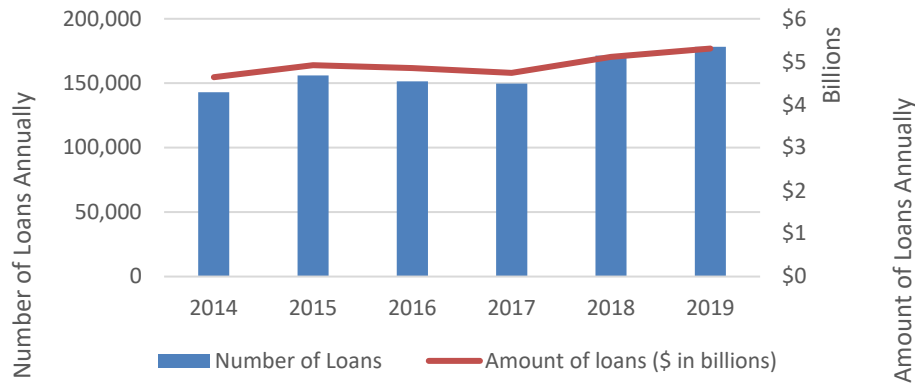
¹²⁵ Moody's Precise Report, San Francisco-Redwood City-South San Francisco CA, November 2020.

¹²⁶ Federal Reserve Bank of San Francisco, Economic Letter, Small Business Lending during Covid-19, November 23, 2020; available from: <https://www.frbsf.org/economic-research/publications/economic-letter/2020/november/small-business-lending-during-covid-19/>.

¹²⁷ Federal Reserve Bank of San Francisco, Economic Letter, Small Business Lending during Covid-19, November 23, 2020; available from: <https://www.frbsf.org/economic-research/publications/economic-letter/2020/november/small-business-lending-during-covid-19/>.

consumer and business activity in the first half of 2020.¹²⁸ In the assessment area, over 80,000 PPP loans in the amount of less than \$1 million were made and approximately 600,000 jobs were self-reported to benefit from the loans made between April 3, 2020 and August 8, 2020.¹²⁹ According to the borrower firms that elected to report their business’s industry, most loans under \$1 million were made to businesses in the Professional, Scientific, and Technical Services industry, followed by the Health Care and Social Assistance industry.¹³⁰

Exhibit 12
Loans to Small Businesses in Assessment Area¹³¹
2014-2019



Unemployment rates in the assessment area decreased during the review period, as shown in Exhibit 13 on the following page. In addition, the unemployment rate in each county in the area was below the statewide unemployment rate.

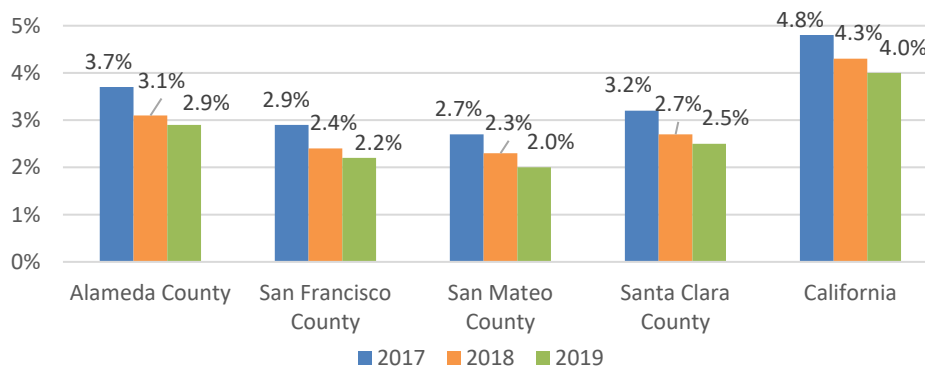
¹²⁸ Ibid.

¹²⁹ Small Business Administration, Paycheck Protection Program Loan Data, available from: <https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program>.

¹³⁰ Ibid.

¹³¹ Aggregate CRA Small Business data reports available from: <https://www.ffiec.gov/craadweb/aggregate.aspx>.

Exhibit 13
Unemployment Rate¹³²
2017-2019



Unemployment in the area increased at the onset of the Pandemic in 2020 from the lows described above. In March 2020, the unemployment rates increased in the area to 3.9 percent in Alameda County, 3.1 percent in San Francisco County, 2.8 percent in San Mateo County, and 3.4 percent in Santa Clara County. Rates peaked in April 2020, reaching 14.0 percent in Alameda County, 12.6 percent in San Francisco County, 11.4 percent in San Mateo County, and 11.7 percent in Santa Clara County.¹³³ Similar to the Southern California assessment area and across the country, unemployment rates in the area trended downward through October 2020 but remained elevated compared to the lows during the review period described above.

The trends in median home prices in the area are shown in Exhibit 14 on the following page. Median home prices in the area fluctuated during the review period compared to the state of California's upward trend. Although Alameda County had the lowest median home prices in the area, it had higher median prices than in California overall. Median home prices in Alameda County peaked in December 2020 to \$1,060,000. Whereas, median home prices in Santa Clara County peaked earlier in the review period in March 2018, to \$1,454,500. Median home prices in San Francisco and San Mateo had similarly higher home prices throughout the review period compared to Alameda County and California. The median home price in San Francisco County spiked in June 2020 to \$1,805,000 and in August 2020 to \$1,812,500 in San Mateo County. The higher median home prices in San Francisco, San Mateo, and Santa Clara counties compared to Alameda County also correlated to housing affordability differences across the assessment area. According to the California Association of Realtors' Housing Affordability Index, the percentage of households that can afford to purchase the median priced home in the fourth quarter of 2020 was 23.40 percent in Alameda County, 20.28 percent in San Francisco County, 19.63 percent in San Mateo County, and 22.26 percent in Santa Clara County.¹³⁴ By another measure of

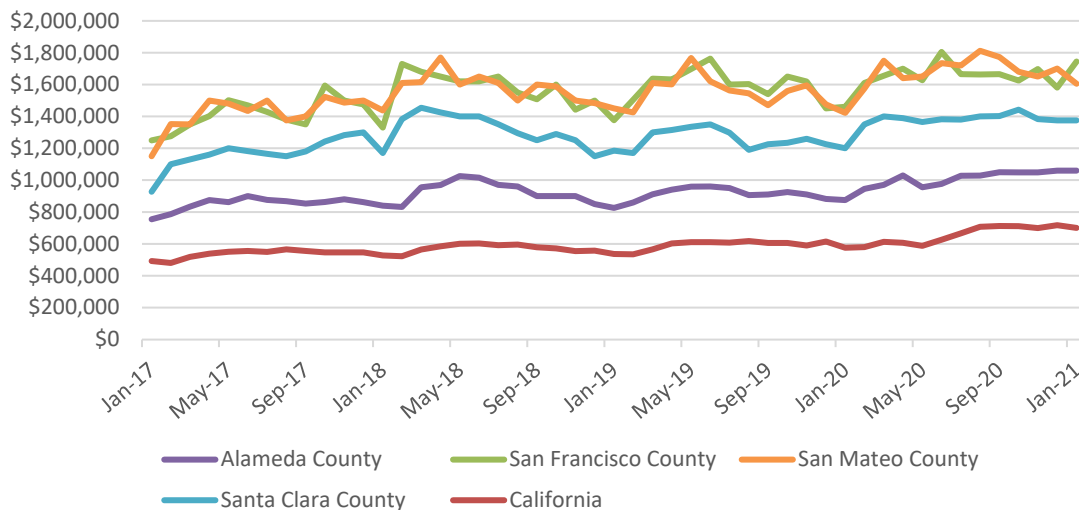
¹³² U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <https://www.bls.gov/lau/>.

¹³³ Ibid.

¹³⁴ California Association of Realtors, Housing Affordability Index-Traditional, 2020 Q4 available from: <https://www.car.org/marketdata/data/haitraditional>.

the affordability challenges in the area, there were 35 percent or more cost burdened homeowners in each county, compared to the national average of 28 percent.¹³⁵

Exhibit 14
Median Home Prices¹³⁶
January 2017-January 2021



Rent prices in the area trended upward during the review period and households experienced similar challenges in finding affordable rental housing as described above for homeowners in the area. Median rent prices for a 1-bedroom unit increased from \$1,297 in 2017 to \$1,537 in 2019 in Alameda County, from \$1,702 in 2017 to \$1,954 in 2019 in San Francisco County, from \$1,685 in 2017 to \$2,011 in 2019 in San Mateo County, and from \$1,669 in 2017 to \$1,992 in 2019 in Santa Clara County.¹³⁷ Rates of cost burdened renters varied between the counties in the assessment area. In San Francisco and Santa Clara counties, there were less renters who were cost burdened than the national average of 49.7 percent.¹³⁸ San Mateo County was on par with the national average with 49.6 percent of cost burdened renters and Alameda had a higher share of cost burdened renters of 51.1 percent.¹³⁹

Homelessness remained a significant challenge in the area. In 2017, the region had the third largest population of people experiencing homelessness in the nation.¹⁴⁰ Of the 28,200 people living without housing in the greater nine county Bay Area region, 20 percent were located in Alameda County.¹⁴¹

¹³⁵ Prosperity Now Scorecard, San Francisco, Alameda, San Mateo, Santa Clara counties, CA; available from: <https://scorecard.prosperitynow.org>.

¹³⁶ California Association of Realtors, Historical Housing Data, Median Prices of Existing Detached Homes; available from: <https://www.car.org/marketdata/data/housingdata/>.

¹³⁷ U.S. Census Bureau, Median Gross Rent, 1-Bedroom, American Community Survey, 5-year estimate; available from: <https://www.census.gov/data>.

¹³⁸ Prosperity Now Scorecard, San Francisco, Alameda, San Mateo, Santa Clara counties, CA; available from: <https://scorecard.prosperitynow.org>.

¹³⁹ Ibid.

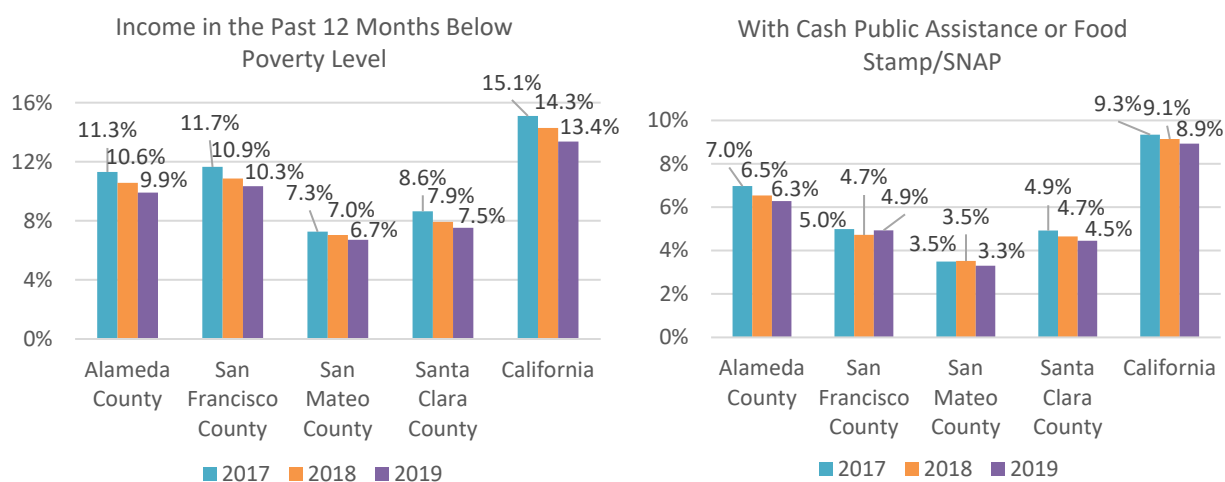
¹⁴⁰ Bay Area Economic Institute, Bay Area Homelessness: A Regional View of a Regional Crisis, April 2019; available from: http://www.bayareaeconomy.org/files/pdf/Homelessness_Report_2019_web.pdf.

¹⁴¹ Ibid.

Housing shortages across the assessment area and limited growth in wages coupled with insufficient temporary shelter and permanent supportive housing all contributed to the crisis.¹⁴²

The trend in the poverty rates and public assistance or food stamp/SNAP benefit usage rates are shown in Exhibit 15. There were higher rates of households with incomes below the poverty level in Alameda and San Francisco counties compared to San Mateo and Santa Clara counties. In all counties and the state overall the poverty rates decreased slightly during the review period. San Mateo County had the lowest levels of households with income below the poverty level and share of households receiving public assistance or food stamp/SNAP benefits. Alameda County had the highest rate of households receiving public assistance or food stamp/SNAP benefits than the other counties in the area, however, less than in the state overall. Although the share of households receiving public assistance or food stamp/SNAP benefits fluctuated during the review period in San Francisco and San Mateo counties, the share decreased in Alameda and Santa Clara counties.

Exhibit 15
Poverty and Food Stamp Usage Rates¹⁴³
2017-2019



Credit and Community Development Needs

Similar to the discussion for the credit needs of the Southern California assessment area, small business lending levels slightly increased during the review period before PPP loans were distributed in 2020 to help meet the immediate credit needs of small businesses enduring the impacts of Covid-19.

There also remains credit needs in the area to address the housing affordability challenges described above, primarily to support increasing the housing stock. According to a community contact, there is a need for banks to provide gap financing to support smaller affordable housing developments. In particular, the contact noted, low-interest, one percent program-related investments (PRI) long-term

¹⁴² Bay Area Economic Institute, Bay Area Homelessness: A Regional View of a Regional Crisis, April 2019; available from: http://www.bayareaeconomy.org/files/pdf/Homelessness_Report_2019_web.pdf.

¹⁴³ Poverty and Food Stamp Usage Rates, U.S. Census Bureau, American Community Survey, 5-Year Estimates; available from: <https://www.census.gov/programs-surveys/acs/data.html>.

loans of 10 to 15 years would be the most helpful. The same contact noted that there is demand from affordable housing developers for additional sources of residual receipt lending from banks, or other flexible forms of financing that may take a subordinate place in the capital stack for a development of affordable housing units.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BAY AREA

Lending Test

EWB's performance under the lending test in the Bay Area is excellent. This conclusion is based on excellent levels of lending that were responsive to area credit needs, overall excellent geographic distributions of loans, and excellent distribution of loans to borrowers of different incomes and businesses of different revenue sizes. EWB is a leader in making community development loans that were particularly responsive to the economic impacts of the Pandemic. Tables 1 through 18 include loan and demographic data used to assess EWB's performance under the lending test.

Lending Activity

Lending levels are excellent despite the economic downturn brought on by the Pandemic during the review period. Overall, EWB extended an excellent number of loans in the Bay Area for all loan types, particularly notable was the number of small business loans. In addition, the percentage of area lending is comparable to the percentage of areas deposits. Loan volume data is depicted in Table 1.

Lending Distribution by Geography

Overall lending distribution by geography within the Bay Area assessment area is excellent. As seen in Tables 2 through 10, EWB extended loans within census tracts of all income categories. Lending levels in low- and moderate-income census tracts were excellent and consistent with lending opportunities. Lending patterns were reasonable, generally displayed no unusual or conspicuous lending gaps, and largely followed the locations of EWB's branches and business or housing unit concentrations.

Small Business Lending

The geographic distribution of small business loans is excellent. As seen in Table 2, EWB's performance in low-income census tracts was particularly strong with lending significantly exceeding the percentage of businesses in the area and the aggregate lending performance. Lending levels in moderate-income census tracts was consistent with the percentage of businesses and aggregate lending, but increased significantly in 2019 as a result of EWB's partnership with a non-profit organization that supports very small businesses. Performance in census tracts of all other income levels compared reasonably to the percentage of businesses and aggregate lending performance.

Home Mortgage Lending

The geographic distribution of home purchase loans is excellent, particularly given the high cost of housing in the area. Lending was distributed within census tracts of all income categories and there were no conspicuous lending gaps. As seen on Table 3, particularly strong performance was noted

throughout the period within moderate-income census tracts where the level of lending exceeded the percentage of owner-occupied units and aggregate lending. Lending levels in moderate-income census tracts was above the percentage of owner-occupied units, but slightly below aggregate lenders; however, those levels increased in 2019, surpassing both comparators. Performance in all other census tracts was generally comparable to the level of owner-occupied units and aggregate lending performance.

The geographic distribution of home mortgage refinance loans is excellent. As seen on Table 4, lending distributions were strong within low- and moderate-income census tracts where lending levels generally exceeded the percentage of owner-occupied units and aggregate lending. Multi-family lending distributions by geography are excellent given the need for affordable housing in this high-cost assessment area. As seen on Table 6, lending in low- and moderate-income areas exceeds multi-family units. Lending performance was particularly notable in moderate-income census tracts where lending levels also exceeded aggregate lending. Similar to home mortgage refinance loans, EWB extended fewer multi-family loans than purchase loans. Lending data of multi-family in 2016 was considered, but not sufficient for a meaningful analysis.

The geographic distributions of home equity lines of credit are also excellent. As seen in Table 10 strong performance was noted in low- and moderate-income areas where lending levels exceeded owner occupied housing units. Similar to the Southern California assessment area, rising home prices have increased lending opportunity for home equity lending.

Lending Distribution by Borrower Income and Business Revenue

Overall lending distribution by business revenue and borrower income within the Bay Area assessment area is excellent based primarily on the distribution of small business loans. Lending to small businesses was generally comparable to the representation of businesses and was well above aggregate lending levels. Performance with regard to home mortgage refinance loans was good, but was based on such small lending volumes over the period that it carried less weight in the overall assessment. Data from Tables 11 through 18 was used in this assessment.

Small Business Lending

The distribution of loans to businesses of different sizes is excellent. The percentage of lending to small businesses compared favorably with the representation of small businesses and substantially exceeded aggregate lending. EWB's lending data exhibited a surge in lending to small businesses during 2019. The improvement is attributable to the bank's partnership with a non-profit organization that provides micro loans to very small businesses. This partnership helped to increase lending to small businesses and increased the number of small business loans in smaller dollar amounts, which are identified credit needs. Data used for this analysis is on Table 11.

Home Mortgage Lending

The borrower distribution of home mortgage loans is good. Income information was available for only a small percentage of the total home mortgage loans extended by the bank. Of those loans extended in this assessment area, only home purchase loans in 2016 and home refinance loans in 2016, 2017, and 2018 had sufficient volume to impact the assessment. As seen on Table 12, home purchase lending

levels to low- and moderate-income borrowers were significantly above aggregate lending, and the percentage of moderate-income families. Home mortgage refinance lending levels to low- and moderate-income borrowers were also generally above the percentage of families and aggregate lending as seen on Table 13.

Community Development Lending

The bank is a leader in making community development loans that exhibit excellent responsiveness to the credit needs within the Bay Area assessment area. Lending levels were commensurate with the bank's capacity and opportunities within the assessment area. As seen on Table 1, EWB extended 213 community development loans totaling \$687.8 million. Loans were responsive to a variety of community development needs with a majority addressing the need for affordable housing. During the period, EWB extended 120 loans totaling \$149 million to develop or preserve 118 units of affordable housing mainly in multi-family dwellings located in low- and moderate-income areas. Loans also helped revitalize and stabilize low- and moderate-income areas, provided financial support to non-profit community service organizations, and contributed to economic development by financing small businesses. Notable examples include:

- A \$5.0 million loan that provides affordable housing to low- and moderate-income individuals and helps stabilize the area. The loan financed a 34-unit apartment complex located in a moderate-income tract. Of the 34 units, 29 units have rents that are affordable to low- and moderate-income individuals. In addition, 13 of the tenants are recipients of rent subsidies from HUD and non-profit organizations with the mission to provide affordable, sustainable housing low- and moderate-income individuals.
- A \$1.4 million SBA 7a loan to finance the purchase of an assisted living facility for the elderly located in a low-income census tract. The assisted living facility's 27 beds are reserved for Alameda County's Housing Support Program, which assists homeless individuals in obtaining permanent housing and provides financial aid for housing related costs.
- A \$5.2 million loan for a 160-unit apartment complex in a middle-income area. Of the total units, 15 units will be set aside for very low-income individuals as part of the City of San Mateo's Below Market Rate Inclusionary Program.
- A \$45.8 million participation loan with a non-profit affordable housing organization to finance a 55-unit apartment in a moderate-income census tract. Except for one manager unit, all units have income restricted to tenants making less than 80 percent of area median income (AMI). The non-profit has a mission to increase the availability of affordable housing for low-income families, seniors, and residents with special needs throughout California by facilitating private capital flow from investors for debt and equity to developers of affordable housing.
- A \$5.1 million SBA 504 loan that supports economic development by financing a small business and creating jobs for low- and moderate-income individuals. The loan finances the purchase of an industrial property to be occupied by the borrower's cabinetry wholesale business. Proceeds from the loan will also be used to install a solar power system on the subject property. This facility will create 6 jobs in the next two years.

- A \$2.1 million loan that supports economic development by financing a small business with 189 low- and moderate-income employees. The loan is for the purchase of an industrial warehouse, which serves as a second warehouse to support the borrower's bakery business. The business operates 13 retail locations and also sells its goods at grocery stores and supermarkets.
- A \$2.7 million PPP loan to a nonprofit organization that provides assistance and support to low- and moderate-income seniors in the San Francisco area. The organization provides health and home care, housing, employment, social, cleaning, and nutrition services and also operates activity centers. The organization is located in a low-income community and services the local residents. The loan provides support to the organization and enables the retention of the 381 employees.
- A \$21,580 PPP loan to a non-profit which provides scholarships and financial aid to low- and moderate-income students. As part of their mission, the scholarships it funds help in creating meaningful opportunities for students, 70 percent of whom qualify for financial assistance and are low-income, including homeless students. The organization also partners with another Homelessness and Housing Scholarship program which provides scholarship to many students who are experiencing homelessness or housing insecurity.
- A \$12 million working capital loan to a non-profit community health center that serves low- and moderate-income individuals. The non-profit community health center offers comprehensive health care services to a variety of patients, a majority of whom are uninsured or low-income. It also provides a multilingual and culturally sensitive health care services, which are accessible and affordable to everyone.
- A \$22 million loan that will stabilize and revitalize a low-income neighborhood of San Francisco known as Mid-Market. The loan will construct and renovate a hotel that will create job opportunities for low- and moderate-income individuals and contribute to the ongoing revitalization of the Mid-Market area.

Investment Test

EWB is a leader in making community development investments in the Bay Area assessment area. Excellent levels of qualified investments and grants were made that benefited all portions of the assessment area and that exhibited excellent responsiveness to community credit needs, particularly the need for affordable housing for low- and moderate-income families and individuals. In addition, grants were provided to a number of organizations serving the needs of low- and moderate-income individuals within the assessment area. As seen on Table 19, EWB made 125 qualified investments and grants totaling \$157.6 million comprised of \$147.2 million in new investments and \$10.4 million in investments that remained on the bank's books from a prior period. There was also nine unfunded commitment totaling \$16.1 million. Notable examples of qualified investments that directly benefited the assessment area include the following investments:

- A \$2.3 million investment for the acquisition and rehabilitation of an existing residential property that was originally built in 1963 and consists of 350 units that will be restricted to low- and moderate-income families.

- A \$1.5 million investment in a mixed-income multi-family complex comprised of four three-story residential buildings in Livermore, California. The total project, funded in part by LIHTCs, will contain 136 market rate units with the affordable portion of the property providing 35 units. This project will allow low- and moderate-income individuals to live in an area where there is not a concentration of poverty.
- An \$8.4 million investment in a mortgage-backed security backed by a loan to fund the new construction of 213 units of affordable housing for low-income individuals in the Hunters Point area of San Francisco. This project helps address the dire need for affordable housing in a high housing cost city.
- A \$4 million investment in a mortgage-backed security backed by a loan to finance the rehabilitation of 92 units of affordable housing in the Chinatown neighborhood of San Francisco. The property is in a very low-income census tract where the median income is 27 percent of the MSA median income. The property helps provide much needed affordable housing as all units are restricted to low-income individuals.
- A \$6.9 million investment in a mortgage-backed security backed by a loan to fund the rehabilitation of 203 units of affordable housing in the Tenderloin neighborhood of San Francisco. The property is in a very low-income census tract where over 20 percent of the population have incomes below the poverty line. The property will provide much needed affordable housing as all units will be restricted to very low-income individuals with incomes below 50 percent of median area income.
- A \$2.7 million investment in a mortgage-backed security backed by a loan to finance 107 units of affordable housing in a senior housing facility that is restricted to low-income individuals. This property provides much needed affordable housing in an area with high housing costs in San Francisco.
- A \$3.6 million investment in a mortgage-backed security backed by a loan to finance 108 units of affordable housing in the Western Addition neighborhood of San Francisco. This provides affordable housing to a high-cost area of San Francisco as 106 of the units are restricted to low-income individuals.

A total of \$5.3 million in investments made in prior periods in five SBICs that helped create or retain 1,171 jobs in the cities of San Francisco, Santa Clara, Oakland, Palo Alto, Milpitas, and Hayward.

Service Test

Performance under the service test in the Bay Area is good based on the accessibility of delivery systems and the level of community development services provided.

Retail Banking Services

Retail banking services are accessible to the bank's geographies and to individuals of different income levels within the Bay Area assessment area and do not vary in a way that inconveniences any portion of

the area. A full array of personal and business banking products and services is offered at all locations in the Bay Area assessment area including one branch located in a grocery store. Services and branch hours vary based on the needs of the areas served. A substantial majority of branches offer Saturday hours and several offer Sunday hours as well. The branch located in a grocery store offers extended evening hours. In addition, delivery systems including 23 ATMs, telephone banking, mobile and online banking, and remote deposit capture provide customers access to banking services after normal business hours.

The majority of branches are located in San Francisco and San Mateo Counties with a total of 15 branches (12 in San Francisco and 3 in San Mateo), followed by Santa Clara and Alameda Counties with five branches in each. Branch optimization activities resulted in the closure of one branch in a moderate-income census tract. Despite the closure, banking services remain accessible to the bank's geographies and to individuals of different income levels within the Bay Area. As seen on Table 20, 32 percent of branches are located within low-and moderate-income geographies, which is comparable to the 32 percent of the population that resides in those areas. Additionally, a number of branches located in middle-and upper-income census tracts are in close proximity to low-and moderate-income areas.

Community Development Services

EWB provided a relatively high level of services in the Bay Area assessment area. Employees provided 60 services totaling more than 2,920 service hours. For three of the organizations served, employees held leadership positions as board members. These qualified services met a variety of community development needs. The majority of the service hours were for personal financial education for low- and moderate-income students and families and SBA lending product presentations to small businesses. Significant time was also devoted to providing free income-tax preparation assistance to low- and moderate-income individuals and families. The following are notable examples of community development services.

- EWB employees participated in 28 separate events to provide over 214 low- and moderate-income individuals with free tax preparation services for a total of 1,662 hours in community development service hours. EWB partnered with a non-profit organization to assist with these events as well as to support the organization's mission to provide underserved communities with social economic, workforce, and business services.
- A bank employee provided 34 community development service hours as a board-member to an organization that provides comprehensive youth development through education, employment training, advocacy, and other support services. The organization is located in a low-income tract of San Francisco.
- Three bank employees provided 36 hours of community development services hours to the clients of a non-profit organization that supports economic development by providing technical assistance to small businesses. EWB employees participated in the organization's business plan review events where they were trained on how to review business plans. In the subsequent weeks, they met with participating business owners to provide feedback and consultation on the assigned business plan. The organization has a mission of empowering under-served individuals to start businesses that bring jobs and sustainable economic health to the local

economy. The organization has locations in several low- and moderate-income neighborhoods in the Bay Area.

Limited-Scope Assessment Area Conclusions

**For each assessment area where a limited-scope review was performed using the examination procedures.*

EWB’s performance in the assessment areas receiving a limited review is generally consistent with the performance in the areas receiving full-scope reviews. Due to the bank’s smaller presence in these markets and lower percentages of loans and deposits, the limited scope assessment areas received less weight than the full-scope areas. Consequently, performance in these areas did not materially affect the bank’s overall lending, investment, and service test performance assessments. EWB operates one branch in Sacramento County and one branch in San Diego County. Facts and data reviewed, including performance and demographic information, can be found in the tables accompanying this report.

EXHIBIT 16 LIMITED-SCOPE ASSESSMENT AREA CONCLUSIONS			
ASSESSMENT AREA(S)	LENDING TEST	INVESTMENT TEST	SERVICE TEST
Sacramento	Consistent	Consistent	Consistent
San Diego	Consistent	Consistent	Consistent

Lending test performance in these markets was generally consistent with the performance in the full-scope assessment areas. Both Sacramento and San Diego benefited from investments that cover the assessment areas as well as broader statewide and regional areas that include these assessment areas. Service test performance was generally consistent given resources available at these locations.

STATE OF NEW YORK

CRA Rating for New York

Performance in New York is rated "OUTSTANDING"

The lending test is rated: Outstanding
The investment test is rated: Outstanding
The service test is rated: High Satisfactory

The major factors supporting the institution's rating include:

- Lending levels that reflect excellent responsiveness to assessment area credit needs.
- Excellent geographic and borrower distributions, with high levels of loans made to small businesses.
- Leadership in making community development loans that were particularly responsive to the economic impacts of the Pandemic.
- Leadership in making qualified investments that met the critical need for affordable housing for low- and moderate-income individuals.
- Accessible delivery systems for retail banking services and high levels of community development services.

Scope of Examination

The scope of the examination for New York is generally consistent with the overall scope of the CRA examination. The bank has one assessment area in the state of New York. Although the bank's overall presence and certain types of loan activity in this area are limited, a full-scope review was conducted to determine the overall state rating. The lending test assessment included the origination and purchases of small business, home purchase, home improvement, and home refinance loans, and home equity lines of credit. The bank extended too few multi-family loans in the area to allow for a meaningful analysis. Accordingly, they were considered during the review, but did not influence the overall assessment. Due to limited availability of borrower income information, for reasons previously discussed, home improvement loans and home equity lines of credit were evaluated for geographic distribution only.

Description of Operations in New York

The New York assessment area includes Bronx, Kings, New York, Queens, and Richmond counties. As of 2019, the area was home to 8 million people.¹⁴⁴

¹⁴⁴ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2019; available from: www.census.gov/quickfacts/.

EWB operated seven branches in the area that held \$1.2 billion in deposits, representing 0.07 percent of the deposit market share as of June 30, 2020.¹⁴⁵ By comparison, there were a total of 112 FDIC-insured financial institutions operating 1,647 offices within the assessment area, with deposits totaling over \$1.7 trillion.¹⁴⁶

Exhibit 17 on the following page presents key demographic and business information used to help develop a performance context for the assessment area.

¹⁴⁵ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2020; available from: <https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

¹⁴⁶ Ibid.

EXHIBIT 17 ASSESSMENT AREA DEMOGRAPHICS NEW YORK ASSESSMENT AREA 2019 FFIEC CENSUS AND 2019 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	289	13.3	314,697	16.9	122,964	39.1	569,883	30.6
Moderate-income	570	26.3	529,651	28.4	116,307	22.0	294,677	15.8
Middle-income	642	29.6	500,429	26.8	59,317	11.9	293,704	15.7
Upper-income	600	27.7	518,079	27.8	26,834	5.2	707,013	37.9
Unknown-income	66	3.0	2,421	0.1	299	12.4	0	0.0
Total AA	2,167	100.0	1,865,277	100.0	325,721	17.5	1,865,277	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	509,555	35,899	3.6	7.0	440,067	86.4	33,589	6.6
Moderate-income	908,393	164,089	16.6	18.1	669,881	73.7	74,423	8.2
Middle-income	843,874	321,969	32.5	38.2	454,286	53.8	67,619	8.0
Upper-income	1,151,140	467,436	47.2	40.6	551,755	47.9	131,949	11.5
Unknown-income	9,263	1,957	0.2	21.1	6,196	66.9	1,110	12.0
Total AA	3,422,225	991,350	100.0	29.0	2,122,185	62.0	308,690	9.0
Income Categories	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	29,671	8.1	27,552	8.4	1,949	5.6	170	7.1
Moderate-income	70,851	19.4	66,283	20.2	4,254	12.3	314	13.1
Middle-income	71,575	19.6	67,112	20.4	4,071	11.7	392	16.3
Upper-income	181,930	49.8	158,938	48.4	21,577	62.3	1,415	58.9
Unknown-income	11,309	3.1	8,389	2.6	2,808	8.1	112	4.7
Total AA	365,336	100.0	328,274	100.0	34,659	100.0	2,403	100.0
% of Total Businesses				89.9		9.5		0.7
2020 Adjusted Median Family Income ¹⁴⁷								
Bronx County			\$81,800					
Kings County			\$81,800					
New York County			\$81,800					
Queens County			\$81,800					
Richmond County			\$81,800					

¹⁴⁷ FFIEC Adjusted Median Family Income; available from: <https://www.ffiec.gov/Medianincome.htm>.

Economic Conditions

During the review period, the area entered a late expansion state of the business cycle before the economic downturn in 2020. The economic drivers in the area were finance, tourism, and healthcare.¹⁴⁸ In 2018, the healthcare industry was the most significant driver of the area's recent economic gains, with the expansion of private hospitals.¹⁴⁹ Three out of the top five employers in the area were healthcare systems, and the other two were large dominant financial institutions.¹⁵⁰ As the financial capital of the world, the financial services industry was pivotal to the area economy.¹⁵¹ However, early in the review period the rate of job losses in the industry grew and was impacted further by the Pandemic-induced downturn.¹⁵² Employment in the industry was down by 5.3 percent in October 2020 using a three month average since the prior year.¹⁵³ In the area's tourism industry, the retail and leisure/hospitality sectors were decimated by the Pandemic, both losing jobs at roughly twice the nationwide rate.¹⁵⁴ By one measure, jobs in the leisure and hospitality sectors were down 41.7 percent in October 2020 since the prior year based on a three month average.¹⁵⁵ Cost pressures in the area have resulted in consistent negative net migration from 2015 to 2019.¹⁵⁶ The housing market showed signs of a softening before stagnating during the review period as prices moved either laterally or lower for single-family and condo home prices.¹⁵⁷ Permit issuance dropped for single-family homes from 7,212 in 2017, to 6,989 in 2018, and for multifamily permits from 33,942 to 32,008 in 2018.¹⁵⁸ In 2020 after the onset of the Pandemic, the impact to the housing market was evident in falling condo prices and apartment rents that were down by double digits.¹⁵⁹ Overall, despite the economic gains seen early in the review period from the area's dominant industries, the area faced numerous headwinds as it entered the recovery stage of the business cycle in late 2020.

As depicted in Exhibit 18 on the following page, small business lending showed improvement during the review period. Loans to small businesses from banks subject to the CRA increased during the review period and peaked in 2019, at 269,829 loans made totaling \$7.5 billion. Lending to small businesses played a critical role in the economy given that small businesses accounted for 89.9 percent of all businesses in the assessment area, as noted in Exhibit 17. As described previously, lending to small businesses nationwide increased in the first half of 2020 as a result of the federal PPP.¹⁶⁰ In the assessment area, over 150,000 PPP loans in the amount of less than \$1 million were made and approximately 950,000 jobs were self-reported to benefit from the loans made between April 3, 2020

¹⁴⁸ Moody's Precis Report, New York-Jersey City-White Plains NY-NJ, November 2020.

¹⁴⁹ Moody's Precis Report, New York-Jersey City-White Plains NY-NJ, November 2018.

¹⁵⁰ Ibid.

¹⁵¹ Moody's Precis Report, New York-Jersey City-White Plains NY-NJ, November 2020.

¹⁵² Ibid.

¹⁵³ Ibid.

¹⁵⁴ Ibid.

¹⁵⁵ Ibid.

¹⁵⁶ Ibid.

¹⁵⁷ Moody's Precis Report, New York-Jersey City-White Plains NY-NJ, November 2019.

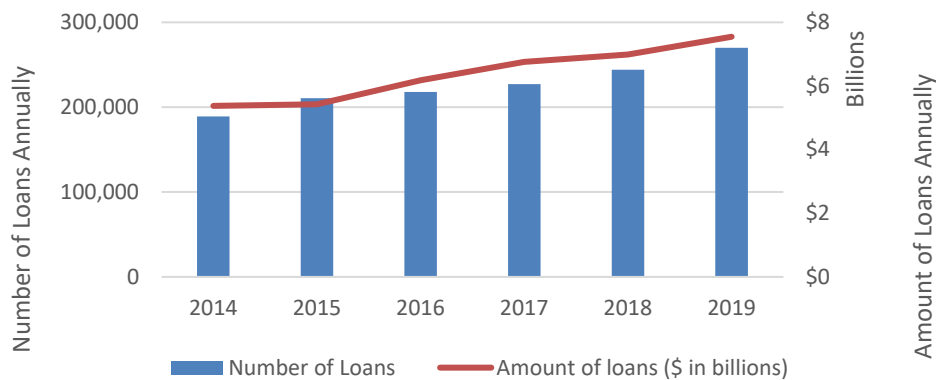
¹⁵⁸ Ibid.

¹⁵⁹ Moody's Precis Report, New York-Jersey City-White Plains NY-NJ, November 2020.

¹⁶⁰ Federal Reserve Bank of San Francisco, Economic Letter, Small Business Lending during Covid-19, November 23, 2020; available from: <https://www.frbsf.org/economic-research/publications/economic-letter/2020/november/small-business-lending-during-covid-19/>.

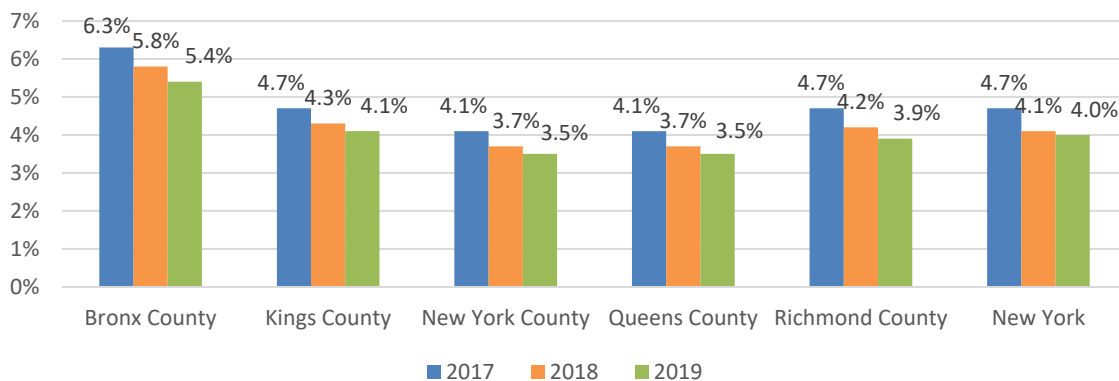
and August 8, 2020.¹⁶¹ According to the borrower firms that elected to report their business’s industry, most loans under \$1 million were made to businesses in the Professional, Scientific, and Technical Services industry, followed by the Retail Trade industry.¹⁶²

Exhibit 18
Loans to Small Businesses in Assessment Area¹⁶³
2014-2019



As depicted in Exhibit 19, the unemployment rates in the area and in the state overall decreased during the review period. Bronx county had the highest unemployment rate in the assessment area and remained well above the statewide rate. Kings and Richmond counties both had unemployment rates in line with the statewide rate. Whereas, New York and Queens counties fared comparatively better during the review period with unemployment rates that fell below the statewide rate.

Exhibit 19
Unemployment Rate¹⁶⁴
2017-2019



¹⁶¹ Small Business Administration, Paycheck Protection Program Loan Data, available from: <https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program>.

¹⁶² Ibid.

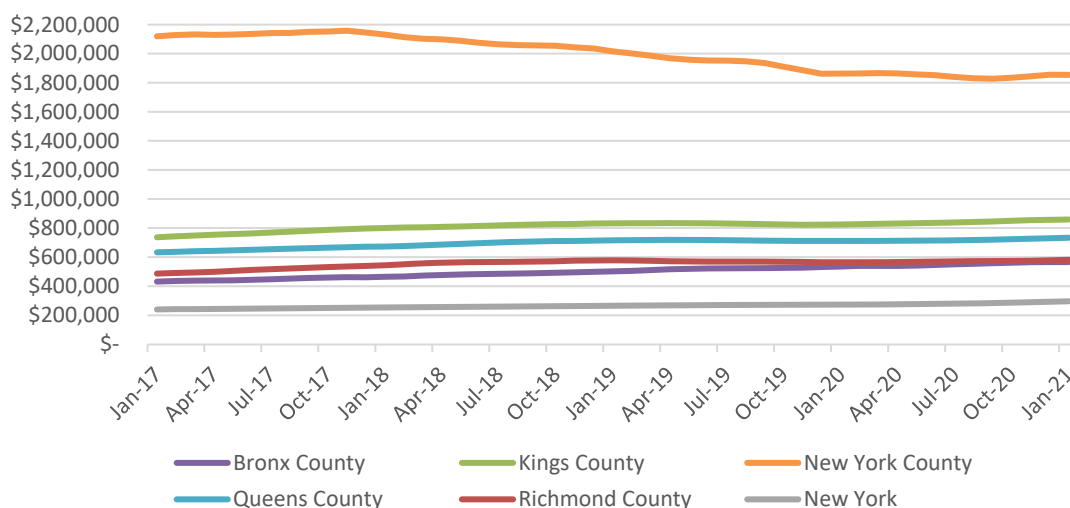
¹⁶³ Aggregate CRA Small Business data reports available from: <https://www.ffiec.gov/craadweb/aggregate.aspx>.

¹⁶⁴ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <https://www.bls.gov/lau/>.

Monthly unemployment rates in the area suggested that the area was significantly impacted by the Pandemic. Unemployment rates increased starting in April 2020 to 16.8 percent in Bronx County, 14.7 percent in Kings County, 11.0 percent in New York County, 16.4 percent in Queens County, and 14.0 percent in Richmond County.¹⁶⁵ For most of the assessment area, rates peaked in June 2020 to 20.5 percent in Kings County, 16.0 percent in New York County, 21.6 percent in Queens County, and 18.1 percent in Richmond County.¹⁶⁶ Unemployment peaked in Bronx County in July 2020 at 25.0 percent.¹⁶⁷ Similar to other assessment areas, unemployment rates fell through the remaining months of 2020 but remained elevated above 10 percent for all counties in the area through October 2020.¹⁶⁸

The trends in median home prices in the area are depicted in Exhibit 20. Housing prices across the assessment area were above the median home price in the state of New York and median prices in New York County were well above the other counties in the area. The median home price in New York County decreased during the review period from \$2.12 million in January 2017, to \$1.85 million in January 2021. In Richmond County, the median home price increased before leveling off in January 2019 and increasing again in March 2020. The median home price in Richmond County as of January 2021, was \$581,428. The median home prices in the remaining counties in the area, Bronx, Kings, and Queens counties, increased during the review period.

Exhibit 20
Median Home Prices¹⁶⁹
January 2017-January 2021



¹⁶⁵ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <https://www.bls.gov/lau/>.

¹⁶⁶ Ibid.

¹⁶⁷ Ibid.

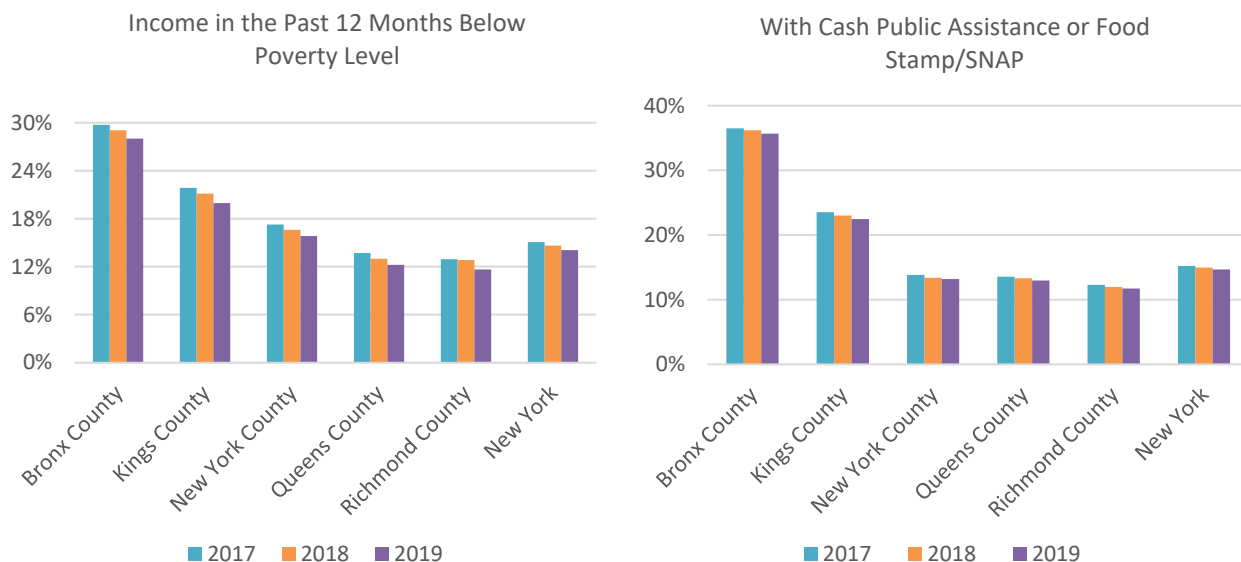
¹⁶⁸ Ibid.

¹⁶⁹ Zillow Research, Zillow Home Value Index, Single-Family Homes Time Series; available from: <https://www.zillow.com/research/data/>.

Rent prices in the area increased during the review period. Median rent for a 1-bedroom unit in 2019 was \$1,167 in Bronx County, \$1,348 in Kings County, \$1,904 in New York County, \$1,447 in Queens County, and \$1,124 in Richmond County.¹⁷⁰

The trends in the poverty rate and share of households receiving public cash assistance or food stamp/SNAP benefits are shown in Exhibit 21. The rate of poverty decreased in all counties in the assessment area during the review period. There were higher percentages of households with income below the poverty level in Bronx, Kings, and New York counties compared to the state overall. Whereas Queens and Richmond counties had lower rates of households living below the poverty level compared to the state of New York’s poverty rate. The rate of households receiving public cash assistance or food stamp/SNAP benefits decreased in the area. Bronx and Kings counties had higher rates of households receiving public cash assistance or food stamp/SNAP benefits than the state overall. In the remaining counties in the area, the rate of households receiving public cash assistance or food stamp/SNAP benefits was lower than the state’s rate. By another measure of poverty, many households were liquid asset poor, or without sufficient liquid assets to subsist at the federal poverty level for three months. The percentage of households that were liquid asset poor was 64 percent in Bronx County, 49 percent in Kings County, 34 percent in New York County, 44 percent in Queens County, and 33 percent in Richmond County.¹⁷¹ All counties in the area had higher levels of households who were liquid asset poor compared to the state’s overall rate of 32 percent.¹⁷²

Exhibit 21
Poverty and Food Stamp Usage Rates¹⁷³
2017-2019



¹⁷⁰ U.S. Census Bureau, Median Gross Rent, 1-Bedroom, American Community Survey, 5-year estimate; available from: <https://www.census.gov/data>.

¹⁷¹ Prosperity Now Scorecard, Bronx, Kings, New York, Queens, Richmond Counties, NY; available from: <https://scorecard.prosperitynow.org>.

¹⁷² Ibid.

¹⁷³ Poverty and Food Stamp Usage Rates, U.S. Census Bureau, American Community Survey, 5-Year Estimates; available from: <https://www.census.gov/programs-surveys/acs/data.html>.

Credit and Community Development Needs

The small business lending trends and needs highlighted in the deployment of PPP loans and in the findings from the Small Business Credit Survey described previously for the other assessment areas, indicate that small business credit needs remain unmet. In addition, a community contact highlighted the specific credit need of working capital by small businesses in the assessment area. In particular, the contact noted that business owners need flexible loan funds during the Pandemic to weather this period where they cannot fully re-open operations. The contact noted that PPP loan funds are limited in addressing the needs of business owners because they cannot help to cover the high cost of commercial rent in the area. The contact indicated that business owners have been unable to receive financing from banks or traditional lenders during the Pandemic and have turned instead to alternative or predatory lenders to access credit that has resulted in business owners accumulating high debt. The community contact noted the need to develop a recovery fund to assist business owners with refinancing high debt. In addition, the community contact indicated there is a need from small business owners for lines of credit from banks.

Furthermore, a review of information collected from community contacts suggest that there is a need in the community for loans to help preserve the existing affordable housing stock. In addition, the review of information indicated a need for loans and grants to help low- and moderate-income individuals acquire and maintain affordable housing.

The prevalence of high rates of poverty in the assessment area described previously, particularly in Bronx and Kings counties, highlight the importance of community service organizations within the bank's communities. Additional community service activities as well as the investment, donation, or lending to nonprofit organizations that serve community residents would be impactful for banks to provide to help address the poverty and credit needs in the assessment area.

Conclusions with Respect to Performance Tests in New York

Lending Test

Lending test performance in New York is outstanding. Lending levels are excellent and the geographic distributions of loans and the level of lending to small businesses was also excellent. EWB is a leader in making community development loans, which were particularly responsive to the economic effects of the Pandemic. Similar to California, lending test performance in New York was enhanced by the partnership established with a non-profit organization that serves very small businesses. Lending and demographic data used to assess EWB's performance under the lending test can be found in Tables 21 through 38.

Lending Activity

EWB extended an excellent number of loans in this assessment area, particularly given the bank's limited presence in the market. Similar to California, lending levels reflected the economic expansion seen throughout the New York assessment area during the review period prior to the downturn caused by the Pandemic. Loan volumes increases were also affected by partnerships with non-profits serving

very small businesses and mortgage programs designed for low- and moderate-income homebuyers. Loan volumes are displayed in Tables 21 and 21A.

Lending Distribution by Geography

Distribution by geography within the New York assessment area is excellent. This assessment is based on high levels of lending in low- and moderate-income census tracts. Loans were made within census tracts of all income categories with strong performance within low- and moderate-income census tracts. Lending patterns generally followed the locations of EWB's branches and business or housing unit concentrations.

Small Business Lending

The geographic distribution of small business loans is excellent. As seen in Table 22, loans were extended in census tracts of all income levels during the review period and the percentage of lending in low- and moderate-income geographies significantly exceeded the percentage of the area businesses and aggregate lending. Similar to lending in California, these distributions were attributable to the bank's partnership with a non-profit organization that serves very small businesses.

Home Mortgage Lending

The geographic distributions of home purchase, home improvement, and home refinance loans and home equity loans are excellent. Performance was particularly strong in low- and moderate-income census tracts where lending levels were above both owner-occupied units and aggregate lending for each of the four loan types. These distributions were driven by loans extended in Kings and Queens counties where home prices are more affordable than in New York County. There were also loans in low- and moderate-income census tracts in Bronx and Richmond counties, but were fewer in number. There were too few home improvement loans in 2016 and 2019 and home refinance loans in 2016 and multifamily loans in all years to draw meaningful conclusions. Relevant loan data is contained in Tables 23 through 30.

Lending Distribution by Borrower Income and Business Revenue

Overall lending distribution by business revenue and borrower income within New York is excellent overall. This conclusion is primarily based on the distribution of small business loans. Lending to small businesses generally exceeded aggregate lending levels and the representation of businesses. Performance with regard to home mortgage loans was adequate, but was based on such small lending volumes over the period that it carried less weight in the overall assessment. Data from Tables 31 through 38 was used in this assessment.

Small Business Lending

The distribution of lending to small businesses is excellent. Lending levels compared favorably during 2016 and 2017 and exceeded the percentage of small businesses. The distribution of loans to businesses of different sizes overall substantially exceeded the performance of aggregate lenders consistently during the review period. Lending to small businesses increased significantly in 2019 primarily due to EWB's partnership with a non-profit that serves very small businesses. In addition, the

percentage of the loans in amounts of \$100,000 continued to increase throughout the review period. Loans in smaller dollar amounts were identified as a credit need in the assessment area. Table 31 includes small business data considered in this assessment.

Home Mortgage Lending

The borrower distribution of home mortgage loans is adequate. Income information was available for only a small percentage of the total home mortgage loans. Of those loans extended in the assessment area, only home purchase loans in 2016, 2018, and 2019 and home mortgage refinance loans in 2018 had sufficient volume to impact the assessment. Lending distributions were particularly good among moderate-income borrowers where the bank's lending exceed the percentage of moderate-income families and aggregate lending. Performance was driven by home purchase loans.

Community Development Lending

EWB is a leader in making community development loans in the New York assessment area given the bank's limited presence and the level of competition in the area. During the assessment period, as seen on Table 21, the bank extended 57 community development loans, totaling \$230.3 million. In addition, five loans totaling \$15.4 million benefited a broader statewide area that includes the assessment area. These loans were responsive to a variety of community credit needs with most of the loans supporting economic development by financing small businesses to help create and retain jobs. Significant portions of the loans also addressed the need to maintain and develop affordable housing for low- and moderate-income individuals and helped stabilize low- and moderate-income census tracts. These loans were particularly impactful in helping to stabilize these areas during the economic disruption caused by the Pandemic. Notable community development loans follow:

- \$1.5 million loan that help stabilize a low-income census tract, by helping a business continue its operation during the Pandemic. The loan is a working capital line to a manufacturer and wholesaler of commercial food service equipment, such as tables, sink, shelves and the more in a low-income tract. Company plans to add more products that allow restaurants to operate while following health precautions, which will also help retain other businesses in the area.
- A \$715,000 loan that supports affordable housing by financing a 6-unit apartment complex located in a moderate- income tract that has four units that are affordable to low- or moderate-income individuals. In addition, one unit currently benefits from Disability Rent Increase Exemption (DRIE). The program is for tenants with a disability who qualify to have their rent frozen at their current level and are exempted from future rent increases.
- A \$300,000 loan to refinance a 6-unit apartment complex located in a moderate- income tract. All six units have rents considered "affordable" based on demographic, economic, and market data for the area where property is located.
- \$48.6 million line of credit that helps stabilize and revitalize a moderate-income census tract. EWB issued the letter in connection with the construction of a mixed-use 315-unit, 24-story tower apartment building with retail spaces on the ground floor. The project is also located in an Opportunity Zone and is consistent with the federal government plan to revitalize this declining area.

- A \$1.7 million loan to finance the ground up development of a 4-story walk up residential condominium building located in a moderate-income tract. The building will attract and retain residents, thereby contributing to stabilization of the area.
- A \$18 million line of credit that supports economic development by financing a small business and retaining employees. The loan is to a distributor and importer of men's fashion undergarments that employs 62 low- and moderate-income individuals.
- A \$1 million PPP loan that supports economic development by financing a small business that employs low- and moderate-income individuals. The loan is to a formal dress manufacturer with 81 employees. This loan helped this small business remain open during the Pandemic.

Investment Test

Performance under the investment test in the New York assessment area is outstanding. EWB is a leader in making qualified investments and grants that were particularly responsive to the need for affordable housing for low- and moderate-income families and individuals. As seen in Table 39, EWB made 86 qualified investment and grants totaling \$58.5 million dollars, comprised of \$42.9 million in new investments and \$15.7 million in investments made during a prior period that remain on the bank's books. Investments were also made that benefited a broader statewide area that includes New York totaling \$19.9 million comprised of \$18.9 million in new investments and \$947,000 in prior period investments. Notable qualified investments include the following:

- A \$2.8 million equity investment to develop 255 units of affordable rental apartments in the Bronx, New York. The investment will help fund the demolition, asbestos removal, and site preparation. The project will provide much needed affordable housing in a very low-income area in the Bronx where nearly 30 percent of the population earns below the poverty line.
- A \$11.8 million investment in a mortgage-backed security backed by a loan that financed 121 units of affordable housing in Kings County, New York. This project will provide affordable housing to low-income individuals as all of the units are income restricted to tenants earning under 50 percent of median income.
- A \$10.4 million investment in an MBS backed by loans secured by two properties for low- and moderate-income individuals. The first property is a 96-unit housing facility in Brooklyn, New York that used HUD Section 8 funds. The second property is an 80-unit senior facility in New York, New York that used HUD Section 202 Supportive Housing for the Elderly funding. Both properties provide needed affordable housing in these high housing cost cities as they are both income-restricted for low- and moderate-income individuals.
- A \$500,000 investment in a loan pool for a CDFI organization dedicated to promoting and advancing homeownership for minority, immigrant, low- and moderate- income, and underserved populations of New York City.

Service Test

The bank's performance under the service test in the New York assessment area is high satisfactory based on the accessibility of delivery systems and the level and responsiveness of community development services provided during the review period.

Retail Banking Services

Retail banking services are readily accessible to the bank's geographies and to individuals of different income levels within the New York assessment area and do not vary in a way that inconveniences any portion of the area. A full array of personal and business banking products and services is offered at all locations in the New York assessment area. Three of the six branches are open seven days a week including Saturday and Sunday. In addition, delivery systems including six ATMs, telephone banking, mobile and online banking, and remote deposit capture are offered to provide customers access to banking services after normal business hours.

As seen on Table 40, EWB currently has all six of its branches in low-and moderate-income census tracts; three in low-income and three in moderate-income census tracts. This results in outstanding access to banking services in low- and moderate-income geographies given that approximately 46 percent of the assessment area population resides in low-and moderate-income geographies. There are two branches each in Kings, New York, and Queens Counties. There were no changes to the bank's branches within the assessment area during the review period

Community Development Services

EWB provided a high level of community development services in the New York assessment area that were responsive to the need for affordable housing, economic development, and financial education for low- and moderate-income individuals. These services also helped to stabilize areas affected by the Pandemic by assisting restaurants in obtaining permits for outdoor dining and instructing small businesses about safety protocols such as social distancing. During the review period, employees provided 61 services totaling over 1,100 hours of community development service. Community development services include providing leadership and financial expertise to organizations benefiting local small businesses and participating in programs aimed at educating underserved immigrant populations on banking products. In addition, for five of the organizations, employees were in leadership capacities as board members.

- EWB provided a total of 67.5 hours of community services by hosting a series of first-time homebuyer webinars to residents. Attendees included low- and moderate-income immigrants and small business owners. The workshop was well-received with total of 217 attendees.
- EWB staff volunteered to teach six classes as part of an entrepreneurship and business management program designed to motivate students to apply their entrepreneurial skills to education, career, and service pursuits. Fifteen EWB employees provided a total of 344 service hours to 394 students from low- and moderate-income families.

- Two EWB employees provided 14 hours of community services to 221 low- and moderate-income individuals by participating in a first-time homebuyer seminar hosted by a local non-profit neighborhood housing service specifically for low- and moderate-income communities. The seminar was a one-day course for first-time homebuyers within the Hispanic and African American communities. Employees presented homeownership education information such as how to budget for a first home, the mortgage process, understanding mortgage terms, down payment assistance programs, and understanding the various types of mortgage products available for first time homebuyers.
- Two EWB employees provided 26 hours of community service as members of the board of directors for a local chamber of commerce of New York that has been actively supporting small business development and Pandemic-related programming in the Flushing, New York area. One employee was a guest speaker in “The Mentoring Learning Lab” webinar, focusing on entrepreneurs’ development for 10 pairs of mentor and mentee program in finance, accounting, technology, advertising, media, and legal services.
- One employee provided 12.5 hours of community service as a board member to a non-profit that serves low- and moderate-income youth, young adults, and seniors in the Flushing area of New York. The employee is also the chairperson of the finance committee providing his financial expertise on fund allocation, budgeting, and overall financial accounting operations of the organization.

STATE OF TEXAS

CRA Rating for Texas

Performance in Texas is rated "OUTSTANDING"

The lending test is rated: Outstanding
The investment test is rated: Outstanding
The service test is rated: High Satisfactory
The major factors supporting the institution's rating include:

- Leadership in making community development loans that are responsive to the critical need for affordable housing as well as support for businesses and organizations affected by the Pandemic.
- Overall excellent geographic and borrower distributions of loans primarily driven by small business loans.
- Excellent levels of community development investments that were responsive to the critical need for affordable housing for low- and moderate-income individuals.
- Accessible retail banking services and relatively high levels of community development services.

Scope of Examination

The scope of the examination for the state of Texas is consistent with the overall scope of the CRA examination. As previously noted, EWB has two assessment areas in Texas – Dallas and Houston. Both assessment areas received full-scope reviews. The Houston assessment area carried the greatest weight in the overall assessment of Texas because of its greater branch presence, larger share of deposits, and higher loan volumes.

All loan types shown on Table 41 were considered as part of the lending test evaluation. However, in some instances lending levels were insufficient to draw meaningful conclusions. While these loans were considered and are presented in the tables in Appendix E, they did not influence the overall assessment. In addition, as stated previously, EWB employs alternative credit standards to meet the needs of its immigrant client base and does not routinely collect borrower income information. As such, the lending test evaluation was based only on the following:

- All loan types were used to evaluate the responsiveness to assessment area credit needs based on the volume of lending within each assessment area.
- Small business, home purchase and home mortgage refinance loans were evaluated for geographic and borrower revenue distributions in Houston and Dallas.

Description of Operations in Texas

As of December 31, 2020, the bank operated 11 of its 104 branches within its assessment areas in the state, as seen on Table 56. In addition, only 2.4 percent of the bank's total deposits were from the Texas assessment areas. Texas is a competitive market for financial services with a strong presence of

national, regional, and non-bank lenders. There were 456 FDIC-insured institutions operating branch offices in Texas with combined deposits totaling \$1.4 trillion as of June 30, 2020.¹⁷⁴ EWB had a small presence in the area with \$964 million total deposits representing 0.07 percent of the deposit market share.¹⁷⁵

The economy in Texas expanded during the review period prior to the economic downturn in 2020.¹⁷⁶ In the years of the review period, job growth exceeded the U.S. average in nearly all industries and the unemployment rate was near a 30-year low at 3.4 percent.¹⁷⁷ The area's economic drivers were energy and natural resources, manufacturing, and logistics.¹⁷⁸ Economic indicators in the energy sector were strong early in the review period before showing some weaknesses in 2019.¹⁷⁹ Since the laws limiting exports of energy products were relaxed in mid-2016, sales across the border quadrupled.¹⁸⁰ However, the forecast for global demand of energy products was lowered in 2019.¹⁸¹ As a result, prices per barrel decreased, and the number of active drill rigs as well as new drill permits both decreased by approximately 14 percent between 2018, and 2019.¹⁸² In the manufacturing and trade sectors, following growth in 2017, and 2018, manufacturing exports started sharply decelerated in 2019.¹⁸³ However, there were upsides for manufacturing seen in other sectors such as military aircraft production and in federal contracts for large corporations such as Lockheed, Bell, and Raytheon.¹⁸⁴ In addition, economic growth was evident in the business services industry. Employment in professional services increased by 3.9 percent in 2018, outpacing the nation.¹⁸⁵ Corporate expansions and relocations were particularly high in the Austin and Dallas metro areas, due to their highly trained labor forces, lower costs of doing business, and well-developed transportation links.¹⁸⁶ Increased military spending during the review period contributed to growth and investment of the military bases in the state, particularly in San Antonio, El Paso, and Killeen.¹⁸⁷

After the economic downturn in 2020, the state started to recover at an above-average pace.¹⁸⁸ Recovery was strong in the Dallas and Austin metro areas where a large number of corporate headquarters and high-tech firms were based and their concentration of professional service jobs allowed large numbers of employees to continue work remotely during the Pandemic.¹⁸⁹ For example, in Austin, payroll employment returned at the end of 2020 to only 1 percent below the pre-crisis level.¹⁹⁰ Overall, Texas continued to rank highly in overall employment growth throughout the review period and

¹⁷⁴ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2020; available from: <https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

¹⁷⁵ Ibid.

¹⁷⁶ Moody's Precis Report, Texas, May 2020.

¹⁷⁷ Moody's Precis Report, Texas, September 2019.

¹⁷⁸ Ibid.

¹⁷⁹ Ibid.

¹⁸⁰ Moody's Precis Report, Texas, May 2018.

¹⁸¹ Moody's Precis Report, Texas, September 2019.

¹⁸² Moody's Precis Report, Texas, September 2019.

¹⁸³ Ibid.

¹⁸⁴ Ibid.

¹⁸⁵ Moody's Precis Report, Texas, May 2018.

¹⁸⁶ Ibid.

¹⁸⁷ Ibid.

¹⁸⁸ Moody's Precis Report, Texas, January 2021.

¹⁸⁹ Ibid.

¹⁹⁰ Ibid.

after the economic slump in 2020 with above-average population growth that supported consumer-driven industries in addition to the diverse economic drivers described above.¹⁹¹

Housing market indicators in the state were mixed during the review period although showed later signs of a strong market.¹⁹² New permits for single-family homes declined in 2019, amid rising costs of construction and the end of reconstruction efforts after Hurricane Harvey.¹⁹³ However, new permits for multifamily housing remained high and were spurred by in-migration, particularly in the Dallas and Austin areas.¹⁹⁴ As of the third quarter of 2020, home sales were up 19 percent year-over-year and price increases statewide approximately matched national average gains.¹⁹⁵

Despite the state's economic expansion described above, credit needs in the area remain evidenced by the higher rates of unemployment after the 2020 economic downturn and the inequitable rates of poverty in the assessment areas described below. In addition to this data, community contacts also noted credit needs in each assessment area including entry-level financial service products with low barriers to serve the unbanked population, affordable mortgage products for first-time homebuyers, and low-cost capital loans and investments to support affordable housing development, as well as small balance loans for small business owners. These credit needs highlighted by community contacts are described in the following analysis for each assessment area.

Conclusions with Respect to Performance Tests in Texas

Conclusions regarding EWB's performance in Texas with respect to the lending, investment, and service tests are essentially driven by the overall conclusions for Houston. As seen on Table 41, over 87 percent of deposits and 64 percent of loan originations occurred within Houston.

In addition to the assessment area specific activity, EWB engaged in community development lending and investment activities within Texas that were in a broader statewide or regional area outside of its designated assessment areas in Texas. As previously mentioned, these activities were considered in the bank's overall performance assessment because the bank adequately engaged in qualified activities addressing the needs within its assessment areas.

With regard to community development lending, over \$43.9 million in community development loans benefited a broader statewide or regional area including one of the Texas assessment areas or were accorded consideration because the bank had adequately met the needs of its assessment areas. Notable community development loans benefitting a broader statewide area in Texas include the following:

- A \$4 million loan to a plastics manufacturer located in a moderate-income tract. The borrower is the successor corporation to an entity that qualified for funding from the New Markets Tax Credit Program (NMTC) based on its Gainesville, Texas location. The NMTC Program incentivizes community development and economic growth through the use of tax credits that attract

¹⁹¹ Moody's Precip Report, Texas, January 2021.

¹⁹² Moody's Precip Report, Texas, September 2019.

¹⁹³ Ibid.

¹⁹⁴ Ibid.

¹⁹⁵ Moody's Precip Report, Texas, January 2021.

private investment to historically low- and moderate-income communities in order to break the cycle of disinvestment in these communities.

- A \$6.4 million loan that provides affordable housing to low- and moderate-income individuals. The loan will finance the purchase of an 86-unit apartment complex located in a moderate-income census tract with rents that are affordable to low- and moderate-income individuals.
- A \$1.7 million PPP loan that helps stabilize a moderate-income census tract by supporting the operations of a small business and preserving 101 local jobs during the Pandemic. The loan is to a company that sells home and garden products such as fertilizers and plants located in a moderate-income census tract.
- A \$2.3 million loan that helps stabilize a moderate-income census tract by refinancing a 14-unit single-story neighborhood shopping center. The shopping center is anchored by a number of retailers that provide services and jobs to local residents.
- A \$2.5 million working capital loan to a wholesale manufacturer and distributor of toys located in a low-income census tract. The business's continued operation provides permanent employment for local low- and moderate-income individuals in positions such as material mover, textile machine operator, and truck driver. These jobs attract and retain residents in this low-income area.
- A \$2.6 million PPP loan that promotes economic development by sustaining a small business operation adversely impacted by the Pandemic and preserving jobs for the local community. The loan is to a food manufacturing company with 381 low- and moderate-income employees.
- A \$1.8 million PPP loan to a retail furniture business with 265 employees. The loan promotes economic development by financing a small business sustain its operations, enabling it to retain jobs, including low- and moderate-income ones.

EWB invested \$37.3 million in qualified investments that benefited a broader statewide or regional area that includes the Texas assessment areas. Of these, \$32.6 million were new investments and \$4.7 million were made during a prior period that remained on the bank's books. These investments were responsive to the needs of affordable housing and economic development. Qualified new investments consisted of investments in an SBIC and a loan pool that supports small businesses, a mortgage-based security backed by loans for affordable housing, and two municipal bonds that provided financing to a school district attended by families from low- and moderate-income families and an income restricted apartment building.

Houston Assessment Area Conclusions

**For each assessment area where a full-scope review was performed using the examination procedures.*

DESCRIPTION OF OPERATIONS IN HOUSTON

The Houston assessment area is comprised of Fort Bend and Harris counties and is part of the Houston-The Woodlands-Sugar Land, Texas, MSA. As of 2019, the area was home to 5.5 million people.¹⁹⁶

EWB operated nine branches in the area which together held \$833 million in total deposits as of June 30, 2020.¹⁹⁷ By comparison, there were a total of 79 FDIC-insured financial institutions operating 1,077 offices in the area, with deposits totaling \$276 billion.¹⁹⁸ EWB ranked 25th in the market, with 0.3 percent of the deposit market share.¹⁹⁹

The exhibit on the following page presents key demographic and business information used to help develop a performance context for the assessment area.

¹⁹⁶ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2019; available from: www.census.gov/quickfacts/.

¹⁹⁷ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2020; available from: <https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

¹⁹⁸ Ibid.

¹⁹⁹ Ibid.

EXHIBIT 22 ASSESSMENT AREA DEMOGRAPHICS HOUSTON ASSESSMENT AREA 2019 FFIEC CENSUS AND 2019 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	149	17.3	152,081	12.7	54,638	35.9	306,843	25.7
Moderate-income	259	30.0	313,182	26.2	61,850	19.7	195,908	16.4
Middle-income	193	22.4	310,448	26.0	30,751	9.9	201,811	16.9
Upper-income	254	29.5	417,423	34.9	15,741	3.8	490,877	41.1
Unknown-income	7	0.8	2,305	0.2	999	43.3	0	0.0
Total AA	862	100.0	1,195,439	100.0	163,979	13.7	1,195,439	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	277,445	62,983	6.4	22.7	171,748	61.9	42,714	15.4
Moderate-income	501,326	223,769	22.7	44.6	225,484	45.0	52,073	10.4
Middle-income	461,416	270,240	27.4	58.6	158,625	34.4	32,551	7.1
Upper-income	630,481	428,126	43.4	67.9	159,182	25.2	43,173	6.8
Unknown-income	6,183	789	0.1	12.8	4,770	77.1	624	10.1
Total AA	1,876,851	985,907	100.0	52.5	719,809	38.4	171,135	9.1
Income Categories	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	31,819	11.6	27,944	11.2	3,695	16.6	180	6.4
Moderate-income	54,916	20.1	49,448	19.9	5,139	23.1	329	11.6
Middle-income	59,967	21.9	55,177	22.2	4,329	19.5	461	16.3
Upper-income	126,545	46.2	115,663	46.5	9,031	40.6	1,851	65.5
Unknown-income	607	0.2	547	0.2	54	0.2	6	0.2
Total AA	273,854	100.0	248,779	100.0	22,248	100.0	2,827	100.0
% of Total Businesses				90.8		8.1		1.0
2020 Adjusted Median Family Income ²⁰⁰								
Fort Bend County			\$80,000					
Harris County			\$80,000					

Economic Conditions

During the review period, the Houston area economy moved out of a risk stage of the business cycle after the destruction of Hurricane Harvey in 2017, and energy market volatility into a period of economic expansion in 2018, and 2019, before the economic downturn brought by the onset of the

²⁰⁰ FFIEC Adjusted Median Family Income; available from: <https://www.ffiec.gov/Medianincome.htm>.

Pandemic in 2020 and subsequent recovery. Energy and manufacturing were the economic drivers which centered the economy, with trade and logistics as well as healthcare rounding out the area's diverse economy. Its location on the Gulf Coast of Texas is a significant strength for the area that allows for trade and export activity.²⁰¹ Trade activity increased during the review period, with exports up by seven percent year-over-year and imports up by nine percent over the same period.²⁰² By 2019, the growth in trade activity resulted in a five percent increase in employment in the distribution sector, triple the rate of the national average.²⁰³ The energy sector was another primary driver of the economy. Early in the review period, the energy sector contracted with a sharp drop in oil prices in late 2018, that resulted in a 20 percent decline in drill rigs active in the area in 2019.²⁰⁴ The reduced outlook for global oil demand contributed to the sector's contraction.²⁰⁵ However, in 2020, oil rebounded to a \$40 per barrel range in July and allowed some producers across the state to restart wells.²⁰⁶ Overall, the economic downturn was most prevalent in the payrolls of manufacturing, construction and mining, which were all down more than their national counterparts on a year-over-year basis in 2020.²⁰⁷

Housing indicators in the area were mixed during the period.²⁰⁸ Early in the period, demand for new housing units increased due to Hurricane Harvey's destruction of thousands of homes.²⁰⁹ By 2018, new permits for single-family units were at their highest point since mid-2007.²¹⁰ Although there was a 10 percent decline in new permits for single-family homes into mid-2019, the number of new permits issued by October 2019, suggested signs of a rebound in the housing sector.²¹¹ However, house prices rose at a lower rate than the nationwide average, in part due to a weakness in hiring in certain cyclical industries, primarily mining and manufacturing.²¹² Furthermore, housing affordability in the area declined by about 25 percent over the previous five years.²¹³ Despite these signals during the review period, the housing market indicators were positive in 2020 with an increase in new permits for single-family as well as home sales.²¹⁴

As depicted in Exhibit 23 on the following page, small business lending showed improvement during the review period. Small business lending increased during the review period and peaked in 2019, with 145,108 loans totaling \$5 billion made in the area. Lending to small businesses played a critical role in the economy given that small businesses accounted for 90.8 percent of all businesses in the assessment area, as noted in Exhibit 22. As noted previously, lending to small businesses increased during the Pandemic with the distribution of PPP loans. In the Houston assessment area, over 87,000 PPP loans in the amount of less than \$1 million were made and approximately 670,000 jobs were self-reported to

²⁰¹ Moody's Precis Report, Houston-The Woodlands-Sugar Land TX, November 2019.

²⁰² Moody's Precis Report, Houston-The Woodlands-Sugar Land TX, May 2018.

²⁰³ Moody's Precis Report, Houston-The Woodlands-Sugar Land TX, November 2019.

²⁰⁴ Ibid.

²⁰⁵ Ibid.

²⁰⁶ Moody's Precis Report, Houston-The Woodlands-Sugar Land TX, November 2020.

²⁰⁷ Ibid.

²⁰⁸ Moody's Precis Report, Houston-The Woodlands-Sugar Land TX, November 2019.

²⁰⁹ Moody's Precis Report, Houston-The Woodlands-Sugar Land TX, May 2018.

²¹⁰ Ibid.

²¹¹ Moody's Precis Report, Houston-The Woodlands-Sugar Land TX, November 2019.

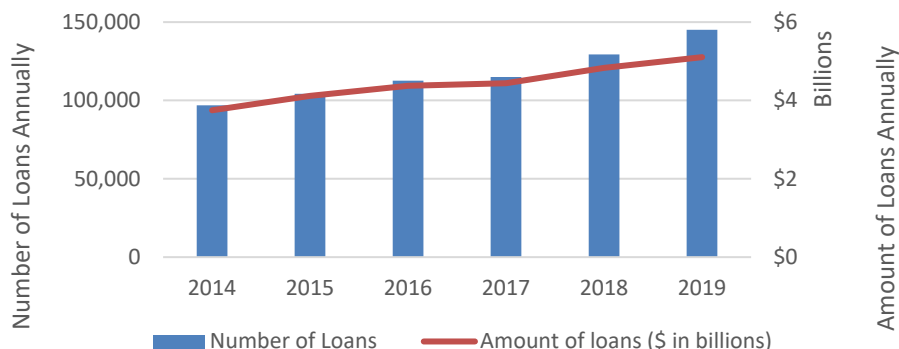
²¹² Moody's Precis Report, Houston-The Woodlands-Sugar Land TX, November 2019.

²¹³ Ibid.

²¹⁴ Moody's Precis Report, Houston-The Woodlands-Sugar Land TX, November 2020.

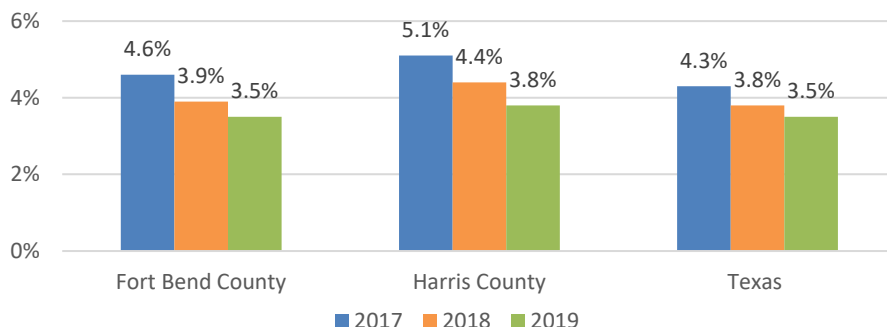
benefit from the loans made between April 3, 2020 and August 8, 2020.²¹⁵ According to the borrower firms that elected to report their industry, most loans under \$1 million were made to businesses in the Professional, Scientific, and Technical Services industry, followed by the Health Care and Social Assistance industry as well the Other Services (except Public Administration) industry.²¹⁶

Exhibit 23
Loans to Small Businesses in Assessment Area²¹⁷
2014-2019



As shown in Exhibit 24, the unemployment rates in the assessment area declined during the review period. Unemployment rates in Harris County were higher than the rates in Fort Bend County and in the state of Texas overall.

Exhibit 24
Unemployment Rate²¹⁸
2017-2019



²¹⁵ Small Business Administration, Paycheck Protection Program Loan Data; Borrower firms self-reported data and had the option to abstain from reporting certain details of the loan application, therefore data may not capture some details of each loan made; available from: <https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program>.

²¹⁶ Ibid.

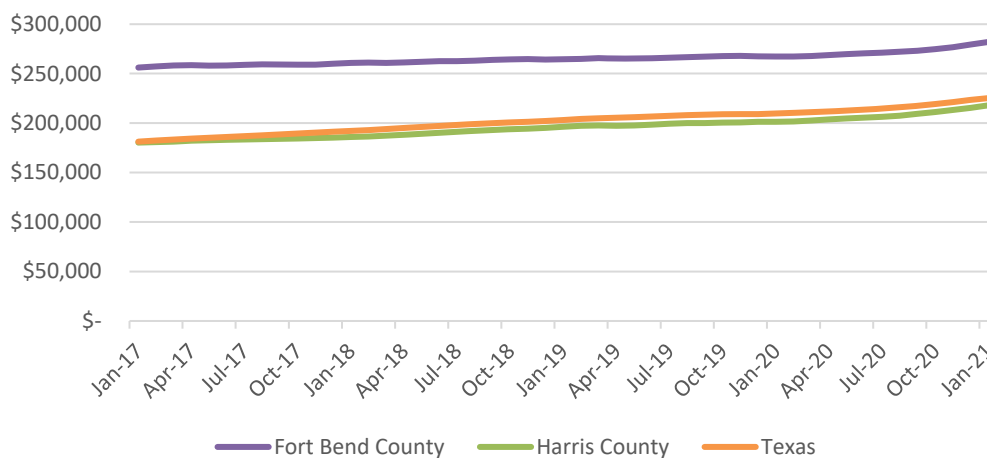
²¹⁷ Aggregate CRA Small Business data reports available from: <https://www.ffiec.gov/craadweb/aggregate.aspx>.

²¹⁸ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <https://www.bls.gov/lau/>.

From the onset of the Pandemic, monthly unemployment rates increased from the lows described above. Unemployment rates spiked in April 2020 to 13.0 percent in Fort Bend County and 14.6 percent in Harris County.²¹⁹ Through the remaining months of 2020, the rates trended downward with some fluctuations in September 2020.²²⁰

Median home prices in the assessment area increased during the review period, as shown in Exhibit 25. The median home price in Fort Bend County was higher than median home prices in Harris County as well as the state overall. However, the median home price in Harris County was closely in-line with the statewide median home price. There were 26 percent of cost burdened households in Fort Bend County and 28 percent in Harris County.²²¹ The area had even higher rates of renters, 45 percent in Fort Bend County and 49 percent in Harris County, that were cost burdened during the review period.²²²

Exhibit 25
Median Home Prices²²³
January 2017-January 2021



As depicted in Exhibit 26 on the following page, the poverty rates in Harris County and statewide in Texas were approximately twice the rate of people living in poverty in Fort Bend County. Similarly, the public assistance or food stamp/SNAP benefit usage rates in Harris County were approximately double the rates in Fort Bend County. In another measure of poverty, the percentage of households who were liquid asset poor was 28 percent in Fort Bend County and 44 percent in Harris County.²²⁴

²¹⁹ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <https://www.bls.gov/lau/>.

²²⁰ Ibid.

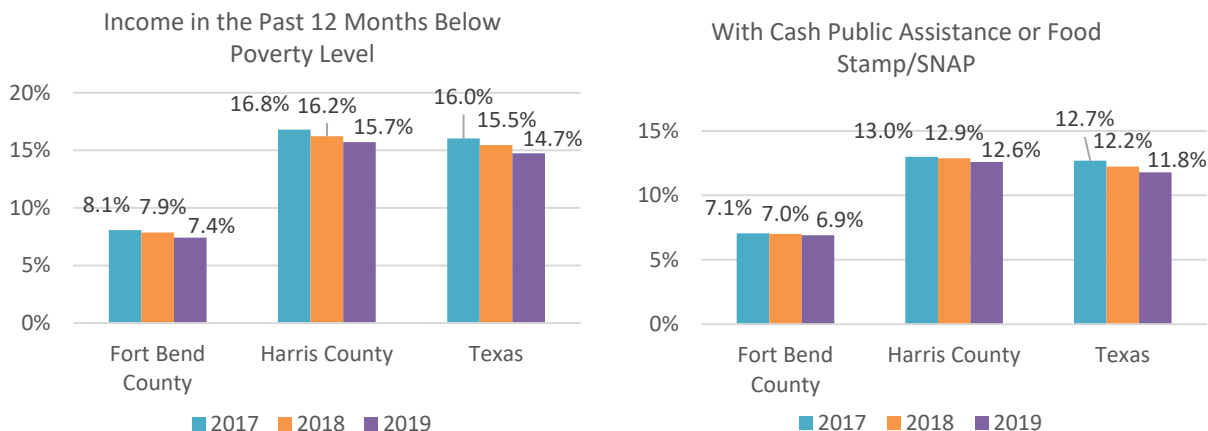
²²¹ Prosperity Now Scorecard, Fort Bend and Harris Counties, TX; available from: <https://scorecard.prosperitynow.org>.

²²² Ibid.

²²³ Zillow Research, Zillow Home Value Index, Single-Family Homes Time Series; available from: <https://www.zillow.com/research/data/>.

²²⁴ Prosperity Now Scorecard, Fort Bend and Harris Counties, TX; available from: <https://scorecard.prosperitynow.org>.

Exhibit 26
Poverty and Food Stamp Usage Rates²²⁵
2017-2019



Credit and Community Development Needs

In addition to the credit needs highlighted in the findings from the Small Business Credit Survey described previously for the other assessment areas, community contacts indicated several community development and housing needs that bank participation could help to address.

According to a community contact, there is a need for financial services that serve the unbanked population in the area who currently rely on check-cashing and pay-day loan companies. The contact noted a banking product that would serve this population that allows for low balances, is zero-fee and has low overdraft fees would be the most impactful in addressing the credit gap for the unbanked population.

A community contact noted that community organizations, particularly nonprofit affordable housing developers, need low-cost capital to support affordable housing development. Nonprofit developers are also in need of construction loans, permanent loans, and equity investments to support their work, according to the community contact.

The same contact noted the need in the area for accessible mortgage products from banks for low- and moderate-income first-time homebuyers. For example, there is a credit need from potential homebuyers for a product with a higher loan-to-value ratio and flexibility in consideration of a credit score below 700. The contact noted that mortgage options such as this would provide greater access to homeownership opportunities for low- and moderate-income first-time homebuyers in the area.

Based on the data presented above as well as the information shared by community contacts, there remains opportunities for banks to provide financial services, investments in affordable housing development organizations, as well as affordable mortgage lending products to help meet the needs in the community.

²²⁵ Poverty and Food Stamp Usage Rates, U.S. Census Bureau, American Community Survey, 5-Year Estimates; available from: <https://www.census.gov/programs-surveys/acs/data.html>.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN HOUSTON

Lending Test

Lending test performance in Houston is excellent overall. This assessment is primarily attributable to the impact of community development loans extended in Houston, overall excellent geographic and borrower distributions. Data used for this analysis is on Tables 41 through 54.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs in Houston considering its relatively limited presence. Performance was assessed based on small business, home purchase, home mortgage refinance, and community development loans. Similar to California and New York, small business lending levels increased significantly due to the bank's partnership with a non-profit organization that supports very small businesses. Levels of multi-family and home improvement lending were insufficient for a meaningful analysis. Data for this performance is on Table 41.

Lending Distribution by Geography

Overall lending distribution by geography within the Houston assessment area is excellent. As seen in Tables 42 through 48, EWB extended loans within census tracts of all income categories. Strong performance was noted in small business lending, particularly in low- and moderate-income areas. The geographic distribution of home purchase loans was notably strong in moderate-income areas, where lending opportunities were more abundant. The distributions of home mortgage refinance loans were adequate and generally comparable to owner occupied units and above aggregate lending. Overall, lending patterns were excellent and generally displayed no unusual or conspicuous lending gaps. Lending distributions largely followed the locations of EWB's branches and business and housing unit concentrations.

Small Business Lending

The geographic distribution of small business lending is excellent. EWB's performance in low-and moderate-income census tracts was particularly strong with lending significantly exceeding the percentage of businesses in the area and the aggregate lending performance. Performance in census tracts of all other income levels compared reasonably to the percentage of businesses and aggregate lending performance. Loans made in 2019 through an partnership with a non-profit significantly enhanced the bank's performance. Table 42 includes data regarding small business lending.

Home Mortgage Lending

The geographic distribution of home purchase loans is good, particularly given the declining housing affordability in the area and low percentage of owner-occupied housing units in low-income census tracts. Lending was distributed within census tracts of all income categories and there were no conspicuous lending gaps. Particularly strong performance was noted within moderate-income census tracts with the level of lending generally exceeding the percentage of owner-occupied units and aggregate lending. Performance in low-income census tracts declined markedly in 2018 and 2019 as the

bank's lending volumes rose. The increased number of loans originated during these two years were made in moderate-income census tracts where lending opportunity was more plentiful compared to low-income census tracts. Lending within all other census tracts was generally comparable to the level of owner-occupied units and aggregate lending performance. Table 43 shows the data used for this analysis.

Home refinance lending distributions are adequate overall, but varied considerably during the review period. Lending volume for this loan type was much lower than home purchase loans and carried less weight in determining the overall lending performance. As seen on Table 44, lending distributions were below owner-occupied units, but generally followed aggregate lending patterns.

Lending Distribution by Borrower Income and Business Revenue

Overall lending distribution by business revenue and borrower income within the Houston assessment area is excellent based primarily on the distribution of small business loans. The distribution of home purchase loans is generally good.

Small Business Lending

The distribution of loans to businesses of different revenue sizes is excellent. As shown on Table 49, the percentage of lending to small businesses consistently and substantially exceeded aggregate lending. Lending was generally below the representation of small businesses until 2019 when lending volumes increased and also exceeded the representation of small businesses. EWB's lending during 2019 shows a surge in lending to small businesses which was driven by EWB's partnership with a non-profit that serves very small businesses. This partnership helped increase lending to small businesses and increased the number of small business loans in smaller dollar amounts, which are identified credit needs.

Home Mortgage Lending

The borrower distribution of home purchase loans and home refinance loans is good. Income information was available for a smaller percentage of the total home mortgage loans extended by the bank. Lending to low- and moderate-income borrowers significantly exceeded the percentage of families and the aggregate, particularly in 2018 and 2019. This performance was driven by the bank's proprietary mortgage program for low- and moderate-income individuals as well as FNMA Home Ready loans. The bank's use of flexible and innovative lending programs enhanced its performance in the Houston area. Tables 50 and 51 show the data used for this analysis.

Community Development Lending

The bank is a leader in making community development loans that exhibit excellent responsiveness to the credit needs within the Houston assessment area. As seen on Table 41, EWB extended 36 community development loans totaling \$142.7 million. Loans were responsive to a variety of community development needs including affordable housing, economic development, community services to low- and moderate-income individuals and loans that helped stabilize low- and moderate-income areas impacted by the Pandemic. During the period, these loans financed 14 units of affordable

housing and created or retained 613 jobs in the assessment area. Notable community development loans in Houston include the following:

- A \$5.7 million loan that helps to stabilize a low-income area by supporting a shopping center. The shopping center retains needed retail services and jobs for low- and moderate-income residents. The shopping center includes an anchor store that is frequented by low- and moderate-income individuals and also includes small businesses.
- A \$5.3 million loan that provides affordable housing to low- and moderate-income individuals. The loan finances the purchase of 67-units of single-family residences that are rental homes in moderate income census tracts. Out of 67 units, 59 are affordable to low- and moderate-income individuals and 21 units are supported by rental assistance by the local housing authority.
- A \$2.2 million PPP loan to a medical laboratory that specialize in blood tests among other services. The Headquarters is located in a moderate-income tract. Borrower is currently offering Covid-19 testing on various locations. The credit not only stabilizes this area through job preservation, but also supports access to health care in this moderate-income census tract.
- A \$2.0 million loan that supports economic development by facilitating a small business to purchase commercial real estate. The loan is to a food manufacturing company that also provides working capital for the borrower to operate a new food processing facility and promote job creation for 50 employees at this new location in a moderate-income census tract.
- A \$504,847 loan to a nonprofit to construct affordable housing for low- and moderate-income seniors. The borrower is a non-profit corporation that is dedicated to enhancing the health, education, and social well-being of low- income and underserved population in the greater Houston metropolitan area through its many health care, training, and community service programs, including the provision of safe and affordable housing for low-income families.
- A \$200,000 loan to a non-profit that provides community services to low- and moderate-income individuals. The organization runs a benefits enrollment center (the first of its kind in Texas), a one-stop shop for helping people sign-up for public benefits such as Medicaid, Gold Card, Supplemental Security Income (SSI), Comprehensive Energy Assistance Program (CEAP), and SNAP.
- A \$42,600 SBA PPP loan to help fund jobs for six employees of a local church that provides a network of social services through its affiliates for low- and moderate-income individuals. Services includes counseling, housing initiatives and family services. A clinic under its diocese for example, provides quality healthcare and education to those with limited access to these services. Thru their non-profit, the organization also provides direct aid to people in need of short-term emergency financial assistance and referrals to services that help break cycles of poverty and promote self-sufficiency.
- A \$39,000 SBA PPP loan to a local church that provides essential community services to low- and moderate-income individuals. The organization, located in a low-income census tract, has a

food pantry that is an agency of the Houston Food Bank. The SBA PPP sustains the operation of this organization so that it can continue providing food to the local residents in need.

Investment Test

Performance under the investment test in the Houston assessment area is excellent. EWB made a high level of qualified investments and grants that were responsive to a variety of community development needs within the assessment area. As seen in Table 55, EWB made \$40.2 million qualified investment and grants, of which \$37.2 million were in new investments and \$3 million were made during a prior period that remained on the bank's books. The bank also made a number of grants and donations to a variety of non-profit organizations serving the needs of low- and moderate-income individuals in Houston. Notable investments include the following:

- A \$2.4 million investment in an MBS secured by two properties that provide 144 units of affordable housing to low- and moderate-income individuals in the city of Houston. Each of the housing units will be restricted to tenants earning less than 80 percent of the area median income.
- A \$7.2 million investment in an MBS secured by a loan to finance affordable housing for low- and moderate-income individuals in Harris County. The property has 135 total units, all of which are income-restricted to tenants earning less than 50 percent of area median income.
- A \$7.4 million investment in an MBS secured by a loan that financed 248 units of affordable housing in Houston. The property is located in a low-income census tract where over 20 percent of the population earn less than the poverty line and the tract median income is less than half of the area median income. This property will provide much needed affordable housing to low- and moderate-income individuals as all of the housing units are income restricted to tenants earning less than 80 percent of area median income.
- A \$6 million investment in a municipal bond for a school district attended by students from low- and moderate-income families. Funds will be used for the construction, acquisition, and equipment of school buildings in the district, including facility renovations and improvements and district-wide technology upgrades, the purchase of necessary sites for school buildings, and the purchase of new school buses. Of the students in this school district, 69.2 percent qualify for free or reduced lunch.

Service Test

EWB's performance under the service test in the Houston assessment area is good based the accessibility of delivery systems and the level of community development services provided.

Retail Banking Services

EWB's banking services are accessible and do not vary in a way that inconveniences portions of the area. A full array of personal and business banking products and services is offered at all locations in the Houston assessment area. In addition, delivery systems including eight ATMs, telephone banking,

mobile and online banking, and remote deposit capture are offered to provide customers access to banking services after normal business hours.

As seen in Table 56, branches are accessible to geographies and individuals of different incomes with the percentage of branches in low- and moderate-income areas comparing favorably to the percentage of the population in those areas. There were no changes to the bank's branches within the assessment area during the review period.

Community Development Services

EWB provided a relatively high level of services in the Houston assessment area that were responsive to community development needs. Employees engaged in 99 services and provided over 1,100 service hours. These qualified services met a variety of community development needs, with the majority addressing the need for personal financial education for low- and moderate-income students and families and SBA lending product presentations to small businesses. Significant time was also devoted to providing free income-tax preparation assistance to low- and moderate-income individuals and families. The following are notable examples of community development services:

- An EWB employee provided over 240 hours during the review period as a volunteer at a non-profit tax center to offer free tax preparation to low-income families and individuals. The tax center is a year-round free tax preparation service that serves families and individuals earning up to \$58,000.
- Three EWB employees provided over 25 hours of community service during an event in the greater Houston area to provide local business owners and entrepreneurs the tools, skills and knowledge needed to grow their business. The forum featured a wide range of instructive seminars and expert speakers offering vital information on both public and private resources. EWB sponsored a table at this event to provide one-on-one financial consulting with the attendees. The event has estimated about 400 guests. The attendees are mostly women from small local business in the Greater Houston area.
- Two EWB employees provided over 31 hours of community service during five events attended by 105 low- and moderate-income individuals. The employees participated in an online class for the students at a non-profit organization that provides education, information, and direct assistance to immigrant and refugee families on health and legal issues prevalent in the immigrant communities. EWB employees spoke to the participants about credit card fraud and cyber security and advised them to take advantage of the free credit report available annually.
- Two EWB employees provided over 26 hours of community services hours to 82 low- and moderate-income attendees of a homebuyer education program. Bank employees were guest speakers at four events for a non-profit organization that is a HUD approved agency for homebuyers who must complete at least eight hours of homebuyer education to receive down payment assistance. EWB employees provided a presentation focused on the mortgage loan approval process.

Dallas Assessment Area Conclusions

DESCRIPTION OF OPERATIONS IN DALLAS

The Dallas assessment area consists of Collin and Dallas counties and is part of the Dallas-Fort Worth-Arlington, Texas, MSA. As of 2019, the area was home to 3.7 million people.²²⁶

EWB operated three branches in the area that held \$131 million in deposits, representing 0.04 percent of the deposit market share as of June 30, 2020.²²⁷ By comparison, there were a total of 126 FDIC-insured financial institutions operating 858 offices with deposits totaling over \$300 billion.²²⁸

Exhibit 27 on the following page presents key demographic and business information used to help develop a performance context for the assessment area.

²²⁶ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2019; available from: www.census.gov/quickfacts/.

²²⁷ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2020; available from: <https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

²²⁸ Ibid.

EXHIBIT 27 ASSESSMENT AREA DEMOGRAPHICS DALLAS ASSESSMENT AREA 2019 FFIEC CENSUS AND 2019 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	109	16.0	102,623	12.8	34,438	33.6	210,531	26.2
Moderate-income	201	29.5	226,536	28.2	43,094	19.0	136,995	17.1
Middle-income	138	20.3	177,568	22.1	15,305	8.6	137,459	17.1
Upper-income	227	33.3	295,051	36.7	11,543	3.9	318,281	39.6
Unknown-income	6	0.9	1,488	0.2	273	18.3	0	0.0
Total AA	681	100.0	803,266	100.0	104,653	13.0	803,266	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	192,788	45,555	7.0	23.6	121,840	63.2	25,393	13.2
Moderate-income	358,531	163,030	24.9	45.5	166,827	46.5	28,674	8.0
Middle-income	283,673	149,926	22.9	52.9	115,404	40.7	18,343	6.5
Upper-income	445,240	295,035	45.1	66.3	125,108	28.1	25,097	5.6
Unknown-income	4,910	1,248	0.2	25.4	3,133	63.8	529	10.8
Total AA	1,285,142	654,794	100.0	51.0	532,312	41.4	98,036	7.6
Income Categories	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	18,855	8.9	16,677	8.7	2,065	12.4	113	4.7
Moderate-income	46,066	21.8	41,546	21.6	4,193	25.3	327	13.6
Middle-income	49,092	23.2	44,571	23.1	4,036	24.3	485	20.2
Upper-income	95,513	45.1	88,309	45.9	5,758	34.7	1,446	60.2
Unknown-income	2,020	1.0	1,451	0.8	537	3.2	32	1.3
Total AA	211,546	100.0	192,554	100.0	16,589	100.0	2,403	100.0
% of Total Businesses				91.0		7.8		1.1
2020 Adjusted Median Family Income ²²⁹								
Collin County			\$86,200					
Dallas County			\$86,200					

Economic Conditions

The Dallas area economy expanded during the review period prior to the economic downturn in 2020. The primary economic drivers in the area were logistics, technology, and finance.²³⁰ Overall, the area

²²⁹ FFIEC Adjusted Median Family Income; available from: <https://www.ffiec.gov/Medianincome.htm>.

²³⁰ Moody's Precip Report, Dallas-Plano-Irving TX, November 2020.

experienced a proportionally smaller downturn and a stronger rebound than the U.S. as a whole in 2020, and the area's economic contraction was concentrated in the hospitality sector.²³¹ Prior to the Pandemic, the assessment area and the neighboring Fort Worth region combined, led the nation in job growth in 2019, for the third consecutive year and had more net new jobs than most other top areas.²³² Dallas remained a magnet for corporate expansions and relocations during the period, primarily due to the highly trained labor force and lower cost of doing business relative to other metro areas in the nation.²³³ Uber and Charles Schwab were two of the major companies relocating and expanding their operations in the area because of its central location, business-friendly environment, well-educated labor force, and lower costs of living and doing business.²³⁴

In the housing market, indicators were mixed. Early in the review period, buoyant homebuilding contributed to overall growth in the economy.²³⁵ By one measure, the rate of total new-housing building permits exceeded the pre-Great Recession peak and was among the highest rates in the country.²³⁶ As a result of the increased construction, employment in the construction industry rose 9 percent from 2017 to 2018.²³⁷ In 2019, increased inventory built in recent years and diminished affordability contributed to a deceleration in house price growth.²³⁸ In addition, the decrease in single-family permits of 10 percent year of year as of June 2019 indicated a weaker market.²³⁹ Late in the review period, housing construction increased late in 2020 for single-family housing, but residential permits were down for multifamily housing.²⁴⁰

As depicted in Exhibit 28 on the following page, small business lending increased during the review period. Small business lending from banks subject to the CRA peaked in 2019, to 98,574 loans totaling \$3.7 billion. Lending to small businesses played a critical role in the economy given that small businesses accounted for 91 percent of all businesses in the assessment area, as noted in Exhibit 27. Regarding the PPP lending in the area, over 60,000 PPP loans in the amount of less than \$1 million were made and approximately 400,000 jobs were self-reported to benefit from the loans made between April 3, 2020 and August 8, 2020.²⁴¹ Similar to previous assessment areas discussed, most loans under \$1 million were made to businesses in the Professional, Scientific, and Technical Services and the Health Care and Social Assistance industries.²⁴²

²³¹ Moody's Precis Report, Dallas-Plano-Irving TX, November 2020.

²³² Dallas Business Journal, Fortune 500 corporate relocations to DFW still 'active' despite Pandemic, April 27, 2020; available from: <https://www.bizjournals.com/dallas/news/2020/04/27/corporate-relocation.html>.

²³³ Moody's Precis Report, Texas, May 2018.

²³⁴ Moody's Precis Report, Dallas-Plano-Irving TX, November 2020.

²³⁵ Moody's Precis Report, Dallas-Plano-Irving TX, November 2018.

²³⁶ Ibid.

²³⁷ Ibid.

²³⁸ Moody's Precis Report, Dallas-Plano-Irving TX, November 2019.

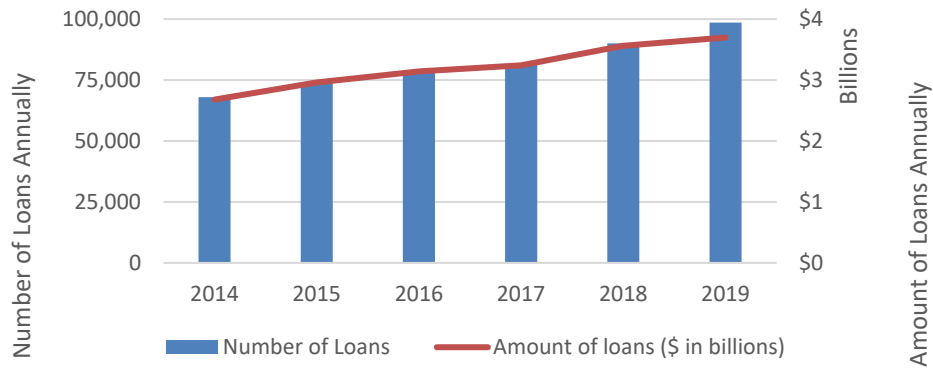
²³⁹ Ibid.

²⁴⁰ Moody's Precis Report, Dallas-Plano-Irving TX, November 2020.

²⁴¹ Small Business Administration, Paycheck Protection Program Loan Data; *Borrower firms self-reported data and had the option to abstain from reporting certain details of the loan application, therefore data may not capture some details of each loan made*; available from: <https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program>.

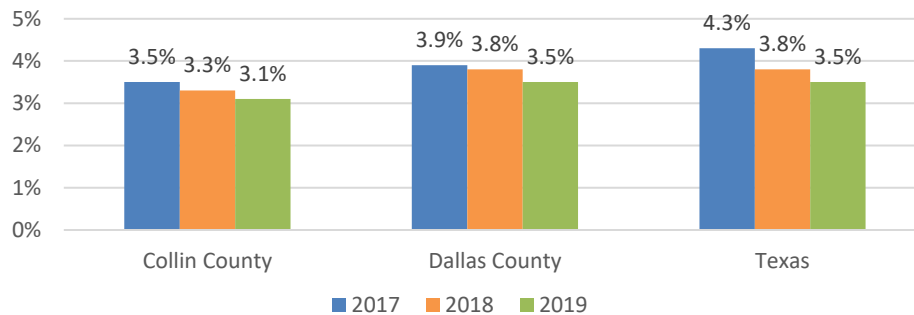
²⁴² Ibid.

Exhibit 28
Loans to Small Businesses in Assessment Area²⁴³
2014-2019



As shown in Exhibit 29, the unemployment rates in the area slightly decreased during the review period. The unemployment rate in Collin County was lower than the rates in Dallas County and in the state overall. In 2018, and 2019, Dallas County had the same rate of unemployment as the state of Texas.

Exhibit 29
Unemployment Rate²⁴⁴
2017-2019



The rise in monthly unemployment rates indicated the impact of the Pandemic on the area economy compared to the low rates described above. Unemployment rates spiked in April 2020 to 12.1 percent in Collin County and 13.0 percent in Dallas County.²⁴⁵ Similar to the Houston assessment area described previously, unemployment rates in the area trended downward with some fluctuations in September 2020.²⁴⁶

Median home prices in the assessment area increased during the review period, as shown in Exhibit 30 on the following page. The median home price in Collin County was higher than median home prices in

²⁴³ Aggregate CRA Small Business data reports; available from: <https://www.ffiec.gov/craadweb/aggregate.aspx>.

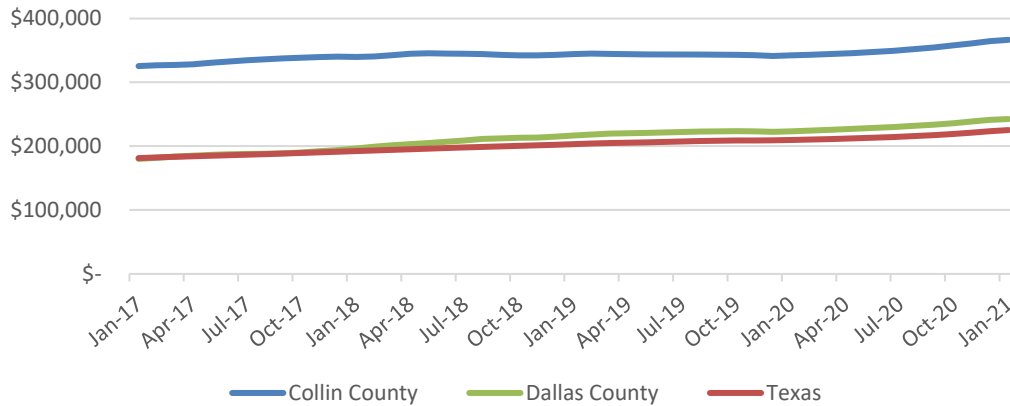
²⁴⁴ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <https://www.bls.gov/lau/>.

²⁴⁵ Ibid.

²⁴⁶ Ibid.

Dallas County as well as the state overall. However, the median home price in Dallas County was closely in-line with the statewide median home price.

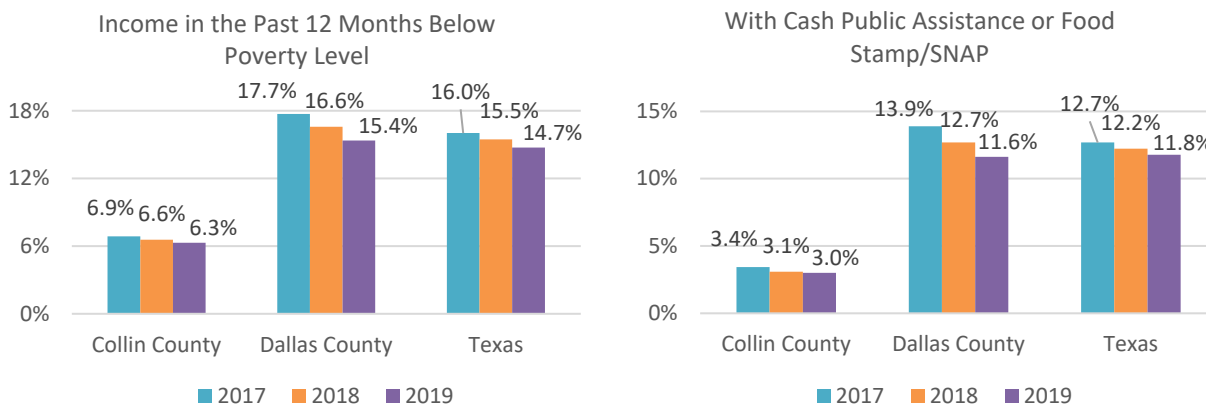
Exhibit 30
Median Home Prices²⁴⁷
January 2017-January 2021



Like the Houston assessment area, the Dallas assessment area had poverty rates and public assistance or food stamp/SNAP benefit usage rates that differed between the two counties in the assessment area, as depicted in Exhibit 31 on the following page. Dallas County and the state overall had poverty and public assistance or food stamp/SNAP benefit usage rates that were significantly higher than Collin County. The poverty rate in Collin County fell to 6.3 percent in 2019, and the public assistance or food stamp/SNAP benefit usage rate fell to a low 3 percent. Comparatively, the poverty rate in Dallas County in 2019, was more than 15 percent and the usage rate of public assistance or food stamp/SNAP benefits was more than 11 percent. Overall, the poverty and public assistance or food stamp/SNAP benefit usage rates decreased in the assessment area and in the state overall during the review period.

²⁴⁷ Zillow Research, Zillow Home Value Index, Single-Family Homes Time Series; available from: <https://www.zillow.com/research/data/>.

Exhibit 31
Poverty and Food Stamp Usage Rates²⁴⁸
2017-2019



Credit and Community Development Needs

In addition to the credit needs highlighted in the findings from the Small Business Credit Survey described previously for the other assessment areas, a community contact also noted several credit needs for small businesses. The contact indicated that it is more difficult for small business owners to obtain loans in smaller amounts from banks and that it is usually easier for a business owner to receive a larger-sized loan from a bank because the loan is either secured by real estate or 100 percent cash. Furthermore, the contact stated that banks will not entertain credit requests from small business owners between \$10,000 and \$20,000. Overall, the largest credit gap for business owners was for a loan in the amount of \$250,000 or less, according to the community contact. In addition to the need for smaller-dollar loans for small businesses, there is a need for more flexible credit standards from banks, such as consideration of alternative collateral or lower FICO scores. The smaller-dollar credit needs the contact shared were similar to the credit gaps highlighted in the findings from the Small Business Credit Survey.

A community contact also shared of the opportunities there are for banks to support nonprofit organizations and affordable housing developers. A contact with a local housing organization noted its need for a line-of-credit in an amount between \$200,00 and \$250,000, which would be particularly helpful for the organization to access rather than drawing from its operating funds. In addition, the contact noted that while banks are willing to offer construction loans for affordable housing development, banks are hesitant to offer pre-development loans for the development of affordable housing and have left a credit gap for this type of financing.

To help support affordable homeownership for households with low incomes, the community contact noted the importance of down payment assistance programs, such as the Federal Home Loan Banks' homeownership grant programs. Overall, the contact highlighted the need for diverse credit products described above for small businesses, homebuyers, and community organization is needed in the community.

²⁴⁸ Poverty and Food Stamp Usage Rates, U.S. Census Bureau, American Community Survey, 5-Year Estimates; available from: <https://www.census.gov/programs-surveys/acs/data.html>.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DALLAS

Lending Test

EWB's lending test performance in Dallas is good and is primarily attributable to the impact of community development loans extended in this assessment area, as well as borrower lending distributions and a good level of lending within the assessment area. Geographic distribution of loans was adequate. Lending and demographic data used to assess EWB's performance under the lending test are shown in Tables 42 through 48.

Lending Activity

EWB reported a good number of loans in this assessment area considering its limited presence in the Dallas market. Performance was assessed based on small business, home purchase, and home refinance loans. The volumes of multi-family lending were insufficient for a meaningful analysis. Please refer to Table 41 for additional details on lending activity.

Lending Distribution by Geography

Overall lending distributions in Dallas are adequate. As seen on Tables 42 through 48, EWB generally extended loans within census tracts of each income category. Strong performance was noted in small business lending, particularly in low- and moderate-income areas. Distributions of home mortgage loans were poor overall driven by distributions of home purchase loans.

Small Business Lending

The geographic distribution of small business loans is excellent. As seen on Table 42, lending distributions within low- and moderate-income census tracts significantly exceeded business entities and aggregate lending. Performance is based on loans made in 2017, 2018, and 2019; there were insufficient loans in 2016 to draw meaningful conclusions as this time period covered only six months.

Home Mortgage Lending

Overall, the geographic distribution of home mortgage loans is poor driven by home purchase loan distributions, which are poor. Home purchase loan lending levels in low- and moderate-income areas were below both owner-occupied housing units and aggregate lending. There were sufficient home mortgage refinance loans only in 2016 where lending levels were above both owner-occupied housing units and aggregate lending. Home refinance lending levels in low-income census tracts were below the percentage of owner-occupied units, but above aggregate lending. The bank did make targeted purchases of loans in 2016, but purchased loans declined considerably in 2017 and EWB did not purchase any loans in 2018 or 2019, which may account for the overall decline in performance.

Lending Distribution by Borrower Income and Business Revenue

Overall lending distributions by borrower income and business revenue in Dallas are excellent. As seen on Tables 49 through 54, lending levels to small businesses and low- and moderate-income borrowers were above aggregate lenders and generally comparable to demographic comparators.

Small Business Lending

Lending distributions by businesses of different sizes is excellent overall. As seen on Table 49, the percentage of lending to small businesses was below the representation of small businesses, but was significantly above aggregate lending distributions. There were also notable amounts of smaller dollar loans throughout the review period, which were identified as a credit need among smaller businesses. This performance is driven by the success of EWB micro lending products in Dallas County.

Home Mortgage Lending

Overall lending distributions of home mortgage loans is excellent. Income data was available only for a small percentage of loans and there was sufficient numbers of loans only for 2016. Lending distributions of home purchase loans is excellent with lending levels to moderate-income borrowers significantly above the percentage of families and aggregate lending. Lending levels to low-income borrowers was below the level of low-income families, but significantly above aggregate lenders. Lending distributions of home refinance loans is also excellent. Although lending levels to low-income borrowers was significantly below the percentage of families and aggregate lenders, the high percentage of loans to moderate-income borrowers compensated for the lower level of lending to low-income borrowers. Lending levels to moderate-income borrowers was significantly above the representation of moderate-income families and aggregate lending.

Community Development Lending

EWB is a leader in making community development loans in the Dallas assessment area. Seventeen loans, totaling \$210.7 million, were extended during the review period. These loans were responsive to a variety of community development needs including affordable housing and economic development. These loans also helped stabilize low- and moderate-income areas, and support non-profits that serve low- and moderate-income individuals. EWB's responsiveness was particularly noteworthy during the Pandemic. Notable community development loans include the following:

- A \$30 million credit facility to a company established to provide low- income households the ability to live in prosperous communities throughout the Dallas Fort Worth metroplex utilizing the HUD Small Area Fair Market Rents ("SAFMR") program. The line of credit will be used for the acquisition of single-family residences which will be leased to HUD Small Area Market Rents (SAFMR) voucher holders thus, providing tenants the opportunity to move into neighborhoods that are safer and offer higher quality public education. The program has an expressed intent to help low-income families access higher-opportunity neighborhoods that can deliver significant benefits for those families and their children.
- A \$45 million line of credit to a SBIC, which will make subordinated debt and private equity investments in growth-oriented small and lower middle market businesses in the South and

Middle regions of the U.S. This loan support economic development by financing small businesses.

- A \$20 million credit enhancement for a 336-unit affordable housing project located in a moderate-income tract. All units are restricted to tenants earning no more than 60 percent of area median income.
- A \$6.9 million loan that stabilizes a moderate-income census tract by preserving jobs and retail and other services in the local community. The loan finances a shopping center anchored by the borrower's supermarket business. The subject currently has 32 occupants, including the anchored supermarket, with various small businesses (i.e., restaurants, skin care, insurance, and hair salon).
- A \$1.6 million SBA PPP loan that helps stabilize and promote economic development in a moderate-income census tract. The loan is to a manufacturer and wholesaler of dog food and treats with 166 employees. The credit facility promotes economic development by sustaining the operations of a small business that supports job opportunities for low- and moderate-income individuals.
- A \$1.4 million SBA PPP loan to a leading manufacturer and distributor of health care products and health food products and energy drinks. The business is located in a moderate-income tract stabilized by this credit facility. The loan will help the company preserve jobs and support the operations of the company at this location.
- An \$806,000 loan to purchase a 12-unit apartment located in a low-income census tract that will provide affordable housing to low- and moderate-income individuals.
- A \$37,100 SAB PPP to a non-profit that provides essential community services to low- and moderate-income individuals. Programs include early childhood care, after-school programs, and high school academic enrichment programs. The organization also has a weekly food distribution program as well as other programs designed to help address generational poverty in an area where 98 percent of the population is economically disadvantaged and where a portion is considered to be in a food desert.

Investment Test

Performance under the investment test in the Dallas assessment area is excellent. EWB made a high level of qualified investments and grants that were responsive to the need for affordable housing within the assessment area. As seen in Table 55, EWB made \$61.5 million qualified investments and grants, of which \$53.3 million were in new investments and \$8.2 million were made during a prior period that remained on the bank's books. The bank also made a number of grants and donations to a variety of non-profit organizations serving the needs of low- and moderate-income individuals in Dallas. Notable investments include the following:

- A \$13.4 million investment for affordable housing targeted to low- and moderate-income individuals. The investment is in an MBS to finance a multi-family property located in Dallas

County. The property has 126 total units, 119 of which are income-restricted for low-income tenants.

- A \$12.5 million investment in a municipal bond for a school district in Collin County, Texas for which the majority of students are from low- and moderate-income families. The bond was issued for the purpose of acquiring, constructing and equipping of school buildings in the district and the purchase of school sites.
- A \$9.5 million investment in an MBS backed by a loan secured by a property in Dallas, Texas that provides 196 units of housing, 147 of which are income restricted to low- and moderate-income individuals.
- A \$5 million investment in an MBS backed by loans secured by two properties in Dallas County that provide affordable housing for low- and moderate-income families. One of the properties is in Duncanville, Texas and provides 80 housing units, 79 of which are income restricted. The other property is in Dallas, Texas and provides 76 housing units, all of which are income restricted.
- A \$1.9 million investment in an MBS backed by loans secured by two properties in Dallas County. One property is in the city of Irving and provides 38 units of housing. The other property is in Dallas and provides 48 units of housing. Each of the housing units is income-restricted to low- and moderate-income individuals.

Service Test

EWB's performance under the service test in the Dallas assessment area is low satisfactory based the accessibility of delivery systems and the level of community development services provided.

Retail Banking Services

EWB's banking services in Dallas are reasonably accessible and do not vary in a way that inconveniences portions of the assessment area. A full array of personal and business banking products and services – including those previously discussed – is offered at each branch location in the Dallas assessment area. Each branch offers extended hours on Friday and open on Saturday. In addition, delivery systems including three ATMs, telephone banking, mobile and online banking, and remote deposit capture are offered to provide customers access to banking services after normal business hours.

As seen in Table 56, one branch is located in a moderate-income census tract, one in a middle-income, and one in an upper-income census tract. Considering the bank's limited presence of only three branches, banking services are reasonably accessible to the bank's geographies and individuals of different income levels within the assessment area. There were no changes to the bank's branches within the assessment area during the review period.

Community Development Services

EWB provided an adequate level of community development services in the Dallas assessment area. Employees provided a total of 18 qualified services and 411 hours of community development services.

These services comprised of attendance and presentations at various small business conferences in the area, including presentations at various venues on SBA products and how to obtain financing.

- EWB employees participated in multiple events organized by a non-profit organization that provides financial education to Title 1 schools where at least 40 percent of the students are from low- and moderate-income families. Bank employees participated in nine events providing 340 hours of community services to over 1,000 students from low- and moderate-income families.
- Four employees provided 16 hours of community development services at a homebuyer fair attended by about 400 individuals from a low- income area. EWB hosted a booth at the fair where staff members provided advice and details on the bank's proprietary down payment assistance and affordable mortgage programs to the community. The event featured informational workshops and conversations related to home ownership, down payment assistant programs, home buyer education, mortgage lending, financial education and maintaining home ownership.
- Three EWB employees provided 5.5 hours of community development services at an SBA loan seminar, explaining different business financing options to 17 local small business owners. The attendees learned about the benefits of SBA financing and the importance of maintaining a good credit score.
- An EWB employee provided nine hours of community development service at a financial literacy event attended by 150 students from low- and moderate-income families. The employee spoke about budgeting, the difference between debits and credits, debt ratios, and other aspects of finance.

STATE OF WASHINGTON

CRA Rating for Washington

Performance in Washington is rated “SATISFACTORY”

The lending test is rated: High Satisfactory
The investment test is rated: High Satisfactory
The service test is rated: High Satisfactory

The major factors supporting the institution’s rating include:

- Lending levels that reflect good responsiveness to assessment area credit needs.
- Generally good geographic distributions of loans driven by small business lending.
- Adequate borrower distributions by different incomes and revenue sizes.
- Relatively high levels of community development lending that exhibited good responsiveness to the need for affordable housing and economic development.
- Significant levels of qualified investments and grants that were responsive to a variety of community development needs.
- Reasonably accessible delivery systems for retail services including low- and moderate-income individuals and communities.
- Relatively high levels of community development services related to financial education for low- and moderate-income individuals and small businesses.

Scope of Examination

The scope of the examination for Washington is generally consistent with the overall scope of the CRA examination. The bank has one assessment area in the state of Washington. Although the bank’s overall presence and certain types of loan activity in this area are limited, a full-scope review was conducted to determine the overall state rating. The lending test assessment was limited to the origination of small business, home purchase and home mortgage refinance loans, and home equity lines of credit. The bank extended too few home improvement and multi-family loans in the area to allow for a meaningful analysis. Accordingly, these loans were considered during the review, but did not influence the overall assessment. Home purchase and home mortgage refinance loans and home equity lines of credit were evaluated for geographic distribution only, due to limited availability of borrower income information discussed previously.

Description of Operations in Washington

The Washington assessment area consists of King County and is part of the Seattle-Tacoma-Bellevue, Washington MSA. As of 2019, the area was home to 2.3 million people.²⁴⁹

EWB operated four branches in the area that held \$1.5 billion in deposits, representing 1.4 percent of the deposit market share as of June 30, 2020.²⁵⁰ By comparison, there were a total of 44 FDIC-insured financial institutions operating 518 offices with deposits totaling \$105.3 billion.²⁵¹

The exhibit on the following page presents key demographic and business information used to help develop a performance context for the assessment area.

²⁴⁹ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2019; available from: www.census.gov/quickfacts/.

²⁵⁰ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2020; available from: <https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

²⁵¹ Ibid.

EXHIBIT 32 ASSESSMENT AREA DEMOGRAPHICS WASHINGTON ASSESSMENT AREA 2019 FFIEC CENSUS AND 2019 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	20	5.0	22,442	4.6	6,030	26.9	102,466	21.0
Moderate-income	80	20.1	91,020	18.7	11,828	13.0	79,951	16.4
Middle-income	154	38.7	188,515	38.6	10,522	5.6	95,073	19.5
Upper-income	141	35.4	185,722	38.1	5,696	3.1	210,516	43.1
Unknown-income	3	0.8	307	0.1	50	16.3	0	0.0
Total AA	398	100.0	488,006	100.0	34,126	7.0	488,006	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	41,381	12,661	2.7	30.6	25,834	62.4	2,886	7.0
Moderate-income	172,710	71,663	15.2	41.5	89,399	51.8	11,648	6.7
Middle-income	333,689	190,001	40.4	56.9	124,794	37.4	18,894	5.7
Upper-income	322,057	196,227	41.7	60.9	107,212	33.3	18,618	5.8
Unknown-income	1,999	80	0.0	4.0	1,780	89.0	139	7.0
Total AA	871,836	470,632	100.0	54.0	349,019	40.0	52,185	6.0
Income Categories	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	6,214	5.1	5,355	4.8	822	8.8	37	4.9
Moderate-income	19,862	16.4	18,224	16.4	1,529	16.4	109	14.4
Middle-income	43,255	35.6	39,870	35.8	3,140	33.8	245	32.4
Upper-income	51,371	42.3	47,271	42.5	3,738	40.2	362	47.9
Unknown-income	668	0.6	591	0.5	74	0.8	3	0.4
Total AA	121,370	100.0	111,311	100.0	9,303	100.0	756	100.0
% of Total Businesses				91.7		7.7		0.6
2020 Adjusted Median Family Income ²⁵²			\$113,300					

Economic Conditions

During the review period, the area economy’s expansion was driven by the manufacturing, high tech, and logistics industries.²⁵³ The area’s economic growth was evident as the City of Seattle entered its 10th year of economic expansion in 2019, characterized by growth in total employment, wages, and output.²⁵⁴ However, economic activity declined across the country at the onset of the Pandemic, as

²⁵² FFIEC Adjusted Median Family Income; available from: <https://www.ffiec.gov/Medianincome.htm>.

²⁵³ Moody’s Precip Report, Seattle-Bellevue-Everett WA, February 2020.

²⁵⁴ Ibid.

discussed earlier for the other assessment areas. Technology was the source of the area's economic strength anchored by two of the area's top employers, Amazon and Microsoft.²⁵⁵ The area's pool of skilled tech workers and abundant access to venture capital made it a premier global technology hub.²⁵⁶ Furthermore, robust hiring by mature and smaller companies sustained the growing labor force in the area.²⁵⁷ Technology was a stabilizing force during the economic downturn in 2020, with payrolls that held steady and were on the rise late in the year.²⁵⁸ In the manufacturing sector, Boeing remained the area's top employer.²⁵⁹ However, trade and tariff uncertainty during the review period reduced production at one of Boeing's plants and impacted local suppliers.²⁶⁰ Boeing continued to struggle through 2020 and cut nearly 10,000 local jobs as it grappled with the extended slump in travel due to the Pandemic.²⁶¹ The area's large port with connections to emerging Asian markets was another top strength of the area.²⁶² Early in the review period, single-family and apartment construction struggled to keep up with the inflow of new residents to the area.²⁶³ In addition, house and apartment prices rose at a double-digit rate while wage gains had yet to maintain an upward trend.²⁶⁴ Later in the review period, house price appreciation no longer outpaced incomes.²⁶⁵ Overall, the area economy expanded early in the review period prior to contracting at the onset of the Pandemic, despite steady performance in the tech industry.

As depicted in Exhibit 33 on the following page, small business lending showed improvement during the review period. After loans to small businesses from banks subject to the CRA fell slightly in 2016, lending rose again during the review period and peaked in 2019, with 60,310 loans made totaling \$2.1 billion. Lending to small businesses played a critical role in the economy given that small businesses accounted for 91.7 percent of all businesses in the assessment area, as noted in Exhibit 32. As noted previously, lending to small businesses increased during the Pandemic with the distribution of PPP loans. In the Washington assessment area, over 39,000 PPP loans in the amount of less than \$1 million were made and approximately 254,000 jobs were self-reported to benefit from the loans made between April 3, 2020 and August 8, 2020.²⁶⁶ According to the borrower firms that elected to report their industry, most loans under \$1 million were made to businesses in the Professional, Scientific, and Technical Services industry, followed by the Health Care and Social Assistance industries.²⁶⁷

²⁵⁵ Moody's Precis Report, Seattle-Bellevue-Everett WA, November 2019.

²⁵⁶ Moody's Precis Report, Seattle-Bellevue-Everett WA, November 2018.

²⁵⁷ Moody's Precis Report, Seattle-Bellevue-Everett WA, November 2019.

²⁵⁸ Moody's Precis Report, Seattle-Bellevue-Everett WA, November 2020.

²⁵⁹ Moody's Precis Report, Seattle-Bellevue-Everett WA, November 2019.

²⁶⁰ Ibid.

²⁶¹ Moody's Precis Report, Seattle-Bellevue-Everett WA, November 2020.

²⁶² Moody's Precis Report, Seattle-Bellevue-Everett WA, November 2019.

²⁶³ Moody's Precis Report, Seattle-Bellevue-Everett WA, November 2017.

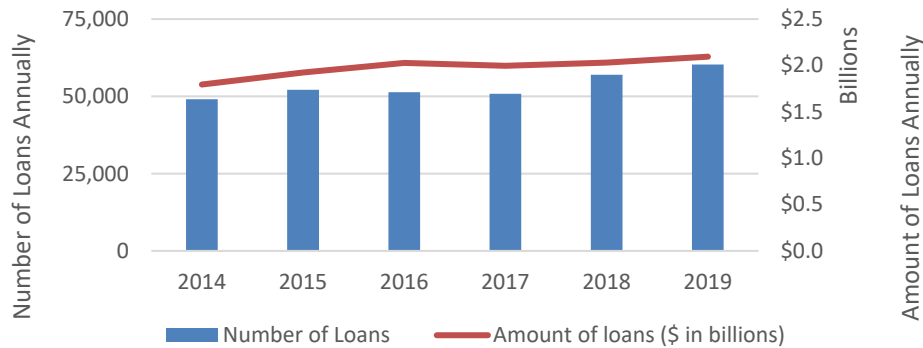
²⁶⁴ Ibid.

²⁶⁵ Moody's Precis Report, Seattle-Bellevue-Everett WA, November 2019.

²⁶⁶ Small Business Administration, Paycheck Protection Program Loan Data; *Borrower firms self-reported data and had the option to abstain from reporting certain details of the loan application, therefore data may not capture some details of each loan made*; available from: <https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program>.

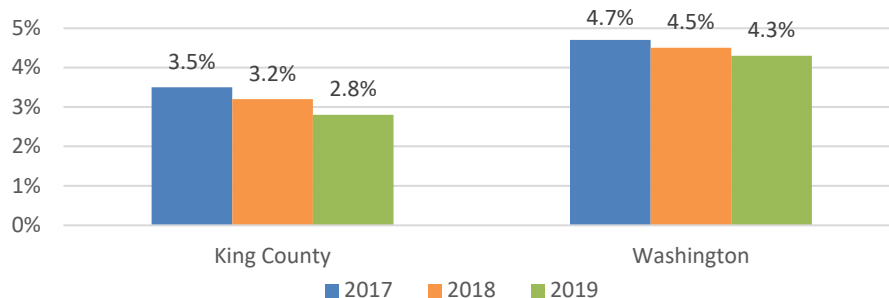
²⁶⁷ Ibid.

Exhibit 33
Loans to Small Businesses in Assessment Area²⁶⁸
2014-2019



The area experienced a slight decrease in the unemployment rate during the review period, as depicted in Exhibit 34. In comparison to the statewide unemployment rate, the assessment area had a lower unemployment rate reaching the low of 2.8 percent in 2019.

Exhibit 34
Unemployment Rate²⁶⁹
2017-2019



At the start of the Pandemic in early 2020, the monthly unemployment rate spiked before decreasing through the year. The rate spiked in April to 14.9 percent and remained elevated in May 2020 at 14.4 percent.²⁷⁰ The unemployment rate decreased through October 2020 to 4.7 percent and trended downward through November 2020.²⁷¹

The trends in median home prices in the assessment area are shown in Exhibit 35 on the following page. Median home prices increased early in the review period before flattening between June 2018, and October 2019. Prices increased again starting in November 2019. By January 2021, the median home price in King County was \$772,543, representing a 10 percent year-over-year increase. Overall, area

²⁶⁸ Aggregate CRA Small Business data reports available from: <https://www.ffiec.gov/craadweb/aggregate.aspx>.

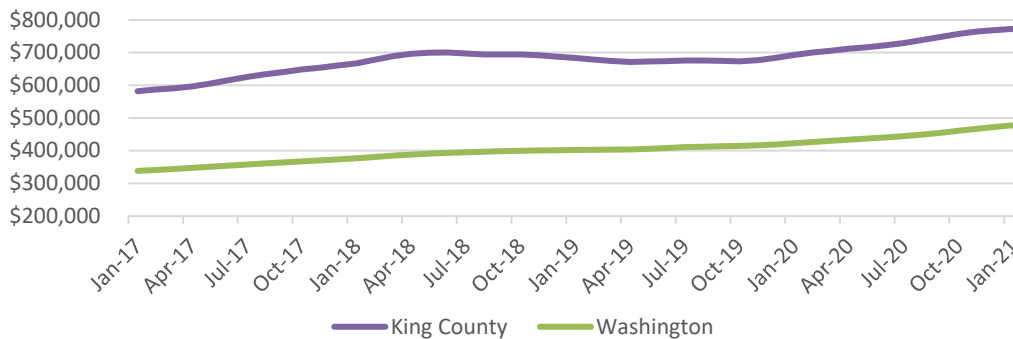
²⁶⁹ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <https://www.bls.gov/lau/>.

²⁷⁰ Ibid.

²⁷¹ Ibid.

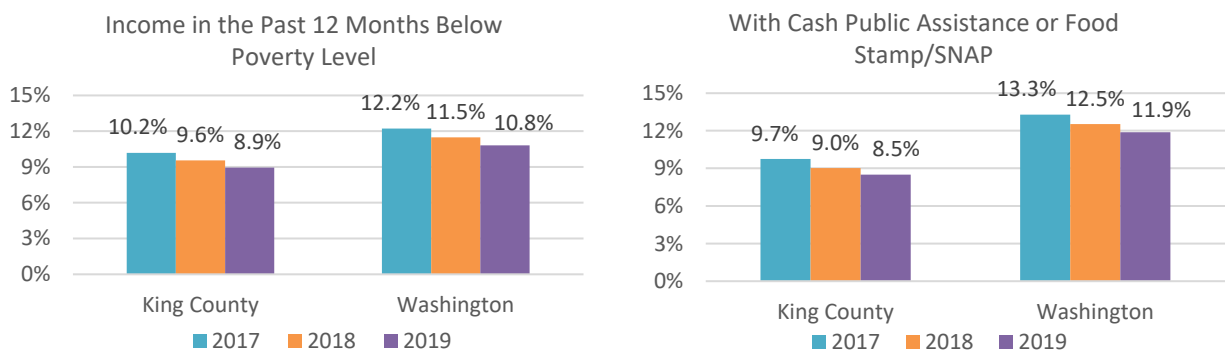
median home prices were higher than the median home price in the state of Washington throughout the review period. There were 30 percent of cost burdened households in the area and an even high rate of renters, 46 percent, that were cost burdened during the review period.²⁷²

Exhibit 35
Median Home Prices²⁷³
January 2017-January 2021



During the review period the rate of poverty and usage of public assistance or food stamp/SNAP benefits decreased in the assessment area and in the state of Washington, as depicted in Exhibit 36. The assessment area had lower rates of poverty and public assistance or food stamp/SNAP benefit usage than the state overall. In another measure of poverty, many households were liquid asset poor, or without sufficient liquid assets to subsist at the federal poverty level for three months. The percentage of households in King County that were liquid asset poor was 27 percent, in line with the statewide percentage of liquid asset poor households.²⁷⁴

Exhibit 36
Poverty and Food Stamp Usage Rates²⁷⁵
2017-2019



²⁷² Prosperity Now Scorecard, King County, WA; available from: <https://scorecard.prosperitynow.org>.

²⁷³ Zillow Research, Zillow Home Value Index, Single-Family Homes Time Series; available from: <https://www.zillow.com/research/data/>.

²⁷⁴ Prosperity Now Scorecard, King County, WA; available from: <https://scorecard.prosperitynow.org>.

²⁷⁵ Poverty and Food Stamp Usage Rates, U.S. Census Bureau, American Community Survey, 5-Year Estimates; available from: <https://www.census.gov/programs-surveys/acs/data.html>.

Credit and Community Development Needs

Community representatives that were contacted suggested that there were a number of credit and community development needs banks could help address through loans, investments, and service activities. A community contact stated small businesses need flexible credit products, that could be offered along with technical assistance. Some business owners, the contact indicated, would benefit from assistance with negotiating a lease or managing cash flow. Other small businesses in some areas of King County need commercial real estate loans in the amount of \$1 million to \$2 million to secure operating space and avoid displacement of the business, according to the same contact. Entrepreneurs looking to start a business are also in need of credit. A community contact stated that an established business can find long-term fixed rate loans, however, entrepreneurs could not obtain that type of financing to open a business in some areas that have a limited or zero bank branch presence in their community. To further support the small business credit needs, a contact suggested that banks could offer lower costs or fees on processing credit card transactions which are often an entry barrier for many small businesses.

The largest need in the area is a shortage of housing inventory, according to one community contact. The contact indicated the need for assistance from banks in a number of ways that can help increase housing development, such as supporting land trusts with the construction of units, financing manufactured housing, and providing down payment assistance. Or, if banks cannot directly provide their own capital as down payment assistance, the contact noted there is an opportunity for banks to partner with organizations such as the State Housing Finance Commission on its financing programs that assist homebuyers. There is an opportunity for banks to provide loans, investments, or donations to help address the shortage of housing inventory that the community contact noted.

There are also opportunities for banks to contribute through community service activities to help meet the housing needs in the area. A community contact indicated one community service from banks needed in the community is homebuyer education classes that would assist local residents in their path to homeownership. The contact also indicated that there is an opportunity for banks to contribute community service hours to the construction of new homes by working with organizations like Habitat for Humanity.

Overall, according to the information shared by the contacts described above, banks could help address the credit needs of affordable housing development and small businesses as well as the community development needs of homebuyers and other nonprofit organizations in the community through investments, loans, donations, and community service activities.

Conclusions with Respect to Performance Tests in Washington

Lending Test

EWB's lending test performance is high satisfactory. Performance ranged from adequate to high satisfactory with stronger performance in community development lending and geographic distribution of small business loans.

Lending Activity

Lending levels reflect good responsiveness to Washington's credit and community development needs. EWB extended a good level of loans in this assessment area in light of the bank's limited presence in the market. Small dollar loans helped meet the credit needs of small businesses and community development loans helped meet the need for affordable housing and economic development. Loan volumes are presented in Tables 57 and 57A.

Lending Distribution by Geography

Overall lending distribution by geography within the Washington assessment area is generally good. Loans were made within census tracts of all income categories, consistent with the representation of business or housing unit concentrations. Performance was good for small business loans and adequate for home mortgage loans. Lending patterns generally followed the locations of EWB's branches and there were no conspicuous gaps in lending.

Small Business Lending

The geographic distribution of small business lending is good. Loan concentrations in low-income census tracts were generally strong throughout the review period exceeding the percentage of businesses in the area and the performance of aggregate lenders. Lending distributions in moderate-income census tracts compared reasonably to the concentrations of business and aggregate lender performance. There were insufficient loans in 2016 for a meaningful conclusion since that period covered only six months. The lending patterns generally followed the locations of EWB's branches and business concentrations. Table 58 depicts the distribution of loans among geographies of different income levels.

Home Mortgage Lending

The geographic distributions of home purchase loans, home refinance, and home equity loans are adequate. As can be seen in Tables 59, 60, and 66 lending patterns generally followed the concentrations of owner-occupied housing units which were in middle- and upper-income areas. Loans in moderate-income census tracts were generally comparable to the percentage of owner-occupied housing units and aggregate lender performance. There were reasonable numbers of loans in low-income census tracts despite limited home lending opportunities. The sole branch in a low-income census tract is located in Seattle's International District, a particularly low-income area where the FFIEC estimated median income of \$39,984 is about one third of the estimated AMI of \$113,300, and where the 96 owner-occupied units comprise less than percent of the 1,570 housing units. Most of the area's other low-income census tracts are not within close proximity of a EWB branch.

Lending Distribution by Borrower Income and Business Revenue

Overall lending distribution by borrower income and business revenue within the Washington assessment area is generally adequate. Performance was adequate for both small business loans and home mortgage loans.

Small Business Lending

The distribution of loans by businesses of different sizes is adequate overall. Lending distributions were significantly below the percentage of small businesses, but generally comparable to aggregate lending in low- and moderate-income census tracts. There were a notable percentage of loans for which the revenue of the borrower was not known, but loan amounts to these borrowers were small. Overall, roughly half of the small business loans were in amount of \$100,000 and under, with significant percentages in amounts of \$10,000 or less. Small dollar loans were an identified credit need in Washington.

Home Mortgage Lending

The distribution of home mortgage loans is adequate. Borrower income information was available for only a small percentage of the total home mortgage loans extended by the bank. Of the loans extended in the assessment area, only home purchase and home refinance loans in 2016 had sufficient numbers for a meaningful analysis. As seen on Tables 45 and 46, lending distributions to low- and moderate-income borrowers exceeded both the percentage of families and aggregate lending for those income categories. The overall performance is attributable to targeted purchases of loans extended in the assessment area.

Community Development Lending

EWB made a relatively high level of community development loans that exhibited good responsiveness to community credit needs. As seen on Table 57, EWB made 37 community development loans totaling \$107.7 million within the state of Washington. Of this number, 26 loans, totaling \$104.4 million, provided direct benefit to the Washington assessment area and 11 loans totaling \$3.3 million benefited a broader statewide or regional area that includes the assessment area. The loans addressed a variety of community development needs including affordable housing, economic development, and support for non-profits that serve low- and moderate-income individuals. Notable community development loans in Washington include the following:

- A \$1.5 million loan that supports economic development by financing a small business headquartered in a moderate-income census tract with 200 employees. This loan helps stabilize the moderate-income area by supporting the ongoing operations of this business in the local community.
- A \$725,000 loan to sustain 95 jobs and operation of this non-profit organization that provides various services to families with single-parent or single income households, foster families, homeless and immigrant families or refugees with minimal resources and connections. Services include early childhood Head Start program, affordable housing placement, and childcare for low- and moderate-income families.
- A \$375,000 SBA 7a loan that supports economic development by financing a small business that employs 16 low- and moderate-income employees. The working capital loan supports business expansion of the borrower's construction company.

- A \$48,290 loan to finance the acquisition of a 60-unit market rate property that will be converted to affordable housing units for low- and moderate-income individuals. The loan is made in participation with the Washington Community Reinvestment Association (WCRA), which has express intent to meet the affordable housing needs of Washington state.

Investment Test

EWB's community development investment performance within the Washington assessment area is high satisfactory. Considering its limited presence in the area, the bank made a significant level of qualified investments and grants that were responsive to a variety of needs in the community. As seen on Table 75, the bank made 78 investments totaling \$45.1 million, consisting of \$12.9 million of investments from a prior period and \$32.1 million in new investments including qualified donations to various organizations. The bank also has four investments totaling \$812,000 from a prior period and \$5.7 million in new investments that benefited a broader statewide or regional area that includes the assessment area.

Noteworthy examples of qualified investments include the following:

- A \$19.8 million investment that provided affordable housing for low- and moderate-income individuals in King County. The investment was in an MBS that was backed by loans that funded two multifamily properties, one in the city of Auburn that provided 295 housing units and the other property in Seattle that provided 115 housing units. Both properties are income-restricted to individuals earning 80 percent or less of the area median income.
- A \$6 million investment in an MBS that is backed by a loan that funded affordable housing targeted to low- and moderate-income individuals. The property is a multifamily building in the city of Burien in King County that provides 43 units of housing for low- and moderate-income individuals.
- A \$4.2 million investment in an MBS based by 14 loans for single-family residences for low- and moderate-income individuals in various cities within King County.
- A \$1.9 million investment in an MBS backed by a loan that funded 21 units of affordable housing for low- and moderate-income individuals in King County. A \$500,000 investment in an economic development fund through a CDFI that has operated in the Seattle area since 1998 and administers a \$6 million loan fund through various programs. The primary financial products are term loans and small business loans.

Service Test

EWB's service test performance in Washington is high satisfactory based on the reasonable accessibility of the bank's delivery systems and the level of community development service provided to the community.

Retail Banking Services

EWB's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in Washington. Services do not vary in a way that inconveniences customers in the assessment area, particularly low- and moderate-income individuals and geographies. A full array of personal and business banking products and services is offered at all locations in the area. Services are consistent across the assessment area, with extended hours on Friday and Saturday availability in the low-income census tract. In addition, delivery systems including two ATMs, telephone banking, online banking and mobile are offered to provide customers access to banking services after normal business hours.

The distribution of branches provides access to banking services for low- and moderate-income geographies and low- and moderate-income individuals. The bank has four full-service branches in Washington, one in a low-income census tract, one in a middle-income, and two in upper-income census tracts, all of which are located in King County. As seen on Table 76, although only one branch is located in a low-income census tract, this is comparable to the percentage of the population that resides in low- and moderate-income geographies at 25.6 percent. There were no changes to the bank's branches within the assessment area during the review period.

Community Development Services

EWB provided a relatively high level of community development services in the Washington assessment area. During the review period, employees provided 36 services totaling 526 service hours. The bulk of services included 32 financial education presentations to small businesses and low- and moderate-income individuals. Employees committed over 460 hours of time to provide these community development services.

- Three EWB employees provided 39 hours of community development services hours as panelists for two workshops for local small business owners and tribal business contactors. Three hundred participants attended the events where EWB employees provided information on small business loan programs including SBA loans and provided individual consultations to some participants. EWB also collaborated with the US Department of Transportation and a minority business development agency to teach small businesses small construction contractors how to obtain government work contracts.
- EWB employees hosted virtual financial education events at three learning centers of a non-profit organization where EWB staff introduced 149 young students from low-income families in the Seattle area to introduce the concept of banking and provided a virtual visit to the bank vault room. EWB hosted four events through 21 EWB employees for a total of 79.5 service hours.
- Through a partnership with a non-profit organization that provides job training to youth, EWB participated at career training events. These events help students from low income and minority communities find jobs that can lead to a lasting career. Five EWB employees provided financial education and bank product service information and also shared their personal

experience on how to become a successful banker. Bank employees participated in 11 events totaling 92.5 hours educating 343 students from low- and moderate-income families.

- EWB employees participated as workshop presenters at two annual small business summits hosted by an economic development organization and various departments of Washington local government. The forum provides local small business contractors the opportunity to network for future government contracting work. EWB was invited as a financial institution to introduce commercial lending products and share their financial expertise.

STATE OF GEORGIA

CRA Rating for Georgia

Performance in Georgia is rated "OUTSTANDING"

The lending test is rated: Outstanding
The investment test is rated: High Satisfactory
The service test is rated: High Satisfactory

The major factors supporting the institution's rating include:

- Lending levels that exhibited good responsiveness to community credit needs.
- Excellent distributions of loans by geography and by borrowers of different incomes and business revenue.
- Relatively high levels of community development loans that were responsive to the need for economic development, stabilizing and revitalizing low- and moderate-income areas, and affordable housing.
- Significant levels of qualified investments and grants that were responsive to the need for affordable housing.
- Reasonable access to retail services by individuals of different incomes and geographies of different incomes.
- Relatively high levels of community development services that provided financial education to low- and moderate-income individuals and small businesses.

Scope of Examination

The scope of the examination for Georgia is generally consistent with the overall scope of the CRA examination. The bank has one assessment area in the state of Georgia. Although the bank's overall presence and certain types of loan activity in this area are limited, a full-scope review was conducted to determine the overall state rating. The lending test assessment was limited to the origination of small business, home purchase, home mortgage refinance, and home equity lines of credit because the bank extended too few home improvement and multi-family loans to allow for a meaningful analysis. Accordingly, although they were considered during the review, they did not influence the overall assessment.

Description of Operations in Georgia

The Georgia assessment area consists of 15 of the 29 counties in the Atlanta-Sandy Springs-Alpharetta, Georgia MSA – Barrow, Bartow, Cherokee, Clayton, Cobb, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding, Rockdale, and Spalding counties – in their entirety. As of 2019, the area was home to 5.3 million people.²⁷⁶

²⁷⁶ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2019; available from: www.census.gov/quickfacts/.

EWB operated three branches in the area and held \$1.15 billion in deposits, representing 0.6 percent of the deposit market share as of June 30, 2020.²⁷⁷ By comparison, there were a total of 74 FDIC-insured financial institutions operating 1,054 offices with deposits totaling \$183.5 billion in the assessment area.²⁷⁸

The exhibit on the following page presents key demographic and business information used to help develop a performance context for the assessment area.

²⁷⁷ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2019; available from: <https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

²⁷⁸ Ibid.

EXHIBIT 37 ASSESSMENT AREA DEMOGRAPHICS GEORGIA ASSESSMENT AREA 2019 FFIEC CENSUS AND 2019 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	99	11.7	78,317	6.7	28,307	36.1	263,569	22.6
Moderate-income	206	24.3	258,081	22.2	51,676	20.0	191,695	16.5
Middle-income	244	28.8	396,582	34.0	38,850	9.8	209,087	17.9
Upper-income	290	34.2	431,713	37.1	19,740	4.6	500,604	43.0
Unknown-income	8	0.9	262	0.0	93	35.5	0	0.0
Total AA	847	100.0	1,164,955	100.0	138,666	11.9	1,164,955	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	178,347	38,473	3.5	21.6	102,964	57.7	36,910	20.7
Moderate-income	476,692	196,461	18.1	41.2	215,800	45.3	64,431	13.5
Middle-income	613,588	385,137	35.4	62.8	171,113	27.9	57,338	9.3
Upper-income	675,229	466,568	42.9	69.1	158,056	23.4	50,605	7.5
Unknown-income	2,621	186	0.0	7.1	2,086	79.6	349	13.3
Total AA	1,946,477	1,086,825	100.0	55.8	650,019	33.4	209,633	10.8
Income Categories	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	17,699	5.7	16,301	5.7	1,293	6.5	105	4.3
Moderate-income	65,213	21.1	60,515	21.1	4,244	21.3	454	18.4
Middle-income	94,250	30.5	88,254	30.8	5,353	26.9	643	26.0
Upper-income	129,606	42.0	119,677	41.8	8,684	43.7	1,245	50.4
Unknown-income	1,769	0.6	1,429	0.5	317	1.6	23	0.9
Total AA	308,537	100.0	286,176	100.0	19,891	100.0	2,470	100.0
% of Total Businesses				92.8		6.4		0.8
2020 Adjusted Median Family Income ²⁷⁹			\$82,200					

Economic Conditions

The area experienced economic expansion during the review period prior to the economic downturn after the onset of the Pandemic in 2020. The diverse area economy was primarily driven by logistics and high tech.²⁸⁰ Early in the review period, the logistics industry reached five consecutive years of growth, adding 34,000 jobs between early 2014 and late 2018.²⁸¹ The area airport is the world's busiest with

²⁷⁹ FFIEC Adjusted Median Family Income; available from: <https://www.ffiec.gov/Medianincome.htm>.

²⁸⁰ Moody's Precip Report, Atlanta-Sandy Springs-Roswell GA, November 2020.

²⁸¹ Moody's Precip Report, Atlanta-Sandy Springs-Roswell GA, November 2018.

more than 104 million passengers traveling through in 2017 and supporting 63,000 jobs.²⁸² Larger visitor and cargo traffic prompted investments in the industry by at least one major local airline.²⁸³ The logistics sector benefited from growth during the Pandemic as a result of consumers' increased reliance on online shopping that boosted e-commerce.²⁸⁴ New fulfillment centers, plans for a new delivery station, and the Covid-19 vaccine distribution work among local businesses, all suggest economic recovery in the sector despite the Pandemic's impact on commercial air travel.²⁸⁵ In addition to logistics, the professional services cluster remained a source of strength for the area economy, with payrolls that rose by nearly twice the national pace early in the review period.²⁸⁶ The high number of graduates with engineering, math, and computer science degrees from Georgia Tech enticed new firms to the area.²⁸⁷ Growth in technology also bolstered the office market, with annual office rent increases of 18 percent leading into the review period.²⁸⁸

Overall workforce gains were softer in the area compared to the years before the review period.²⁸⁹ For example, the job mix was less impressive, average hourly earnings trended lower from 2018, to 2019, and mid-range positions grew at a slow pace.²⁹⁰ Despite the slower growth, the area was the state of Georgia's main growth engine and one of the strongest large economies in the nation.²⁹¹ Early in the review period, the area's housing market gains were constrained by supply-demand mismatches.²⁹² Despite a pool of likely homebuyers, house price appreciation for single-family units was among the fastest in the South.²⁹³ This was in parallel to a slow pace of single-family homebuilding and a focus on high-priced homes.²⁹⁴ Some indicators seemed to show resiliency in housing during the Pandemic particularly in the low rate environment that aided affordability for homebuyers.²⁹⁵

As depicted in Exhibit 38 on the following page, small business lending increased during the review period and peaked in 2019, at 150,572 loans totaling \$4.6 billion made by banks subject to the CRA. Lending to small businesses played a critical role in the economy given that small businesses accounted for 92.8 percent of all businesses in the assessment area, as noted in Exhibit 37. As noted previously, lending to small businesses increased during the Pandemic with the distribution of PPP loans. In the Georgia assessment area, over 100,000 PPP loans in the amount of less than \$1 million were made and approximately 600,000 jobs were self-reported to benefit from the loans made between April 3, 2020 and August 8, 2020.²⁹⁶ According to the borrower firms that elected to report their industry, most loans

²⁸² Moody's Precis Report, Atlanta-Sandy Springs-Roswell GA, November 2018.

²⁸³ Ibid.

²⁸⁴ Moody's Precis Report, Atlanta-Sandy Springs-Roswell GA, November 2020.

²⁸⁵ Ibid.

²⁸⁶ Moody's Precis Report, Atlanta-Sandy Springs-Roswell GA, November 2017.

²⁸⁷ Ibid.

²⁸⁸ Ibid.

²⁸⁹ Moody's Precis Report, Atlanta-Sandy Springs-Roswell GA, November 2019.

²⁹⁰ Ibid.

²⁹¹ Ibid.

²⁹² Moody's Precis Report, Atlanta-Sandy Springs-Roswell GA, November 2018.

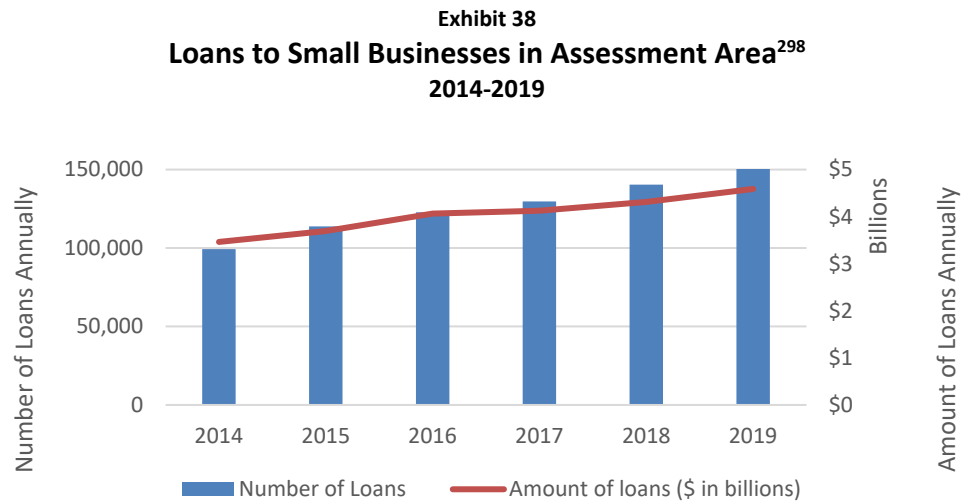
²⁹³ Moody's Precis Report, Atlanta-Sandy Springs-Roswell GA, November 2019.

²⁹⁴ Moody's Precis Report, Atlanta-Sandy Springs-Roswell GA, November 2018.

²⁹⁵ Moody's Precis Report, Atlanta-Sandy Springs-Roswell GA, November 2020.

²⁹⁶ Small Business Administration, Paycheck Protection Program Loan Data; *Borrower firms self-reported data and had the option to abstain from reporting certain details of the loan application, therefore data may not capture some details of each loan made*; available from: <https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program>.

under \$1 million were made to businesses in the Professional, Scientific, and Technical Services industry, followed by the Other Services (except Public Administration) industry.²⁹⁷

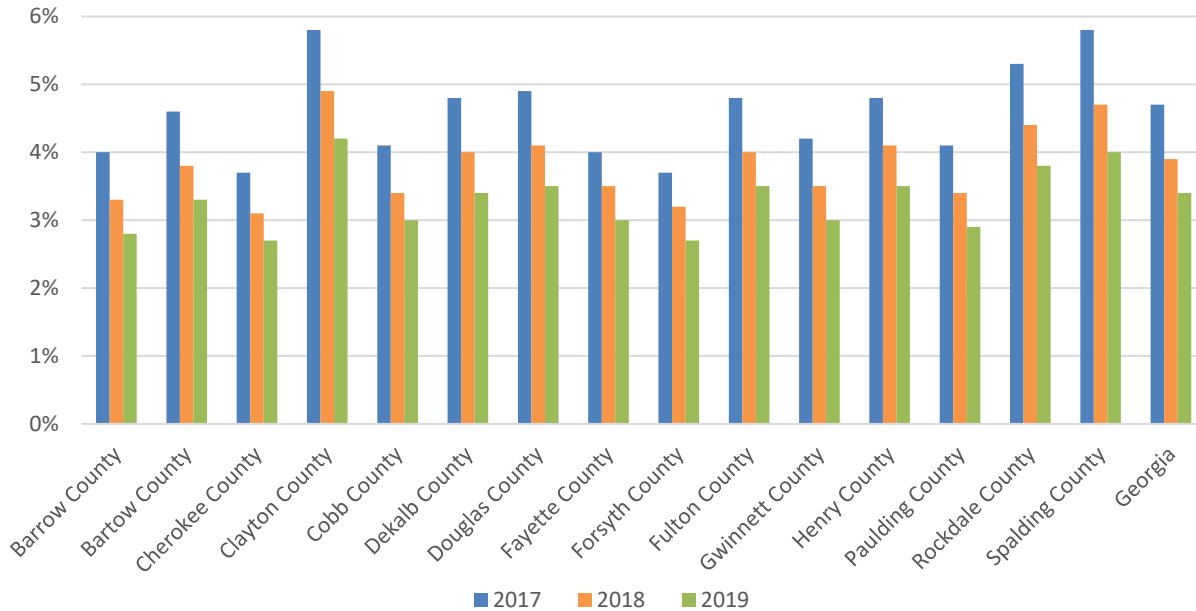


The trends in unemployment in the area are shown in Exhibit 39 on the following page. During the review period, unemployment decreased in each county of the assessment area and in the state of Georgia. There were higher rates of unemployment in Clayton, Douglas, Fulton, Henry, Rockdale, and Spalding counties compared to the other counties as well as the statewide unemployment rate.

²⁹⁷ Ibid.

²⁹⁸ Aggregate CRA Small Business data reports available from: <https://www.ffiec.gov/craadweb/aggregate.aspx>.

Exhibit 39
Unemployment Rate²⁹⁹
2017-2019



There was an increase in unemployment in the area at the onset of the Pandemic. Monthly unemployment rates spiked in the area in April 2020, as shown in Exhibit 40 on the following page. Monthly unemployment rates in the area trended downward through October 2020, and in some counties approached the 2019 annual rate.

²⁹⁹ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <https://www.bls.gov/lau/>.

Exhibit 40
Monthly Unemployment Rates³⁰⁰

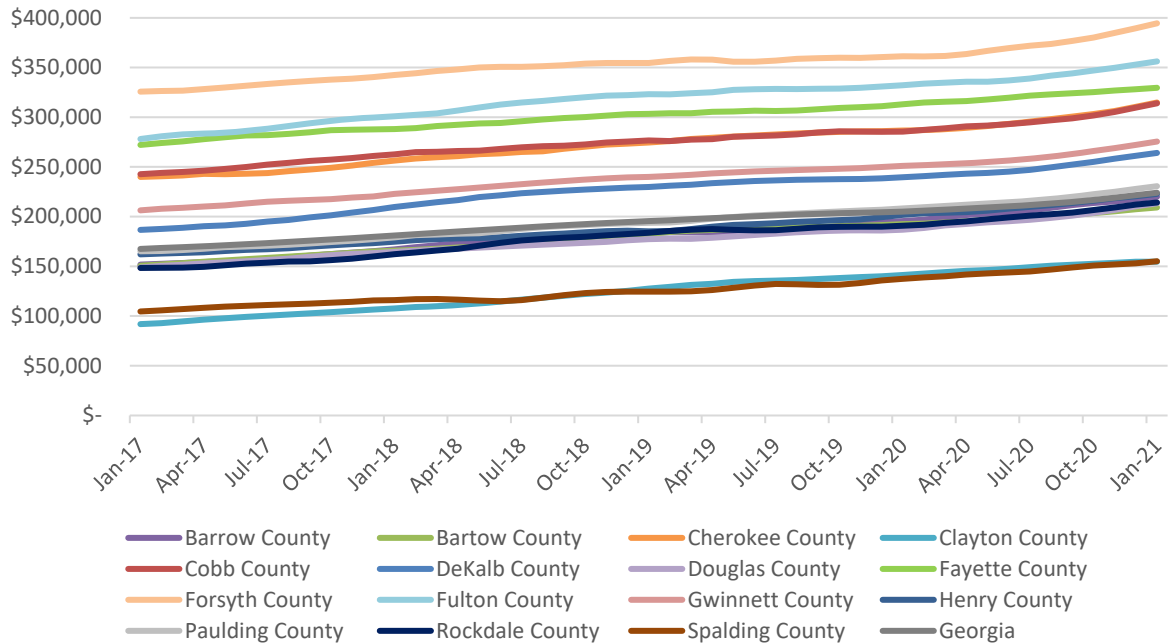
Area	April 2020	May 2020	October 2020
Barrow County	11.6%	8.0%	3.2%
Bartow County	14.4%	9.4%	3.8%
Cherokee County	11.0%	7.5%	2.9%
Clayton County	16.0%	13.8%	7.8%
Cobb County	11.4%	8.6%	3.8%
DeKalb County	13.3%	11.2%	5.6%
Douglas County	12.7%	10.7%	5.1%
Fayette County	10.3%	8.4%	3.4%
Forsyth County	10.3%	7.5%	2.7%
Fulton County	13.8%	11.3%	5.6%
Gwinnett County	12.5%	9.5%	4.2%
Henry County	13.4%	11.1%	5.1%
Paulding County	11.1%	7.9%	3.5%
Rockdale County	12.7%	10.5%	5.3%
Spalding County	12.7%	9.7%	5.4%

As shown in Exhibit 41 on the following page, the median home price in the assessment area increased at a similar rate as the increase seen in the state median home price. Clayton and Spalding counties had the lowest median home prices in the assessment area, whereas Forsyth County had the highest. As of January 2021, median home prices ranged from \$154,750 to \$394,414 in the area. The area had a similar rate of cost burdened households, 27.3 percent, compared to the U.S. overall, 27.7 percent.³⁰¹

³⁰⁰ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <https://www.bls.gov/lau/>.

³⁰¹ Prosperity Now Scorecard, Clark County, NV; available from: <https://scorecard.prosperitynow.org>.

Exhibit 41
Median Home Prices³⁰²
January 2017-January 2021



As depicted in Exhibits 42 and 43 on the following page, the assessment area and the state of Georgia both had decreases in the rates of poverty as well as usage of public assistance or food stamp/SNAP benefits. Clayton, DeKalb, and Spalding counties had higher rates of households with incomes below the poverty level compared to the remaining counties in the area and in the state overall. Poverty levels in Fayette and Forsyth counties were the lowest in the area, reaching lows in 2019, of 5.5 and 5.7 percent, respectively. Similar to the rates of poverty, the percentage of households receiving public assistance or food stamp/SNAP benefits was higher in Clayton, DeKalb, and Spalding counties than the other counties and in the state of Georgia. Cherokee, Fayette, and Forsyth counties had less than 5 percent of households receiving public assistance or food stamp/SNAP benefits. Overall, there were inequitable rates of poverty and public assistance or food stamp/SNAP benefits usage during the review period throughout the assessment area.

³⁰³ Poverty Rates, U.S. Census Bureau, American Community Survey, 5-Year Estimates; available from: <https://www.census.gov/programs-surveys/acs/data.html>.

Exhibit 42
Poverty Rates³⁰³
2017-2019

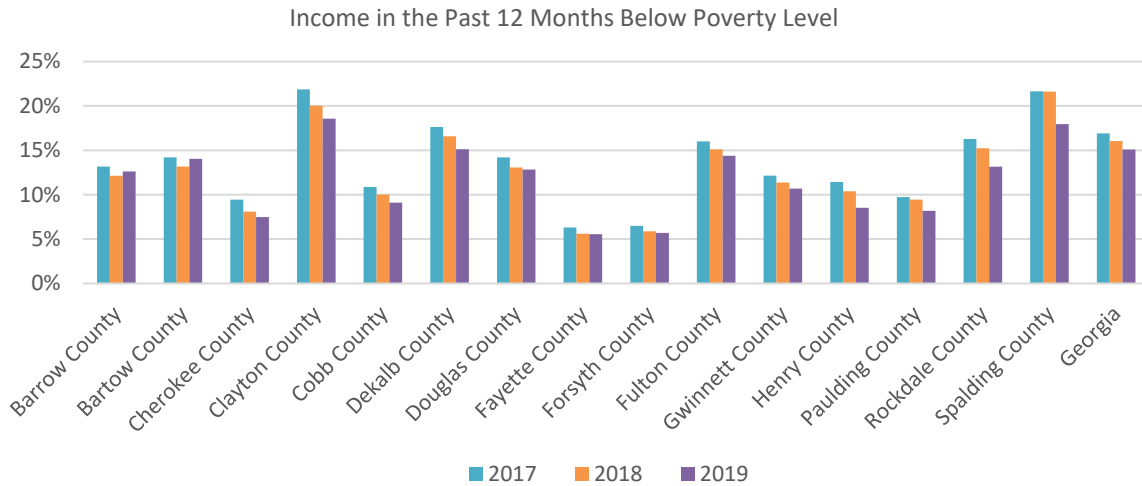
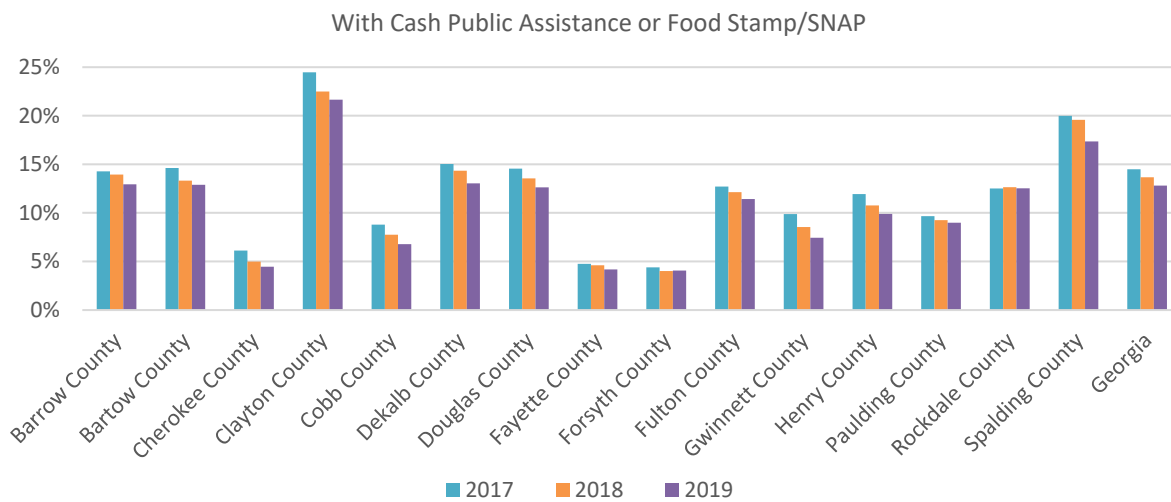


Exhibit 43
Food Stamp Usage Rates³⁰⁴
2017-2019



Credit and Community Development Needs

The small business lending trends and needs highlighted in the deployment of PPP loans and in the findings from the Small Business Credit Survey described previously for the other assessment areas,

³⁰³ Poverty Rates, U.S. Census Bureau, American Community Survey, 5-Year Estimates; available from: <https://www.census.gov/programs-surveys/acs/data.html>.

³⁰⁴ Food Stamp Usage Rates, U.S. Census Bureau, American Community Survey, 5-Year Estimates; available from: <https://www.census.gov/programs-surveys/acs/data.html>.

indicate that small business credit needs remain unmet. In particular, there remains opportunities for banks to help address the credit needs of small businesses. A community contact noted that businesses, particularly those contracting work for federal or local agencies, have been challenged in obtaining unsecured lines of credit. A line of credit of \$1 million or less is the most difficult for small businesses to find, according to the contact. Although some banks may offer a business owner a credit card in lieu of a line of credit, the contact noted that this is not usually a good alternative as the credit card may accrue higher interest, cannot be billed from, and presents longer term challenges for the business. The same contact also described the importance of banks building a relationship with small businesses and opening bank accounts after seeing many businesses blocked from accessing PPP loans because many banks required applicant firms to have a bank account with the institution. There is also an opportunity for banks to provide financial education for small business owners according to the community contact.

Furthermore, there are opportunities for banks to support the housing needs in the community. According to a community contact, there is a need for more down payment assistance for homebuyers in the assessment area. In addition, the contact noted that the low housing stock in the area has been an issue, in addition to other pressures impacting housing affordability. Based on the information shared by the community contacts, there are opportunities for banks to provide credit products to support small businesses as well as investments or other community service activities that support the housing affordability needs of homebuyers.

Conclusions with Respect to Performance Tests in Georgia

Lending Test

Lending test performance in Georgia is Outstanding. Overall geographic and borrower lending distributions by revenue and income are excellent along with relatively high levels of community development lending. Lending and demographic data used to assess EWB's lending test performance are in Tables 77 through 94.

Lending Activity

EWB extended an overall good number of small business, home mortgage and community development loans in the assessment area, given the bank's limited presence in the sizable market. Information on the volume of loans is on Tables 77 and 77A.

Lending Distribution by Geography

Overall lending distributions by geography within the Georgia assessment area are excellent overall. Loans were made within all income categories, with excellent performance of small business, home purchase and home refinance loans and good performance of home equity lines of credit within low- and moderate-income census tracts. Adequate performance was noted for home equity loans. Data regarding geographic distributions for this assessment area are in Tables 78 through 86.

Small Business Lending

Overall, the distribution of small business lending in Georgia is excellent. As seen in Table 78, loans were dispersed throughout census tracts of all income levels, with lending in low- and moderate-income census tracts exceeding the percentage of businesses and the level of aggregate lending.

Home Mortgage Lending

The distribution of home purchase and home refinance loans is excellent. This assessment is based upon an analysis of loan data contained in Tables 79 and 80. Lending levels in low- and moderate-income census tracts exceeded aggregate lending and the percentage of owner-occupied units. This performance is attributable to the hiring of additional mortgage business development personnel, a relatively more affordable housing market, and the introduction of the bank's special mortgage product for low- and moderate-income borrowers discussed earlier.

The geographic distributions of home equity lines of credit are adequate. As seen on Table 86, loans were generally made within each income category with the concentrations of loans generally following the concentrations of owner-occupied housing units, which tended to be in middle- and upper-income census tracts. There were no loans in low-income census tracts in 2017, but relatively high levels of lending were in moderate-income census tracts, which exceeded the percentage of owner-occupied housing units.

Lending Distribution by Borrower Income and Business Revenue

Overall lending distributions by business revenue and borrower income within the Georgia assessment area are excellent. Lending to small businesses and low- and moderate-income individuals were above aggregate lending. The performance was driven by EWB's special loan programs targeted to very small businesses and low- and moderate-income borrowers as well as the addition of a mortgage business development officer.

Small Business Lending

The distribution of loans to businesses of different revenue sizes is excellent. As seen on Table 87, lending was generally comparable to the concentration of businesses, but well above aggregate lending with an increasing trend toward the end of the review period. In addition, the majority of loans were in small dollar amounts, which was identified as a credit need for small businesses in Georgia. This performance is attributable to the success of the bank's micro loan product.

Home Mortgage Lending

The borrower distribution of home purchase and refinance loans is excellent. As reflected in Tables 88 and 89, lending levels were above the percentage of low- and moderate-income families and aggregate lending. This performance is reflective of the success of the bank's special mortgage product designed to assist low- and moderate-income borrowers as well as the hiring of an additional mortgage business development officer. Income information was not available for home equity loans.

Community Development Lending

EWB made a relatively high level of community development loans that exhibited good responsiveness to community credit needs in Georgia. As seen on Table 77, the bank made 15 community development loans totaling \$38.4 million within the Georgia assessment area. The loans addressed a variety of community development needs including affordable housing, economic development, and stabilizing and revitalizing low- and moderate-income areas. Notable examples of community development loans include:

- A \$9 million construction loan that provided affordable housing for low- and moderate-income individuals. The loan was for a 60-unit assisted living facility project that is restricted to tenants making no more than 60 percent of area median income.
- A \$1.8 million SBA loan that supports economic development by providing financing to a small business to purchase a warehouse to be occupied by the borrower's wrought iron door wholesale business. This facility supports the continued operation of the business, which supports job retention for low- and moderate-income individuals. The facility also helped stabilize the area since the warehouse is located in a moderate-income area.
- A \$1.3 million SBA loan to a wholesaler of general merchandises for acquiring a commercial property in a moderate-income census tract. The company will open a retail store at this location. Currently, the borrower has 6 employees and will hire additional 4 employees for this new store. The facility promotes economic development by assisting the growth of a small business and also helps stabilize this moderate-income census tract.
- A \$1.2 million SBA PPP loan to a manufacturer located in a moderate-income census tract. The facility contributes to economic development by helping a small business retain 123 jobs and also helps stabilize this moderate-income geography during the Pandemic.
- A \$470,000 loan that provides affordable housing for low- and moderate-income individuals. The loan refinances a 12-unit apartment complex in a low-income census tract.
- A \$250,000 SBA loan that promotes economic development by sustaining a small business operation that supports ten jobs in a moderate-income tract. The loan facility provides working capital and supports the ongoing business expansion of a wholesaler and importer in a moderate-income tract.
- A \$250,000 SBA loan to finance an increase in working capital to further expand business operations of a small business. The activity promotes economic development by assisting this small business to continue operating and retain 27 jobs for low- and moderate-income individuals.

Investment Test

EWB's community development investment performance within the Georgia assessment area is high satisfactory. Considering its limited presence in the area, the bank made a significant level of qualified investments and grants that were responsive to a variety of needs in the community. As seen on Table

95, the bank made 69 investments totaling \$77.2 million consisting of \$2.0 million that were made during prior periods that remain on the bank's books and \$75.2 million in new investments. As with other assessment areas, Georgia benefited from investments in regional funds that cover a broader statewide or regional area that includes Georgia. A total of \$5.2 million of EWB regional investments were allocated to the Georgia assessment area or within a broader statewide area in Georgia. These investments comprised of MBS and municipal bonds were responsive to the need for affordable housing. Examples of these investments include the following:

- A \$13.5 million investment in a multi-family tax-exempt mortgage-backed bond that provides affordable housing with supportive amenities to very low-income individuals. The bond financed a housing rehabilitation project located in Atlanta that will be operated as a qualified residential rental project with all residential units occupied by tenants whose incomes do not exceed 60 percent of the area median income. The building construction consists of two buildings, including approximately 182 residential units with community space.
- A \$21.7 million investment in an MBS backed by loans to finance affordable housing for low- and moderate-income individuals. These loans financed two multi-family properties providing Gwinnett and Newton counties 224 and 250 housing units respectively. Each of the housing units is income-restricted to individuals earning 80 percent or less of the area median income.
- A \$8 million investment in a municipal bond to fund the construction of a large affordable housing project in DeKalb County. The Project will contain 240 income-restricted apartment units located in eight buildings. Common area improvements will include: an office, exercise room, office equipment for tenant use, onsite laundry facilities and furnished arts and crafts activity center.
- A \$5.9 million investment in an MBS backed by a loan to finance affordable housing in Dekalb County. The property is a multi-family building that will provide 83 units of affordable housing to individuals earning 80 percent or less of the area median income.

Service Test

EWB's performance under the service test in Georgia is high satisfactory based on the accessibility of delivery systems and level of community development services provided.

Retail Banking Services

EWB's banking services are reasonably accessible to the bank's geographies and to individuals of different income levels. Services do not vary in a way that inconveniences customers in the assessment area, particularly low- and moderate-income individuals and geographies. A full array of personal and business banking services – including those previously discussed – is offered at all locations in the Georgia assessment area. Branch hours include Saturday hours at two of the three branches, including one in a low-income census tract. In addition, delivery systems including ATMs at each branch, telephone banking, online and mobile banking, are offered to provide customers access to banking services after normal business hours.

EWB maintains three branches in this assessment area – one in a low-income census tract, one in a middle-income, and one in an upper-income census tract. As seen on Table 96, although only one of three branches is located in a low-income census tract, this is comparable to the percentage of the population that resides in low- and moderate-income geographies at 32 percent. Overall, given the bank's limited presence in the area, the distribution of branches provides reasonable access to banking services for low- and moderate-income geographies and individuals. There were no changes to the bank's branches within the assessment area during the review period.

Community Development Services

EWB provided a relatively high level of community development services to the Georgia assessment area. During the review period, employees provided 39 services for a total of 701 service hours. The bulk of services involved providing financial education presentations to small businesses and low- and moderate-income individuals. EWB employees also took on leadership roles for two of the organizations as board members and as a treasurer. Examples of qualified services provided include the following:

- EWB hosted eight seminars where employees presented an overview of SBA programs and services, discussed benefits to small business owners and provided guidance on what type of programs are suitable for different business owners. EWB employees provided a total of 108 service hours to 52 attendees.
- An EWB employee serves as a homebuyer counselor at a local non-profit's first-time home buyer seminars. Many of the attendees are low- and moderate-income individuals purchasing their first home, and there are usually 45-60 homebuyers in attendance. The employee reviews the homebuying process with potential homebuyers including the possibility of receiving down payment assistance. This employee participated in 12 events totaling 96 hours and 720 total attendees.
- EWB employees participated in a local non-profit's five-day financial education event. Employees volunteered to teach 100-125 8th grade students per class each day. Employees guided and mentored students on a variety of activities about income, savings, investing and risk management, credit, and debit, budget, and the simulation debriefing. Six employees provided a total of 103 service hours for a total of 621 students from low- and moderate-income families.
- An EWB employee serves as a committee member and financial literacy contributor at a local non-profit organization. The employee is one of the recurring presenters, providing technical assistance on mortgage programs for low- and moderate-income borrowers. After both events, the employee also provided individual consultation to attendees. There was also a virtual event during the Pandemic with 670 attendees.

STATE OF MASSACHUSETTS

CRA Rating for Massachusetts

Performance in Massachusetts is rated "OUTSTANDING"

The lending test is rated: Outstanding
The investment test is rated: High Satisfactory
The service test is rated: High Satisfactory

The major factors supporting the institution's rating include:

- Excellent distributions of loans by geography and by borrowers of different incomes and business sizes.
- Levels of lending that demonstrated good responsiveness for community credit needs.
- Relatively high levels of community development loans that exhibited good responsiveness to the needs of low- and moderate-income individuals and small businesses.
- Significant levels of qualified investments for affordable housing and economic development.
- Reasonably accessible delivery systems for banking services to geographies and individuals of different incomes.

Scope of Examination

The scope of the examination for Massachusetts is generally consistent with the overall scope of the CRA examination. The bank has one assessment area in the state of Massachusetts. Although the bank's overall presence and lending activity in this area are limited, a full-scope review was conducted to determine the overall state rating. Lending activity for some loan types was nominal, consequently the lending test was limited to home purchase, home mortgage refinance, home equity, and community development loans.

Description of Operations in Massachusetts

The Massachusetts assessment area is comprised of Middlesex, Norfolk, and Suffolk counties. As of 2019, the area was home to 3 million people.³⁰⁵

EWB operated two branches in the area which together held \$499 million in deposits, representing 0.13 percent of the deposit market share as of June 30, 2020.³⁰⁶ In comparison, there were a total of 88 FDIC-insured financial institutions operating 994 offices within the area, with deposits totaling over \$383 billion.³⁰⁷

³⁰⁵ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2019; available from: www.census.gov/quickfacts/.

³⁰⁶ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2020; available from: <https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

³⁰⁷ Ibid.

Exhibit 44 presents key demographic and business information used to help develop a performance context for the assessment area.

EXHIBIT 44 ASSESSMENT AREA DEMOGRAPHICS MASSACHUSETTS ASSESSMENT AREA 2019 FFIEC CENSUS AND 2019 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	70	10.7	54,960	7.9	14,887	27.1	159,300	22.9
Moderate-income	131	20.1	127,833	18.4	17,184	13.4	107,986	15.6
Middle-income	220	33.7	251,447	36.2	13,341	5.3	130,282	18.8
Upper-income	217	33.3	259,102	37.3	6,882	2.7	296,817	42.7
Unknown-income	14	2.1	1,043	0.2	163	15.6	0	0.0
Total AA	652	100.0	694,385	100.0	52,457	7.6	694,385	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	101,287	19,570	3.0	19.3	74,214	73.3	7,503	7.4
Moderate-income	248,742	91,388	14.1	36.7	140,484	56.5	16,870	6.8
Middle-income	443,967	256,086	39.4	57.7	165,324	37.2	22,557	5.1
Upper-income	412,813	281,534	43.3	68.2	109,618	26.6	21,661	5.2
Unknown-income	4,063	1,086	0.2	26.7	2,555	62.9	422	10.4
Total AA	1,210,872	649,664	100.0	53.7	492,195	40.6	69,013	5.7
Income Categories	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	9,896	6.0	8,877	6.0	965	5.9	54	5.3
Moderate-income	23,057	13.9	21,225	14.3	1,727	10.6	105	10.4
Middle-income	56,081	33.8	49,563	33.3	6,261	38.3	257	25.4
Upper-income	76,165	45.9	68,287	45.9	7,285	44.5	593	58.6
Unknown-income	834	0.5	707	0.5	124	0.8	3	0.3
Total AA	166,033	100.0	148,659	100.0	16,362	100.0	1,012	100.0
% of Total Businesses				89.5		9.9		0.6
2020 Adjusted Median Family Income ³⁰⁸								
Middlesex County		\$118,800						
Norfolk County		\$109,800						
Suffolk County		\$109,800						

³⁰⁸ FFIEC Adjusted Median Family Income; available from: <https://www.ffiec.gov/Medianincome.htm>.

Economic Conditions

Similar to the assessment areas discussed previously, the Massachusetts assessment area experienced economic expansion during the review period prior to the economic downturn in 2020. The economic drivers in the area were technology, healthcare, education, and finance. The area's proximity to Harvard, Massachusetts Institute of Technology, and research hospitals made the area a mecca for global pharmaceutical companies and biotech startups.³⁰⁹ The area also had one of the nation's largest concentrations of technology jobs.³¹⁰ The Pandemic and the aggressive business restrictions put in place to control the spread of Covid-19 dealt a severe blow to the economy and caused employment to plunge by 21 percent in some parts of the assessment area between February and April 2020, which was a worse performance than the region or the U.S.³¹¹ The leisure and hospitality as well as transportation industries suffered the biggest losses.³¹² As of August 2020, less than half the jobs lost were recouped.³¹³ The finance industry experienced the least severe job losses in 2020 of any major industry in the greater Boston area.³¹⁴ The area economy relies on finance jobs and was one of the country's premier hubs for money managers.³¹⁵ In the housing market, home building fell in 2019, from a high reached in 2018.³¹⁶ High living costs in the area prevented a faster pace of in-migration to the area to support the labor supply.³¹⁷

As depicted in Exhibit 45 on the following page, small business lending had an overall upward trend during the review period. Although the number of loans to small businesses from banks subject to the CRA increased during the review period, the dollar amount of the loans flattened. However, there was a slight spike in small business lending in 2019, that reached 81,531 loans totaling \$2.5 billion. Lending to small businesses played a critical role in the economy given that small businesses accounted for 89.5 percent of all businesses in the assessment area, as noted in Exhibit 44. The distribution of PPP loans in 2020 helped increase lending to small businesses. In the Massachusetts assessment area, over 50,000 PPP loans in the amount of less than \$1 million were made and approximately 380,000 jobs were self-reported to benefit from the loans made between April 3, 2020 and August 8, 2020.³¹⁸ According to the borrower firms that elected to report their industry, most loans under \$1 million were made to businesses in the Professional, Scientific, and Technical Services industry, followed by the Other Services (except Public Administration) industry.³¹⁹

³⁰⁹ Moody's Precise Report, Cambridge-Newton-Framingham MA, September 2018.

³¹⁰ Ibid.

³¹¹ Moody's Precise Report, Boston MA, September 2020.

³¹² Ibid.

³¹³ Moody's Precise Report, Boston MA, September 2020.

³¹⁴ Ibid.

³¹⁵ Moody's Precise Report, Boston MA, September 2020.

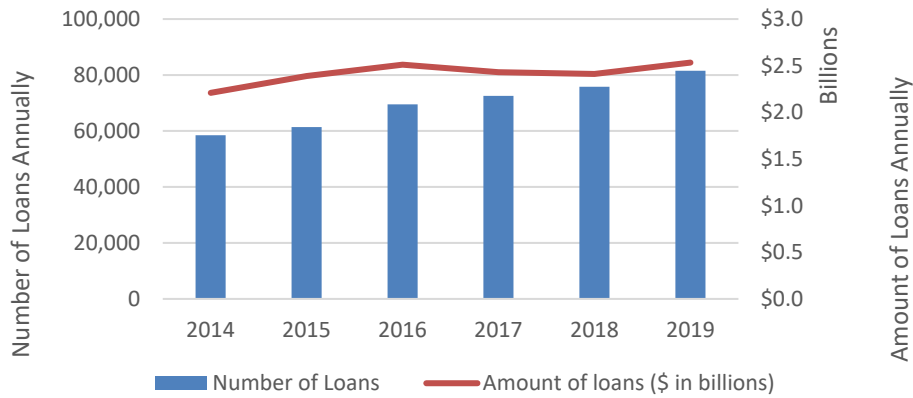
³¹⁶ Moody's Precise Report, Boston MA, September 2019.

³¹⁷ Ibid.

³¹⁸ Small Business Administration, Paycheck Protection Program Loan Data; *Borrower firms self-reported data and had the option to abstain from reporting certain details of the loan application, therefore data may not capture some details of each loan made*; available from: <https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program>.

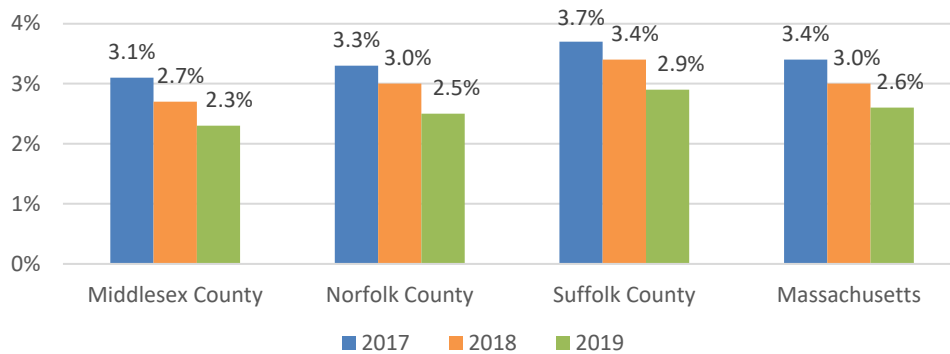
³¹⁹ Ibid.

Exhibit 45
Loans to Small Businesses in Assessment Area³²⁰
2014-2019



The unemployment rates in each county within the assessment area decreased during the review period, as depicted in Exhibit 46. The assessment area had slightly lower rates of unemployment than the statewide rate.

Exhibit 46
Unemployment Rate³²¹
2017-2019



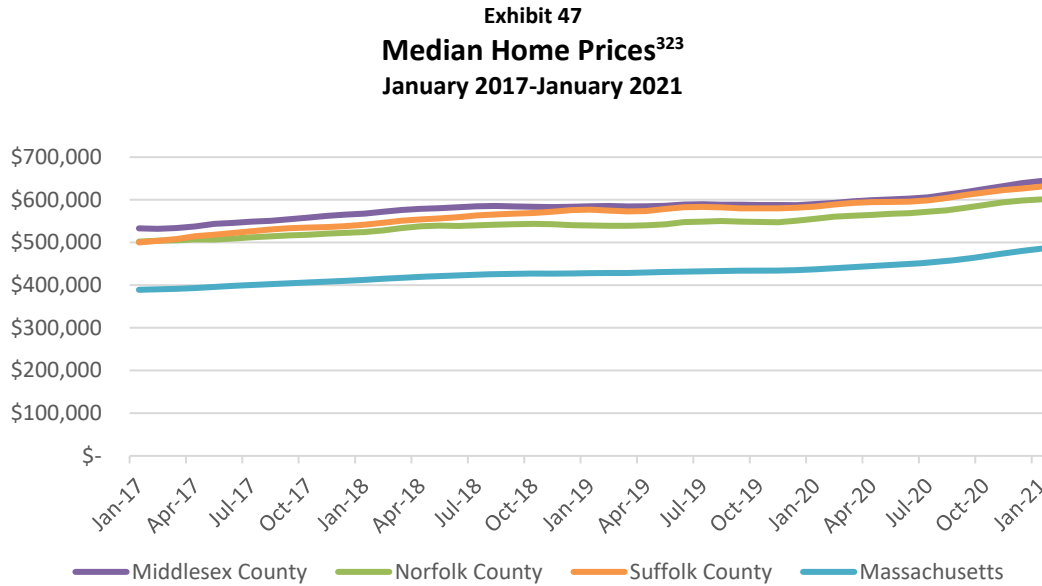
Unemployment in the area increased from the lows described above at the onset of the Pandemic in 2020. Unemployment rates spiked in June 2020 in the area to 15.0 percent in Middlesex County, 17.2 percent in Norfolk County, and 20.3 percent in Suffolk County.³²² Through October 2020, the monthly unemployment rates in the area trended downward, however, they remained above the lows during the review period described above.

³²⁰ Aggregate CRA Small Business data reports available from: <https://www.ffiec.gov/craadweb/aggregate.aspx>.

³²¹ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <https://www.bls.gov/lau/>.

³²² Ibid.

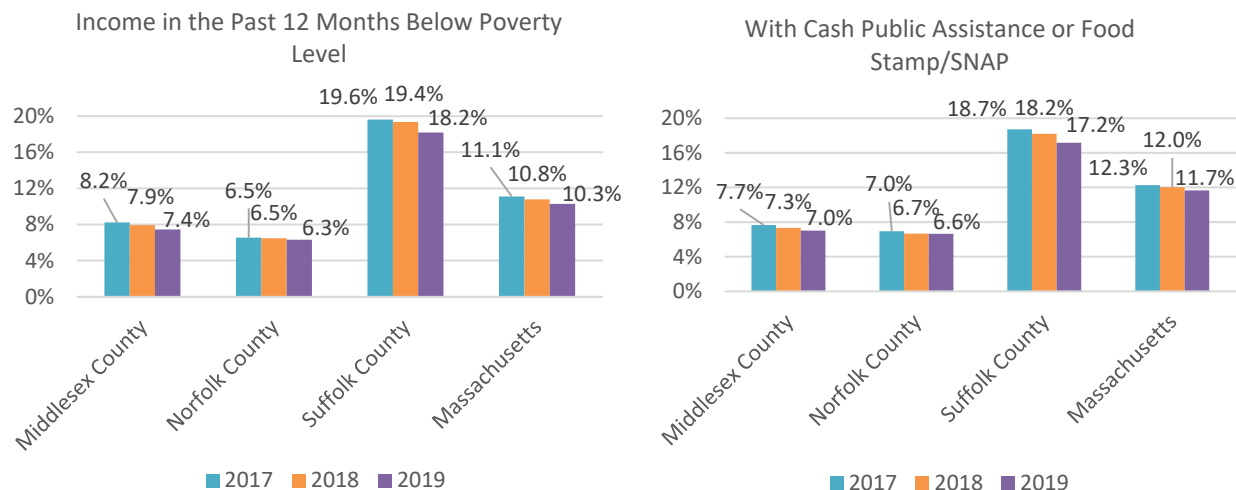
Median home prices in the assessment area increased during the review period, as shown in Exhibit 47. All three counties in the assessment area had higher median home prices compared to the state of Massachusetts overall.



As depicted in Exhibit 48 on the following page, the rates of poverty and cash assistance or food stamp/SNAP benefit usage decreased during the review period in the area and statewide. Middlesex and Norfolk counties both had lower rates of poverty and usage of cash assistance or food stamp/SNAP benefits. Suffolk County had a significantly higher levels of poverty and cash assistance or food stamp/SNAP benefit usage. In Suffolk County, 18 percent of people had income below the poverty level in 2019. Similarly, 17 percent of people in Suffolk County received cash assistance or food stamp/SNAP benefits in 2019.

³²³ Zillow Research, Zillow Home Value Index, Single-Family Homes Time Series; available from: <https://www.zillow.com/research/data/>.

Exhibit 48
Poverty and Food Stamp Usage Rates³²⁴
2017-2019



Credit and Community Development Needs

Based on the data described above and the information gathered from community contacts, there appears to be credit and community development needs that remain unmet. According to a community contact, there is a need in the area for culturally and linguistically appropriate services at a bank’s branch or retail level. The contact noted it is important to have a loan officer or mortgage processor who speaks the borrower’s language. The lack of culturally and linguistically appropriate services inhibit access to bank services and credit, according to the contact.

One community contact noted that there is a need for more banks to engage in community development service hours. For example, a contact indicated the need for more financial literacy, particularly in the immigrant community further explaining that some immigrant populations lack an understanding of credit and the importance of building a credit history. Additional financial literacy and education services by banks would help to address this need in the community. There is also a need for banks to provide volunteer services for homebuyer workshops or education classes, according to a community contact. Overall, the community service activities noted above would be the most impactful to addressing the community development needs in the area.

In a review of the information obtained from community contacts in the assessment area, one community organization suggested similar needs as the findings highlighted from the Small Business Credit Survey discussed previously. Small businesses were particularly impacted by Covid-19 and need PPP style loans to stabilize their business operations as well as low-interest loans. According to the information gathered, businesses were in need of equipment, cleaning and protective equipment, and new technology such as credit card readers to adjust business operations to comply with restrictions put in place to control the spread of the virus.

³²⁴ Poverty and Food Stamp Usage Rates, U.S. Census Bureau, American Community Survey, 5-Year Estimates; available from: <https://www.census.gov/programs-surveys/acs/data.html>.

Conclusions with Respect to Performance Tests in Massachusetts

Lending Test

Lending test performance in Massachusetts is outstanding. Overall geographic lending distributions are excellent and borrower distributions by revenue and income are also excellent along with relatively high levels of community development lending. Lending and demographic data used to assess EWB's lending test performance are in Tables 97 through 114.

Lending Activity

Lending levels demonstrated good responsiveness to assessment area credit needs. As seen on Tables 97 and 97A, EWB extended good levels of small business and home mortgage loans and relatively high level of community development loans considering its limited presence in this competitive market.

Lending Distribution by Geography

Overall lending distributions of loans by geography are excellent. Loans were made throughout the assessment area including low- and moderate-income census tracts. There were no conspicuous lending gaps and lending patterns generally followed the locations of EWB branches and businesses or owner-occupied housing units. The bank performed well in low- and moderate-income census tracts through its extension of small business loans and home refinance loans.

Small Business Lending

The geographic distribution of small business loans is excellent. As seen on Table 98, loans were extended in census tracts of all income levels and the distribution of loans within low- and moderate-income census tracts exceeded the representation of businesses as well as aggregate lending. This performance is attributable to EWB's partnership with a non-profit that serves very small businesses. Lending levels in low- and moderate-income census tracts increased considerably in 2019 when the partnership began.

Home Mortgage Lending

The geographic distribution of home purchase loans is good overall considering rising home prices throughout the review period. As seen on Table 99, performance varied during the review period, but was particularly good within low- and moderate-income census tracts in 2018. Lending in low-income census tracts was generally comparable to owner-occupied housing units and aggregate lenders.

The geographic lending distribution for home mortgage refinance loans is excellent. As seen on Table 100, lending levels were above both owner-occupied units and aggregate lending, with particularly strong performance in low- and moderate-income census tracts.

The geographic distribution of home equity lines of credit is good. As reflected in Table 106, lending levels in low- and moderate-income census tracts are generally comparable to the percentage of owner-occupied housing units.

Lending Distribution by Borrower Income and Business Revenue

Lending distributions by borrower income is excellent. Performance was particularly strong in small business lending where a large number of loans were made to very small businesses. EWB does not generally collect borrower income for home mortgage loans, but did make targeted purchases of home purchase and home refinance loans made to low- and moderate-income borrowers that demonstrated favorable comparisons to the percentage of families and aggregate lending. Overall performance was driven by the bank's small business lending, which was particularly impactful.

Small Business Lending

The distribution of loans to businesses of different revenue sizes is excellent. As seen on Table 107, lending was above the concentration of businesses and aggregate lending. Similar to other assessment areas, EWB's partnership with a non-profit that serves very small businesses enhanced overall performance. Lending distributions to small businesses significantly exceeded the concentration of aggregate lenders for the duration of the review period, but was particularly high in 2019 when the partnership began. In addition, a substantial majority of loans were in small dollar amounts, which are responsive to the credit needs of small businesses.

Home Mortgage Lending

Lending distributions of home purchase and home refinance loans by borrower income is good. As seen on Tables 108 and 109, income data was not available for a sufficient number of loans extended from 2017 through 2019 to draw meaningful conclusions, as such these loans were considered but did not impact the overall assessment. EWB made a targeted purchase of loans in 2016 that resulted in high levels of lending to moderate-income borrowers, well above the percentage of moderate-income families and aggregate lenders.

Community Development Lending

EWB is a leader in making community development loans. As seen on Table 97, the bank made 12 community development loans totaling \$83 million within the Massachusetts assessment area. The loans addressed a variety of community development needs including affordable housing, economic development, stabilizing and revitalizing low- and moderate-income areas, and community services for low- and moderate-income individuals. Notable examples of community development loans include the following:

- A \$22 million working capital line to a CDFI non-profit organization to further its mission of providing capital and financing for multi-family affordable housing.
- A \$9.4 million SBA PPP loan to an electric lighting equipment manufacturing company with 430 employees. The loan promotes economic development by sustaining a small business operation that supports permanent jobs retention for low- and moderate-income Individuals.

- A \$4.7 million SBA PPP loan that helps preserve economic development as well as stabilizes a moderate-income census tract by preserving jobs for a small business during the Pandemic. The loan is to a company that designs, manufactures, and sells medical devices that has 254 employees, including low- and moderate-income individuals.
- A \$1.2 million SBA PPP loan that helps stabilize a moderate-income census tract by preserving jobs for an industry that is heavily impacted by the Pandemic. The loan is to a hotel that attracts tourism and increases foot traffic in the immediate neighborhood which benefits the nearby businesses. In addition, the hotel also attracts and retains local residents through job creation.
- A \$300,000 working capital line to a non-profit charter school operator located in a low-income census tract. The charter school provides students from underserved communities with a rigorous, high-quality education focused on science, technology, engineering, and math. Sixty one percent of the school's students come from economically disadvantaged families.
- A \$43,320 SBA PPP loan to a non-profit that serves as the umbrella organization for various organizations and also manages two apartment complexes that provide much-needed affordable housing to the Chinese community. The organization coordinates activities to attract visitors and to further economic growth in the Boston Chinatown area, located in a low-income census tract.

Investment Test

EWB's community development investment performance within the Massachusetts assessment area is high satisfactory. Considering its limited presence in the area, the bank made a significant level of qualified investments and grants that were responsive to a variety of needs in the community. As seen on Table 115, the bank made a total of 51 investments and grants totaling \$7.9 million that benefited the assessment area. These investments were comprised of \$4.2 million in new investments and \$3.7 million in investments made during a prior period that remain on the bank's books. EWB also invested \$2.8 million, comprised of \$1.7 million new investments and \$1.2 million during a prior period that benefited a broader statewide or regional area. As with other assessment areas, Massachusetts benefited from investments in national funds that cover a broader statewide or regional area that includes the assessment area.

These investments (local and national) were made in a variety of investment instruments that are not routinely provided by private investors and were comprised of LIHTCs, SBICs, and MBS. The investments were responsive to a variety of community development needs with a focus on affordable housing for low- and moderate-income individuals and economic development. Examples include:

- A \$4.1 million new investment to fund affordable housing. EWB invested in an MBS secured by loans that funded 14 affordable housing units for low- and moderate-income individuals in Middlesex, Norfolk, and Suffolk Counties.
- A \$1.5 million investment in affordable housing for low- and moderate-income individuals. This prior period investment provided 489 housing units in seven properties

in Suffolk and Middlesex counties as well as in the broader statewide area of Massachusetts.

- A \$947,584 investment that provided 143 units of affordable housing for low- and moderate-income individuals in Suffolk County. The investment was made during a prior period in a LIHTC.
- A \$544,000 new investment in a New Market Tax Credit that will stabilize and revitalize a low-income census tract located in a city outside of the bank's assessment area, but within the state of Massachusetts. The investment will help rehabilitate the building site of former textile college. The building occupies an entire city block and will include market rate apartments as well as 11 affordable apartments for practicing artists, and 24,220 SF of commercial/retail space. The Project will create a collaborative co-working space that will host job training programs and provide space for a small business/non-profit incubator, and office space for an organization with programs that provide young adults with autism the opportunity for gainful employment, among others.
- A \$311,722 investment that supports economic development by financing small businesses and creating or retaining 248 jobs in Middlesex County. The investment made during a prior period is a woman-owned lower middle market mezzanine fund and conducts its business as a small business investment company. The fund is industry-agnostic and is aimed for women-owned and minority-owned companies.
- A \$267,464 investment that supports economic development by financing small businesses. This investment was made during a prior period in an SBIC that created or retained 347 jobs in Middlesex County.

Service Test

EWB's performance under the service test in Massachusetts is high satisfactory based on the accessibility of its delivery systems and level of community development services provided within the assessment area.

Retail Banking Services

EWB's banking services are reasonably accessible to the bank's geographies and to individuals of different income levels within the Massachusetts assessment area and do not vary in a way that inconveniences any portion of the area. A full array of personal and business banking products and services – including those previously discussed – is offered at each location in the area. Services are consistent across the assessment area and include hours on Saturday and Sunday. In addition, delivery systems including two ATMs, telephone, online, and mobile banking are offered to provide customers access to banking services after normal business hours.

EWB has two branches in Massachusetts, one in a low-income census tract and one in a middle-income census tract. Although the bank has a limited presence in this area, the branches provide reasonable access to banking services for low- and moderate-income individuals and geographies. EWB maintains 50 percent of its branches within low-and moderate-income census tracts, which compares favorably to the percentage of the population that resides in those areas at 29 percent. One of the branches is in close proximity to a cluster of low- and moderate-income areas, which increases access for low- and moderate-income populations. There were no changes to the bank's branches within the assessment area during the review period.

Community Development Services

EWB provided a reasonably high level of community development services in the assessment area considering its small presence; employees provided 20 services for a total of 404 service hours. These community development services met a variety of needs of low- and moderate-income individuals and small businesses. The bulk of the services involved providing financial education presentations to low- and moderate-income individuals and small businesses. An EWB employee also took on a leadership role for one of the organizations as a board member and financial advisor. Examples of the types of community development services provided follow:

- EWB employees partnered with a non-profit organization to host multiple day events where local small business owners received individual consultation about SBA business lending programs. Fifteen EWB employees met with business owners to assess their business challenges and explained how the programs can benefit each business owner to start, grow and expand their business. Employees also reviewed business proposals and provided technical assistance on how to apply for loans. Fifteen bank employees provided a total of 112 hours of community development service hours to 23 attendees at these events.
- EWB employees partnered with a local non-profit to host five personal financial seminars to educate low- and moderate-income, limited-English-speaking senior citizens. Topics covered choosing the right bank account, the difference between a debit card and a credit card, how to protect themselves and prevent identity theft and where and how to report crimes. Four EWB employees provided a total of 51.5 hours of community development service hours to 158 attendees at these events.
- EWB employees participated in five homebuyer seminars for low-income, non-English-speaking new immigrants in the nearby area. Presenters explained the advantages and disadvantages of renting versus owning a home, provided questions to determine attendees' readiness to buy a home, identified steps and basic terms and required disclosures in a mortgage transaction. A total of 24 bank employees provided 102 attendees with 61 hours of community development service.
- EWB employees partnered with a non-profit to host a loan seminar at a local community center where four staff members presented an overview of SBA programs and services, discussed benefits, and provided guidance on what type of programs are suitable for different business owners. The 40 attendees were native Spanish speaking immigrant business owners and their

employees. Attendees were provided with bilingual assistance from the partnering nonprofit organization. EWB employees provided a total of 10 hours for this event.

- An EWB employee provided 16 hours of community service as a board member and financial advisor for an organization that provides community members, including those that are low- and moderate-income individuals with citizenship classes and legal assistance, among other services. During the pandemic, discussions included fundraising for personal protective equipment (PPE), donating PPE to seniors, pandemic relief outreach, and COVID-19 health seminars.

STATE OF NEVADA

CRA Rating for Nevada

Performance in Nevada is rated "OUTSTANDING"

The lending test is rated: Outstanding
The investment test is rated: High Satisfactory
The service test is rated: High Satisfactory

The major factors supporting the institution's rating include:

- Excellent lending levels despite the bank's limited presence.
- Excellent distributions of loans by borrower income and businesses of different sizes.
- Good distributions of loans among geographies of different incomes.
- Leadership in making community development loans that were particularly responsive to the economic impacts of the Pandemic.
- Significant levels of qualified investments and grants that were responsive to a variety of community development needs.
- Reasonable accessibility of banking services.

Scope of Examination

The scope for the examination for Nevada is generally consistent with the overall scope of the CRA examination. The bank has one assessment area in the state of Nevada. Although the bank's overall presence and loan activity is limited, a full-scope review was conducted to determine the overall state rating. The lending test assessment was limited to home purchase and home equity lines of credit. Small business, home improvement, home mortgage refinance, and multi-family loans were considered, but did not influence the overall assessment due to their limited volume.

Description of Operations in Nevada

The Nevada assessment area is comprised of Clark County and is part of the Las Vegas-Henderson-Paradise, Nevada MSA. As of 2019, the area was home to 2.3 million people.³²⁵

The bank operated one office in Clark County that held \$181 million in deposits, representing 0.19 percent of the deposit market share as of June 30, 2020.³²⁶ By comparison, there were a total of 42 FDIC-insured financial institutions operating 326 offices within Clark County, with deposits totaling over \$95 billion.³²⁷

³²⁵ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2019; available from: www.census.gov/quickfacts/.

³²⁶ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2020; available from: <https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

³²⁷ Ibid.

Exhibit 49 presents key demographic and business information used to help develop a performance context for the assessment area.

EXHIBIT 49 ASSESSMENT AREA DEMOGRAPHICS NEVADA ASSESSMENT AREA 2019 FFIEC CENSUS AND 2019 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	28	5.7	19,625	4.2	7,662	39.0	96,196	20.7
Moderate-income	128	26.3	104,903	22.5	23,375	22.3	85,415	18.4
Middle-income	181	37.2	184,975	39.7	17,254	9.3	95,475	20.5
Upper-income	149	30.6	155,834	33.5	7,057	4.5	188,356	40.5
Unknown-income	1	0.2	105	0.0	37	35.2	0	0.0
Total AA	487	100.0	465,442	100.0	55,385	11.9	465,442	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	47,951	7,232	1.9	15.1	30,033	62.6	10,686	22.3
Moderate-income	213,646	64,256	16.9	30.1	113,530	53.1	35,860	16.8
Middle-income	331,753	158,649	41.7	47.8	126,932	38.3	46,172	13.9
Upper-income	262,157	150,241	39.5	57.3	72,752	27.8	39,164	14.9
Unknown-income	1,624	47	0.0	2.9	774	47.7	803	49.4
Total AA	857,131	380,425	100.0	44.4	344,021	40.1	132,685	15.5
Income Categories	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,912	3.7	2,633	3.7	247	4.4	32	5.0
Moderate-income	17,261	22.2	15,542	21.7	1,619	28.6	100	15.5
Middle-income	29,874	38.4	27,432	38.4	2,208	39.1	234	36.2
Upper-income	27,306	35.1	25,511	35.7	1,522	26.9	273	42.3
Unknown-income	441	0.6	379	0.5	55	1.0	7	1.1
Total AA	77,794	100.0	71,497	100.0	5,651	100.0	646	100.0
% of Total Businesses				91.9		7.3		0.8
2020 Adjusted Median Family Income ³²⁸			\$70,800					

Economic Conditions

The assessment area economy expanded during the review period prior to the economic downturn in 2020. Key economic drivers included tourism as well as the leisure and hospitality industries that

³²⁸ FFIEC Adjusted Median Family Income; available from: <https://www.ffiec.gov/Medianincome.htm>.

anchored the area as a retiree destination.³²⁹ The area's tourism-based economy was significantly impacted by the Pandemic-induced downturn, as evident in the unemployment rates described below. By the fourth quarter of 2020 the area's economic recovery showed some gains despite the 13.9 percent unemployment rate that was the fourth highest among U.S. metro area.³³⁰ Business operation restrictions to control the spread of Covid-19 reduced casino, bar, and restaurant capacity down to 25 percent and the visitor slump required some casinos to implement mid-week closures.³³¹ Gaming revenue was down by 40 percent in 2020.³³² Prior to the Pandemic, the area's low business costs and proximity to nearby markets in California and Arizona drew distributors and manufacturers to the area.³³³ This growth in the distribution sector helped diversify the tourism-driven economy.³³⁴ In addition, the broadened job base and increased hiring in mid- and high-paying industries caused average hourly earnings to rise in the area.³³⁵

Construction employment also rose during the review period.³³⁶ Although construction accounted for seven percent of employment, the industry was responsible for 60 percent of jobs created between 2018 and 2019.³³⁷ Housing starts in the area decreased early in the review period and further strained the already lean housing supply.³³⁸ Late in the review period, homebuilding increased and helped mitigate those supply constraints.³³⁹ However, housing affordability remained a challenge in the area. Potential homebuyers were priced out of the market during the review period as house prices rose twice as fast as incomes.³⁴⁰ After the onset of the Pandemic, housing starts returned to pre-crisis levels and house prices rose although at a slower pace compared to the U.S. average.³⁴¹

As depicted in Exhibit 50 on the following page, lending to small businesses from banks subject to the CRA increased during the review period and peaked in 2019, reaching 49,647 loans totaling \$1.3 billion. Lending to small businesses played a critical role in the economy given that small businesses accounted for 91.9 percent of all businesses in the assessment area, as noted in Exhibit 49. As described previously, lending to small businesses nationwide increased in the first half of 2020 as a result of PPP loans. In the assessment area, over 30,000 PPP loans in the amount of less than \$1 million were made and approximately 240,000 jobs were self-reported to benefit from the loans made between April 3, 2020 and August 8, 2020.³⁴² According to the borrower firms that elected to report their business's industry, most loans under \$1 million were made to businesses in the Professional, Scientific, and Technical Services industry, followed by the Health Care and Social Assistance industry and the Other Services (except Public Administration) industry.³⁴³

³²⁹ Moody's Precis Report, Las Vegas-Henderson-Paradise NV, November 2019.

³³⁰ Moody's Precis Report, Las Vegas-Henderson-Paradise NV, November 2020.

³³¹ Ibid.

³³² Ibid.

³³³ Moody's Precis Report, Las Vegas-Henderson-Paradise NV, July 2018.

³³⁴ Ibid.

³³⁵ Ibid.

³³⁶ Moody's Precis Report, Las Vegas-Henderson-Paradise NV, November 2019.

³³⁷ Ibid.

³³⁸ Moody's Precis Report, Las Vegas-Henderson-Paradise NV, July 2018.

³³⁹ Moody's Precis Report, Las Vegas-Henderson-Paradise NV, November 2019.

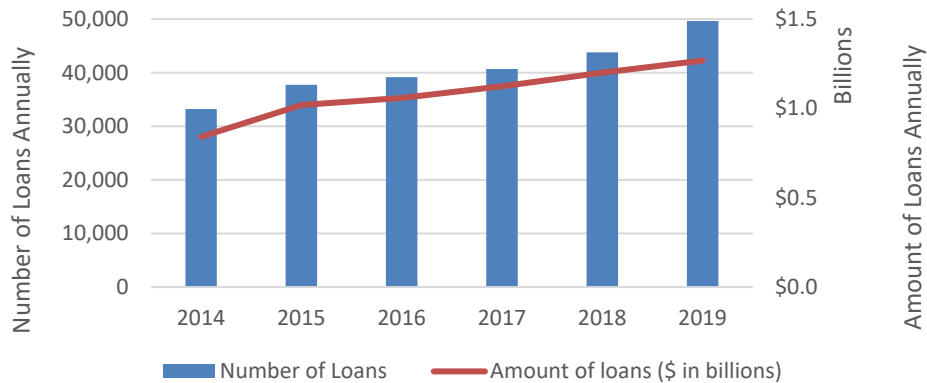
³⁴⁰ Ibid.

³⁴¹ Moody's Precis Report, Las Vegas-Henderson-Paradise NV, November 2020.

³⁴² Small Business Administration, Paycheck Protection Program Loan Data, available from: <https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program>.

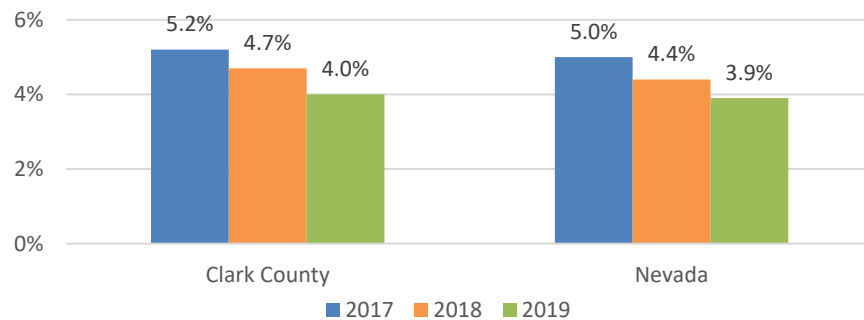
³⁴³ Ibid.

Exhibit 50
Loans to Small Businesses in Assessment Area³⁴⁴
2014-2019



As shown in Exhibit 51, the unemployment rate in the area declined at the same rate as the state during the review period. However, the unemployment rate remained slightly higher than the statewide unemployment rate.

Exhibit 51
Unemployment Rate³⁴⁵
2017-2019



The Pandemic significantly impacted employment in the area. Unemployment spiked dramatically in Clark County to 34 percent in April 2020 before decreasing throughout 2020. Although, unemployment remained elevated at 17.8 percent in June 2020, and 13.7 percent in October 2020.³⁴⁶

As shown in Exhibit 52 on the following page, median home prices in the assessment area tracked closely in-line with the median home price in the state overall during the review period. The area had a higher percentage of homeowners who were cost burdened or spent more than 30 percent of their

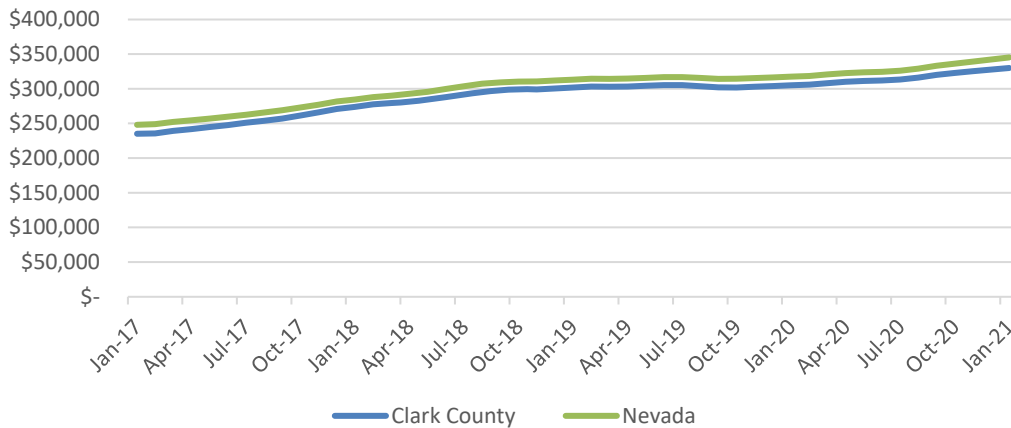
³⁴⁴ Aggregate CRA Small Business data reports available from: <https://www.ffiec.gov/craadweb/aggregate.aspx>.

³⁴⁵ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics by County; available from: <https://www.bls.gov/lau/>.

³⁴⁶ Ibid.

income on housing costs, than the share of homeowners in Nevada and nationwide, 32 percent, 30 percent, and 28 percent, respectively.³⁴⁷

Exhibit 52
Median Home Prices³⁴⁸
January 2017-January 2021



Rent prices also increased in the area during the review period from \$792 in 2017, to \$878 in 2019.³⁴⁹ Half of renters in the area were cost burdened, indicating the high level of housing costs in the area.³⁵⁰ Higher rental housing costs were exacerbated by a limited rental housing supply. The area had the most severe shortage of rental homes affordable to households with extremely low incomes.³⁵¹ For every 100 renter households with extremely low income in the area, there were only 14 rental units available.³⁵²

As depicted in Exhibit 53 on the following page, the poverty and public assistance or food stamp/SNAP benefit usage rates decreased during the review period. The assessment area had slightly higher rates of both poverty and public assistance or food stamp/SNAP benefits usage than the statewide average. Despite the slight decrease in the poverty rate, the prevalence of poverty in the area remained high. Many households, 43 percent, lived in liquid asset poverty.³⁵³ The liquid poverty rate in the area exceeded the nationwide rate of 37 percent.³⁵⁴

³⁴⁷ Prosperity Now Scorecard, Clark County, NV; available from: <https://scorecard.prosperitynow.org>.

³⁴⁸ Zillow Research, Zillow Home Value Index, Single-Family Homes Time Series; available from: <https://www.zillow.com/research/data/>.

³⁴⁹ Zillow, Zillow Median Rent List Price, 1-Bedroom; available from: <https://www.zillow.com/research/data/>.

³⁵⁰ Prosperity Now Scorecard, Clark County, NV; available from: <https://scorecard.prosperitynow.org>.

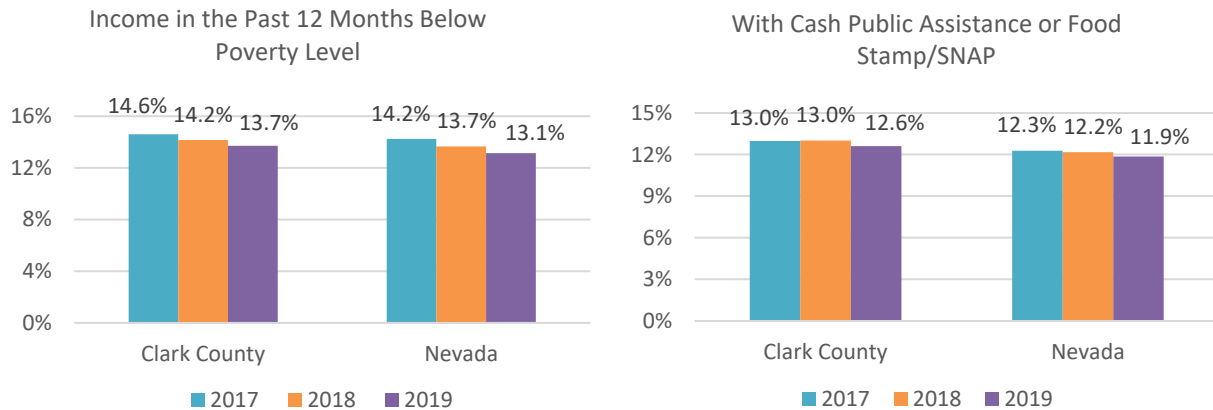
³⁵¹ National Low-Income Housing Coalition, The Gap, March 2020; available from: <https://reports.nlihc.org/gap>.

³⁵² Ibid.

³⁵³ Prosperity Now Scorecard, Clark County, NV; available from: <https://scorecard.prosperitynow.org>.

³⁵⁴ Ibid.

Exhibit 53
Poverty and Food Stamp Usage Rates³⁵⁵
2017-2019



Credit and Community Development Needs

Similar to the discussion for the credit needs of the previously discussed assessment areas, small business lending levels increased during the review period before PPP loans were distributed in 2020 to help meet the immediate credit needs of small businesses enduring the impacts of Covid-19. In addition to the small business lending needs highlighted by the Small Business Credit Survey results discussed previously, one community contact noted that there is a recent demand from small business owners for smaller-dollar loans. However, the contact noted that for smaller start-up staged businesses, there is usually insufficient collateral for a loan. In order to mitigate this barrier to credit for small start-up businesses, the organization that operates as a CDFI considers alternative forms of collateral from the business owner such as personal assets.

Similar to the needs described for the Southern California assessment area, nonprofit organizations such as CDFIs need additional financing from banks. Products such as EQ2s with flexible terms would be the most impactful for CDFIs to receive in order to increase the pool of capital the organization could lend to small businesses in the community.

In the housing market, there is a significant shortage of affordable rental housing, as described previously. A community contacted indicated that there is an opportunity for banks to support the development of affordable rental housing with LIHTC projects with low-cost debt or equity financing. The contact noted the need for rental housing is comparatively high in the area because there is a higher concentration of renter households in Clark County, 47 percent, compared to the 36 percent of nationwide renter households. Overall, there are opportunities for banks to lend or invest to small businesses, support affordable housing development and nonprofit community organizations in order to help address the credit needs described above.

³⁵⁵ Poverty and Food Stamp Usage Rates, U.S. Census Bureau, American Community Survey, 5-Year Estimates; available from: <https://www.census.gov/programs-surveys/acs/data.html>.

Conclusions with Respect to Performance Tests in Nevada

Lending Test

EWB's lending test performance in Nevada is Outstanding. Lending levels are overall excellent despite the bank's limited presence in the assessment area. Geographic lending distributions are good and borrower distributions are excellent. Overall lending performance is driven by the lending distributions of small business and home mortgage loans and high level and excellent responsiveness of community development loans. EWB's responsiveness to economic impacts of the Pandemic is commendable.

Lending Activity

EWB's lending levels reflect excellent responsiveness to assessment area credit needs. High levels of community development and home mortgage loans were extended despite the bank's limited presence in the assessment area. Data on lending volumes are on Tables 117 and 117A.

Lending Distribution by Geography

The geographic distributions of loans in Nevada are good. Loans were extended within each census tract income category. There were no conspicuous lending gaps, lending patterns are generally clustered near EWB's sole branch and followed the concentration of owner-occupied housing units and concentrations of small businesses.

Small Business Lending

The geographic distribution of small business loans is excellent. As seen on Table 118, loans were generally extended in census tracts of all income levels and the distribution of loans within low- and moderate-income census tracts exceeded the representation of businesses as well as aggregate lending. This assessment is based primarily on loans extended in 2017, 2018, and 2019, as the volume for 2016 were too few to reach a meaningful conclusion.

Home Mortgage Lending

The geographic distribution of home purchase loans is good overall. Performance was strongest in middle-income census tracts where opportunities were more abundant. Owner-occupied housing units in low-income areas comprised less than two percent of total owner-occupied housing units and less than 17 percent in moderate-income areas. Performance in low- and moderate-income census tracts varied during the review period, but improved considerably in 2019 due to the success of the bank's special mortgage product designed to assist low- and moderate-income borrowers and the hiring of a mortgage business development officer in 2018. The bank had similar lending patterns in home improvement and home refinance loans. Data used for this analysis is on Tables 119, 120, and 121.

The geographic distribution of home equity lines of credit is excellent overall. As seen on Table 126, and similar to home purchase loans, performance was strongest in middle-income areas where the bulk of owner-occupied housing units are located. Lending levels in low- and moderate-income areas improved considerably in 2017 when they exceeded owner-occupied units.

Lending Distribution by Borrower Income and Business Revenue

Overall lending distributions by borrower income and business revenue are excellent in Nevada. For both small business loans and home purchase loans, lending performance exceeded aggregate lending performance and lending levels were above or comparable to demographic comparators as noted below. Data used for this assessment can be seen on Tables 127, and 128.

Small Business Lending

The distribution of small business loans among businesses of different sizes is excellent. Lending levels to small businesses is well above aggregate lender performance and compare favorably to the representation of small businesses. The bank also made a good number of loans in small dollar amounts, which met an identified credit need within the assessment area. Data used for this assessment can be seen in Table 83.

Home Mortgage Lending

The lending distribution by borrower income of home purchase loans is excellent. Lending levels substantially exceed aggregate lender performance and the percentage of moderate-income families and compared favorably to the percentage of low-income families. Performance was driven by loans made in 2019 given the increased volume for that year, which is attributable to the hiring of a mortgage business development officer and the success of the bank's special mortgage program targeted to low- and moderate-income borrowers.

Community Development Lending

EWB is a leader in making community development loans that exhibited excellent responsiveness to community credit needs, despite the bank's limited presence in Nevada. As seen on Table 117, EWB made 17 community development loans totaling over \$727.2 million in Nevada. These loans addressed a variety of community development needs and were responsive to the economic impacts of the Pandemic. Given Nevada's reliance on the tourism and leisure and hospitality sectors, which were significantly impacted by the Pandemic, the bank's PPP loan volume was particularly responsive. Notable community development loans in Nevada include the following:

- A \$3.7 million loan for a 76-unit apartment complex that provides affordable housing for low- and moderate-income individuals that also helps stabilize the low-income tract where it is located.
- \$2.5 million loan to finance the purchase of a 57-unit apartment in moderate-income census tract that will provide affordable housing for low- and moderate-income individuals.
- A \$1.7 million loan to finance the acquisition of a 41-unit apartment complex in a moderate-income area. Of the total units, 37 units are affordable to low- or moderate-income individuals.

- A \$1.4 million SBA PPP loan to a restaurant in a moderate-income tract. The facility stabilizes this moderate-income tract by retaining existing jobs for local low- and moderate-income residents.
- A \$1.3 million SBA PPP loan that helped stabilize a low-income census tract by preserving jobs in an industry that was particularly impacted by the Pandemic. The loan financed the ongoing operations of a hotel that attracts tourism and increases foot traffic in the immediate neighborhood which benefits the nearby businesses. Financing for the hotel also benefits the local residents by maintaining jobs in this low-income neighborhood.
- A \$1.3 million SBA loan to a pharmacy that promotes economic development by sustaining a small business operation that provides 15 jobs, including those for low- and moderate-income individuals. The pharmacy also provides the community personalized services including medication therapy management, immunization service, health screening service, and free local delivery.
- A \$615,000 loan that provides affordable housing for low- and moderate-income individuals. The loan financed a 20-unit apartment complex located in a moderate- income tract with rents that are affordable to moderate-income individuals.

Investment Test

EWB's community development investment performance within the Nevada assessment area is high satisfactory. Considering its limited presence in the area, the bank made a significant level of qualified investments and grants that were responsive to a variety of needs in the community. As seen on Table 135, the bank made a total of \$13.1 million in investments comprised of \$9.3 million in new investments and \$3.8 million made during prior periods that remain on the bank's books. As with other assessment areas, Nevada benefited from investments in national funds that cover a broader statewide or regional area that includes the assessment area. These investments were responsive to the need for affordable housing for low- and moderate-income individuals and economic development. Examples of investments include the following:

- A \$4 million investment that provided 120 affordable housing units for low- and moderate-income individuals. The investment was in an MBS backed by a loan to finance the refurbishment of a multi-family property located in the city of Henderson.
- A \$2.3 million investment in a nationwide MBS that provided 65 units of affordable housing for low- and moderate-income individuals in Las Vegas. Each of the units is income-restricted to individuals earning 60 percent or less of the area median income.
- A \$3 million investment in a nationwide MBS that provided 80 units of affordable housing for low- and moderate-income individuals. The property is located in a moderate-income census tract in Las Vegas, and the property also helps to stabilize the area by providing affordable housing.

- \$398,780 total investments that support economic development. These funds were invested in two SBICs that created or retained 378 jobs in Clark County. These investments were made during a prior period and remain on the bank's books.

Service Test

EWB's performance under the service test in Nevada is high satisfactory based on the availability of its delivery systems and the level of community development services provided.

Retail Banking Services

EWB's banking services are reasonably accessible to the bank's geographies and to individuals of different income levels and do not vary in a way that inconveniences any portion of the area. A full array of personal and business banking products and services – including those previously discussed – is offered in Nevada. Services include extended hours on Friday and Saturday banking services. In addition, delivery systems including ATM, telephone banking, online, and mobile banking are offered to provide customers access to banking services after normal business hours.

EWB has one branch in this assessment area located in a low-income census tract. There have been no changes in branches since the bank opened this branch in 2013. Given the bank's limited presence in this large geographic area, its sole branch in a low-income census tract provides reasonable access to surrounding low- and moderate-income areas and populations as seen on Table 136.

Community Development Services

Considering its limited presence in Nevada, EWB provided a high level of community development services in the assessment area. EWB employees provided a total of 318 hours of community development service hours through 22 services. Many of the services involved providing basic financial education or information about the lending process to small businesses, low- and moderate-income individuals, or students from low- and moderate-income families. One bank employee also provided services hours in a leadership position as a board member for one of the organizations. The following are examples of the types of services provided in Nevada.

- EWB employees hosted three home buyer workshops for 65 first-time homebuyers in the Las Vegas surrounding communities. The workshops covered various mortgage options as well as the bank's REACH down payment assistance program designed for low- and moderate-income individuals. Eleven employees provided a total of 77 community development service hours for these events.
- An EWB employee volunteered to teach six classes of personal financial education to 11th grade students at a Title I school in Las Vegas, where over 80 percent of the students received free or reduced-price lunch. The finance course covered topics such as earnings, employment, income, budgeting, savings, credit and debit, consumer protection, smart shopping, risk management and investing. In total, the employees provided 20 hours of community development service hours to 218 students from low- and moderate-income families.

- An EWB employee provided over 42 hours of community development service in a leadership position as a board member for a local chamber of commerce. The local chamber was established more than 20 years ago with the primary objective to help small business owners grow in the Las Vegas area.
- Four EWB employees provided 21 hours of community development service hours at a local chamber of commerce by presenting home mortgage options to 12 low- and moderate-income borrowers and small business owners interested in purchasing a home.

APPENDIX A

SCOPE OF EXAMINATION

Please refer to page 4 of this report for a discussion of the examination scope. The following chart is a supplement to that discussion and serves to illustrate the scope of the various states and assessment areas.

SCOPE OF EXAMINATION	
TIME PERIOD REVIEWED	July 1, 2016 – December 31, 2019 (Retail Lending) January 31, 2017 – December 31, 2020 (Community Development)
FINANCIAL INSTITUTION	PRODUCTS REVIEWED
East West Bank Pasadena, California	<ul style="list-style-type: none"> – Home Mortgage (Purchase, Refinance, Home Improvement, Home Equity) – Small Business

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
California <ul style="list-style-type: none"> • Southern California • Bay Area • Sacramento • San Diego 	<ul style="list-style-type: none"> Full Full Limited Limited 	<ul style="list-style-type: none"> 0 0 0 0 	
New York <ul style="list-style-type: none"> • New York 	<ul style="list-style-type: none"> Full 	<ul style="list-style-type: none"> 0 	
Texas <ul style="list-style-type: none"> • Houston • Dallas 	<ul style="list-style-type: none"> Full Full 	<ul style="list-style-type: none"> 0 0 	
Washington <ul style="list-style-type: none"> • Washington 	<ul style="list-style-type: none"> Full 	<ul style="list-style-type: none"> 0 	
Geogia <ul style="list-style-type: none"> • Georgia 	<ul style="list-style-type: none"> Full 	<ul style="list-style-type: none"> 0 	
Massachusetts <ul style="list-style-type: none"> • Massachusetts 	<ul style="list-style-type: none"> Full 	<ul style="list-style-type: none"> 0 	
Nevada <ul style="list-style-type: none"> • Nevada 	<ul style="list-style-type: none"> Full 	<ul style="list-style-type: none"> 0 	

APPENDIX B

SUMMARY OF RATINGS

SUMMARY OF RATINGS				
STATE/TERRITORY	LENDING TEST RATING	INVESTMENT TEST RATING	SERVICE TEST RATING	OVERALL RATING
California	Outstanding	Outstanding	High Satisfactory	Outstanding
New York	Outstanding	Outstanding	High Satisfactory	Outstanding
Texas	Outstanding	Outstanding	High Satisfactory	Outstanding
Washington	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Georgia	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Massachusetts	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Nevada	Outstanding	High Satisfactory	High Satisfactory	Outstanding

APPENDIX C

GLOSSARY OF TERMS

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

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language. Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on:
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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 and community development tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, responsiveness).

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

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

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 and community development tests is analyzed using only quantitative factors (for example, 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, or a median family income that is less than 50 percent, in the case of a geography.

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

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

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) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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.

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

APPENDIX D

LIMITED-SCOPE ASSESSMENT AREA

MARKET PROFILES

All demographic and economic information in this appendix originates from one of the following sources:

- U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2019; available from <http://www.census.gov/quickfacts/>.
- Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2020; available from: <https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2>.
- FFIEC Adjusted Median Family Income; available from: <https://www.ffiec.gov/MedianIncome.htm>.

Sacramento Assessment Area

The Sacramento assessment area consists of Sacramento County in its entirety and is part of the Sacramento-Roseville-Folsom, California Metropolitan Statistical Area (MSA). Sacramento is located in California's Central Valley which extends from the delta lands between the Sacramento and San Joaquin rivers to the foothills of the Sierra Nevada. The area was home to more than 1.6 million people in 2019.

There were 31 Federal Deposit Insurance Corporation (FDIC)-insured financial institutions operating 204 offices that held deposits totaling over \$43 billion in the area as of June 30, 2020. East West Bank (EWB) operated one branch in the area and held \$133 million in total deposits, representing 0.31 percent of the deposit market share. In 2019, there were 122 lenders reporting small business loans pursuant to the reporting requirements of the CRA, most of which were large regional and national institutions. These lenders, which represent only a portion of the overall commercial lending market, extended 34,261 small business loans totaling \$948 million. EWB ranked 40th and extended 11 small business loans totaling \$1.6 million.

The exhibit on the following page presents key demographic and business information used to help develop a performance context for the assessment area.

EXHIBIT 54 ASSESSMENT AREA DEMOGRAPHICS SACRAMENTO ASSESSMENT AREA 2019 FFIEC CENSUS AND 2019 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	42	13.2	40,741	11.9	13,946	34.2	91,759	26.7
Moderate-income	94	29.7	94,782	27.6	17,455	18.4	59,254	17.3
Middle-income	103	32.5	117,572	34.3	11,747	10.0	63,858	18.6
Upper-income	77	24.3	89,856	26.2	3,810	4.2	128,338	37.4
Unknown-income	1	0.3	258	0.1	91	35.3	0	0.0
Total AA	317	100.0	343,209	100.0	47,049	13.7	343,209	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	70,180	20,114	6.9	28.7	43,376	61.8	6,690	9.5
Moderate-income	159,284	70,538	24.4	44.3	77,347	48.6	11,399	7.2
Middle-income	193,250	104,165	36.0	53.9	76,753	39.7	12,332	6.4
Upper-income	135,494	94,601	32.7	69.8	34,102	25.2	6,791	5.0
Unknown-income	2,063	188	0.1	9.1	1,412	68.4	463	22.4
Total AA	560,271	289,606	100.0	51.7	232,990	41.6	37,675	6.7
Income Categories	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	7,793	12.0	6,888	11.3	869	21.6	36	10.6
Moderate-income	17,008	26.1	15,812	26.0	1,109	27.5	87	25.7
Middle-income	20,221	31.1	19,339	31.8	811	20.1	71	20.9
Upper-income	18,470	28.4	17,407	28.7	995	24.7	68	20.1
Unknown-income	1,617	2.5	1,298	2.1	242	6.0	77	22.7
Total AA	65,109	100.0	60,744	100.0	4,026	100.0	339	100.0
% of Total Businesses				93.3		6.2		0.5
2020 Adjusted Median Family Income			\$86,700					

San Diego Assessment Area

The San Diego assessment area consists of San Diego County and comprises the full San Diego-Chula Vista-Carlsbad, California MSA. San Diego County is located on the coast of southern California, south of Riverside and Orange counties and north of the U.S.-Mexico international border. The assessment area was home to more than 3.3 million people in 2019.

There were 48 FDIC-insured financial institutions operating 561 offices that held deposits totaling over \$111 billion in the area as of June 30, 2020. East West Bank operated one branch in the area and held \$150 million in total deposits, representing 0.14 percent of the deposit market share. In 2019, there were 161 lenders reporting small business loans pursuant to the reporting requirements of the CRA, most of which were large regional and national institutions. These lenders, which represent only a portion of the overall commercial lending market, extended 100,874 small business loans totaling \$2.8 billion. EWB ranked 49th and extended 17 small business loans totaling \$3.1 million.

The exhibit on the following page presents key demographic and business information used to help develop a performance context for the assessment area.

EXHIBIT 55 ASSESSMENT AREA DEMOGRAPHICS SAN DIEGO ASSESSMENT AREA 2019 FFIEC CENSUS AND 2019 DUN AND BRADSTREET DATA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	61	9.7	57,401	7.8	18,951	33.0	172,423	23.6
Moderate-income	142	22.6	158,623	21.7	25,027	15.8	123,833	16.9
Middle-income	204	32.5	236,551	32.3	20,679	8.7	130,363	17.8
Upper-income	214	34.1	278,708	38.1	13,088	4.7	304,709	41.7
Unknown-income	7	1.1	45	0.0	0	0.0	0	0.0
Total AA	628	100.0	731,328	100.0	77,745	10.6	731,328	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	90,459	16,148	2.8	17.9	67,684	74.8	6,627	7.3
Moderate-income	255,834	87,646	15.1	34.3	148,426	58.0	19,762	7.7
Middle-income	403,508	205,291	35.5	50.9	168,950	41.9	29,267	7.3
Upper-income	430,949	269,968	46.6	62.6	129,999	30.2	30,982	7.2
Unknown-income	56	26	0.0	46.4	19	33.9	11	19.6
Total AA	1,180,806	579,079	100.0	49.0	515,078	43.6	86,649	7.3
Income Categories	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	9,990	5.7	9,189	5.7	754	6.2	47	5.6
Moderate-income	27,436	15.7	25,556	15.8	1,763	14.4	117	14.0
Middle-income	61,740	35.3	56,913	35.2	4,619	37.7	208	24.9
Upper-income	75,586	43.2	70,016	43.3	5,108	41.7	462	55.4
Unknown-income	138	0.1	122	0.1	16	0.1	0	0.0
Total AA	174,890	100.0	161,796	100.0	12,260	100.0	834	100.0
% of Total Businesses				92.5		7.0		0.5
2020 Adjusted Median Family Income			\$92,700					

APPENDIX E

CRA CORE TABLES

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East West Bank, Pasadena, California

Rated Area: State of California

Table 1 - Lending Volume of Reported Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	% of Rated Area Loans	Small Business Loans		Small Farm Loans		All HMDA Loans		Community Development Loans		Total Reported Loans		% of Rated Area Deposits
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<i>Full Scope</i>												
Southern California	73.9%	6,622	805,433	0	0	6,530	3,979,178	980	3,079,956	14,132	7,864,567	82.9
Bay Area	22.4%	2,402	160,686	0	0	1,674	1,217,253	213	687,801	4,289	2,065,740	16.1
Broader Statewide/Regional Area								148	396,270			
<i>Limited Scope</i>												
Sacramento	2.1%	44	9,203	0	0	330	96,089	22	69,006	396	174,298	0.5
San Diego	1.6%	71	12,843	0	0	221	99,100	17	50,747	309	162,690	0.5

Table 1A - Lending Volume of Optional Loans

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	% of Rated Area Loans	Home Equity		Letters of Credit		Total Optional Loans					
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
<i>Full Scope</i>											
Southern California	62.4	926	395,140	12	336,045	938	731,185				
Bay Area	29.1	436	216,921	2	72,145	438	289,066				
<i>Limited Scope</i>											
Sacramento	6.7	99	14,061	1	14,696	100	28,757				
San Diego	1.8	27	9,740	0	0	27	9,740				
Broader Statewide /Regional Area				10	152,779	1,503	152,779				

East West Bank, Pasadena, California

Rated Area: State of California

Table 2 - Geographic Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Southern California 2016	399	73.1	7.3	6.0	22.6	21.1	40.4	28.6	29.8	44.3	5.1	19.0	27.9	48.0	0.2	0.3	0.3	0.3	0.1
Southern California 2017	1,085	70.3	7.7	5.3	26.3	20.7	33.4	27.1	32.6	46.9	4.8	20.3	26.8	48.2	0.2	0.4	0.3	0.3	0.2
Southern California 2018	985	67.3	7.6	5.2	25.3	20.9	36.0	27.0	31.1	46.9	4.7	20.1	26.7	48.6	0.2	0.3	0.2	0.3	0.1
Southern California 2019	4,080	74.1	34.0	5.3	46.9	21.0	11.1	26.9	8.0	46.8	4.9	20.2	26.5	48.3	0.8	5.2	1.7	0.3	0.1
Bay Area 2016	133	24.4	28.6	12.1	17.3	17.3	30.8	33.2	23.3	37.4	9.5	17.4	35.5	37.5	0.3	0.7	0.2	0.3	0.2
Bay Area 2017	422	27.3	22.0	10.6	16.6	17.2	35.3	31.2	26.1	41.0	9.9	18.0	32.6	39.4	0.3	0.6	0.3	0.3	0.2
Bay Area 2018	443	30.3	18.1	10.8	16.7	17.5	38.1	31.1	27.1	40.5	9.6	18.3	32.8	39.3	0.3	0.5	0.2	0.3	0.2
Bay Area 2019	1,399	25.4	43.5	10.9	31.6	17.7	17.1	31.1	7.8	40.4	9.8	18.6	32.9	38.7	0.8	3.4	1.3	0.4	0.2
<i>Limited Scope</i>																			
Sacramento 2016	3	0.5	66.7	9.3	0.0	25.5	33.3	38.5	0.0	26.6	8.5	21.7	37.7	32.2	0.0	0.1	0.0	0.0	0.0
Sacramento 2017	18	1.2	27.8	11.9	33.3	26.9	33.3	32.2	5.6	29.0	12.1	25.5	30.1	32.3	0.1	0.1	0.1	0.1	0.0
Sacramento 2018	12	0.8	25.0	12.2	8.3	26.7	50.0	32.0	16.7	29.1	11.7	25.2	30.1	33.0	0.0	0.1	0.0	0.1	0.0
Sacramento 2019	11	0.2	18.2	12.3	18.2	26.8	27.3	31.8	36.4	29.1	11.1	25.5	30.5	32.8	0.0	0.1	0.0	0.0	0.0
San Diego 2016	11	2.0	18.2	5.8	9.1	15.6	45.5	35.7	27.3	42.9	4.4	14.1	34.4	47.1	0.0	0.0	0.0	0.0	0.0
San Diego 2017	19	1.2	10.5	5.4	10.5	15.3	47.4	35.3	31.6	44.0	4.7	14.4	34.9	46.0	0.0	0.0	0.0	0.0	0.0
San Diego 2018	24	1.6	0.0	5.7	4.2	15.7	41.7	35.4	54.2	43.3	4.7	14.0	34.5	46.9	0.0	0.0	0.0	0.0	0.0
San Diego 2019	17	0.3	0.0	5.7	17.6	15.7	29.4	35.3	52.9	43.3	4.9	14.1	34.5	46.4	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 3 - Geographic Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Southern California 2016	301	71.2	2.3	2.5	12.3	18.1	27.2	31.3	58.1	48.0	2.8	19.1	33.0	45.1	0.4	0.4	0.4	0.4	0.4
Southern California 2017	921	78.9	2.2	2.7	9.3	18.3	21.1	29.2	67.4	49.8	3.3	19.9	30.4	46.5	0.6	0.4	0.3	0.4	0.8
Southern California 2018	1,049	73.0	1.6	2.7	10.7	18.3	21.8	29.2	65.9	49.8	3.6	19.9	30.3	46.2	0.0	0.0	0.0	0.0	0.0
Southern California 2019	910	73.1	2.6	2.7	15.8	18.3	22.9	29.2	58.7	49.8	3.2	19.9	30.6	46.4	0.0	0.0	0.0	0.0	0.0
Bay Area 2016	66	15.6	6.1	4.9	21.2	15.5	43.9	39.5	28.8	40.0	7.6	18.0	39.8	34.6	0.2	0.2	0.2	0.2	0.2
Bay Area 2017	127	10.9	5.5	4.6	21.3	15.7	44.9	35.8	28.3	43.9	6.6	19.3	36.4	37.7	0.2	0.2	0.3	0.3	0.2
Bay Area 2018	217	15.1	5.5	4.6	19.8	15.7	38.2	35.8	36.4	43.9	6.3	18.6	36.0	39.0	0.0	0.0	0.0	0.0	0.0
Bay Area 2019	192	15.4	8.9	4.6	28.1	15.7	35.9	35.8	27.1	43.9	6.1	17.9	36.7	39.2	0.0	0.0	0.0	0.0	0.0
<i>Limited Scope</i>																			
Sacramento 2016	32	7.6	18.8	5.8	46.9	24.0	34.4	39.3	0.0	30.9	6.9	24.4	42.1	26.7	0.4	0.7	0.7	0.3	0.1
Sacramento 2017	31	2.7	12.9	6.9	29.0	24.4	32.3	36.0	25.8	32.7	10.4	25.7	36.3	27.5	0.1	0.1	0.1	0.1	0.1
Sacramento 2018	29	2.0	6.9	6.9	34.5	24.4	34.5	36.0	24.1	32.7	11.6	26.5	37.1	24.8	0.0	0.0	0.0	0.0	0.0
Sacramento 2019	26	2.1	26.9	6.9	38.5	24.4	26.9	36.0	7.7	32.7	11.2	26.1	34.7	28.1	0.0	0.0	0.0	0.0	0.0
San Diego 2016	18	4.3	5.6	3.3	27.8	14.3	33.3	38.8	33.3	43.6	3.5	14.2	38.1	44.1	0.1	0.2	0.2	0.1	0.1
San Diego 2017	24	2.1	0.0	2.8	0.0	15.1	29.2	35.5	70.8	46.6	3.5	16.8	35.5	44.2	0.1	0.0	0.0	0.0	0.1
San Diego 2018	40	2.8	0.0	2.8	5.0	15.1	25.0	35.5	70.0	46.6	3.5	16.8	34.5	45.3	0.0	0.0	0.0	0.0	0.0
San Diego 2019	37	3.0	0.0	2.8	8.1	15.1	18.9	35.5	73.0	46.6	3.1	16.7	34.1	46.1	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 4 - Geographic Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Southern California 2016	231	61.9	3.5	2.5	26.8	18.1	39.0	31.3	30.7	48.0	1.9	15.5	30.7	51.9	0.2	0.3	0.3	0.2	0.1
Southern California 2017	329	60.3	3.6	2.7	17.9	18.3	24.6	29.2	53.8	49.8	2.8	18.9	30.4	47.9	0.2	0.2	0.2	0.1	0.2
Southern California 2018	540	64.0	2.0	2.7	22.2	18.3	25.7	29.2	50.0	49.8	3.1	19.4	30.1	47.5	0.0	0.0	0.0	0.0	0.0
Southern California 2019	639	70.8	3.9	2.7	18.5	18.3	29.9	29.2	47.7	49.8	2.5	16.8	29.4	51.3	0.0	0.0	0.0	0.0	0.0
Bay Area 2016	74	19.8	5.4	4.9	28.4	15.5	41.9	39.5	24.3	40.0	4.7	16.0	39.9	39.4	0.1	0.1	0.1	0.1	0.1
Bay Area 2017	158	28.9	9.5	4.6	22.8	15.7	34.8	35.8	32.9	43.9	5.7	17.8	36.2	40.2	0.2	0.4	0.3	0.2	0.2
Bay Area 2018	223	26.4	5.8	4.6	20.6	15.7	44.8	35.8	28.7	43.9	5.7	17.7	35.3	41.3	0.0	0.0	0.0	0.0	0.0
Bay Area 2019	217	24.1	4.6	4.6	24.0	15.7	38.2	35.8	33.2	43.9	5.0	16.7	35.8	42.5	0.0	0.0	0.0	0.0	0.0
<i>Limited Scope</i>																			
Sacramento 2016	46	12.3	6.5	5.8	34.8	24.0	41.3	39.3	17.4	30.9	4.2	18.2	41.5	36.1	0.3	0.4	0.5	0.3	0.1
Sacramento 2017	36	6.6	13.9	6.9	30.6	24.4	33.3	36.0	22.2	32.7	6.4	24.0	38.8	30.8	0.1	0.3	0.2	0.1	0.1
Sacramento 2018	59	7.0	15.3	6.9	33.9	24.4	35.6	36.0	15.3	32.7	7.1	25.4	37.6	29.8	0.0	0.0	0.0	0.0	0.0
Sacramento 2019	21	2.3	19.0	6.9	23.8	24.4	52.4	36.0	4.8	32.7	6.8	21.0	38.4	33.8	0.0	0.0	0.0	0.0	0.0
San Diego 2016	22	5.9	9.1	3.3	27.3	14.3	31.8	38.8	31.8	43.6	2.8	12.5	38.1	46.7	0.1	0.1	0.2	0.1	0.0
San Diego 2017	18	3.3	5.6	2.8	33.3	15.1	27.8	35.5	33.3	46.6	3.1	15.7	35.9	45.3	0.0	0.1	0.1	0.0	0.0
San Diego 2018	21	2.5	4.8	2.8	23.8	15.1	33.3	35.5	38.1	46.6	3.5	16.4	35.2	44.9	0.0	0.0	0.0	0.0	0.0
San Diego 2019	18	2.0	0.0	2.8	27.8	15.1	16.7	35.5	55.6	46.6	2.6	14.1	35.5	47.7	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 5 - Geographic Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Southern California 2016	23	69.7	0.0	2.5	34.8	18.1	17.4	31.3	47.8	48.0	1.9	16.6	31.3	50.2	0.1	0.0	0.2	0.1	0.1
Southern California 2017	76	69.7	9.2	2.7	28.9	18.3	30.3	29.2	31.6	49.8	2.7	19.4	30.8	47.0	0.3	1.1	0.5	0.3	0.2
Southern California 2018	123	66.8	7.3	2.7	20.3	18.3	22.0	29.2	50.4	49.8	2.0	13.9	26.5	57.6	0.0	0.0	0.0	0.0	0.0
Southern California 2019	95	73.1	3.2	2.7	13.7	18.3	27.4	29.2	55.8	49.8	1.7	13.2	26.4	58.7	0.0	0.0	0.0	0.0	0.0
Bay Area 2016	5	15.2	0.0	4.9	0.0	15.5	80.0	39.5	20.0	40.0	5.1	15.6	38.4	40.8	0.1	0.0	0.0	0.1	0.1
Bay Area 2017	26	23.9	15.4	4.6	15.4	15.7	34.6	35.8	34.6	43.9	5.4	16.9	37.3	40.4	0.3	0.9	0.3	0.3	0.3
Bay Area 2018	55	29.9	9.1	4.6	38.2	15.7	30.9	35.8	21.8	43.9	3.9	14.9	37.1	44.1	0.0	0.0	0.0	0.0	0.0
Bay Area 2019	31	23.8	9.7	4.6	29.0	15.7	38.7	35.8	22.6	43.9	4.1	14.5	35.7	45.7	0.0	0.0	0.0	0.0	0.0
<i>Limited Scope</i>																			
Sacramento 2016	3	9.1	0.0	5.8	66.7	24.0	33.3	39.3	0.0	30.9	4.7	20.8	41.1	33.5	0.2	0.0	0.4	0.2	0.0
Sacramento 2017	3	2.8	0.0	6.9	66.7	24.4	33.3	36.0	0.0	32.7	6.8	23.3	38.6	31.4	0.1	0.0	0.3	0.1	0.0
Sacramento 2018	3	1.6	33.3	6.9	33.3	24.4	33.3	36.0	0.0	32.7	5.2	20.1	36.0	38.7	0.0	0.0	0.0	0.0	0.0
Sacramento 2019	1	0.8	0.0	6.9	100.0	24.4	0.0	36.0	0.0	32.7	4.8	18.3	37.3	39.6	0.0	0.0	0.0	0.0	0.0
San Diego 2016	2	6.1	0.0	3.3	50.0	14.3	0.0	38.8	50.0	43.6	3.8	13.3	39.3	43.7	0.0	0.4	0.1	0.0	0.0
San Diego 2017	4	3.7	25.0	2.8	0.0	15.1	25.0	35.5	50.0	46.6	4.3	17.2	36.9	41.6	0.1	0.4	0.0	0.0	0.1
San Diego 2018	2	1.1	0.0	2.8	0.0	15.1	50.0	35.5	50.0	46.6	1.9	11.9	34.3	51.9	0.0	0.0	0.0	0.0	0.0
San Diego 2019	2	1.5	0.0	2.8	50.0	15.1	0.0	35.5	50.0	46.6	2.2	10.8	34.0	52.9	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 6 - Geographic Distribution of Multifamily Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Southern California 2016	80	85.1	31.3	11.3	45.0	33.2	16.3	27.5	7.5	28.0	14.6	41.1	23.7	20.5	2.1	3.4	2.4	1.9	0.7
Southern California 2017	226	86.6	20.8	11.6	44.2	32.6	20.4	25.2	14.6	30.6	16.9	39.7	21.5	21.8	3.4	4.2	3.8	3.2	2.3
Southern California 2018	197	80.4	18.8	2.7	40.6	18.3	26.4	29.2	14.2	49.8	15.5	39.1	23.1	22.3	0.0	0.0	0.0	0.0	0.0
Southern California 2019	189	81.8	15.9	2.7	47.6	18.3	25.4	29.2	11.1	49.8	15.2	37.7	22.4	24.8	0.0	0.0	0.0	0.0	0.0
Bay Area 2016	11	11.7	18.2	16.4	27.3	24.8	36.4	36.1	18.2	22.7	21.2	28.0	29.5	21.3	1.2	1.9	1.1	0.8	1.2
Bay Area 2017	31	11.9	29.0	15.2	22.6	23.7	29.0	34.0	19.4	27.1	19.4	26.2	30.3	24.1	1.9	2.9	1.7	1.8	1.5
Bay Area 2018	39	15.9	15.4	4.6	20.5	15.7	46.2	35.8	17.9	43.9	19.6	25.1	30.8	24.5	0.0	0.0	0.0	0.0	0.0
Bay Area 2019	36	15.6	38.9	4.6	25.0	15.7	16.7	35.8	19.4	43.9	19.2	28.0	28.3	24.5	0.0	0.0	0.0	0.0	0.0
<i>Limited Scope</i>																			
Sacramento 2016	2	2.1	100.0	16.2	0.0	37.8	0.0	32.8	0.0	13.3	14.6	49.8	25.9	9.7	1.2	8.3	0.0	0.0	0.0
Sacramento 2017	4	1.5	50.0	19.4	25.0	34.9	25.0	31.4	0.0	14.3	29.0	32.1	28.6	10.3	1.8	3.1	1.4	1.6	0.0
Sacramento 2018	4	1.6	0.0	6.9	75.0	24.4	25.0	36.0	0.0	32.7	21.6	34.6	31.7	12.0	0.0	0.0	0.0	0.0	0.0
Sacramento 2019	3	1.3	66.7	6.9	0.0	24.4	33.3	36.0	0.0	32.7	17.6	28.9	41.8	11.7	0.0	0.0	0.0	0.0	0.0
San Diego 2016	1	1.1	0.0	12.7	100.0	26.7	0.0	34.8	0.0	25.8	27.4	34.2	26.2	12.2	0.2	0.0	0.3	0.4	0.0
San Diego 2017	0	0.0	0.0	11.5	0.0	27.5	0.0	33.7	0.0	27.3	24.9	35.6	28.1	11.3	0.0	0.0	0.0	0.0	0.0
San Diego 2018	1	0.4	100.0	2.8	0.0	15.1	0.0	35.5	0.0	46.6	24.2	36.4	28.9	10.5	0.0	0.0	0.0	0.0	0.0
San Diego 2019	1	0.4	0.0	2.8	100.0	15.1	0.0	35.5	0.0	46.6	25.2	33.5	27.3	14.0	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 7 - Geographic Distribution of Home Mortgage Other Purpose Open-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Southern California 2018	87	53.7	3.4	2.7	16.1	18.3	18.4	29.2	62.1	49.8	1.0	10.3	22.8	65.9	0.0	0.0	0.0	0.0	0.0
Southern California 2019	53	57.0	5.7	2.7	15.1	18.3	22.6	29.2	56.6	49.8	1.1	10.6	24.3	64.0	0.0	0.0	0.0	0.0	0.0
Bay Area 2018	60	37.0	3.3	4.6	35.0	15.7	46.7	35.8	15.0	43.9	3.1	13.1	35.5	48.2	0.0	0.0	0.0	0.0	0.0
Bay Area 2019	38	40.9	13.2	4.6	21.1	15.7	34.2	35.8	31.6	43.9	2.7	12.1	34.1	51.1	0.0	0.0	0.0	0.0	0.0
<i>Limited Scope</i>																			
Sacramento 2018	10	6.2	20.0	6.9	40.0	24.4	40.0	36.0	0.0	32.7	3.5	17.6	33.3	45.5	0.0	0.0	0.0	0.0	0.0
Sacramento 2019	2	2.2	0.0	6.9	0.0	24.4	0.0	36.0	100.0	32.7	4.1	16.5	35.1	44.3	0.0	0.0	0.0	0.0	0.0
San Diego 2018	1	0.6	0.0	2.8	0.0	15.1	0.0	35.5	100.0	46.6	1.2	9.4	30.7	58.7	0.0	0.0	0.0	0.0	0.0
San Diego 2019	0	0.0	0.0	2.8	0.0	15.1	0.0	35.5	0.0	46.6	1.4	9.6	31.3	57.6	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 8 - Geographic Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Southern California 2018	37	52.9	5.4	2.7	18.9	18.3	37.8	29.2	37.8	49.8	2.1	15.3	25.9	56.6	0.0	0.0	0.0	0.0	0.0
Southern California 2019	46	63.9	4.3	2.7	19.6	18.3	32.6	29.2	43.5	49.8	2.2	14.4	27.3	56.1	0.0	0.0	0.0	0.0	0.0
Bay Area 2018	27	38.6	3.7	4.6	22.2	15.7	55.6	35.8	18.5	43.9	5.1	17.6	33.4	43.8	0.0	0.0	0.0	0.0	0.0
Bay Area 2019	16	22.2	12.5	4.6	37.5	15.7	37.5	35.8	12.5	43.9	4.9	15.2	35.6	44.3	0.0	0.0	0.0	0.0	0.0
<i>Limited Scope</i>																			
Sacramento 2018	4	5.7	75.0	6.9	0.0	24.4	25.0	36.0	0.0	32.7	10.1	23.0	35.3	31.6	0.0	0.0	0.0	0.0	0.0
Sacramento 2019	3	4.2	0.0	6.9	66.7	24.4	33.3	36.0	0.0	32.7	6.9	22.4	35.0	35.7	0.0	0.0	0.0	0.0	0.0
San Diego 2018	0	0.0	0.0	2.8	0.0	15.1	0.0	35.5	0.0	46.6	2.7	13.7	34.3	49.3	0.0	0.0	0.0	0.0	0.0
San Diego 2019	3	4.2	0.0	2.8	0.0	15.1	100.0	35.5	0.0	46.6	2.6	14.3	36.7	46.5	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 9 - Geographic Distribution of Home Mortgage Not Applicable Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Southern California 2018	23	50.0	8.7	2.7	34.8	18.3	39.1	29.2	17.4	49.8	3.8	21.7	31.5	43.0	0.0	0.0	0.0	0.0	0.0
Southern California 2019	74	85.1	4.1	2.7	50.0	18.3	32.4	29.2	13.5	49.8	3.2	19.0	28.9	48.9	0.0	0.0	0.0	0.0	0.0
Bay Area 2018	9	19.6	0.0	4.6	33.3	15.7	44.4	35.8	22.2	43.9	5.4	19.3	36.2	39.1	0.0	0.0	0.0	0.0	0.0
Bay Area 2019	13	14.9	30.8	4.6	30.8	15.7	30.8	35.8	7.7	43.9	4.4	14.2	32.4	48.9	0.0	0.0	0.0	0.0	0.0
<i>Limited Scope</i>																			
Sacramento 2018	8	17.4	25.0	6.9	25.0	24.4	50.0	36.0	0.0	32.7	9.7	26.9	35.5	27.8	0.0	0.0	0.0	0.0	0.0
Sacramento 2019	0	0.0	0.0	6.9	0.0	24.4	0.0	36.0	0.0	32.7	10.0	25.5	35.6	28.9	0.0	0.0	0.0	0.0	0.0
San Diego 2018	6	13.0	16.7	2.8	33.3	15.1	33.3	35.5	16.7	46.6	3.5	17.9	31.6	47.0	0.0	0.0	0.0	0.0	0.0
San Diego 2019	0	0.0	0.0	2.8	0.0	15.1	0.0	35.5	0.0	46.6	2.6	14.9	29.7	52.8	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 10 - Geographic Distribution of Home Equity Lines of Credit

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)
<i>Full Scope</i>										
Southern California 2016	260	67.2	2.3	2.5	14.6	18.1	31.5	31.3	51.5	48.0
Southern California 2017	664	60.5	1.7	2.7	14.6	18.3	26.2	29.2	57.5	49.7
Bay Area 2016	95	24.5	6.3	4.9	22.1	15.5	37.9	39.5	33.7	40.0
Bay Area 2017	339	30.9	10.9	4.6	21.2	15.7	32.4	35.7	35.4	43.8
<i>Limited Scope</i>										
Sacramento 2016	24	6.2	12.5	5.8	41.7	24.0	37.5	39.3	8.3	30.9
Sacramento 2017	75	6.8	16.0	6.9	42.7	24.4	36.0	36.0	5.3	32.7
San Diego 2016	8	2.1	0.0	3.3	0.0	14.3	12.5	38.8	87.5	43.6
San Diego 2017	19	1.7	0.0	2.8	10.5	15.1	21.1	35.5	68.4	46.6

East West Bank, Pasadena, California

Rated Area: State of California

Table 11 - Borrower Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Small Business Loans		Businesses with Revenue <= \$1 Million		Originations Regardless of Revenue Size			Aggregate Lending (%)		Market Share (%)	
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Businesses (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million	All Loans	Loans to Revenue <= \$1 Million (%)	All Loans	Loans to Revenue <= \$1 Million (%)
<i>Full Scope</i>											
Southern California 2016	404	73.3	46.0	90.6	46.3	9.2	44.6	573,112	44.4	0.2	0.3
Southern California 2017	1,106	70.6	61.7	89.6	64.2	4.7	31.1	464,450	52.8	0.2	0.3
Southern California 2018	1,010	67.7	59.3	91.2	62.7	4.7	32.7	513,944	46.8	0.2	0.2
Southern California 2019	4,102	74.2	92.1	91.4	91.8	1.2	6.9	550,074	50.6	0.7	1.4
Bay Area 2016	133	24.1	76.7	89.9	79.7	3.8	16.5	211,941	39.0	0.3	0.6
Bay Area 2017	424	27.1	78.5	88.9	79.2	3.5	17.2	154,483	54.0	0.3	0.4
Bay Area 2018	445	29.8	82.0	90.4	85.4	2.2	12.4	175,410	47.0	0.3	0.4
Bay Area 2019	1,400	25.3	95.6	90.7	95.1	0.6	4.3	183,244	52.7	0.8	1.4
<i>Limited Scope</i>											
Sacramento 2016	3	0.5	66.7	92.6	66.7	0.0	33.3	41,057	41.1	0.0	0.1
Sacramento 2017	18	1.1	72.2	91.9	55.6	0.0	44.4	30,452	51.0	0.1	0.1
Sacramento 2018	12	0.8	91.7	93.0	75.0	8.3	16.7	33,245	47.1	0.0	0.1
Sacramento 2019	11	0.2	72.7	93.3	81.8	0.0	18.2	35,467	50.6	0.0	0.0
San Diego 2016	11	2.0	81.8	92.1	72.7	18.2	9.1	123,509	42.1	0.0	0.0
San Diego 2017	19	1.2	73.7	91.3	63.2	0.0	36.8	90,218	51.3	0.0	0.0
San Diego 2018	24	1.6	62.5	92.2	54.2	20.8	25.0	98,589	45.5	0.0	0.0
San Diego 2019	17	0.3	58.8	92.5	70.6	0.0	29.4	105,095	49.2	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 12 - Borrower Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Southern California 2016	60	53.6	16.7	23.4	71.7	16.8	3.3	18.4	8.3	41.4	1.3	7.7	19.6	71.3	0.2	2.1	1.6	0.0	0.0
Southern California 2017	30	78.9	33.3	24.4	6.7	16.4	20.0	17.3	40.0	41.9	1.2	7.2	18.7	72.9	0.0	0.6	0.0	0.0	0.0
Southern California 2018	31	79.5	16.1	24.4	16.1	16.4	25.8	17.3	41.9	41.9	3.1	6.6	18.0	72.3	0.0	0.0	0.0	0.0	0.0
Southern California 2019	108	88.5	11.1	24.4	23.1	16.4	46.3	17.3	19.4	41.9	2.0	7.2	19.4	71.3	0.0	0.0	0.0	0.0	0.0
Bay Area 2016	17	15.2	5.9	24.0	64.7	16.3	11.8	18.8	17.6	40.9	1.0	6.1	16.6	76.2	0.1	0.6	0.8	0.0	0.0
Bay Area 2017	2	5.3	50.0	24.6	0.0	15.7	50.0	18.2	0.0	41.6	0.9	5.2	15.9	77.9	0.0	0.2	0.0	0.0	0.0
Bay Area 2018	2	5.1	100.0	24.6	0.0	15.7	0.0	18.2	0.0	41.6	1.1	4.6	14.2	80.0	0.0	0.0	0.0	0.0	0.0
Bay Area 2019	7	5.7	14.3	24.6	14.3	15.7	71.4	18.2	0.0	41.6	1.1	5.6	16.4	76.9	0.0	0.0	0.0	0.0	0.0
<i>Limited Scope</i>																			
Sacramento 2016	24	21.4	4.2	25.2	83.3	17.9	12.5	20.4	0.0	36.6	3.1	18.5	29.2	49.2	0.4	0.6	1.8	0.1	0.0
Sacramento 2017	2	5.3	100.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4	3.0	19.8	29.3	47.8	0.0	0.3	0.0	0.0	0.0
Sacramento 2018	3	7.7	100.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4	3.9	18.4	30.3	47.4	0.0	0.0	0.0	0.0	0.0
Sacramento 2019	5	4.1	0.0	26.7	80.0	17.3	0.0	18.6	20.0	37.4	3.2	21.1	30.9	44.9	0.0	0.0	0.0	0.0	0.0
San Diego 2016	11	9.8	9.1	22.4	81.8	17.5	0.0	18.7	9.1	41.3	0.8	6.6	22.7	69.9	0.1	0.6	1.5	0.0	0.0
San Diego 2017	4	10.5	75.0	23.6	0.0	16.9	0.0	17.8	25.0	41.7	0.9	7.5	23.7	67.9	0.0	0.8	0.0	0.0	0.0
San Diego 2018	3	7.7	100.0	23.6	0.0	16.9	0.0	17.8	0.0	41.7	2.2	6.7	21.9	69.2	0.0	0.0	0.0	0.0	0.0
San Diego 2019	2	1.6	0.0	23.6	0.0	16.9	50.0	17.8	50.0	41.7	1.9	8.0	23.5	66.6	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 13 - Borrower Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)					
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid
<i>Full Scope</i>																				
Southern California 2016	179	61.1	14.5	23.4	67.6	16.8	6.7	18.4	11.2	41.4	2.6	8.1	18.5	70.8	0.1	1.1	1.2	0.1	0.0	
Southern California 2017	60	59.4	58.3	24.4	10.0	16.4	16.7	17.3	15.0	41.9	4.0	10.3	20.5	65.2	0.0	0.5	0.0	0.0	0.0	
Southern California 2018	106	69.3	50.9	24.4	23.6	16.4	8.5	17.3	17.0	41.9	9.0	9.2	16.4	65.4	0.0	0.0	0.0	0.0	0.0	
Southern California 2019	163	93.7	27.6	24.4	60.7	16.4	3.1	17.3	8.6	41.9	7.0	6.1	16.6	70.3	0.0	0.0	0.0	0.0	0.0	
Bay Area 2016	49	16.7	14.3	24.0	71.4	16.3	4.1	18.8	10.2	40.9	2.9	10.1	21.0	66.1	0.1	0.4	0.5	0.0	0.0	
Bay Area 2017	24	23.8	45.8	24.6	4.2	15.7	33.3	18.2	16.7	41.6	5.2	12.8	22.0	60.0	0.0	0.3	0.0	0.1	0.0	
Bay Area 2018	30	19.6	53.3	24.6	20.0	15.7	13.3	18.2	13.3	41.6	8.6	10.9	18.7	61.7	0.0	0.0	0.0	0.0	0.0	
Bay Area 2019	5	2.9	60.0	24.6	20.0	15.7	20.0	18.2	0.0	41.6	4.8	8.3	18.5	68.4	0.0	0.0	0.0	0.0	0.0	
<i>Limited Scope</i>																				
Sacramento 2016	43	14.7	9.3	25.2	81.4	17.9	9.3	20.4	0.0	36.6	4.3	14.9	25.5	55.3	0.3	0.8	1.8	0.1	0.0	
Sacramento 2017	4	4.0	100.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4	6.3	20.2	27.5	46.0	0.0	0.3	0.0	0.0	0.0	
Sacramento 2018	7	4.6	100.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4	11.6	17.7	23.7	46.9	0.0	0.0	0.0	0.0	0.0	
Sacramento 2019	4	2.3	75.0	26.7	0.0	17.3	25.0	18.6	0.0	37.4	10.7	14.3	25.8	49.2	0.0	0.0	0.0	0.0	0.0	
San Diego 2016	22	7.5	13.6	22.4	86.4	17.5	0.0	18.7	0.0	41.3	2.3	8.3	20.7	68.7	0.1	0.4	1.0	0.0	0.0	
San Diego 2017	13	12.9	100.0	23.6	0.0	16.9	0.0	17.8	0.0	41.7	4.4	12.0	23.0	60.6	0.0	0.7	0.0	0.0	0.0	
San Diego 2018	10	6.5	90.0	23.6	0.0	16.9	0.0	17.8	10.0	41.7	8.9	9.2	17.7	64.1	0.0	0.0	0.0	0.0	0.0	
San Diego 2019	2	1.1	50.0	23.6	0.0	16.9	0.0	17.8	50.0	41.7	10.9	6.4	17.1	65.6	0.0	0.0	0.0	0.0	0.0	

East West Bank, Pasadena, California

Rated Area: State of California

Table 14 - Borrower Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Southern California 2016	8	53.3	0.0	23.4	87.5	16.8	0.0	18.4	12.5	41.4	3.0	9.9	20.2	67.0	0.1	0.0	0.6	0.0	0.0
Southern California 2017	20	64.5	20.0	24.4	10.0	16.4	20.0	17.3	50.0	41.9	4.2	10.8	21.0	63.9	0.1	0.4	0.1	0.1	0.1
Southern California 2018	14	66.7	71.4	24.4	14.3	16.4	14.3	17.3	0.0	41.9	3.2	6.8	15.6	74.4	0.0	0.0	0.0	0.0	0.0
Southern California 2019	4	50.0	50.0	24.4	25.0	16.4	25.0	17.3	0.0	41.9	3.3	6.9	15.8	74.0	0.0	0.0	0.0	0.0	0.0
Bay Area 2016	3	20.0	0.0	24.0	66.7	16.3	33.3	18.8	0.0	40.9	4.2	11.5	20.8	63.5	0.0	0.0	0.2	0.1	0.0
Bay Area 2017	7	22.6	57.1	24.6	0.0	15.7	14.3	18.2	28.6	41.6	4.9	12.8	22.7	59.6	0.1	1.0	0.0	0.1	0.0
Bay Area 2018	4	19.0	50.0	24.6	25.0	15.7	25.0	18.2	0.0	41.6	4.2	9.7	19.5	66.6	0.0	0.0	0.0	0.0	0.0
Bay Area 2019	4	50.0	25.0	24.6	25.0	15.7	0.0	18.2	50.0	41.6	5.3	10.2	18.9	65.7	0.0	0.0	0.0	0.0	0.0
<i>Limited Scope</i>																			
Sacramento 2016	3	20.0	0.0	25.2	100.0	17.9	0.0	20.4	0.0	36.6	3.6	16.9	27.6	51.9	0.2	0.9	0.8	0.0	0.0
Sacramento 2017	0	0.0	0.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4	6.5	18.4	28.0	47.1	0.0	0.0	0.0	0.0	0.0
Sacramento 2018	2	9.5	100.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4	5.8	16.3	25.2	52.8	0.0	0.0	0.0	0.0	0.0
Sacramento 2019	0	0.0	0.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4	5.3	16.0	25.7	53.0	0.0	0.0	0.0	0.0	0.0
San Diego 2016	1	6.7	0.0	22.4	0.0	17.5	100.0	18.7	0.0	41.3	2.7	10.4	23.8	63.1	0.0	0.6	0.0	0.1	0.0
San Diego 2017	4	12.9	100.0	23.6	0.0	16.9	0.0	17.8	0.0	41.7	4.4	12.3	24.6	58.7	0.1	1.6	0.0	0.0	0.0
San Diego 2018	1	4.8	0.0	23.6	100.0	16.9	0.0	17.8	0.0	41.7	2.7	7.5	18.7	71.1	0.0	0.0	0.0	0.0	0.0
San Diego 2019	0	0.0	0.0	23.6	0.0	16.9	0.0	17.8	0.0	41.7	3.3	8.0	18.7	70.0	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 15 - Borrower Distribution of Home Mortgage Other Purpose Open-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Southern California 2018	4	66.7	25.0	24.4	25.0	16.4	25.0	17.3	25.0	41.9	2.8	6.2	13.6	77.4	0.0	0.0	0.0	0.0	0.0
Southern California 2019	1	100.0	0.0	24.4	0.0	16.4	0.0	17.3	100.0	41.9	3.3	6.4	14.0	76.3	0.0	0.0	0.0	0.0	0.0
Bay Area 2018	1	16.7	0.0	24.6	100.0	15.7	0.0	18.2	0.0	41.6	4.7	9.6	19.2	66.6	0.0	0.0	0.0	0.0	0.0
Bay Area 2019	0	0.0	0.0	24.6	0.0	15.7	0.0	18.2	0.0	41.6	5.2	9.8	18.3	66.7	0.0	0.0	0.0	0.0	0.0
<i>Limited Scope</i>																			
Sacramento 2018	1	16.7	100.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4	6.9	15.3	23.2	54.5	0.0	0.0	0.0	0.0	0.0
Sacramento 2019	0	0.0	0.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4	5.3	15.3	24.0	55.3	0.0	0.0	0.0	0.0	0.0
San Diego 2018	0	0.0	0.0	23.6	0.0	16.9	0.0	17.8	0.0	41.7	3.3	7.9	18.2	70.7	0.0	0.0	0.0	0.0	0.0
San Diego 2019	0	0.0	0.0	23.6	0.0	16.9	0.0	17.8	0.0	41.7	3.6	7.3	18.3	70.8	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 16 - Borrower Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Southern California 2018	8	72.7	62.5	24.4	25.0	16.4	0.0	17.3	12.5	41.9	5.0	9.2	16.5	69.3	0.0	0.0	0.0	0.0	0.0
Southern California 2019	4	57.1	0.0	24.4	50.0	16.4	25.0	17.3	25.0	41.9	5.4	10.7	17.4	66.6	0.0	0.0	0.0	0.0	0.0
Bay Area 2018	2	18.2	50.0	24.6	50.0	15.7	0.0	18.2	0.0	41.6	7.6	12.1	18.5	61.8	0.0	0.0	0.0	0.0	0.0
Bay Area 2019	1	14.3	0.0	24.6	0.0	15.7	0.0	18.2	100.0	41.6	8.2	11.9	18.9	61.1	0.0	0.0	0.0	0.0	0.0
<i>Limited Scope</i>																			
Sacramento 2018	1	9.1	100.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4	7.4	16.3	24.5	51.8	0.0	0.0	0.0	0.0	0.0
Sacramento 2019	0	0.0	0.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4	8.2	15.7	24.9	51.2	0.0	0.0	0.0	0.0	0.0
San Diego 2018	0	0.0	0.0	23.6	0.0	16.9	0.0	17.8	0.0	41.7	4.2	10.4	21.4	64.0	0.0	0.0	0.0	0.0	0.0
San Diego 2019	2	28.6	100.0	23.6	0.0	16.9	0.0	17.8	0.0	41.7	6.2	9.6	21.0	63.1	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 17 - Borrower Distribution of Home Mortgage Not Applicable-Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Southern California 2018	23	50.0	100.0	24.4	0.0	16.4	0.0	17.3	0.0	41.9	8.7	24.6	29.3	37.5	0.0	0.0	0.0	0.0	0.0
Southern California 2019	66	83.5	3.0	24.4	45.5	16.4	36.4	17.3	15.2	41.9	9.5	20.9	26.2	43.3	0.0	0.0	0.0	0.0	0.0
Bay Area 2018	9	19.6	100.0	24.6	0.0	15.7	0.0	18.2	0.0	41.6	17.6	31.1	24.4	26.9	0.0	0.0	0.0	0.0	0.0
Bay Area 2019	13	16.5	7.7	24.6	84.6	15.7	7.7	18.2	0.0	41.6	9.6	40.4	23.1	26.9	0.0	0.0	0.0	0.0	0.0
<i>Limited Scope</i>																			
Sacramento 2018	8	17.4	100.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4	17.6	23.6	28.6	30.2	0.0	0.0	0.0	0.0	0.0
Sacramento 2019	0	0.0	0.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4	23.5	11.8	29.4	35.3	0.0	0.0	0.0	0.0	0.0
San Diego 2018	6	13.0	100.0	23.6	0.0	16.9	0.0	17.8	0.0	41.7	14.4	24.6	21.8	39.3	0.0	0.0	0.0	0.0	0.0
San Diego 2019	0	0.0	0.0	23.6	0.0	16.9	0.0	17.8	0.0	41.7	16.7	5.6	30.6	47.2	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of California

Table 18 - Borrower Distribution of Home Equity Lines of Credit

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)
<i>Full Scope</i>										
Southern California 2016	0	0.0	0.0	23.4	0.0	16.8	0.0	18.4	0.0	41.4
Southern California 2017	0	0.0	0.0	24.4	0.0	16.4	0.0	17.3	0.0	41.9
Bay Area 2016	0	0.0	0.0	24.0	0.0	16.3	0.0	18.8	0.0	40.9
Bay Area 2017	0	0.0	0.0	24.6	0.0	15.7	0.0	18.2	0.0	41.6
<i>Limited Scope</i>										
Sacramento 2016	0	0.0	0.0	25.2	0.0	17.9	0.0	20.4	0.0	36.6
Sacramento 2017	0	0.0	0.0	26.7	0.0	17.3	0.0	18.6	0.0	37.4
San Diego 2016	0	0.0	0.0	22.4	0.0	17.5	0.0	18.7	0.0	41.3
San Diego 2017	0	0.0	0.0	23.6	0.0	16.9	0.0	17.8	0.0	41.7

East West Bank, Pasadena, California

Rated Area: State of California

Table 19 - Qualified Investments

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
<i>Full Scope</i>									
Southern California	45	63,928	380	137,987	425	201,915	38%	14	41,740
Bay Area	21	10,421	104	147,178	125	157,599	30%	9	16,106
Broader Statewide/Regional Area	22	18,210	15	44,488	37	62,698	12%	13	17,298
<i>Limited Scope</i>									
Sacramento	11	3,358	20	24,310	31	27,668	5%	5	2,180
San Diego	9	12,854	23	63,774	32	76,628	15%	2	855

Table 20- Distribution of Branch Delivery System and Branch Openings/Closings

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Deposits	Branches						Branch Openings / Closings						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income Level of Geography (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Population within each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full Scope</i>																	
Southern California	71.7	50	64.9	6.0	28.0	32.0	32.0	0	-2	0	-1	0	-1	8.3	29.0	28.2	33.9
Bay Area	26.7	25	32.5	28.0	4.0	48.0	20.0	0	-1	0	-1	0	0	10.7	21.6	34.3	32.9
<i>Limited Scope</i>																	
Sacramento	0.8	1	1.3	0.0	0.0	100.0	0.0	0	0	0	0	0	0	12.8	28.9	34.3	23.9
San Diego	0.8	1	1.3	0.0	0.0	100.0	0.0	0	0	0	0	0	0	8.9	23.6	32.5	34.7

East West Bank, Pasadena, California

Rated Area: State of New York

Table 21 - Lending Volume of Reported Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	% of Rated Area Loans	Small Business Loans		Small Farm Loans		All HMDA Loans		Community Development Loans		Total Reported Loans		% of Rated Area Deposits
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<i>Full Scope</i>												
New York	100.0	930	61,412	0	0	2,725	1,516,616	57	230,295	3,712	1,808,323	100.0
Broader Statewide/Regional Area								5	15,440			

Table 21A - Lending Volume of Optional Loans

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	% of Rated Area Loans	Home Equity		Letters of Credit		Total Optional Loans							
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)						
<i>Full Scope</i>													
New York	100.0	198	101,841	1	48,620	199	150,461						

East West Bank, Pasadena, California

Rated Area: State of New York

Table 22 - Geographic Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2016	37	100.0	29.7	10.7	24.3	22.4	16.2	22.8	29.7	44.0	11.2	23.0	24.3	41.4	0.1	0.2	0.1	0.1	0.0
New York 2017	165	100.0	29.7	11.1	30.9	20.2	20.0	20.4	19.4	48.3	12.4	21.2	20.8	45.6	0.1	0.2	0.1	0.1	0.0
New York 2018	178	100.0	34.8	11.2	29.8	20.4	16.9	20.4	18.5	48.0	11.7	20.9	20.7	46.8	0.1	0.2	0.1	0.1	0.0
New York 2019	535	100.0	41.9	8.4	39.1	20.0	12.0	20.2	7.1	51.4	9.4	20.8	21.2	48.5	0.2	0.9	0.4	0.1	0.0

Table 23 - Geographic Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2016	90	100.0	3.3	4.3	27.8	20.2	34.4	35.4	34.4	40.1	5.1	19.4	33.5	42.0	0.5	0.3	0.6	0.6	0.3
New York 2017	406	100.0	9.6	4.7	21.9	19.5	41.4	34.4	27.1	41.4	5.8	18.9	31.2	44.1	0.9	1.5	1.1	1.2	0.6
New York 2018	695	100.0	6.8	4.7	21.3	19.5	43.5	34.4	28.5	41.4	5.9	20.5	31.9	41.7	0.0	0.0	0.0	0.0	0.0
New York 2019	965	100.0	7.9	3.6	23.9	16.6	34.8	32.5	33.4	47.2	4.3	17.4	30.2	48.1	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of New York

Table 24 - Geographic Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2016	11	100.0	9.1	4.3	18.2	20.2	45.5	35.4	27.3	40.1	5.3	19.4	32.0	43.2	0.1	0.2	0.1	0.2	0.1
New York 2017	36	100.0	22.2	4.7	30.6	19.5	25.0	34.4	22.2	41.4	6.8	21.4	32.9	38.9	0.2	0.6	0.2	0.1	0.1
New York 2018	116	100.0	15.5	4.7	37.9	19.5	27.6	34.4	19.0	41.4	7.4	21.0	33.2	38.4	0.0	0.0	0.0	0.0	0.0
New York 2019	233	100.0	7.3	3.6	28.8	16.6	41.2	32.5	22.7	47.2	5.2	16.9	29.5	48.4	0.0	0.0	0.0	0.0	0.0

Table 25 - Geographic Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2016	3	100.0	33.3	4.3	0.0	20.2	33.3	35.4	33.3	40.1	6.4	23.4	29.1	41.0	0.1	0.6	0.0	0.1	0.1
New York 2017	33	100.0	15.2	4.7	36.4	19.5	36.4	34.4	12.1	41.4	6.8	21.5	32.3	39.4	1.1	2.5	1.9	1.2	0.3
New York 2018	18	100.0	27.8	4.7	27.8	19.5	38.9	34.4	5.6	41.4	5.5	18.6	33.0	42.8	0.0	0.0	0.0	0.0	0.0
New York 2019	9	100.0	11.1	3.6	33.3	16.6	22.2	32.5	33.3	47.2	4.1	15.3	30.3	50.4	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of New York

Table 26 - Geographic Distribution of Multifamily Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2016	1	100.0	0.0	17.9	0.0	31.3	0.0	23.8	100.0	27.0	17.5	37.0	18.7	26.9	0.1	0.2	0.0	0.0	0.1
New York 2017	7	100.0	57.1	19.6	28.6	28.3	0.0	22.6	14.3	29.4	21.4	31.2	16.2	31.2	0.3	0.9	0.3	0.0	0.2
New York 2018	8	100.0	25.0	4.7	37.5	19.5	12.5	34.4	25.0	41.4	20.0	33.1	16.6	30.3	0.0	0.0	0.0	0.0	0.0
New York 2019	9	100.0	55.6	3.6	44.4	16.6	0.0	32.5	0.0	47.2	18.3	34.2	16.8	30.7	0.0	0.0	0.0	0.0	0.0

Table 27 - Geographic Distribution of Home Mortgage Other Purpose Open-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2018	27	100.0	11.1	4.7	44.4	19.5	25.9	34.4	18.5	41.4	5.1	16.2	31.3	47.4	0.0	0.0	0.0	0.0	0.0
New York 2019	16	100.0	12.5	3.6	31.3	16.6	31.3	32.5	25.0	47.2	3.9	14.6	27.6	53.8	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of New York

Table 28 - Geographic Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2018	18	100.0	5.6	4.7	38.9	19.5	38.9	34.4	16.7	41.4	7.0	17.9	26.8	48.2	0.0	0.0	0.0	0.0	0.0
New York 2019	23	100.0	13.0	3.6	34.8	16.6	39.1	32.5	13.0	47.2	5.3	14.3	21.0	59.5	0.0	0.0	0.0	0.0	0.0

Table 29 - Geographic Distribution of Home Mortgage Not Applicable Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2018	1	100.0	0.0	4.7	0.0	19.5	100.0	34.4	0.0	41.4	6.9	23.3	37.8	31.9	0.0	0.0	0.0	0.0	0.0
New York 2019	0	0.0	0.0	3.6	0.0	16.6	0.0	32.5	0.0	47.2	5.2	19.2	39.9	35.7	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of New York

Table 30 - Geographic Distribution of Home Equity Lines of Credit

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)
<i>Full Scope</i>										
New York 2016	40	100.0	7.5	4.3	40.0	20.2	20.0	35.4	32.5	40.1
New York 2017	158	100.0	13.9	4.7	33.5	19.5	31.6	34.3	20.9	41.3

Table 31 - Borrower Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Small Business Loans		Businesses with Revenue <= \$1 Million		Originations Regardless of Revenue Size			Aggregate Lending (%)		Market Share (%)	
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Businesses (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million	All Loans	Loans to Revenue <= \$1 Million (%)	All Loans	Loans to Revenue <= \$1 Million (%)
<i>Full Scope</i>											
New York 2016	38	100.0	78.9	88.6	73.7	5.3	21.1	237,601	42.5	0.1	0.1
New York 2017	169	100.0	82.8	87.7	79.9	3.6	16.6	237,429	49.6	0.1	0.1
New York 2018	182	100.0	90.1	89.5	83.0	2.2	14.8	249,739	40.0	0.1	0.2
New York 2019	541	100.0	97.2	89.9	96.5	0.4	3.1	277,963	44.7	0.2	0.4

East West Bank, Pasadena, California

Rated Area: State of New York

Table 32 - Borrower Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2016	23	100.0	26.1	31.8	60.9	17.2	13.0	16.6	0.0	34.4	2.0	8.5	22.0	67.5	0.2	1.6	1.5	0.0	0.0
New York 2017	8	100.0	25.0	32.5	25.0	16.2	37.5	15.7	12.5	35.5	1.7	7.2	20.4	70.8	0.0	0.3	0.1	0.0	0.0
New York 2018	17	100.0	23.5	32.5	41.2	16.2	17.6	15.7	17.6	35.5	2.3	7.7	20.5	69.5	0.0	0.0	0.0	0.0	0.0
New York 2019	30	100.0	3.3	30.6	43.3	15.8	40.0	15.7	13.3	37.9	2.1	6.9	19.6	71.4	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of New York

Table 33 - Borrower Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2016	5	100.0	0.0	31.8	60.0	17.2	0.0	16.6	40.0	34.4	2.3	7.6	19.8	70.2	0.1	0.6	0.9	0.0	0.0
New York 2017	5	100.0	40.0	32.5	20.0	16.2	0.0	15.7	40.0	35.5	2.8	8.0	21.1	68.1	0.0	0.4	0.1	0.0	0.0
New York 2018	12	100.0	58.3	32.5	16.7	16.2	0.0	15.7	25.0	35.5	7.1	8.2	18.0	66.7	0.0	0.0	0.0	0.0	0.0
New York 2019	9	100.0	11.1	30.6	77.8	15.8	0.0	15.7	11.1	37.9	6.3	5.3	14.8	73.6	0.0	0.0	0.0	0.0	0.0

Table 34 - Borrower Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2016	0	0.0	0.0	31.8	0.0	17.2	0.0	16.6	0.0	34.4	3.9	11.4	18.7	66.1	0.0	0.0	0.0	0.0	0.0
New York 2017	0	0.0	0.0	32.5	0.0	16.2	0.0	15.7	0.0	35.5	4.2	10.4	21.3	64.1	0.0	0.0	0.0	0.0	0.0
New York 2018	1	100.0	0.0	32.5	0.0	16.2	0.0	15.7	100.0	35.5	2.4	6.4	15.8	75.5	0.0	0.0	0.0	0.0	0.0
New York 2019	1	100.0	100.0	30.6	0.0	15.8	0.0	15.7	0.0	37.9	2.1	6.3	16.3	75.3	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of New York

Table 35 - Borrower Distribution of Home Mortgage Other Purpose Open-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2018	0	0.0	0.0	32.5	0.0	16.2	0.0	15.7	0.0	35.5	3.0	7.0	15.9	74.0	0.0	0.0	0.0	0.0	0.0
New York 2019	0	0.0	0.0	30.6	0.0	15.8	0.0	15.7	0.0	37.9	4.0	5.9	16.3	73.8	0.0	0.0	0.0	0.0	0.0

Table 36 - Borrower Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2018	1	100.0	0.0	32.5	0.0	16.2	100.0	15.7	0.0	35.5	3.7	6.5	17.0	72.7	0.0	0.0	0.0	0.0	0.0
New York 2019	1	100.0	0.0	30.6	100.0	15.8	0.0	15.7	0.0	37.9	3.2	8.2	14.7	73.9	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of New York

Table 37 - Borrower Distribution of Home Mortgage Not Applicable-Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
New York 2018	1	100.0	100.0	32.5	0.0	16.2	0.0	15.7	0.0	35.5	5.7	19.0	34.9	40.4	0.0	0.0	0.0	0.0	0.0
New York 2019	0	0.0	0.0	30.6	0.0	15.8	0.0	15.7	0.0	37.9	13.0	37.7	24.7	24.7	0.0	0.0	0.0	0.0	0.0

Table 38 - Borrower Distribution of Home Equity Home Equity Lines of Credit

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)
<i>Full Scope</i>										
New York 2016	0	0.0	0.0	31.8	0.0	17.2	0.0	16.6	0.0	34.4
New York 2017	0	0.0	0.0	32.5	0.0	16.2	0.0	15.7	0.0	35.5

East West Bank, Pasadena, California

Rated Area: State of New York

Table 39 - Qualified Investments

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
<i>Full Scope</i>									
New York	17	15,656	69	42,885	86	58,541	75%	2	345
Broader Statewide/Regional Area	7	947	6	18,918	13	19,865	25%	5	6,519

Table 40- Distribution of Branch Delivery System and Branch Openings/Closings

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Deposits	Branches						Branch Openings / Closings				Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income Level of Geography (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Population within each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full Scope</i>																	
New York	100.0	6	100.0	50.0	50.0	0.0	0.0	0	0	0	0	0	0	16.8	29.1	25.9	27.9

East West Bank, Pasadena, California

Rated Area: State of Texas

Table 41 - Lending Volume of Reported Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	% of Rated Area Loans	Small Business Loans		Small Farm Loans		All HMDA Loans		Community Development Loans		Total Reported Loans		% of Rated Area Deposits
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<i>Full Scope</i>												
Houston	75.1%	785	64,760	0	0	505	147,075	36	142,669	1,326	354,504	86.2
Dallas	24.9%	88	19,275	0	0	334	99,913	17	210,666	439	329,854	13.8
Broader Statewide/Regional Area								14	43,932			

Table 41A - Lending Volume of Optional Loans

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	% of Rated Area Loans	Letters of Credit		Total Optional Loans							
		#	\$ (000's)	#	\$ (000's)						
<i>Full Scope</i>											
Houston	0.0%	0	0	0	0						
Dallas	100.0%	1	20,000	1	20,000						
Broader Statewide/Regional Area		0	0	0	0						

East West Bank, Pasadena, California

Rated Area: State of Texas

Table 42 - Geographic Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Houston 2016	41	87.2	26.8	9.0	34.1	20.2	29.3	24.3	9.8	46.6	8.7	19.2	24.1	48.0	0.1	0.3	0.2	0.1	0.0
Houston 2017	81	77.1	29.6	11.9	32.1	20.4	17.3	21.9	21.0	45.8	11.8	19.8	22.1	46.3	0.1	0.2	0.1	0.1	0.0
Houston 2018	90	74.4	33.3	11.5	25.6	20.2	17.8	22.0	23.3	46.3	11.6	19.2	21.7	47.5	0.1	0.2	0.1	0.1	0.0
Houston 2019	573	96.0	52.0	11.6	34.7	20.1	8.4	21.9	4.9	46.3	11.7	18.8	21.9	47.6	0.4	1.7	0.7	0.1	0.0
Dallas 2016	6	12.8	33.3	9.1	0.0	19.4	33.3	24.1	33.3	47.5	9.4	18.9	21.5	50.2	0.0	0.1	0.0	0.0	0.0
Dallas 2017	24	22.9	12.5	8.7	58.3	22.2	12.5	23.2	16.7	45.9	9.0	22.0	22.1	46.8	0.0	0.0	0.1	0.0	0.0
Dallas 2018	31	25.6	9.7	8.9	38.7	21.9	25.8	23.5	25.8	45.7	8.5	21.5	21.7	48.3	0.0	0.0	0.1	0.0	0.0
Dallas 2019	24	4.0	12.5	9.0	54.2	22.0	16.7	23.4	16.7	45.6	8.5	21.6	21.6	48.3	0.0	0.0	0.1	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Texas

Table 43 - Geographic Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Houston 2016	70	48.3	5.7	4.9	20.0	22.8	37.1	28.7	37.1	43.6	2.0	11.3	31.0	55.7	0.3	0.9	0.6	0.4	0.2
Houston 2017	65	47.8	9.2	6.4	12.3	22.7	15.4	27.4	63.1	43.5	3.0	13.5	27.9	55.6	0.1	0.2	0.1	0.0	0.1
Houston 2018	114	55.9	0.9	6.4	24.6	22.7	39.5	27.4	35.1	43.5	3.4	13.5	27.7	55.4	0.0	0.0	0.0	0.0	0.0
Houston 2019	179	82.1	2.8	6.4	21.8	22.7	35.8	27.4	39.7	43.5	3.5	13.4	27.6	55.5	0.0	0.0	0.0	0.0	0.0
Dallas 2016	75	51.7	4.0	6.7	16.0	22.7	42.7	26.4	37.3	44.3	4.1	14.1	28.4	53.4	0.3	0.3	0.5	0.4	0.2
Dallas 2017	71	52.2	2.8	7.0	5.6	24.9	19.7	22.9	71.8	45.1	5.5	17.2	25.0	52.3	0.1	0.1	0.0	0.1	0.1
Dallas 2018	90	44.1	1.1	7.0	5.6	24.9	20.0	22.9	73.3	45.1	5.4	18.0	23.3	53.3	0.0	0.0	0.0	0.0	0.0
Dallas 2019	38	17.4	2.6	7.0	10.5	24.9	18.4	22.9	68.4	45.1	6.1	18.3	24.2	51.4	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Texas

Table 44 - Geographic Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Houston 2016	16	34.0	0.0	4.9	12.5	22.8	37.5	28.7	50.0	43.6	1.7	10.7	27.6	60.1	0.1	0.0	0.1	0.2	0.1
Houston 2017	6	54.5	0.0	6.4	16.7	22.7	33.3	27.4	50.0	43.5	3.0	15.7	30.6	50.7	0.0	0.0	0.0	0.0	0.0
Houston 2018	20	83.3	5.0	6.4	35.0	22.7	40.0	27.4	20.0	43.5	4.1	19.6	29.7	46.7	0.0	0.0	0.0	0.0	0.0
Houston 2019	19	82.6	15.8	6.4	21.1	22.7	31.6	27.4	31.6	43.5	3.3	13.2	25.2	58.4	0.0	0.0	0.0	0.0	0.0
Dallas 2016	31	66.0	3.2	6.7	25.8	22.7	38.7	26.4	32.3	44.3	2.3	10.7	23.5	63.6	0.2	0.1	0.4	0.4	0.1
Dallas 2017	5	45.5	0.0	7.0	40.0	24.9	20.0	22.9	40.0	45.1	3.0	17.3	25.1	54.5	0.0	0.0	0.0	0.0	0.0
Dallas 2018	4	16.7	0.0	7.0	25.0	24.9	50.0	22.9	25.0	45.1	4.3	19.7	25.0	51.0	0.0	0.0	0.0	0.0	0.0
Dallas 2019	4	17.4	0.0	7.0	50.0	24.9	0.0	22.9	50.0	45.1	3.5	15.3	22.7	58.5	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Texas

Table 45 - Geographic Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Houston 2016	2	66.7	0.0	4.9	50.0	22.8	50.0	28.7	0.0	43.6	3.7	13.1	25.0	58.2	0.1	0.0	0.2	0.1	0.1
Houston 2017	0	0.0	0.0	6.4	0.0	22.7	0.0	27.4	0.0	43.5	4.7	18.3	25.9	51.2	0.0	0.0	0.0	0.0	0.0
Houston 2018	1	100.0	100.0	6.4	0.0	22.7	0.0	27.4	0.0	43.5	3.9	13.7	23.1	59.3	0.0	0.0	0.0	0.0	0.0
Houston 2019	0	0.0	0.0	6.4	0.0	22.7	0.0	27.4	0.0	43.5	3.9	14.6	24.5	57.0	0.0	0.0	0.0	0.0	0.0
Dallas 2016	1	33.3	0.0	6.7	100.0	22.7	0.0	26.4	0.0	44.3	2.5	13.3	22.8	61.4	0.0	0.0	0.2	0.0	0.0
Dallas 2017	0	0.0	0.0	7.0	0.0	24.9	0.0	22.9	0.0	45.1	3.4	16.1	21.5	59.1	0.0	0.0	0.0	0.0	0.0
Dallas 2018	0	0.0	0.0	7.0	0.0	24.9	0.0	22.9	0.0	45.1	3.2	15.8	20.8	60.1	0.0	0.0	0.0	0.0	0.0
Dallas 2019	0	0.0	0.0	7.0	0.0	24.9	0.0	22.9	0.0	45.1	3.7	15.5	21.4	59.3	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Texas

Table 46 - Geographic Distribution of Multifamily Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Houston 2016	1	50.0	100.0	21.8	0.0	32.7	0.0	21.9	0.0	23.6	22.9	30.6	24.4	22.1	0.3	1.3	0.0	0.0	0.0
Houston 2017	2	50.0	50.0	25.6	50.0	30.1	0.0	19.9	0.0	24.4	31.0	31.3	15.5	22.3	0.6	1.0	1.0	0.0	0.0
Houston 2018	2	100.0	0.0	6.4	50.0	22.7	0.0	27.4	50.0	43.5	23.7	32.5	18.1	25.7	0.0	0.0	0.0	0.0	0.0
Houston 2019	5	83.3	40.0	6.4	40.0	22.7	20.0	27.4	0.0	43.5	24.2	27.6	16.8	31.3	0.0	0.0	0.0	0.0	0.0
Dallas 2016	1	50.0	0.0	24.6	0.0	27.8	100.0	24.1	0.0	23.5	29.9	29.6	21.0	19.4	0.9	1.0	1.0	1.5	0.0
Dallas 2017	2	50.0	50.0	24.7	50.0	28.2	0.0	21.3	0.0	25.8	34.4	33.0	15.1	17.6	0.6	0.8	0.9	0.0	0.0
Dallas 2018	0	0.0	0.0	7.0	0.0	24.9	0.0	22.9	0.0	45.1	28.5	33.9	16.5	21.1	0.0	0.0	0.0	0.0	0.0
Dallas 2019	1	16.7	0.0	7.0	0.0	24.9	0.0	22.9	100.0	45.1	26.9	36.1	17.1	19.9	0.0	0.0	0.0	0.0	0.0

Table 47- Geographic Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Houston 2018	1	100.0	0.0	6.4	0.0	22.7	0.0	27.4	100.0	43.5	6.6	18.8	29.9	44.8	0.0	0.0	0.0	0.0	0.0
Houston 2019	0	0.0	0.0	6.4	0.0	22.7	0.0	27.4	0.0	43.5	5.1	17.7	27.3	50.0	0.0	0.0	0.0	0.0	0.0
Dallas 2018	0	0.0	0.0	7.0	0.0	24.9	0.0	22.9	0.0	45.1	4.9	20.3	21.6	53.3	0.0	0.0	0.0	0.0	0.0
Dallas 2019	0	0.0	0.0	7.0	0.0	24.9	0.0	22.9	0.0	45.1	4.2	18.5	22.1	55.1	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Texas

Table 48 - Geographic Distribution of Home Mortgage Not Applicable Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Houston 2018	2	16.7	0.0	6.4	50.0	22.7	50.0	27.4	0.0	43.5	3.2	22.5	40.0	34.3	0.0	0.0	0.0	0.0	0.0
Houston 2019	0	0.0	0.0	6.4	0.0	22.7	0.0	27.4	0.0	43.5	3.1	21.5	41.7	33.7	0.0	0.0	0.0	0.0	0.0
Dallas 2018	9	75.0	0.0	7.0	66.7	24.9	33.3	22.9	0.0	45.1	6.3	32.1	31.5	30.1	0.0	0.0	0.0	0.0	0.0
Dallas 2019	0	0.0	0.0	7.0	0.0	24.9	0.0	22.9	0.0	45.1	6.1	33.0	32.8	28.2	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Texas

Table 49 - Borrower Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Small Business Loans		Businesses with Revenue <= \$1 Million		Originations Regardless of Revenue Size			Aggregate Lending (%)		Market Share (%)	
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Businesses (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million	All Loans	Loans to Revenue <= \$1 Million (%)	All Loans	Loans to Revenue <= \$1 Million (%)
<i>Full Scope</i>											
Houston 2016	41	87.2	65.9	90.2	41.5	19.5	39.0	126,875	40.5	0.1	0.2
Houston 2017	81	77.1	67.9	88.7	59.3	9.9	30.9	121,446	45.6	0.1	0.1
Houston 2018	90	73.8	66.7	90.5	53.3	11.1	35.6	135,693	40.6	0.1	0.1
Houston 2019	573	95.7	96.7	90.8	95.6	1.2	3.1	151,229	45.1	0.4	0.8
Dallas 2016	6	12.8	33.3	90.2	50.0	16.7	33.3	90,057	42.3	0.0	0.0
Dallas 2017	24	22.9	62.5	89.3	45.8	8.3	45.8	85,030	46.6	0.0	0.0
Dallas 2018	32	26.2	59.4	90.6	50.0	15.6	34.4	93,041	41.8	0.0	0.0
Dallas 2019	26	4.3	69.2	91.0	57.7	7.7	34.6	101,860	46.8	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Texas

Table 50 - Borrower Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Houston 2016	58	51.8	19.0	25.0	65.5	16.9	12.1	17.3	3.4	40.8	2.8	15.4	22.8	59.1	0.3	2.0	1.5	0.1	0.0
Houston 2017	5	50.0	20.0	25.7	60.0	16.4	0.0	16.9	20.0	41.1	3.7	16.5	23.8	55.9	0.0	0.0	0.0	0.0	0.0
Houston 2018	43	91.5	65.1	25.7	30.2	16.4	4.7	16.9	0.0	41.1	4.1	19.4	24.8	51.7	0.0	0.0	0.0	0.0	0.0
Houston 2019	84	97.7	19.0	25.7	67.9	16.4	13.1	16.9	0.0	41.1	3.8	20.0	26.7	49.5	0.0	0.0	0.0	0.0	0.0
Dallas 2016	54	48.2	13.0	25.5	87.0	17.1	0.0	17.7	0.0	39.7	4.6	14.7	20.1	60.6	0.3	1.1	1.6	0.0	0.0
Dallas 2017	5	50.0	100.0	26.2	0.0	17.1	0.0	17.1	0.0	39.6	3.8	14.3	20.8	61.1	0.0	0.2	0.0	0.0	0.0
Dallas 2018	4	8.5	100.0	26.2	0.0	17.1	0.0	17.1	0.0	39.6	5.1	15.9	21.7	57.4	0.0	0.0	0.0	0.0	0.0
Dallas 2019	2	2.3	0.0	26.2	100.0	17.1	0.0	17.1	0.0	39.6	5.0	19.0	22.9	53.0	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Texas

Table 51 - Borrower Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Houston 2016	14	31.8	7.1	25.0	92.9	16.9	0.0	17.3	0.0	40.8	3.9	11.5	19.3	65.3	0.1	0.3	1.0	0.0	0.0
Houston 2017	1	20.0	100.0	25.7	0.0	16.4	0.0	16.9	0.0	41.1	7.0	14.9	23.4	54.8	0.0	0.1	0.0	0.0	0.0
Houston 2018	16	94.1	62.5	25.7	37.5	16.4	0.0	16.9	0.0	41.1	11.7	17.7	21.6	48.9	0.0	0.0	0.0	0.0	0.0
Houston 2019	15	88.2	40.0	25.7	46.7	16.4	13.3	16.9	0.0	41.1	8.8	10.7	17.9	62.6	0.0	0.0	0.0	0.0	0.0
Dallas 2016	30	68.2	3.3	25.5	96.7	17.1	0.0	17.7	0.0	39.7	4.0	11.3	18.7	65.9	0.3	0.8	2.0	0.0	0.0
Dallas 2017	4	80.0	100.0	26.2	0.0	17.1	0.0	17.1	0.0	39.6	6.3	14.6	22.4	56.7	0.0	0.3	0.0	0.0	0.0
Dallas 2018	1	5.9	100.0	26.2	0.0	17.1	0.0	17.1	0.0	39.6	12.7	15.8	20.0	51.5	0.0	0.0	0.0	0.0	0.0
Dallas 2019	2	11.8	50.0	26.2	50.0	17.1	0.0	17.1	0.0	39.6	8.1	10.7	17.3	63.8	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Texas

Table 52 - Borrower Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Houston 2016	2	66.7	50.0	25.0	50.0	16.9	0.0	17.3	0.0	40.8	4.6	11.7	18.3	65.4	0.1	1.0	0.6	0.0	0.0
Houston 2017	0	0.0	0.0	25.7	0.0	16.4	0.0	16.9	0.0	41.1	7.0	12.5	18.4	62.0	0.0	0.0	0.0	0.0	0.0
Houston 2018	1	100.0	100.0	25.7	0.0	16.4	0.0	16.9	0.0	41.1	5.9	13.0	17.7	63.4	0.0	0.0	0.0	0.0	0.0
Houston 2019	0	0.0	0.0	25.7	0.0	16.4	0.0	16.9	0.0	41.1	6.1	13.3	18.4	62.2	0.0	0.0	0.0	0.0	0.0
Dallas 2016	1	33.3	100.0	25.5	0.0	17.1	0.0	17.7	0.0	39.7	5.7	12.4	17.6	64.3	0.0	0.4	0.0	0.0	0.0
Dallas 2017	0	0.0	0.0	26.2	0.0	17.1	0.0	17.1	0.0	39.6	5.4	12.2	19.3	63.0	0.0	0.0	0.0	0.0	0.0
Dallas 2018	0	0.0	0.0	26.2	0.0	17.1	0.0	17.1	0.0	39.6	6.0	11.4	16.8	65.8	0.0	0.0	0.0	0.0	0.0
Dallas 2019	0	0.0	0.0	26.2	0.0	17.1	0.0	17.1	0.0	39.6	6.4	12.0	18.5	63.0	0.0	0.0	0.0	0.0	0.0

Table 53 - Borrower Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Houston 2018	1	100.0	100.0	25.7	0.0	16.4	0.0	16.9	0.0	41.1	7.4	17.9	24.4	50.3	0.0	0.0	0.0	0.0	0.0
Houston 2019	0	0.0	0.0	25.7	0.0	16.4	0.0	16.9	0.0	41.1	6.7	15.5	24.6	53.1	0.0	0.0	0.0	0.0	0.0
Dallas 2018	0	0.0	0.0	26.2	0.0	17.1	0.0	17.1	0.0	39.6	7.4	15.0	20.1	57.6	0.0	0.0	0.0	0.0	0.0
Dallas 2019	0	0.0	0.0	26.2	0.0	17.1	0.0	17.1	0.0	39.6	8.7	17.6	17.5	56.2	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Texas

Table 54 - Borrower Distribution of Home Mortgage Not Applicable-Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Houston 2018	2	16.7	100.0	25.7	0.0	16.4	0.0	16.9	0.0	41.1	14.6	28.3	21.9	35.2	0.0	0.0	0.0	0.0	0.0
Houston 2019	0	0.0	0.0	25.7	0.0	16.4	0.0	16.9	0.0	41.1	22.8	27.2	12.6	37.4	0.0	0.0	0.0	0.0	0.0
Dallas 2018	10	83.3	100.0	26.2	0.0	17.1	0.0	17.1	0.0	39.6	14.7	21.2	23.1	41.0	0.0	0.0	0.0	0.0	0.0
Dallas 2019	0	0.0	0.0	26.2	0.0	17.1	0.0	17.1	0.0	39.6	6.0	12.1	6.0	75.9	0.0	0.0	0.0	0.0	0.0

Table 55 - Qualified Investments

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
<i>Full Scope</i>									
Houston	5	2,989	55	37,166	60	40,155	29%	2	10,840
Dallas	5	8,207	29	53,276	34	61,483	44%	1	88
Broader Statewide/Regional Area	11	4,724	5	32,614	16	37,338	27%	1	3

East West Bank, Pasadena, California

Rated Area: State of Texas

Table 56- Distribution of Branch Delivery System and Branch Openings/Closings

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Deposits	Branches						Branch Openings / Closings						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income Level of Geography (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Population within each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full Scope</i>																	
Houston	86.2	8	72.7	37.5	12.5	0.0	50.0	0	0	0	0	0	0	14.0	27.8	25.6	32.3
Dallas	13.8	3	27.3	0.0	33.3	33.3	33.3	0	0	0	0	0	0	14.4	30.5	21.4	33.4

East West Bank, Pasadena, California

Rated Area: State of Washington

Table 57 - Lending Volume of Reported Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	% of Rated Area Loans	Small Business Loans		Small Farm Loans		All HMDA Loans		Community Development Loans		Total Reported Loans		% of Rated Area Deposits
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<i>Full Scope</i>												
Washington	100.0	135	35,836	0	0	1,284	706,673	26	104,358	1,445	846,867	100.0
Broader Statewide/Regional Area								11	3,310			

Table 57A - Lending Volume of Optional Loans

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	% of Rated Area Loans	Home Equity		Letters of Credit		Total Optional Loans					
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
<i>Full Scope</i>											
Washington	100.0	276	135,246	9	219,562	285	354,808				
Broader Statewide/ Regional Area				1	6,279	1	6,279				

East West Bank, Pasadena, California

Rated Area: State of Washington

Table 58 - Geographic Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2016	10	100.0	0.0	4.9	20.0	14.5	50.0	43.3	30.0	37.3	4.5	13.8	43.9	37.8	0.1	0.2	0.1	0.1	0.1
Washington 2017	45	100.0	6.7	4.9	15.6	15.9	33.3	35.5	44.4	43.8	5.4	16.1	35.7	42.8	0.1	0.1	0.1	0.1	0.1
Washington 2018	40	100.0	5.0	5.0	10.0	16.3	30.0	35.8	55.0	42.9	5.3	15.8	35.8	43.2	0.1	0.1	0.0	0.1	0.1
Washington 2019	39	100.0	12.8	5.1	10.3	16.5	15.4	35.8	61.5	42.6	5.7	16.8	35.5	42.0	0.1	0.1	0.0	0.0	0.1

Table 59 - Geographic Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2016	115	100.0	2.6	1.7	9.6	13.2	47.8	47.3	40.0	37.7	2.1	14.3	48.1	35.5	0.4	0.4	0.3	0.4	0.4
Washington 2017	331	100.0	2.1	2.7	11.2	15.2	28.1	40.4	58.6	41.7	2.9	16.5	42.4	38.1	0.8	0.6	0.6	0.5	1.3
Washington 2018	258	100.0	2.3	2.7	10.9	15.2	27.9	40.4	58.9	41.7	3.0	16.9	41.5	38.6	0.0	0.0	0.0	0.0	0.0
Washington 2019	264	100.0	1.9	2.7	19.7	15.2	29.2	40.4	49.2	41.7	2.6	16.4	42.9	38.0	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Washington

Table 60 - Geographic Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2016	27	100.0	3.7	1.7	25.9	13.2	33.3	47.3	37.0	37.7	1.5	11.3	47.7	39.5	0.1	0.4	0.2	0.1	0.1
Washington 2017	46	100.0	2.2	2.7	21.7	15.2	39.1	40.4	37.0	41.7	2.6	17.1	41.5	38.8	0.1	0.1	0.2	0.1	0.1
Washington 2018	74	100.0	4.1	2.7	13.5	15.2	39.2	40.4	43.2	41.7	2.6	16.5	42.2	38.7	0.0	0.0	0.0	0.0	0.0
Washington 2019	63	100.0	0.0	2.7	20.6	15.2	30.2	40.4	49.2	41.7	2.2	14.6	41.6	41.6	0.0	0.0	0.0	0.0	0.0

Table 61 - Geographic Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2016	0	0.0	0.0	1.7	0.0	13.2	0.0	47.3	0.0	37.7	1.4	12.4	49.1	37.1	0.0	0.0	0.0	0.0	0.0
Washington 2017	3	100.0	0.0	2.7	33.3	15.2	0.0	40.4	66.7	41.7	2.3	16.8	41.9	39.1	0.1	0.0	0.1	0.0	0.1
Washington 2018	2	100.0	0.0	2.7	0.0	15.2	50.0	40.4	50.0	41.7	2.2	14.3	41.5	42.0	0.0	0.0	0.0	0.0	0.0
Washington 2019	9	100.0	0.0	2.7	11.1	15.2	22.2	40.4	66.7	41.7	2.2	14.8	42.6	40.4	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Washington

Table 62 - Geographic Distribution of Multifamily Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2016	0	0.0	0.0	8.5	0.0	24.2	0.0	44.1	0.0	23.1	7.4	29.6	43.4	19.7	0.0	0.0	0.0	0.0	0.0
Washington 2017	3	100.0	0.0	7.7	33.3	24.9	33.3	34.8	33.3	32.6	6.9	26.5	32.9	33.6	0.5	0.0	0.6	0.5	0.5
Washington 2018	8	100.0	25.0	2.7	0.0	15.2	37.5	40.4	37.5	41.7	5.5	25.4	35.8	33.3	0.0	0.0	0.0	0.0	0.0
Washington 2019	1	100.0	0.0	2.7	0.0	15.2	0.0	40.4	100.0	41.7	5.2	23.2	39.1	32.5	0.0	0.0	0.0	0.0	0.0

Table 63 - Geographic Distribution of Home Mortgage Other Purpose Open-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2018	37	100.0	5.4	2.7	13.5	15.2	24.3	40.4	56.8	41.7	2.3	12.3	40.2	45.2	0.0	0.0	0.0	0.0	0.0
Washington 2019	7	100.0	14.3	2.7	0.0	15.2	57.1	40.4	28.6	41.7	2.2	13.0	38.4	46.4	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Washington

Table 64 - Geographic Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2018	22	100.0	0.0	2.7	18.2	15.2	40.9	40.4	40.9	41.7	2.3	15.1	38.3	44.3	0.0	0.0	0.0	0.0	0.0
Washington 2019	6	100.0	0.0	2.7	16.7	15.2	0.0	40.4	83.3	41.7	3.0	14.3	38.6	44.1	0.0	0.0	0.0	0.0	0.0

Table 65 - Geographic Distribution of Home Mortgage Not Applicable Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2018	8	100.0	12.5	2.7	50.0	15.2	25.0	40.4	12.5	41.7	3.0	18.1	37.3	41.5	0.0	0.0	0.0	0.0	0.0
Washington 2019	0	0.0	0.0	2.7	0.0	15.2	0.0	40.4	0.0	41.7	2.0	17.8	35.7	44.6	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Washington

Table 66 - Geographic Distribution of Home Equity Lines of Credit

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)
<i>Full Scope</i>										
Washington 2016	85	100.0	1.2	1.7	8.2	13.2	34.1	47.3	56.5	37.7
Washington 2017	191	100.0	0.5	2.7	17.3	15.2	27.7	40.4	54.5	41.7

Table 67- Borrower Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Small Business Loans		Businesses with Revenue <= \$1 Million		Originations Regardless of Revenue Size			Aggregate Lending (%)		Market Share (%)	
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Businesses (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million	All Loans	Loans to Revenue <= \$1 Million (%)	All Loans	Loans to Revenue <= \$1 Million (%)
<i>Full Scope</i>											
Washington 2016	10	100.0	30.0	91.6	40.0	10.0	50.0	73,276	39.5	0.1	0.1
Washington 2017	46	100.0	34.8	90.3	50.0	8.7	41.3	52,505	50.4	0.1	0.1
Washington 2018	40	100.0	45.0	91.5	50.0	10.0	40.0	58,796	44.7	0.1	0.1
Washington 2019	39	100.0	41.0	91.7	53.8	12.8	33.3	62,131	48.8	0.1	0.1

East West Bank, Pasadena, California

Rated Area: State of Washington

Table 68 - Borrower Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2016	20	100.0	10.0	20.0	90.0	16.9	0.0	21.1	0.0	42.0	3.6	14.1	21.9	60.3	0.1	0.6	0.6	0.0	0.0
Washington 2017	3	100.0	100.0	21.0	0.0	16.4	0.0	19.5	0.0	43.1	2.9	13.3	22.3	61.5	0.0	0.3	0.0	0.0	0.0
Washington 2018	2	100.0	100.0	21.0	0.0	16.4	0.0	19.5	0.0	43.1	3.3	13.7	22.5	60.5	0.0	0.0	0.0	0.0	0.0
Washington 2019	4	100.0	0.0	21.0	0.0	16.4	100.0	19.5	0.0	43.1	3.4	14.7	23.6	58.3	0.0	0.0	0.0	0.0	0.0

Table 69 - Borrower Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2016	22	100.0	22.7	20.0	77.3	16.9	0.0	21.1	0.0	42.0	4.0	13.8	23.3	59.0	0.1	0.5	0.8	0.0	0.0
Washington 2017	13	100.0	84.6	21.0	0.0	16.4	15.4	19.5	0.0	43.1	5.7	17.9	25.3	51.1	0.0	0.7	0.0	0.0	0.0
Washington 2018	5	100.0	100.0	21.0	0.0	16.4	0.0	19.5	0.0	43.1	9.1	14.7	23.0	53.3	0.0	0.0	0.0	0.0	0.0
Washington 2019	0	0.0	0.0	21.0	0.0	16.4	0.0	19.5	0.0	43.1	5.8	11.1	22.4	60.6	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Washington

Table 70 - Borrower Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2016	0	0.0	0.0	20.0	0.0	16.9	0.0	21.1	0.0	42.0	5.0	15.3	26.1	53.5	0.0	0.0	0.0	0.0	0.0
Washington 2017	1	100.0	100.0	21.0	0.0	16.4	0.0	19.5	0.0	43.1	5.4	18.0	25.9	50.7	0.0	0.4	0.0	0.0	0.0
Washington 2018	1	100.0	100.0	21.0	0.0	16.4	0.0	19.5	0.0	43.1	4.4	13.9	25.8	55.8	0.0	0.0	0.0	0.0	0.0
Washington 2019	0	0.0	0.0	21.0	0.0	16.4	0.0	19.5	0.0	43.1	4.5	14.2	26.0	55.3	0.0	0.0	0.0	0.0	0.0

Table 71- Borrower Distribution of Home Mortgage Other Purpose Open-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2018	0	0.0	0.0	21.0	0.0	16.4	0.0	19.5	0.0	43.1	4.8	14.3	23.5	57.5	0.0	0.0	0.0	0.0	0.0
Washington 2019	0	0.0	0.0	21.0	0.0	16.4	0.0	19.5	0.0	43.1	6.1	13.6	24.1	56.2	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Washington

Table 72 - Borrower Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2018	2	100.0	50.0	21.0	50.0	16.4	0.0	19.5	0.0	43.1	9.9	15.5	22.5	52.1	0.0	0.0	0.0	0.0	0.0
Washington 2019	0	0.0	0.0	21.0	0.0	16.4	0.0	19.5	0.0	43.1	8.0	17.2	25.4	49.3	0.0	0.0	0.0	0.0	0.0

Table 73 - Borrower Distribution of Home Mortgage Not Applicable-Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Washington 2018	8	100.0	100.0	21.0	0.0	16.4	0.0	19.5	0.0	43.1	18.3	33.1	25.9	22.8	0.0	0.0	0.0	0.0	0.0
Washington 2019	0	0.0	0.0	21.0	0.0	16.4	0.0	19.5	0.0	43.1	12.9	19.4	31.6	36.1	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Washington

Table 74 - Borrower Distribution of Home Equity Lines of Credit

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)
<i>Full Scope</i>										
Washington 2016	0	0.0	0.0	20.0	0.0	16.9	0.0	21.1	0.0	42.0
Washington 2017	0	0.0	0.0	21.0	0.0	16.4	0.0	19.5	0.0	43.1

Table 75 - Qualified Investments

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
<i>Full Scope</i>									
Washington	9	12,979	69	32,140	78	45,119	87%	1	69
Broader Statewide/Regional Area	4	812	2	5,652	6	6,464	13%	0	0

East West Bank, Pasadena, California

Rated Area: State of Washington

Table 76- Distribution of Branch Delivery System and Branch Openings/Closings

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Deposits	Branches						Branch Openings / Closings						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income Level of Geography (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Population within each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full Scope</i>																	
Washington	100.0	4	100.0	25.0	0.0	25.0	50.0	0	0	0	0	0	0	5.1	20.5	38.0	35.9

East West Bank, Pasadena, California

Rated Area: State of Georgia

Table 77 - Lending Volume of Reported Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	% of Rated Area Loans	Small Business Loans		Small Farm Loans		All HMDA Loans		Community Development Loans		Total Reported Loans		% of Rated Area Deposits
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<i>Full Scope</i>												
Georgia	100.0	190	35,684	0	0	839	132,308	15	38,397	1,044	206,389	100

Table 77A - Lending Volume of Optional Loans

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	% of Rated Area Loans	Home Equity		Total Optional Loans									
		#	\$ (000's)	#	\$ (000's)								
<i>Full Scope</i>													
Georgia	100.0	76	10,234	76	10,234								

East West Bank, Pasadena, California

Rated Area: State of Georgia

Table 78 - Geographic Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Georgia 2016	34	100.0	17.6	4.8	23.5	18.9	20.6	34.0	38.2	42.3	4.2	16.9	30.8	48.1	0.1	0.2	0.1	0.0	0.0
Georgia 2017	62	100.0	9.7	5.4	38.7	20.0	14.5	30.4	37.1	44.2	4.8	19.0	28.5	47.7	0.0	0.1	0.1	0.0	0.0
Georgia 2018	55	100.0	9.1	5.7	38.2	21.0	18.2	30.7	34.5	42.6	4.9	19.0	28.4	47.7	0.0	0.1	0.1	0.0	0.0
Georgia 2019	39	100.0	10.3	5.8	38.5	21.3	20.5	30.7	30.8	42.2	4.9	19.3	29.0	46.8	0.0	0.1	0.0	0.0	0.0

Table 79 - Geographic Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Georgia 2016	129	100.0	4.7	3.1	25.6	16.2	45.7	38.9	24.0	41.8	2.1	13.3	40.3	44.3	0.4	0.6	0.6	0.5	0.2
Georgia 2017	98	100.0	2.0	3.5	24.5	18.1	41.8	35.4	31.6	42.9	3.1	17.3	37.0	42.5	0.1	0.1	0.1	0.1	0.1
Georgia 2018	153	100.0	6.5	3.5	30.1	18.1	31.4	35.4	32.0	42.9	3.4	18.7	36.6	41.2	0.0	0.0	0.0	0.0	0.0
Georgia 2019	240	100.0	10.0	3.5	28.8	18.1	30.8	35.4	30.4	42.9	3.9	19.2	36.8	40.0	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Georgia

Table 80 - Geographic Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)					
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid
<i>Full Scope</i>																				
Georgia 2016	20	100.0	0.0	3.1	10.0	16.2	45.0	38.9	45.0	41.8	1.4	10.3	35.0	53.4	0.1	0.0	0.1	0.1	0.1	0.1
Georgia 2017	18	100.0	5.6	3.5	33.3	18.1	22.2	35.4	38.9	42.9	2.3	14.1	37.2	46.4	0.0	0.1	0.1	0.0	0.0	0.0
Georgia 2018	54	100.0	7.4	3.5	24.1	18.1	40.7	35.4	27.8	42.9	2.8	15.1	36.3	45.8	0.0	0.0	0.0	0.0	0.0	0.0
Georgia 2019	69	100.0	7.2	3.5	21.7	18.1	39.1	35.4	31.9	42.9	2.5	13.7	35.0	48.8	0.0	0.0	0.0	0.0	0.0	0.0

Table 81 - Geographic Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)					
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid
<i>Full Scope</i>																				
Georgia 2016	0	0.0	0.0	3.1	0.0	16.8	0.0	38.9	0.0	41.8	2.3	12.5	35.4	49.9	0.1	0.0	0.2	0.1	0.1	0.1
Georgia 2017	2	100.0	0.0	3.5	50.0	18.1	0.0	35.4	50.0	42.9	2.4	14.3	32.8	50.4	0.0	0.0	0.1	0.0	0.0	0.0
Georgia 2018	9	100.0	0.0	3.5	11.1	18.1	66.7	35.4	22.2	42.9	2.2	10.5	27.2	60.2	0.0	0.0	0.0	0.0	0.0	0.0
Georgia 2019	8	100.0	0.0	3.5	25.0	18.1	62.5	35.4	12.5	42.9	2.1	11.5	30.0	56.4	0.0	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Georgia

Table 82 - Geographic Distribution of Multifamily Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Georgia 2016	1	100.0	0.0	15.1	100.0	33.2	0.0	26.9	0.0	24.8	16.7	33.8	24.7	24.7	0.3	0.0	1.0	0.0	0.0
Georgia 2017	1	100.0	100.0	17.3	0.0	32.1	0.0	22.6	0.0	28.0	24.2	33.1	19.0	23.6	0.3	1.2	0.0	0.0	0.0
Georgia 2018	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	20.9	36.2	24.0	18.9	0.0	0.0	0.0	0.0	0.0
Georgia 2019	1	100.0	0.0	3.5	0.0	18.1	0.0	35.4	100.0	42.9	19.8	32.4	21.7	26.1	0.0	0.0	0.0	0.0	0.0

Table 83 - Geographic Distribution of Home Mortgage Other Purpose Open-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Georgia 2018	5	100.0	0.0	3.5	0.0	18.1	60.0	35.4	40.0	42.9	1.2	9.1	26.7	63.0	0.0	0.0	0.0	0.0	0.0
Georgia 2019	1	100.0	100.0	3.5	0.0	18.1	0.0	35.4	0.0	42.9	1.4	8.6	27.1	62.9	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Georgia

Table 84 - Geographic Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Georgia 2018	4	100.0	0.0	3.5	0.0	18.1	50.0	35.4	50.0	42.9	3.6	17.0	31.6	47.8	0.0	0.0	0.0	0.0	0.0
Georgia 2019	5	100.0	0.0	3.5	60.0	18.1	20.0	35.4	20.0	42.9	4.5	15.5	33.8	46.3	0.0	0.0	0.0	0.0	0.0

Table 85 - Geographic Distribution of Home Mortgage Not Applicable Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Georgia 2018	21	100.0	4.8	3.5	14.3	18.1	61.9	35.4	19.0	42.9	4.4	25.7	44.2	25.7	0.0	0.0	0.0	0.0	0.0
Georgia 2019	0	0.0	0.0	3.5	0.0	18.1	0.0	35.4	0.0	42.9	4.4	25.9	44.2	25.4	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Georgia

Table 86 - Geographic Distribution of Home Equity Lines of Credit

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)
<i>Full Scope</i>										
Georgia 2016	25	100.0	4.0	3.1	4.0	16.2	36.0	38.9	56.0	41.8
Georgia 2017	51	100.0	0.0	3.5	25.5	18.1	23.5	35.4	51.0	42.9

Table 87 - Borrower Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Small Business Loans		Businesses with Revenue <= \$1 Million		Originations Regardless of Revenue Size			Aggregate Lending (%)		Market Share (%)	
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Businesses (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million	All Loans	Loans to Revenue <= \$1 Million (%)	All Loans	Loans to Revenue <= \$1 Million (%)
<i>Full Scope</i>											
Georgia 2016	34	100.0	55.9	92.0	70.6	11.8	17.6	138,981	49.9	0.1	0.1
Georgia 2017	62	100.0	61.3	91.2	67.7	8.1	24.2	134,470	52.7	0.0	0.1
Georgia 2018	55	100.0	69.1	92.4	65.5	3.6	30.9	145,583	46.8	0.0	0.1
Georgia 2019	39	100.0	76.9	92.8	74.4	2.6	23.1	156,090	48.2	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Georgia

Table 88 - Borrower Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Georgia 2016	122	100.0	14.8	21.2	73.8	16.7	10.7	19.1	0.8	43.0	6.9	20.6	23.7	48.7	0.4	1.5	1.4	0.2	0.0
Georgia 2017	41	100.0	80.5	22.6	14.6	16.5	4.9	17.9	0.0	43.0	6.2	21.1	24.1	48.5	0.0	0.5	0.0	0.0	0.0
Georgia 2018	78	100.0	62.8	22.6	24.4	16.5	7.7	17.9	5.1	43.0	7.7	21.8	24.7	45.7	0.0	0.0	0.0	0.0	0.0
Georgia 2019	138	100.0	48.6	22.6	41.3	16.5	8.7	17.9	1.4	43.0	8.0	25.3	25.1	41.7	0.0	0.0	0.0	0.0	0.0

Table 89 - Borrower Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Georgia 2016	20	100.0	15.0	21.2	70.0	16.7	15.0	19.1	0.0	43.0	5.5	12.9	20.4	61.2	0.1	0.3	0.8	0.1	0.0
Georgia 2017	16	100.0	81.3	22.6	12.5	16.5	6.3	17.9	0.0	43.0	7.4	16.9	23.4	52.4	0.0	0.4	0.0	0.0	0.0
Georgia 2018	41	100.0	70.7	22.6	24.4	16.5	0.0	17.9	4.9	43.0	12.4	15.0	21.3	51.3	0.0	0.0	0.0	0.0	0.0
Georgia 2019	65	100.0	56.9	22.6	41.5	16.5	0.0	17.9	1.5	43.0	10.7	12.6	20.3	56.3	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Georgia

Table 90 - Borrower Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)					
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid
<i>Full Scope</i>																				
Georgia 2016	0	0.0	0.0	21.2	0.0	16.7	0.0	19.1	0.0	43.0	5.2	14.4	22.5	57.8	0.1	0.6	0.4	0.1	0.0	
Georgia 2017	0	0.0	0.0	22.6	0.0	16.5	0.0	17.9	0.0	43.0	5.7	15.2	22.0	57.1	0.0	0.0	0.0	0.0	0.0	
Georgia 2018	1	100.0	100.0	22.6	0.0	16.5	0.0	17.9	0.0	43.0	5.1	11.6	20.7	62.6	0.0	0.0	0.0	0.0	0.0	
Georgia 2019	3	100.0	0.0	22.6	66.7	16.5	33.3	17.9	0.0	43.0	5.4	14.2	22.1	58.3	0.0	0.0	0.0	0.0	0.0	

Table 91 - Borrower Distribution of Home Mortgage Other Purpose Open-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)					
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid
<i>Full Scope</i>																				
Georgia 2018	0	0.0	0.0	22.6	0.0	16.5	0.0	17.9	0.0	43.0	5.2	11.7	18.8	64.3	0.0	0.0	0.0	0.0	0.0	
Georgia 2019	0	0.0	0.0	22.6	0.0	16.5	0.0	17.9	0.0	43.0	5.0	11.1	20.1	63.8	0.0	0.0	0.0	0.0	0.0	

East West Bank, Pasadena, California

Rated Area: State of Georgia

Table 92 - Borrower Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Georgia 2018	1	100.0	100.0	22.6	0.0	16.5	0.0	17.9	0.0	43.0	10.2	16.1	21.1	52.7	0.0	0.0	0.0	0.0	0.0
Georgia 2019	3	100.0	66.7	22.6	0.0	16.5	0.0	17.9	33.3	43.0	9.9	18.7	21.1	50.4	0.0	0.0	0.0	0.0	0.0

Table 93 - Borrower Distribution of Home Mortgage Not Applicable-Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Georgia 2018	21	100.0	100.0	22.6	0.0	16.5	0.0	17.9	0.0	43.0	19.5	24.8	26.4	29.3	0.0	0.0	0.0	0.0	0.0
Georgia 2019	0	0.0	0.0	22.6	0.0	16.5	0.0	17.9	0.0	43.0	17.8	10.3	17.8	54.1	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Georgia

Table 94 - Borrower Distribution of Home Equity Lines of Credit

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)
<i>Full Scope</i>										
Georgia 2016	0	0.0	0.0	21.2	0.0	16.7	0.0	19.1	0.0	43.0
Georgia 2017	0	0.0	0.0	22.6	0.0	16.5	0.0	17.9	0.0	43.0

Table 95 - Qualified Investments

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
<i>Full Scope</i>									
Georgia	7	1,950	62	75,236	69	77,186	94%	1	477
Statewide/Regional	4	2,034	1	3,178	5	5,212	6%	0	0

East West Bank, Pasadena, California

Rated Area: State of Georgia

Table 96- Distribution of Branch Delivery System and Branch Openings/Closings

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Deposits	Branches						Branch Openings / Closings						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income Level of Geography (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Population within each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full Scope</i>																	
Georgia	100.0	3	100.0	33.3	0.0	33.3	33.3	0	0	0	0	0	0	8.1	23.9	32.9	34.8

East West Bank, Pasadena, California

Rated Area: State of Massachusetts

Table 97 - Lending Volume of Reported Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	% of Rated Area Loans	Small Business Loans		Small Farm Loans		All HMDA Loans		Community Development Loans		Total Reported Loans		% of Rated Area Deposits
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<i>Full Scope</i>												
Massachusetts	100.0	343	7,050	0	0	545	245,423	12	82,990	900	335,463	100.0
Broader Statewide/Regional Area								2	21,400			

Table 97A- Lending Volume of Optional Loans

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	% of Rated Area Loans	Home Equity		Total Optional Loans									
		#	\$ (000's)	#	\$ (000's)								
<i>Full Scope</i>													
Massachusetts	100.0	46	23,226	46	23,226								

East West Bank, Pasadena, California

Rated Area: State of Massachusetts

Table 98 - Geographic Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2016	15	100.0	13.3	5.6	33.3	12.6	26.7	35.0	26.7	46.8	4.9	13.6	36.1	45.3	0.1	0.3	0.1	0.0	0.0
Massachusetts 2017	37	100.0	18.9	5.8	21.6	13.5	37.8	34.2	21.6	46.5	5.5	15.0	35.6	43.9	0.0	0.2	0.1	0.1	0.0
Massachusetts 2018	28	100.0	32.1	5.9	14.3	13.9	35.7	34.0	17.9	46.1	5.4	15.0	35.5	44.0	0.0	0.2	0.0	0.0	0.0
Massachusetts 2019	261	100.0	40.6	6.0	45.6	14.0	11.5	33.9	2.3	46.1	5.8	15.8	35.8	42.6	0.3	2.1	0.9	0.1	0.0

Table 99 - Geographic Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2016	66	100.0	0.0	2.8	12.1	12.9	33.3	41.7	54.5	42.7	3.7	13.7	42.1	40.6	0.3	0.1	0.5	0.3	0.2
Massachusetts 2017	97	100.0	2.1	3.0	22.7	14.1	24.7	39.5	50.5	43.4	4.2	17.0	38.5	40.3	0.2	0.1	0.3	0.1	0.3
Massachusetts 2018	128	100.0	4.7	3.0	18.8	14.1	27.3	39.5	49.2	43.4	4.3	17.0	38.5	40.3	0.0	0.0	0.0	0.0	0.0
Massachusetts 2019	121	99.2	5.8	3.0	14.0	14.1	35.5	39.5	44.6	43.4	4.1	16.7	39.1	40.1	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Massachusetts

Table 100 - Geographic Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2016	22	100.0	4.5	2.8	13.6	12.9	63.6	41.7	18.2	42.7	3.1	12.3	41.0	43.6	0.1	0.2	0.2	0.2	0.1
Massachusetts 2017	19	100.0	15.8	3.0	21.1	14.1	31.6	39.5	31.6	43.4	4.4	16.7	40.4	38.5	0.1	0.2	0.1	0.0	0.1
Massachusetts 2018	20	100.0	5.0	3.0	35.0	14.1	40.0	39.5	20.0	43.4	3.9	16.3	38.4	41.5	0.0	0.0	0.0	0.0	0.0
Massachusetts 2019	19	100.0	21.1	3.0	26.3	14.1	36.8	39.5	15.8	43.4	3.3	14.1	39.1	43.4	0.0	0.0	0.0	0.0	0.0

Table 101 - Geographic Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2016	0	0.0	0.0	2.8	0.0	12.9	0.0	41.7	0.0	42.7	2.6	11.2	41.0	45.2	0.0	0.0	0.1	0.1	0.0
Massachusetts 2017	4	100.0	25.0	3.0	25.0	14.1	50.0	39.5	0.0	43.4	3.1	13.7	38.7	44.5	0.1	0.4	0.1	0.1	0.0
Massachusetts 2018	8	100.0	0.0	3.0	37.5	14.1	37.5	39.5	25.0	43.4	2.8	13.5	39.3	44.3	0.0	0.0	0.0	0.0	0.0
Massachusetts 2019	4	100.0	0.0	3.0	25.0	14.1	25.0	39.5	50.0	43.4	2.8	13.3	39.7	44.2	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Massachusetts

Table 102- Geographic Distribution of Multifamily Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2016	1	100.0	0.0	12.9	0.0	27.1	0.0	36.9	100.0	23.1	12.1	37.3	29.5	21.2	0.2	0.0	0.0	0.4	0.5
Massachusetts 2017	2	100.0	0.0	13.1	50.0	27.2	50.0	34.6	0.0	25.1	16.7	35.3	30.0	17.9	0.3	0.0	0.4	0.4	0.0
Massachusetts 2018	3	100.0	0.0	3.0	66.7	14.1	33.3	39.5	0.0	43.4	16.5	31.1	31.3	21.2	0.0	0.0	0.0	0.0	0.0
Massachusetts 2019	0	0.0	0.0	3.0	0.0	14.1	0.0	39.5	0.0	43.4	15.7	30.5	29.0	24.8	0.0	0.0	0.0	0.0	0.0

Table 103 - Geographic Distribution of Home Mortgage Other Purpose Open-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2018	5	100.0	0.0	3.0	20.0	14.1	20.0	39.5	60.0	43.4	2.7	11.6	36.4	49.3	0.0	0.0	0.0	0.0	0.0
Massachusetts 2019	3	100.0	0.0	3.0	0.0	14.1	66.7	39.5	33.3	43.4	2.3	10.1	37.2	50.4	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Massachusetts

Table 104 - Geographic Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2018	5	100.0	40.0	3.0	40.0	14.1	0.0	39.5	20.0	43.4	3.5	15.9	36.9	43.8	0.0	0.0	0.0	0.0	0.0
Massachusetts 2019	0	0.0	0.0	3.0	0.0	14.1	0.0	39.5	0.0	43.4	2.4	13.7	42.9	41.0	0.0	0.0	0.0	0.0	0.0

Table 105 - Geographic Distribution of Home Mortgage Not Applicable Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2018	17	100.0	0.0	3.0	23.5	14.1	52.9	39.5	23.5	43.4	4.0	16.7	34.0	45.2	0.0	0.0	0.0	0.0	0.0
Massachusetts 2019	0	0.0	0.0	3.0	0.0	14.1	0.0	39.5	0.0	43.4	4.3	12.8	27.8	55.2	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Massachusetts

Table 106 - Geographic Distribution of Home Equity Lines of Credit

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)
<i>Full Scope</i>										
Massachusetts 2016	15	100.0	0.0	2.8	26.7	12.9	33.3	41.7	40.0	42.7
Massachusetts 2017	31	100.0	3.2	3.0	16.1	14.1	32.3	39.4	48.4	43.3

Table 107 - Borrower Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Small Business Loans		Businesses with Revenue <= \$1 Million		Originations Regardless of Revenue Size			Aggregate Lending (%)		Market Share (%)	
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Businesses (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million	All Loans	Loans to Revenue <= \$1 Million (%)	All Loans	Loans to Revenue <= \$1 Million (%)
<i>Full Scope</i>											
Massachusetts 2016	15	100.0	80.0	88.6	86.7	0.0	13.3	76,168	44.9	0.1	0.1
Massachusetts 2017	37	100.0	73.0	87.8	89.2	2.7	8.1	75,060	47.2	0.0	0.1
Massachusetts 2018	28	100.0	85.7	89.2	96.4	3.6	0.0	80,847	39.9	0.0	0.1
Massachusetts 2019	263	100.0	99.2	89.5	98.9	0.4	0.8	87,957	41.6	0.3	0.7

East West Bank, Pasadena, California

Rated Area: State of Massachusetts

Table 108 - Borrower Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2016	37	100.0	5.4	22.3	81.1	15.7	10.8	19.8	2.7	42.3	4.1	15.8	25.1	55.1	0.3	0.6	1.4	0.1	0.0
Massachusetts 2017	14	100.0	100.0	22.9	0.0	15.6	0.0	18.8	0.0	42.7	4.1	16.0	25.0	55.0	0.0	0.9	0.0	0.0	0.0
Massachusetts 2018	11	100.0	90.9	22.9	9.1	15.6	0.0	18.8	0.0	42.7	4.6	16.2	24.4	54.8	0.0	0.0	0.0	0.0	0.0
Massachusetts 2019	7	100.0	57.1	22.9	42.9	15.6	0.0	18.8	0.0	42.7	4.7	18.2	24.6	52.6	0.0	0.0	0.0	0.0	0.0

Table 109 - Borrower Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2016	22	100.0	4.5	22.3	90.9	15.7	4.5	19.8	0.0	42.3	3.3	13.0	25.7	58.0	0.2	0.6	1.0	0.0	0.0
Massachusetts 2017	14	100.0	100.0	22.9	0.0	15.6	0.0	18.8	0.0	42.7	5.9	18.2	27.3	48.5	0.1	0.9	0.0	0.0	0.0
Massachusetts 2018	9	100.0	77.8	22.9	11.1	15.6	11.1	18.8	0.0	42.7	7.8	16.2	23.6	52.4	0.0	0.0	0.0	0.0	0.0
Massachusetts 2019	17	100.0	58.8	22.9	41.2	15.6	0.0	18.8	0.0	42.7	5.2	13.8	23.8	57.2	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Massachusetts

Table 110 - Borrower Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2016	0	0.0	0.0	22.3	0.0	15.7	0.0	19.8	0.0	42.3	3.6	12.4	24.5	59.5	0.0	0.0	0.4	0.0	0.0
Massachusetts 2017	0	0.0	0.0	22.9	0.0	15.6	0.0	18.8	0.0	42.7	4.5	14.4	25.1	55.9	0.0	0.0	0.0	0.0	0.0
Massachusetts 2018	1	100.0	100.0	22.9	0.0	15.6	0.0	18.8	0.0	42.7	5.3	14.9	25.4	54.4	0.0	0.0	0.0	0.0	0.0
Massachusetts 2019	0	0.0	0.0	22.9	0.0	15.6	0.0	18.8	0.0	42.7	6.0	15.5	26.3	52.2	0.0	0.0	0.0	0.0	0.0

Table 111 - Borrower Distribution of Home Mortgage Other Purpose Open-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2018	0	0.0	0.0	22.9	0.0	15.6	0.0	18.8	0.0	42.7	7.1	16.3	25.5	51.1	0.0	0.0	0.0	0.0	0.0
Massachusetts 2019	0	0.0	0.0	22.9	0.0	15.6	0.0	18.8	0.0	42.7	6.7	16.2	22.6	54.4	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Massachusetts

Table 112 - Borrower Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2018	1	100.0	100.0	22.9	0.0	15.6	0.0	18.8	0.0	42.7	7.0	15.9	26.0	51.1	0.0	0.0	0.0	0.0	0.0
Massachusetts 2019	0	0.0	0.0	22.9	0.0	15.6	0.0	18.8	0.0	42.7	8.5	17.8	25.7	48.0	0.0	0.0	0.0	0.0	0.0

Table 113 - Borrower Distribution of Home Mortgage Not Applicable-Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Massachusetts 2018	17	100.0	100.0	22.9	0.0	15.6	0.0	18.8	0.0	42.7	18.8	26.3	19.9	34.9	0.0	0.0	0.0	0.0	0.0
Massachusetts 2019	0	0.0	0.0	22.9	0.0	15.6	0.0	18.8	0.0	42.7	40.0	26.7	10.0	23.3	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Massachusetts

Table 114 - Borrower Distribution of Home Equity Lines of Credit

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)
<i>Full Scope</i>										
Massachusetts 2016	0	0.0	0.0	22.3	0.0	15.7	0.0	19.8	0.0	42.3
Massachusetts 2017	0	0.0	0.0	22.9	0.0	15.6	0.0	18.8	0.0	42.7

Table 115 - Qualified Investments

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
<i>Full Scope</i>									
Massachusetts	9	3,738	42	4,195	51	7,933	74%	0	0
Statewide/Regional	2	1,154	3	1,662	5	2,816	26%	2	3,050

East West Bank, Pasadena, California

Rated Area: State of Massachusetts

Table 116- Distribution of Branch Delivery System and Branch Openings/Closings

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Deposits	Branches						Branch Openings / Closings				Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income Level of Geography (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Population within each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full Scope</i>																	
Massachusetts	100.0	2	100.0	50.0	0.0	50.0	0.0	0	0	0	0	0	0	8.9	20.4	35.8	34.5

East West Bank, Pasadena, California

Rated Area: State of Nevada

Table 117 - Lending Volume of Reported Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	% of Rated Area Loans	Small Business Loans		Small Farm Loans		All HMDA Loans		Community Development Loans		Total Reported Loans		% of Rated Area Deposits
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<i>Full Scope</i>												
Nevada	100.0	55	17,006	0	0	616	135,685	17	727,215	688	879,906	100.0
Broader Statewide/Regional Area								3	15,603			

Table 117A - Lending Volume of Optional Loans

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	% of Rated Area Loans	Home Equity		Total Optional Loans									
		#	\$ (000's)	#	\$ (000's)								
<i>Full Scope</i>													
Nevada	100.0	135	17,017	135	17,017								

East West Bank, Pasadena, California

Rated Area: State of Nevada

Table 118- Geographic Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Nevada 2016	8	100.0	0.0	4.7	50.0	20.7	37.5	42.5	12.5	32.1	2.9	16.3	42.0	38.9	0.1	0.2	0.1	0.0	0.0
Nevada 2017	17	100.0	5.9	3.9	29.4	23.4	29.4	38.7	35.3	33.9	2.9	19.3	38.3	39.5	0.0	0.1	0.1	0.0	0.0
Nevada 2018	14	100.0	14.3	3.8	14.3	22.5	28.6	38.9	42.9	34.9	3.0	18.8	37.7	40.6	0.0	0.1	0.0	0.0	0.0
Nevada 2019	16	100.0	6.3	3.8	31.3	22.3	25.0	38.6	37.5	35.3	3.1	18.3	37.7	40.9	0.0	0.1	0.1	0.0	0.0

Table 119 - Geographic Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Nevada 2016	21	100.0	0.0	1.7	9.5	15.5	52.4	45.7	38.1	37.1	1.1	10.0	46.4	42.6	0.2	0.4	0.2	0.2	0.1
Nevada 2017	42	100.0	0.0	1.9	7.1	16.9	57.1	41.7	35.7	39.5	1.2	13.1	43.8	41.9	0.1	0.0	0.0	0.1	0.1
Nevada 2018	139	100.0	1.4	1.9	12.2	16.9	45.3	41.7	41.0	39.5	1.9	15.1	42.3	40.6	0.0	0.0	0.0	0.0	0.0
Nevada 2019	254	100.0	2.4	1.9	33.1	16.9	38.2	41.7	26.4	39.5	1.8	15.0	41.6	41.7	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Nevada

Table 120- Geographic Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Nevada 2016	5	100.0	0.0	1.7	40.0	15.5	40.0	45.7	20.0	37.1	0.5	7.4	43.6	48.5	0.1	0.0	0.3	0.1	0.1
Nevada 2017	17	100.0	5.9	1.9	35.3	16.9	35.3	41.7	23.5	39.5	0.8	11.1	43.8	44.2	0.1	0.4	0.2	0.0	0.0
Nevada 2018	31	100.0	0.0	1.9	12.9	16.9	61.3	41.7	25.8	39.5	1.1	13.2	44.2	41.5	0.0	0.0	0.0	0.0	0.0
Nevada 2019	30	100.0	3.3	1.9	33.3	16.9	40.0	41.7	23.3	39.5	0.9	10.3	42.8	46.0	0.0	0.0	0.0	0.0	0.0

Table 121 - Geographic Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Nevada 2016	0	0.0	0.0	1.7	0.0	15.5	0.0	45.7	0.0	37.1	0.9	9.7	42.4	47.0	0.0	0.0	0.4	0.0	0.0
Nevada 2017	5	100.0	0.0	1.9	20.0	16.9	20.0	41.7	60.0	39.5	1.0	11.4	43.0	44.6	0.1	0.0	0.3	0.1	0.2
Nevada 2018	5	100.0	0.0	1.9	60.0	16.9	0.0	41.7	40.0	39.5	0.8	9.3	39.7	50.2	0.0	0.0	0.0	0.0	0.0
Nevada 2019	21	100.0	0.0	1.9	23.8	16.9	52.4	41.7	23.8	39.5	1.0	10.7	38.5	49.9	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Nevada

Table 122- Geographic Distribution of Multifamily Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Nevada 2016	1	100.0	0.0	12.1	100.0	39.2	0.0	36.6	0.0	12.1	21.2	47.1	26.0	5.8	3.8	0.0	8.2	0.0	0.0
Nevada 2017	4	100.0	75.0	11.6	25.0	37.9	0.0	33.9	0.0	16.5	29.6	45.8	14.8	9.9	2.8	7.1	1.5	0.0	0.0
Nevada 2018	2	100.0	50.0	1.9	50.0	16.9	0.0	41.7	0.0	39.5	20.0	37.9	27.9	14.3	0.0	0.0	0.0	0.0	0.0
Nevada 2019	5	100.0	80.0	1.9	20.0	16.9	0.0	41.7	0.0	39.5	19.5	36.2	28.9	15.4	0.0	0.0	0.0	0.0	0.0

Table 123 - Geographic Distribution of Home Mortgage Other Purpose Open-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Nevada 2018	6	100.0	16.7	1.9	16.7	16.9	16.7	41.7	50.0	39.5	0.5	8.0	41.4	50.1	0.0	0.0	0.0	0.0	0.0
Nevada 2019	7	100.0	0.0	1.9	28.6	16.9	14.3	41.7	57.1	39.5	0.5	8.2	38.2	53.1	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Nevada

Table 124- Geographic Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Nevada 2018	3	100.0	0.0	1.9	0.0	16.9	33.3	41.7	66.7	39.5	1.3	12.6	43.7	42.4	0.0	0.0	0.0	0.0	0.0
Nevada 2019	9	100.0	0.0	1.9	0.0	16.9	55.6	41.7	44.4	39.5	1.3	13.3	44.6	40.8	0.0	0.0	0.0	0.0	0.0

Table 125 - Geographic Distribution of Home Mortgage Not Applicable Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Nevada 2018	9	100.0	0.0	1.9	22.2	16.9	33.3	41.7	44.4	39.5	1.6	18.5	44.6	35.3	0.0	0.0	0.0	0.0	0.0
Nevada 2019	0	0.0	0.0	1.9	0.0	16.9	0.0	41.7	0.0	39.5	1.3	15.7	46.6	36.4	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Nevada

Table 126 - Geographic Distribution of Home Equity Lines of Credit

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)
<i>Full Scope</i>										
Nevada 2016	26	100.0	3.8	1.7	7.7	15.5	69.2	45.7	19.2	37.1
Nevada 2017	109	100.0	4.6	1.9	30.3	16.9	33.9	41.7	31.2	39.5

Table 127 - Borrower Distribution of Small Business Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Small Business Loans		Businesses with Revenue <= \$1 Million		Originations Regardless of Revenue Size			Aggregate Lending (%)		Market Share (%)	
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Businesses (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million	All Loans	Loans to Revenue <= \$1 Million (%)	All Loans	Loans to Revenue <= \$1 Million (%)
<i>Full Scope</i>											
Nevada 2016	8	100.0	50.0	90.2	62.5	0.0	37.5	47,832	45.4	0.1	0.1
Nevada 2017	17	100.0	70.6	89.0	52.9	17.6	29.4	43,273	50.4	0.0	0.1
Nevada 2018	14	100.0	85.7	91.3	64.3	0.0	35.7	46,625	44.8	0.0	0.1
Nevada 2019	16	100.0	68.8	91.9	43.8	6.3	50.0	51,646	47.1	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Nevada

Table 128 - Borrower Distribution of Home Purchase Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Nevada 2016	12	100.0	8.3	20.1	91.7	18.0	0.0	22.0	0.0	39.9	4.6	20.1	27.1	48.2	0.2	0.8	0.9	0.0	0.0
Nevada 2017	12	100.0	83.3	20.7	0.0	18.4	8.3	20.5	8.3	40.5	3.9	18.8	27.8	49.5	0.0	0.6	0.0	0.0	0.0
Nevada 2018	20	100.0	25.0	20.7	50.0	18.4	15.0	20.5	10.0	40.5	4.3	18.0	27.9	49.8	0.0	0.0	0.0	0.0	0.0
Nevada 2019	130	100.0	16.2	20.7	56.9	18.4	26.2	20.5	0.8	40.5	3.9	19.7	27.9	48.5	0.0	0.0	0.0	0.0	0.0

Table 129 - Borrower Distribution of Home Mortgage Refinance Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Nevada 2016	5	100.0	20.0	20.1	80.0	18.0	0.0	22.0	0.0	39.9	5.5	17.0	25.1	52.4	0.1	0.4	0.7	0.0	0.0
Nevada 2017	11	100.0	72.7	20.7	0.0	18.4	0.0	20.5	27.3	40.5	6.3	19.7	26.3	47.8	0.1	0.6	0.0	0.0	0.0
Nevada 2018	7	100.0	85.7	20.7	0.0	18.4	0.0	20.5	14.3	40.5	11.4	17.2	24.5	46.9	0.0	0.0	0.0	0.0	0.0
Nevada 2019	9	100.0	0.0	20.7	44.4	18.4	44.4	20.5	11.1	40.5	15.8	13.9	22.5	47.8	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Nevada

Table 130 - Borrower Distribution of Home Improvement Loans

Evaluation Period: July 1, 2016 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)					
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid
<i>Full Scope</i>																				
Nevada 2016	0	0.0	0.0	20.1	0.0	18.0	0.0	22.0	0.0	39.9	6.7	17.8	23.4	52.1	0.0	0.0	0.2	0.0	0.0	
Nevada 2017	1	100.0	100.0	20.7	0.0	18.4	0.0	20.5	0.0	40.5	5.7	19.5	24.7	50.2	0.0	0.5	0.0	0.0	0.0	
Nevada 2018	3	100.0	100.0	20.7	0.0	18.4	0.0	20.5	0.0	40.5	5.6	13.4	22.8	58.1	0.0	0.0	0.0	0.0	0.0	
Nevada 2019	3	100.0	33.3	20.7	66.7	18.4	0.0	20.5	0.0	40.5	5.0	14.4	22.3	58.3	0.0	0.0	0.0	0.0	0.0	

Table 131 - Borrower Distribution of Home Mortgage Other Purpose Open-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)					
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid
<i>Full Scope</i>																				
Nevada 2018	0	0.0	0.0	20.7	0.0	18.4	0.0	20.5	0.0	40.5	6.3	15.8	24.8	53.1	0.0	0.0	0.0	0.0	0.0	
Nevada 2019	0	0.0	0.0	20.7	0.0	18.4	0.0	20.5	0.0	40.5	5.7	13.9	22.3	58.1	0.0	0.0	0.0	0.0	0.0	

East West Bank, Pasadena, California

Rated Area: State of Nevada

Table 132 - Borrower Distribution of Home Mortgage Other Purpose Closed-end Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)					
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid
<i>Full Scope</i>																				
Nevada 2018	1	100.0	100.0	20.7	0.0	18.4	0.0	20.5	0.0	40.5	8.9	14.8	22.2	54.0	0.0	0.0	0.0	0.0	0.0	0.0
Nevada 2019	3	100.0	0.0	20.7	66.7	18.4	0.0	20.5	33.3	40.5	9.1	17.4	23.1	50.4	0.0	0.0	0.0	0.0	0.0	0.0

Table 133 - Borrower Distribution of Home Mortgage Not Applicable-Purpose Loans

Evaluation Period: January 1, 2018 to December 31, 2019

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)					
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid
<i>Full Scope</i>																				
Nevada 2018	9	100.0	100.0	20.7	0.0	18.4	0.0	20.5	0.0	40.5	15.6	29.6	28.5	26.3	0.0	0.0	0.0	0.0	0.0	0.0
Nevada 2019	0	0.0	0.0	20.7	0.0	18.4	0.0	20.5	0.0	40.5	22.5	15.0	15.0	47.5	0.0	0.0	0.0	0.0	0.0	0.0

East West Bank, Pasadena, California

Rated Area: State of Nevada

Table 134 - Borrower Distribution of Home Equity Lines of Credit

Evaluation Period: July 1, 2016 to December 31, 2017

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)
<i>Full Scope</i>										
Nevada 2016	0	0.0	0.0	20.1	0.0	18.0	0.0	22.0	0.0	39.9
Nevada 2017	0	0.0	0.0	20.7	0.0	18.4	0.0	20.5	0.0	40.5

Table 135 - Qualified Investments

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
<i>Full Scope</i>									
Nevada	3	3,776	21	9,318	24	13,094	100%	0	0
Broader Statewide/Regional Area	0	0	0	0	0	0	0%	0	0

East West Bank, Pasadena, California

Rated Area: State of Nevada

Table 136- Distribution of Branch Delivery System and Branch Openings/Closings

Evaluation Period: January 31, 2017 to December 31, 2020

Assessment Areas	Deposits	Branches						Branch Openings / Closings						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income Level of Geography (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Population within each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full Scope</i>																	
Nevada	100.0	1	100.0	100.0	0.0	0.0	0.0	0	0	0	0	0	0	5.0	25.3	39.2	30.3