Date of Evaluation: **DECEMBER 2, 2019**

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Name of Depository Institution: **THE BRYN MAWR TRUST COMPANY**

Institution's Identification Number: **765019**

Address: **801 LANCASTER AVENUE**

BRYN MAWR, PENNSYLVANIA

FEDERAL RESERVE BANK OF PHILADELPHIA
TEN INDEPENDENCE MALL
PHILADELPHIA, PENNSYLVANIA 19106

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.

Table of Contents

INSTITUTION'S CRA RATING

OVERALL RATING: SATISFACTORY

PERFORMANCE TEST RATING TABLE

The following table indicates the Community Reinvestment Act (CRA) performance level of Bryn Mawr Trust Company ("Bryn Mawr") with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	Bryn Mawr Trust Company		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to this rating include:

- Lending levels that reflect good responsiveness to assessment area credit needs;
- A high percentage of loans are made in the bank's assessment areas;
- The distribution of borrowers reflects adequate penetration among retail customers of different income levels and business customers of different sizes;
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas;
- The bank has made a relatively high level of community development loans;
- The bank has made a significant level of qualified community development investments and grants; and
- The bank has made a relatively high level of community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Bryn Mawr, headquartered in Bryn Mawr, Montgomery County, Pennsylvania, is a state-chartered full-service commercial bank. The bank offers a variety of consumer and commercial banking services through 35 full-service branches and 8 limited-service branches in Delaware, Montgomery, Chester, Philadelphia and Dauphin Counties in Pennsylvania, New Castle County in Delaware, and Camden County in New Jersey. Of its 35 full-service branches, one is located in a low-income census tract and four branches are located in moderate-income census tracts within the bank's footprint. All five of the low- and moderate-income branch locations are within the Philadelphia assessment area.

Bryn Mawr is a subsidiary of Bryn Mawr Bank Corporation (BMBC), a $4.7 billion bank holding company (as of June 30, 2019), also located in Bryn Mawr, Pennsylvania. Bryn Mawr offers insurance, investment, leasing, and wealth management services to individuals, businesses and non-profits through its various non-bank subsidiaries.

In December 2017, BMBC completed its acquisition of Royal Bancshares of Pennsylvania, Inc., and the parent company of Royal Bank America, headquartered in Bala Cynwyd, Pennsylvania. Bryn Mawr acquired twelve branches, including: one in a low-income census tract; three in moderate-income census tracts; four in middle-income census tracts; and four in upper-income census tracts. Eleven of the twelve branches acquired are in the Philadelphia-Camden-Wilmington MSA.

The bank opened two de novo branch locations since the last examination. In April 2016, the bank opened a branch in Dauphin County, PA which established the bank's presence in the Harrisburg-Carlisle MSA. In January 2019, the bank opened a branch in New Castle, Delaware, part of the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA. The bank also closed five branches, three of which were in middle-income tracts and two in upper- income tracts.

The table below details the locations of Bryn Mawr's branches as of the evaluation date.

Metropolitan Area	County	State	Number of Branches
Philadelphia-Camden-Wilmington MSA	Delaware	Pennsylvania	10
Philadelphia-Camden-Wilmington MSA	Montgomery	Pennsylvania	12
Philadelphia-Camden-Wilmington MSA	Chester	Pennsylvania	5
Philadelphia-Camden-Wilmington MSA	Philadelphia	Pennsylvania	5
Philadelphia-Camden-Wilmington MSA	Camden	New Jersey	1
Philadelphia-Camden-Wilmington MSA	New Castle	Delaware	1
Harrisburg-Carlisle MSA	Dauphin	Pennsylvania	1
Total Full-Service Branches			**35**
LIMITED-SERVICE BRANCHES			
Philadelphia-Camden-Wilmington MSA	Delaware	Pennsylvania	4
Philadelphia-Camden-Wilmington MSA	Montgomery	Pennsylvania	3
Philadelphia-Camden-Wilmington MSA	Chester	Pennsylvania	1
Total Limited-Service Branches			**8**
Total Branches			**43**

According to the Consolidated Reports of Condition and Income (Call Report), as of June 30, 2019, Bryn Mawr reported $4.7 billion in assets, of which $3.5 billion, or 74% were loans. At the previous evaluation, conducted as of February 2, 2016, total assets measured $2.9 billion and loans totaled $2.2 billion, or 75% of bank assets, using September 30, 2015 data.

On a dollar-volume basis, commercial loans (which include commercial mortgages and commercial and industrial loans) accounted for 51% of the bank's loan portfolio. Residential loans (which include closed-end and open-end loans secured by residential properties and loans for multifamily housing) accounted for another 37% of the bank's loan portfolio.

The composition of the bank's loan portfolio as of June 30, 2019 is presented in the following table.

LOANS AS OF 06/30/2019	$000	%
Construction & Land Development	195,269	5.5
Secured by Residential Properties (Open-end)	231,697	6.5
Secured by Residential Properties (Closed-end)	750,001	21.2
Secured by Multifamily Residential Property	334,350	9.4
Commercial Mortgages	1,395,067	39.4
Commercial and Industrial	410,917	11.6
Consumer Loans	48,921	1.4
Lease Financing Receivables	162,866	4.6
Secured by Farmland	2,359	<0.1
Loans to Depository Institutions	9,019	.3
Other Loans	532	<0.1
TOTAL LOANS	**3,540,998**	**100.0%**

Source: June 30, 2019 Consolidated Reports of Condition and Income, Schedule RC-C.

Commercial Loans

Schedule RC-C Part II (Loans to Small Farms and Small Businesses) of the Call Report provides data on the number and dollar amount of commercial loans that were small business loans made in original amounts of $1 million or less. This data is reported biannually, and at the time of the examination, the most recent data available was reported as of June 30, 2019. As seen in the following table, Schedule RC-C Part II indicates that 20% of Bryn Mawr's commercial loans were designated as loans to small businesses. This represents a decrease compared to 25% designated as small business loans at the bank's previous CRA evaluation. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less, as detailed in the table on the following page.

Bryn Mawr Trust Company Commercial Loan Portfolio		
Loan By Size	Amount Outstanding As of 06/30/2019 ($000)	%
Loans with original amounts of $100,000 or less	17,041	0.9
Loans with original amounts of $100,001 through $250,000	29,370	1.6
Loans with original amounts of $250,001 to $1 million	313,645	17.4
Total Small-Business Loans	**360,056**	**19.9**
Loans with original amounts greater than $1 million	1,445,928	80.1
Total Commercial Loans	**1,805,984**	**100.0%**

The bank's asset size and financial condition indicate that it has the ability to effectively meet the credit needs of its assessment areas. There are no legal or other impediments that would hamper the bank's ability to meet community credit needs.

Bryn Mawr was rated satisfactory at its previous CRA examination performed by the Federal Reserve Bank of Philadelphia, dated February 22, 2016. The previous evaluation was performed using the Interagency Large Institution CRA Examination Procedures adopted by the Board of Governors of the Federal Reserve System (Board of Governors).

DESCRIPTION OF ASSESSMENT AREAS

For purposes of the CRA, Bryn Mawr has designated two assessment areas, as follows:

(1) Philadelphia Assessment Area - Delaware, Montgomery, Chester, and Philadelphia Counties in Pennsylvania, Camden County in New Jersey and New Castle County in Delaware. All six counties are part of the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD, Metropolitan Statistical Area (MSA).
(2) Harrisburg Assessment Area - Dauphin County in the Harrisburg-Carlisle, PA MSA. The Harrisburg-Carlisle, PA MSA also includes Cumberland and Perry Counties, but these are not included in the bank's assessment area.

The bank's assessment areas were determined to comply with the requirements of the CRA and do not arbitrarily exclude low- or moderate-income census tracts.

It is noted that Bryn Mawr's assessment areas have changed from the previous CRA evaluation, when the bank designated only one assessment area, the Philadelphia assessment area. As indicated earlier, the Harrisburg assessment area was added when the bank opened a de novo branch in Daupin County in April 2016.

SCOPE OF EXAMINATION

The current evaluation of the bank's CRA performance covers the period from February 23, 2016 through December 2, 2019, in accordance with the Interagency Large Institution CRA Examination Procedures adopted by the Board of Governors.

Loan products evaluated include:

- Home-purchase, home-improvement, and multifamily loans, and the refinancing of such loans, collectively titled Home Mortgage Disclosure Act (HMDA) loans, reported by the bank for calendar years 2016 and 2017;

- Home-purchase, home improvement, and multifamily loans, and the refinancing of such loans, open-end lines of credit, closed-end mortgage loans, and loans with a purpose not applicable, collectively titled Home Mortgage Disclosure Act (HMDA) loans, reported by the bank for calendar year 2018[1];
- Small business loans reported by the bank pursuant to the CRA, for calendar years 2016, 2017, and 2018; and
- Other loans that qualified as community development loans during the entire evaluation period, from February 23, 2016 through December 2, 2019.

In determining the bank's overall performance, HMDA loans were weighted heavier than small business loans. As mentioned previously, these loan types comprise 37% and 20%, respectively, of the bank's total loan portfolio. It is noted that small business loans were not evaluated in the Harrisburg assessment area because analysis of the very low volume of small business loans would not have yielded meaningful conclusions.

Bryn Mawr's HMDA and small business loans were compared to the aggregate of all lenders in the bank's assessment areas reporting home-mortgage loans pursuant to HMDA, and small business loans pursuant to CRA. These data are reported annually.

Examiners also analyzed the demographic characteristics of each assessment area as one way to measure loan demand. Demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers, or geography. Rather, demographic data provides context for the bank's performance in the assessment areas where it operates.

For purposes of evaluating the geographic distribution of loans by census tract type, census tracts were classified on the basis of 2010 U.S. Census data for loans made in 2016, and on the basis of updated American Community Survey (ACS) data for loans originated in 2017 and 2018[2]. The distribution of HMDA loans to borrowers of different income levels was based upon annually-adjusted median family income data for each of those years, made available by the Federal Financial Institutions Examination Council (FFIEC). All other demographic indices and statistics presented throughout this evaluation are based on 2010 Census data in 2016, and on 2015 ACS-updated data in 2017 and 2018, unless otherwise noted.

---

[1] In October 2015 and August 2017 final rules that amended Regulation C, the Consumer Financial Protection Bureau (CFPB) modified: (1) the types of institutions that are subject to Regulation C (covered institutions); (2) the types of transactions that are subject to Regulation C (covered transactions); (3) the types of data that institutions are required to collect, record, and report pursuant to Regulation C; and (4) the corresponding processes for reporting and disclosing HMDA data. See 80 Fed. Reg. 66127 (Oct. 28, 2015) (final rule); 82 Fed. Reg. 43088 (Sep. 13, 2017) (correction). The Board of Governors, along with the other federal financial regulatory agencies, amended their regulations implementing the CRA to conform to the CFPB regulation changes. Of note, changes include the "home mortgage loan" definition in the CRA regulations to mean a "closed-end mortgage loan" or an "open-end line of credit" as those terms are defined in, and that are not excluded transactions under, amended Regulation C. As a result: Home-improvement loans that are not secured by a dwelling, which were previously required to be reported under Regulation C, are no longer reportable transactions under HMDA; Home equity lines of credit (HELOCs) secured by a dwelling, which were previously reported at the option of the financial institution under Regulation C, are now covered transactions under HMDA; and "Home equity loan" was deleted from the CRA definition of "consumer loan" because home equity loans are now included within the CRA definition of "home mortgage loan."

[2] In accordance with FFIEC policy, 2015 ACS data is used to analyze 2017 and 2018 lending data, while previous years use 2010 Census data for comparison.

For small business loans, examiners used Dun & Bradstreet data for comparison purposes for the applicable years. Dun & Bradstreet collects and publishes data detailing the revenues and locations of local businesses.

To supplement economic, demographic, and performance data, and to gain a better perspective on community credit needs, examiners also conducted a total of four community contact interviews with community representatives within the bank's two assessment areas. Discussions were held with two agencies focused on homeownership, one economic development corporation, and one small business organization. Additional detail on the community development needs identified by the contacts can be found within the discussion of each assessment area.

For purposes of assessing the bank's overall CRA performance, greater weight was given to the performance in the Philadelphia assessment area. A substantial majority of the bank's lending and operations were in this assessment area and, as such, a full-scope review of the bank's performance in the assessment area was conducted. Of the bank's branch network, 97% of branches are located in the Philadelphia assessment area, and this area also accounts for over 99% of the bank's overall lending activity by both number and dollar amount of loans.

A lesser amount of weight was given to the bank's Harrisburg assessment area. Bryn Mawr operates only one branch in this area, and has significantly less lending volume (< 1% by number of loans and by dollar volume) compared to the Philadelphia assessment area. However, because the assessment area is new since the prior evaluation, the Harrisburg assessment area also received a full-scope review during this CRA evaluation. As mentioned previously, small business loans were not considered in the Harrisburg assessment area due to their very limited volume[3].

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Performance under the lending test is rated high satisfactory. Overall, the bank did a good job of serving the credit and community development needs of its assessment areas. The lending test was rated high satisfactory in the Philadelphia assessment area, and needs to improve in the Harrisburg assessment area.

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Concentration of lending within assessment areas, including HMDA and small business lending;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers and businesses of different sizes, including small businesses;

---

[3] In 2016, Bryn Mawr made no small business loans in the Harrisburg assessment area. In 2017, the bank made two small business loans, and in 2018, one small business loan was made in the Harrisburg assessment area.

- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Lending Activity

The bank's lending activity demonstrates good responsiveness to the credit needs of its assessment areas. As indicated earlier, as of June 20, 2019, Bryn Mawr reported total loans of $3.5 billion, or 74% of total assets. This is comparable to the percentage of loans to total assets at the previous evaluation (75%), using September 30, 2015 Call Report data. HMDA loans represent the largest overall volume in the bank's loan portfolio, by number and dollar amount, followed by small business loans.

The table below depicts the bank's HMDA and CRA lending activity from January 1, 2016 through December 31, 2018.[4]

Loan Type	#	%	$ (000s)	%
Total Consumer related	**0**	**0.0**	**0**	**0.0**
Home Improvement	370	10.0	77,551	6.1
Home Purchase - Conventional	1,223	33.1	424,553	33.6
Home Purchase – FHA	31	0.8	5,772	0.5
Multi-Family Housing	59	1.6	92,389	7.3
Refinancing	862	23.3	251,214	19.9
Total HMDA related	**2,545**	**68.9**	**851,479**	**67.4**
Small Business	1,146	31.0	411,103	32.5
Total Small Business related	**1,146**	**31.0**	**411,103**	**32.5**
Small Farm	1	<0.1	500	<0.1
Total Small Farm related	**1**	**<0.1**	**500**	**<0.1**
TOTAL LOANS	**3,692**	**100.0**	**1,263,082**	**100.0**

Assessment Area Concentration

An analysis was performed to determine the volume of loans extended inside and outside of the bank's assessment areas. The analysis consisted of an evaluation of Bryn Mawr's HMDA loans and small business loans. The assessment area concentration analysis indicates that a high percentage of loans were made in the bank's assessment areas.

More specifically, during the evaluation period, Bryn Mawr made 83% of HMDA loans by number, and 77% of loans by dollar amount inside the bank's assessment areas. This performance is similar to that at the previous evaluation when 85% of HMDA loans by number, and 82% by dollar volume, were made within the bank's assessment area.

---

[4] 2018 HMDA loans with a loan purpose of "other" or "not applicable" have been excluded from the table as further guidance from the Board of Governors has not yet been issued regarding the analysis of such data. The number of loans with purpose "other" totaled 82 loans while loans with a purpose of "not applicable" totaled 61.

With respect to small business loans, 84% of the number of small business loans and 84% of the aggregate dollar amount of loans were extended inside the bank's assessment areas. This performance is similar to that at the previous examination, when 88% of small business loans by number, and 89% by dollar volume were made within the assessment areas.

Overall, 83% of loans by number and 79% of loans by dollar volume were made within Bryn Mawr's two assessments areas, representing a high percentage of lending within the assessment areas.

The table below shows the distribution of lending inside and outside the bank's assessment areas[5].

Bryn Mawr Trust Company Lending Inside and Outside the Assessment Area								
	Inside				Outside			
Loan Type	#	%	$(000s)	%	#	%	$(000s)	%
Home Improvement	335	90.5	68,455	88.3	35	9.5	9,096	11.7
Home Purchase – Conventional	974	79.6	310,854	73.2	249	20.4	113,699	26.8
Home Purchase – FHA	28	90.3	5,113	88.6	3	9.7	659	11.4
Multi-Family Housing	52	88.1	76,600	82.9	7	11.9	15,789	17.1
Refinancing	725	84.1	194,569	77.5	137	15.9	56,645	22.5
Total HMDA Related Loans	**2,114**	**83.1**	**655,591**	**77.0**	**431**	**16.9**	**195,888**	**23.0**
Small Business	965	84.2	345,200	84.0	181	15.8	65,903	16.0
Total Small Business-related Loans	**965**	**84.2**	**345,200**	**84.0**	**181**	**15.8**	**65,903**	**16.0**
Small Farm	1	100.0	500	100.0	0	0.0	0	0.0
Total Small Farm related Loans	**1**	**100.0**	**500**	**100.0**	**0**	**0.0**	**0**	**0.0**
TOTAL LOANS	**3,080**	**83.4**	**1,001,291**	**79.3**	**612**	**16.6**	**261,791**	**20.7**

Borrower and Geographic Distribution of Lending

Home-Mortgage Lending

Overall, the bank's borrower distribution of home-mortgage loans was adequate, due to adequate performance in the Philadelphia assessment area and poor performance in the Harrisburg assessment area. Performance in the Philadelphia assessment area was given more weight in determining the overall conclusion, as the vast majority of the bank's operations and lending was in this assessment area.

Similarly, the geographic distribution of HMDA loans was adequate overall. Once again, performance in the Philadelphia assessment area was adequate and performance in Harrisburg was poor.

---

[5] 2018 HMDA loans with a loan purpose of "other" or "not applicable" have been excluded from the table as further guidance from the Board of Governors has not yet been issued regarding the analysis of such data.

Small Business Lending

The borrower distribution of small business loans was adequate and was driven by performance in the Philadelphia assessment area. Small business loans were not analyzed in the Harrisburg assessment area due to very low volumes, which would not have produced meaningful results.

Similarly, the geographic distribution of small business loans was adequate, and was primarily the result of the bank's performance in the Philadelphia assessment area.

Responsiveness to Credit Needs

Bryn Mawr exhibits a good record of serving the credit needs of low- and moderate-income individuals and areas, and very small businesses. Affordable housing was identified as an important credit need by community contacts, and the bank's HMDA lending record shows that home-mortgage credit is being extended throughout the assessment areas. Additionally, a number of special lending programs are used by the bank to reach low- and moderate-income borrowers who may not qualify for traditional credit products.

Another enumerated credit need was lending to small businesses and start-ups. In addition to its retail small business lending, Bryn Mawr offers U.S. Small Business Administration (SBA) financing, as discussed below, and made nearly $6 million in community development loans that support economic development by financing small businesses and farms.

Innovative and/or Flexible Lending Practices

Bryn Mawr makes use of innovative and flexible lending programs to address specific credit needs of low- and moderate-income borrowers and small businesses in its assessment areas, and these efforts have enhanced its home-mortgage and small business lending profiles. Specifically, Bryn Mawr participated in flexible loan programs such as the Fannie Mae HomeReady® mortgage program and the Federal Housing Administration (FHA) loan program. During the evaluation period, the bank originated 37 HomeReady® loans within its Philadelphia assessment area (aggregating $8.1 million) and 45 FHA loans (aggregating $8.3 million), also within the Philadelphia assessment area.

In 2014, the bank developed the Neighborhood Opportunity Program (NOP), a proprietary home-mortgage loan product targeted to low- and moderate-income borrowers. The program allows for greater underwriting flexibility, low down payment options, no private mortgage insurance requirement, and a slightly higher debt-to-income ratio. The bank originated a total of 375 Neighborhood Opportunity loans for $70 million within its assessment areas during the review period. This performance is significantly higher than at the previous evaluation, when the bank originated 37 NOP loans for a total of $4.4 million.

Finally, Bryn Mawr committed $1 million in loan pool financing, and participated in 11 Community Development Corporation Community Lenders (Community Lenders) loans totaling $315 thousand in the Philadelphia assessment area, which also support affordable housing in this assessment area.

Similarly, in an effort to expand its lending to small businesses, Bryn Mawr participated in the SBA lender program. Over the evaluation period, the bank originated a total of 19 SBA loans totaling $22 million within the Philadelphia assessment area.

Community Development Lending

Bryn Mawr makes a relatively high level of community development loans in its assessment areas. In total, during the review period, the bank originated 23 community development loans, aggregating just under $82 million, compared to $25 million in community development loans at the previous CRA evaluation. Of the bank's 23 community development loans, 21 such loans, aggregating $79 million (91% of the total by number, and 97% by dollar volume) were in the bank's Philadelphia assessment area. Two other loans aggregating over $2.5 million were in the broader statewide or regional area. No community development loans were made in the Harrisburg assessment area. Bryn Mawr's high level of community development loans had a positive impact on the bank's overall lending performance.

Community development loans by assessment area are detailed in the table below.

Assessment Area	CD Loans (#)	CD Loans ($000)	% (Dollars)
Philadelphia Assessment Area	21	79,012	96.8
Harrisburg Assessment Area	0	0	0
Broader Statewide or Regional Area	2	2,588	3.2
TOTAL COMMUNITY DEVELOPMENT LOANS	**23**	**81,600**	**100.0**

INVESTMENT TEST

Overall performance under the investment test is rated high satisfactory. The investment test wasrated high satisfactory in the Philadelphia assessment area, and needs to improve in the Harrisburg assessment area.

Bryn Mawr has a significant level of qualified community development investments and grants which exhibit good responsiveness to community development needs. The bank made 151 qualified investments directly benefiting the assessment areas and totaling over $19 million, which is a significant increase from the investment level at the prior examination of $2.8 million. Investments primarily supported affordable housing (66%), and economic development (19%), which were two community needs identified by community contacts. Of the total qualified investment dollars, 97% benefit the Philadelphia assessment area and 3% of investments support the Harrisburg assessment area. Qualified investments are addressed in more detail within the discussions of each of the bank's assessment areas.

In addition to these qualified investments within the bank's two assessment areas, the bank also made five investments totaling just over $1 million in the broader statewide or regional area.

The bank makes significant use of innovative and/or complex investments to support community development initiatives when opportunities exist. Finally, Bryn Mawr exhibits good responsiveness to credit and community development investment needs, as the vast majority of investments addressed affordable housing and small business financing needs.

SERVICE TEST

Performance under the service test is rated high satisfactory. The service test was rated high satisfactory in the Philadelphia assessment area and low satisfactory in the Harrisburg assessment area.

Branch delivery systems, as well as alternative delivery systems such as automated teller machines (ATMs), telephone banking, and online banking, are accessible to geographies and individuals of different income levels in the bank's assessment areas. The bank provides retail services through its network of 35 full-service offices, eight limited service facilities located in life care centers, and 36 ATMs. Of the bank's 43 branches, 42 are located in the Philadelphia assessment area, while one branch is situated in the Harrisburg assessment area.

Bryn Mawr's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals and areas. Since the last examination, and primarily due to the recent acquisition of Royal Bancshares of Pennsylvania, Inc., the bank has opened 14 branches and closed 5 branches, mostly in the Philadelphia assessment area. More detail on these changes can be found in the discussions of each assessment area.

Banking services do not vary in a way that inconveniences the bank's constituents, irrespective of census tract or income level. Hours of operation are reasonable, and Saturday hours are offered at 34 of the bank's 35 full-service branch locations. Saturday hours are not offered at the branch located in the Harrisburg assessment area. As mentioned above, Bryn Mawr maintains a network of 36 ATMs within its assessment areas.

Additionally, the bank provides alternative delivery systems that include remote deposit capture, night deposit, telephone banking, online banking, and mobile banking, which allow customers to obtain deposit and loan account information, transfer funds, and make loan and other bill payments.

Finally, overall, the bank provides a relatively high level of community development services. Bank officers and employees provided assistance to: nonprofit organizations that assist low- and moderate-income individuals; economic development organizations that support growth, job creation, and small businesses; organizations and community efforts that help to revitalize and stabilize local areas; and organizations that promote affordable housing. Many employees serve as board, finance committee, or loan committee members, or in other important leadership roles in such organizations. The bank is predominantly active in the Philadelphia assessment area, which is reasonable given its large and longtime footprint in the area. No community development services were provided in the Harrisburg assessment area.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

Bryn Mawr is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices, inconsistent with helping to meet community credit needs, was identified.

MULTI-STATE METROPOLITAN AREA

CRA RATING FOR PHILADELPHIA-CAMDEN-WILMINGTON PA-NJ-DE-MD MSA[6]

Performance Test	Performance Level
Lending	High Satisfactory
Investment	High Satisfactory
Service	High Satisfactory
Overall	Satisfactory

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to this rating include the following.

- Lending levels reflect excellent responsiveness to assessment area credit needs;
- The borrower distribution reflects, given the product lines offered, adequate penetration among retail customers of different income levels and business customers of different sizes;
- The geographic distribution of loans reflects adequate penetration throughout the assessment area;
- The bank exhibits a good record of serving the credit needs of low-income individuals and areas, and very small businesses;
- The bank makes use of innovative and/or flexible lending practices;
- The bank makes a relatively high level of community development loans in the assessment area;
- The bank has a significant level of qualified community development investments and grants, occasionally in a leadership position; and
- The bank provides a relatively high level of community development services in its Philadelphia assessment area.

SCOPE OF EXAMINATION

Bryn Mawr's CRA performance in the Philadelphia assessment area was evaluated for the period from February 23, 2016 through December 2, 2019. The lending, investment, and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans[7], small business loans, and other loans that qualified as community development. As mentioned previously, examiners completed a full-scope review for the Philadelphia assessment area, as the vast majority of the bank's operations are within this multistate metropolitan area.

---

[6]This rating reflects overall performance within the multistate metropolitan area. The statewide evaluation was adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area.

[7]In October 2015, the Bureau issued a final rule amending Regulation C (2015 HMDA Final Rule) in order to implement the Dodd-Frank Act (Dodd-Frank) amendments to HMDA (Regulation C). The 2015 HMDA Final Rule established transactional thresholds to determine whether a financial institution is required to collect and report data on open-end lines of credit or closed-end mortgage loans, implemented the new data points specified in Dodd-Frank, added additional data points using the Bureau's Dodd-Frank authority, and made revisions to pre-existing data points, among other changes.

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

Because an overwhelming majority of the bank's operations and loan activity take place within the multistate metropolitan area, the Philadelphia assessment area is given much more weight than the Harrisburg assessment area in determining Bryn Mawr's overall CRA rating. More specifically, of the bank's total deposits, over 99% can be attributed to the Philadelphia assessment area. Similarly, over 99% of the bank's lending volume, by both number of loans and by dollar amount, are within this multistate assessment area.

Bryn Mawr operates 42 of its 43 branches (98%) in the Philadelphia assessment area, 34 of which are full-service branches, and eight of which are limited-service branches located within life care centers. Of these branches, 40 are located in Pennsylvania (15 in Montgomery County, 14 in Delaware County, six in Chester County, and five in Philadelphia County). One branch is located in New Jersey (Camden County) and one branch is in Delaware (New Castle County). Out of the 42 branches, one branch is located in a low-income census tract (2%), while four branches are located in moderate-income census tracts (10%).

Bryn Mawr's Philadelphia assessment area is comprised of the Montgomery-Bucks-Chester County, PA Metropolitan Division (MD), which includes Montgomery, Bucks, and Chester Counties; the Philadelphia, PA MD, which consists of Delaware and Philadelphia Counties; the Camden, NJ MD, which consists of Camden County, NJ; and the Wilmington, DE MD which includes New Castle County, Delaware. These four MDs combine to form the multistate Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA.

Recent growth through the acquisition of Royal Bancshares of Pennsylvania, Inc., has increased the bank's Philadelphia assessment area to include Camden County, NJ within the MSA. At the previous CRA evaluation, the bank's Philadelphia assessment area consisted of only Montgomery, Chester, Delaware, and Philadelphia Counties, PA and New Castle County, DE.

CRA performance in the Philadelphia assessment area was evaluated in terms of the demographic and economic context in which the bank operates.

2010 Census Data

According to 2010 Census data, the bank's Philadelphia assessment area included 1,113 census tracts. Of these tracts, 103 (9%) were designated as low-income, 257 (23%) as moderate-income, 388 (35%) as middle-income, and 348 (31%) as upper-income. The bank's assessment area also contained 17 tracts (2%) classified as unknown-income. These unknown-income tracts mainly consist of the Philadelphia International Airport, the Northeast Philadelphia Airport, Fairmount Park, and the Philadelphia Navy Yard.

The substantial majority of the 103 low-income tracts were located in the cities of Philadelphia (61 tracts, or 59%), Camden, NJ (15 tracts, or 15%), Wilmington, DE (11 tracts, or 11%) and Chester (four tracts, or 4%). An additional three low-income tracts were located Delaware County and nine in Montgomery County. Of the assessment area's population of over 4.4 million residents, just under 9% of the population (385,830) resided in these low-income census tracts.

Of the 257 moderate-income census tracts, 111 tracts (43%) were in the city of Philadelphia, and 42 tracts (16%), were in Montgomery County. Thirty-five tracts (14%) were in New Castle, DE and 28 tracts (11%) were in Camden County. The remaining 41 moderate-income tracts located were in Chester County (22 tracts), and in Delaware County (19 tracts). Of the assessment area's total population, 23% of individuals resided in the moderate-income census tracts.

2015 ACS Data

The results of the 2015 ACS caused changes in the tract designations in the bank's assessment area. More specifically, 12 tracts changed from low- to moderate-income. Additionally, four moderate-income tracts changed to low-income, 13 middle-income tracts changed to moderate-income, while three middle-income tracts changed to upper-income, and two to an unknown-income tract. According to 2015 ACS data, the bank's assessment area included 1,113 census tracts. Of these tracts, 95 (9%) were designated as low-income, 278 (25%) as moderate-income, 377 (34%) as middle-income, and 344 (31%) as upper-income. The bank's assessment area also contained 19 (2%) tracts classified as unknown-income. As with the 2010 Census, these tracts mainly consist of the Philadelphia International Airport, the Northeast Philadelphia Airport, Fairmount Park, and the Philadelphia Navy Yard. As of the 2015 ACS update, the assessment area's population experienced modest growth, and measured just over 4.5 million.

The substantial majority of the 95 low-income tracts were again located in the cities of Philadelphia (50 tracts, or 53%), Camden (19 tracts, or 20%), and Wilmington (eight tracts, or 8%). An additional 18 low-income tracts were located in Montgomery County (10 tracts), Chester County (5 tracts), and Delaware County (3 tracts). Of the assessment area's population, 8% of individuals resided in these low-income census tracts.

Of the 278 moderate-income census tracts, just under half (130 tracts, or 47%) were located in the city of Philadelphia, and 38 tracts, or 14%, were in the city of Wilmington. An additional 86 moderate-income tracts were in Montgomery County (39 tracts), Chester County (24 tracts), and Delaware County (23 tracts). In New Jersey, 24 moderate-income tracts were in Camden County. Of the assessment area's total population, 24% of individuals resided in the moderate-income census tracts.

Maps of the Philadelphia assessment area, at both the 2010 Census and the 2015 ACS update, are available in Appendix F.

According to the Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits as of June 30, 2019[8], 109 depository institutions operated branches in the Philadelphia-Camden-Wilmington, PA-NJ-DE MD MSA. These institutions collectively operated 1,629 branches maintaining $460 billion in deposits. Bryn Mawr ranked sixteenth among those depository institutions, operating 42 branches which held just under 1% of the market's deposits. Capital One, N.A. ranked first in the assessment area with 30% of area deposits, followed by TD Bank, N.A. with 26% of deposits, and Wells Fargo, N.A. with 7% of deposits.

Bryn Mawr reports home-mortgage loans pursuant to HMDA, and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. In 2016, a total of 750 institutions reported 130,518 HMDA loan originations and purchases within the assessment area. Data shows that Wells Fargo Bank, N.A. ranked first among these institutions with 13% of all loan originations and purchases. Quicken Loans, Inc. ranked second with 4% of HMDA originations and purchases, followed closely by Freedom Mortgage Corporation with 3% of the market. Bryn Mawr ranked fiftieth, with under 1% of the market.

The 2017 aggregate HMDA data showed a 9% decrease in overall HMDA lending compared to 2016. Lenders originated a total of 119,062 home-mortgage loans in the assessment area. The number of institutions reporting real estate loans pursuant to HMDA in the assessment area decreased to 748. Wells Fargo Bank, N.A. again ranked first among these institutions with 12% of all loans originated and purchased, followed by Quicken Loans, Inc. with 3% of the market, and JP Morgan Chase Bank, N.A., with 3% of the HMDA market. Bryn Mawr ranked fifty-third, with less than 1% of the market.

The 2018 aggregate HMDA data showed a 9% increase in overall HMDA lending compared to 2017. Lenders originated a total of 130,124 home-mortgage loans in the assessment area. The number of institutions reporting real estate loans pursuant to HMDA in the assessment area decreased to 742. Wells Fargo Bank, N.A. ranked first among these institutions with 10% of all loans originated and purchased, followed by PNC Bank, N.A. and Citizens Bank of Pennsylvania, both with 3% of the HMDA market. Bryn Mawr moved up to thirty-sixth in rank, with under 1% of the market.

Similarly, the institution reports its small business loans pursuant to the CRA, and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to the aggregate CRA data, the assessment area had a total of 204 small business reporters in 2016, who collectively reported 92,587 small business originations and purchases. American Express Bank, FSB ranked first, with 23% of all small business originations and purchases, followed by Citibank, N.A. with 12% of all small business originations and purchases, and PNC Bank, N.A. with 8% of the market. Bryn Mawr was twenty-third among small business reporters, with less than 1% of the market.

---

[8] June 30, 2019 is the most recent date for which FDIC deposit data is available as of the date of this evaluation.

There were 216 small business reporters who collectively reported 91,226 small business loans in 2017. American Express Bank, FSB ranked first, with over 24% of all small business originations and purchases, followed by PNC Bank, N.A. with another 9% of the market, and Capital One Bank USA, N.A. with 7% of small business originations and purchases. Bryn Mawr was twenty-sixth among small business reporters with less than 1% of the market.

In 2018, there were 201 small business reporters who collectively reported 95,616 small business loans. American Express Bank, FSB ranked first, with over 24% of all small business originations and purchases, followed by Chase Bank USA, N.A. with nearly 10% of the market, and Citibank, N.A. with 7% of small business originations and purchases. Bryn Mawr was twenty-seventh among small business reporters with less than 1% of the market.

Since CRA small business loan reporting includes small business loans issued by reporters under corporate credit card arrangements, the reporters with the highest rankings included national originators such as American Express Bank, FSB, Citibank, N.A., and Chase Bank USA, N.A., and others mentioned above. In fact, in 2016, the top five market leaders, all national originators with large credit card portfolios, controlled 56% of the market. Similar results were seen in 2017 and 2018, when the top five national small business originators accounted for 53% and 55% of the market, respectively.

To supplement economic, demographic and performance data, interviews were conducted with three community representatives to provide perspective on the credit needs in the Philadelphia assessment area. Two interviews were held with representatives from homeownership organizations, and a third interview was with a small business organization. Contacts consistently identified the greatest credit needs in the assessment area as business lending to start-up companies, and affordable housing (both purchase and rental), with a particular need for first-time homebuyer loan programs, especially for borrowers who may not meet traditional credit standards.

Economic Characteristics

As indicated previously, the bank's Philadelphia assessment area is located in the Delaware Valley region of southeastern Pennsylvania, in the Philadelphia MSA. Philadelphia is the largest city in Pennsylvania, and the fifth largest city in the nation with a population of over 1.5 million according to 2010 Census data. Philadelphia is one of the strongest economies in Pennsylvania, with a falling unemployment rate and broad-based job gains including private services and construction. According to the May 2019 Moody's Analytics Précis Report for the entire Philadelphia MSA, strengths of the area include the fact that the city has a concentration of well-regarded higher-education institutions, and is a center for healthcare and medical research. Philadelphia continues to see a rising housing market, mostly in single-family housing, supported by strong house price appreciation. On the other hand, weaknesses include the fact that the region suffers from weak population growth, significant fiscal problems that crowd out other government spending, and prohibitive city taxes that push many businesses into the suburbs or neighboring states.

Philadelphia's economy is in late expansion mode, and the metro division is outperforming the Commonwealth and region with year-over-year job growth, exceeding the U.S average according to Moody's Analytics. Steady job creation pushed the jobless rate well below 5%, its lowest rate in history. Healthcare remains an important economic driver, with the city's large healthcare institutions employing one in three Philadelphia workers, although gains are expected to slow as the pool of available workers thins. The growing share of seniors support the demand for medical services and Philadelphia's top-ranked hospitals remain a magnet for medical tourism.

The city boasts a developed port and international airport which assists in promoting trade and tourism for the city. According to Moody's, visitor counts are soaring for hospitality, entertainment and cultural attractions. Center City's hotel occupancy rate reached a new record of nearly 80% in 2018, even as room supply increased by 18%. Since Philadelphia draws both domestic and international tourists, visitor arrivals and spending are expected to continue.

Education and health services represent the largest employment segments in Philadelphia, contributing 31% of the total jobs. Professional and business services, and government are the second largest employment segments, both at nearly 14%, followed closely by leisure and hospitality, at 10% of jobs in the MSA. Major employers in Philadelphia include the University of Pennsylvania Health Systems, Thomas Jefferson University Hospital, Comcast, Drexel University, and Aramark Corporation.

Camden County New Jersey, located directly across the Delaware River from Philadelphia, is experiencing a steady economy with unemployment rates declining year-over-year, and with home sales growth exceeding the national average. Within Camden County is the city of Camden. As of the 2010 Census, the city had a population of just under 77,000, and 19 census tracts, of which 15 were low-income, two were moderate-income and two were middle-income. According to the 2010 Census, the median family income for the city was $29,063, with 82% of families designated as low- or moderate-income. Families living below the poverty level represented 34% of total families. According to Moody's, there is a lack of prime working age residents within the city and the weak job base results in a widening total income gap. Camden County's strengths include a prime strategic location near major cities along the northeast corridor, and the low costs of living and doing business in the region. Weaknesses include the poor population trends, high crime and poverty rates in the metro area, and a low per capita income relative to both the state and the region. Leading employers in Camden County include Virtua Health, McGuire Air Force Base, Cooper Health System, and TD Bank Corporation.

New Castle County, Delaware is situated approximately 30 miles south of Philadelphia and is located along the Delaware River. The county seat is Wilmington, which is the state's most populous city with a population of over 70,000 residents based on the 2010 Census. According to Moody's, Wilmington's economy is gaining strength. Employment growth has steadily increased over the last two years and now exceeds that of the Northeast, although stands below that of the nation. Business and professional services along with healthcare are the primary economic drivers. Wilmington's unemployment rate is nearing an all-time low. However, housing prices are rising at only half the national pace, making homebuilders reluctant to construct new units.

According to Moody's, Wilmington's strengths include numerous valuable financial services jobs, low business costs for the Northeast region, and the ability to draw labor from both Pennsylvania, New Jersey and Maryland. Weaknesses include lower industrial diversity and an aging infrastructure. Top employers in New Castle County include the Chemours Company (a DuPont spin-off company), Christiana Care Health System, E.I. DuPont Nemours & Company, and Bank of America Corporation.

Seasonally unadjusted unemployment rates for the Philadelphia assessment area, according to the U.S. Department of Labor's Bureau of Labor Statistics, are presented in the following table. Unemployment rates have decreased across all counties in the assessment area, the Philadelphia-Camden-Wilmington, PA-NJ-DE MD MSA, the Commonwealth, and the country as whole. Philadelphia County has the highest unemployment rate of the six counties in the assessment area, and unemployment rates in Chester and Montgomery Counties are the lowest among the counties in the Philadelphia MSA. Overall, the unemployment rates in the MSA are slightly higher than the rates in the nation as a whole.

Bryn Mawr Trust Company Annual Unemployment Rates Percentage			
Geographical Area	**2016 Annual**	**2017 Annual**	**2018 Annual**
Chester County, PA	3.9	3.6	3.1
Delaware County, PA	4.9	4.5	4.0
Montgomery County, PA	4.1	3.8	3.4
Philadelphia County, PA	6.7	6.2	5.5
Camden County, NJ	5.5	5.1	4.6
New Castle County, DE	4.4	4.4	3.7
Philadelphia-Camden-Wilmington, PA, NJ, DE MSA	5.1	4.7	4.2
Commonwealth of Pennsylvania	5.4	4.9	4.2
State of New Jersey	5.0	4.6	4.1
State of Delaware	4.5	4.5	3.8
United States	4.9	4.4	3.9

Unemployment data is from the Bureau of Labor Statistics. Rates are not seasonally adjusted.

Housing

2010 Census Data

According to the 2010 Census data, the Philadelphia assessment area contained 1,823,456 housing units, of which 61% were owner-occupied, 30% were rental, and 9% were vacant units. The overall owner-occupancy rate in the assessment area (61%) trailed the rate in the Commonwealth of Pennsylvania (63%), matched the State of Delaware (61%), and was just above the State of New Jersey (60%).

The distribution of owner-occupied housing throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such census tracts. According to the 2010 Census, 5% of owner-occupied housing was located in the assessment area's low-income census tracts, and 20% in the moderate-income census tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (39% and 37%, respectively).

Of the total existing housing units, 72% of the housing units in the Philadelphia assessment area were single family units, while 10% were two-to-four family units, 17% were multifamily units, and less than 1% were mobile homes. The median age of housing stock in the assessment area was 54 years, compared to 50 years in the Commonwealth of Pennsylvania, 45 years in the State of New Jersey and 30 years in the State of Delaware. The median housing value in the assessment area was $230,211. A state comparison shows that the median housing value in Pennsylvania ($159,300) is significantly lower than in New Jersey ($357,000) and in Delaware ($242,300). The median housing values in the assessment area's low- and moderate-income census tracts ($72,110 and $137,780) were significantly lower than the median housing values in middle- and upper-income census tracts ($224,668 and $329,652, respectively).

Median gross rent (rent plus utilities) in the assessment area was $895 per month, with 49% of renters paying more than 30% of their income for housing. Median rent in Pennsylvania was lower at $739, with 44% of renters paying more than 30% of income for housing statewide. In New Jersey, median rent was high at $1,092, with 49% of renters paying more than 30% of income for housing. Finally, in Delaware, median rent was $938, with 48% of renters paying more than 30% of income for housing. Higher rents can be a burden, especially to low- and moderate-income renters, effectively diminishing their ability to save money for a down payment.

2015 ACS Data

According to the updated 2015 ACS data, the Philadelphia assessment area contained 1,839,705 housing units, of which 59% were owner-occupied, 32% were rental, and 9% were vacant. The overall owner-occupancy rate in the assessment area (59%) once again trailed that in the Commonwealth of Pennsylvania (61%), matched the rate in the State of Delaware (59%), and was above the rate in the State of New Jersey (57%).

The distribution of owner-occupied housing with census tracts in the assessment area remained unchanged as a result of the ACS update. More specifically, according to 2015 ACS data, 5% of owner-occupied housing was located in the assessment area's low-income census tracts, and 20% in the moderate-income census tracts. Again, the majority of owner-occupied units were located in middle-income (39%) and upper-income tracts (37%).

According to the 2015 ACS, 72% of the housing units were single-family units, while 10% were two-to-four family units, 17% were multifamily units, and slightly less than 1% were mobile homes. The median age of housing stock in the assessment area remained at 61 years, making it older than that in the Commonwealth of Pennsylvania (54 years), in New Jersey (49 years), and in Delaware (33 years). The median housing value in the assessment area was $226,210. A state comparison shows once again that the median housing value in Pennsylvania ($166,000) is significantly lower than in New Jersey ($315,900) and in Delaware ($231,500). The median housing values in the assessment area's low and moderate-income census tracts ($81,348 and $132,261) were significantly lower than the median housing value in middle- and upper-income census tracts ($224,627 and $317,807, respectively).

The median gross rent in the assessment area remained notably higher than the rents in the Commonwealth of Pennsylvania as a whole ($992 per month compared to $840, respectively) but less than rents in both New Jersey ($1,192) and Delaware ($1,018). Once again, the percentage of renters paying more than 30% of their income on rent was higher in the Philadelphia assessment area than in the Commonwealth (50% and 46%, respectively). Comparably, renters in the Philadelphia assessment area paying more than 30% of their income on rent was slightly higher in New Jersey (51%) and lower in Delaware (46%).

Borrower Income Data

2010 Census Data

The percentage of low- and moderate-income families is used as a proxy to estimate demand for home-mortgage lending in the assessment area. According to the 2010 Census, of the 1,049,481 families in the assessment area, 22% were designated as low-income, 17% were designated as moderate-income, 20% were middle-income, and 41% were upper-income. Families living below the poverty level represented 10% of families in the assessment area, which is higher than that of the Commonwealth of Pennsylvania (9%), and both New Jersey and Delaware (each at 7%).

2015 ACS Data

According to the updated 2015 ACS data, of the 1,046,275 families in the assessment area, 23% were designated as low-income, 17% were designated as moderate-income, 19% were middle income, and 41% were upper-income. According to the 2015 ACS data, 11% of assessment area families were living below the poverty level, which is again higher than the level in the Commonwealth of Pennsylvania of 9%, and both New Jersey and Delaware (each at 8%).

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon U.S. Department of Housing and Urban Development (HUD) annually-adjusted median family income data made available by the FFIEC. The Philadelphia MSA is comprised of four Metropolitan Divisions (MDs): the Montgomery-Bucks-Chester County, PA MD; the Philadelphia, PA MD, consisting of Philadelphia and Delaware Counties; the Camden, NJ MD, comprising of Camden, Burlington and Gloucester Counties; and the Wilmington, DE-MD-NJ MD, consisting of New Castle County, DE, Cecil County, MD, and Salem County, NJ. Median family incomes for 2016 through 2018 are listed in the table below, and are categorized by the dollar amounts recognized as low, moderate, middle, and upper income.

Metropolitan Division	Year	FFIEC-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
Montgomery-Bucks-Chester County, PA MD	2016	$99,500	$49,750	$49,750 - $79,599	$79,600 - $119,399	$119,400 or more
Philadelphia, PA MD	2016	$55,400	$27,700	$27,700 - $44,319	$44,320 - $66,479	$66,480 or more
Camden, NJ MD	2016	$84,200	$42,100	$42,100 - $67,359	$67,360 - $101,039	$101,040 or more
Wilmington, DE MD	2016	$80,000	$40,000	$40,000 - $63,999	$64,000 - $95,999	$96,000 or more
Montgomery-Bucks-Chester County, PA MD	2017	$102,600	$51,300	$51,300 - $82,079	$82,080 - $123,119	$123,120 or more
Philadelphia, PA MD	2017	$57,400	$28,700	$28,700 - $45,919	$45,920 - $68,879	$68,880 or more
Camden, NJ MD	2017	$91,500	$45,750	$45,750 - $73,199	$73,200 - $109,799	$109,800 or more
Wilmington, DE MD	2017	$81,400	$40,700	$40,700 - $65,119	$65,120 - $97,679	$97,680 or more
Montgomery-Bucks-Chester County, PA MD	2018	$107,900	$53,950	$53,950 - $86,319	$86,320 - $129,479	$129,480 or more
Philadelphia, PA MD	2018	$61,700	$30,850	$30,850 - $49,359	$49,360 - $74,039	$74,040 or more
Camden, NJ MD	2018	$92,400	$46,200	$46,200 - $73,919	$73,92 - $110,879	$110,880 or more
Wilmington, DE MD	2018	$87,900	$43,950	$43,950 - $70,319	$70,320 - $105,479	$105,480 or more

Geographic Business Data

2010 Census Data

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. According to the Dun & Bradstreet business demographics, in 2016 there were 201,390 businesses in the assessment area. Of these businesses, 5% were located in low-income tracts, and 17% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (35% and 43%, respectively). Business demographic data also revealed that of the 201,390 businesses in the assessment area, 90% (181,193) were small businesses with gross annual revenues of $1 million or less.

2015 ACS Data

According to Dun & Bradstreet data for 2017, there were 181,435 businesses in the assessment area. Of these businesses, 5% were located in low-income tracts and 18% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (36% and 41%, respectively). Business demographic data also revealed that of the 181,435 businesses in the assessment area, 89% (161,899) were small businesses with gross annual revenues of $1 million or less.

Finally, according to Dun & Bradstreet data for 2018, there were 215,396 businesses in the assessment area. Of these businesses, 5% were located in low-income tracts and 18% were located in moderate-income tracts. Once again, the majority of businesses were located in middle- and upper-income tracts (36% and 41%, respectively). Business demographic data also revealed that of the 215,396 businesses in the assessment area, 91% (194,847) were small businesses with gross annual revenues of $1 million or less.

The assessment area demographics used to evaluate Bryn Mawr's performance in the Philadelphia assessment area are detailed in the tables below.

Bryn Mawr Trust Company Philadelphia Assessment Area Assessment Area Demographics 2016								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	103	9.3	78,022	7.4	30,690	39.3	232,925	22.2
Moderate-income	257	23.1	228,828	21.8	40,575	17.7	178,849	17.0
Middle-income	388	34.9	389,048	37.1	23,290	6.0	211,146	20.1
Upper-income	348	31.3	353,508	33.7	10,114	2.9	426,561	40.6
Unknown-income	17	1.5	75	0.0	44	58.7	0	0.0
Total Assessment Area	**1,113**	**100.0**	**1,049,481**	**100.0**	**104,713**	**10.0**	**1,049,481**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	161,392	52,910	4.8	32.8	77,901	48.3	30,581	18.9
Moderate-income	432,452	211,257	19.1	48.9	167,825	38.8	53,370	12.3
Middle-income	652,102	433,854	39.2	66.5	172,835	26.5	45,413	7.0
Upper-income	577,015	409,815	37.0	71.0	131,210	22.7	35,990	6.2
Unknown-income	495	41	0.0	8.3	348	70.3	106	21.4
Total Assessment Area	**1,823,456**	**1,107,877**	**100.0**	**60.8**	**550,119**	**30.2**	**165,460**	**9.1**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	9,912	4.9	8,841	4.9	1,002	5.4	69	4.0
Moderate-income	33,904	16.8	30,288	16.7	3,332	18.0	284	16.6
Middle-income	70,336	34.9	63,549	35.1	6,198	33.5	589	34.4
Upper-income	86,209	42.8	77,835	43.0	7,612	41.2	762	44.5
Unknown-income	1,029	0.5	680	0.4	339	1.8	10	0.6
Total Assessment Area	**201,390**	**100.0**	**181,193**	**100.0**	**18,483**	**100.0**	**1,714**	**100.0**
	Percentage of Total Businesses:		**90.0**		**9.2**			**0.9**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	13	1.1	12	1.1	1	1.3	0	0.0
Moderate-income	163	14.4	145	13.7	18	22.5	0	0.0
Middle-income	509	44.8	484	45.9	25	31.3	0	0.0
Upper-income	449	39.6	413	39.1	36	45.0	0	0.0
Unknown-income	1	0.1	1	0.1	0	0.0	0	0.0
Total Assessment Area	**1,135**	**100.0**	**1,055**	**100.0**	**80**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**93.0**		**7.0**			**0.0**

Information Based on 2010 Census Data and 2016 Dun & Bradstreet Information

Bryn Mawr Trust Company Philadelphia Assessment Area Assessment Area Demographics 2017								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	95	8.5	77,756	7.4	30,751	39.5	240,198	23.0
Moderate-income	278	25.0	230,872	22.1	44,389	19.2	177,336	16.9
Middle-income	377	33.9	388,524	37.1	26,044	6.7	200,994	19.2
Upper-income	344	30.9	347,809	33.2	11,121	3.2	427,747	40.9
Unknown-income	19	1.7	1,314	0.1	518	39.4	0	0.0
Total Assessment Area	**1,113**	**100.0**	**1,046,275**	**100.0**	**112,823**	**10.8**	**1,046,275**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	**#**	**%**	**%**	**#**	**%**	**#**	**%**
Low-income	156,303	50,718	4.7	32.4	78,840	50.4	26,745	17.1
Moderate-income	458,718	210,487	19.5	45.9	185,973	40.5	62,258	13.6
Middle-income	644,829	415,922	38.6	64.5	182,821	28.4	46,086	7.1
Upper-income	575,728	400,243	37.1	69.5	139,286	24.2	36,199	6.3
Unknown-income	4,127	198	0.0	4.8	3,431	83.1	498	12.1
Total Assessment Area	**1,839,705**	**1,077,568**	**100.0**	**58.6**	**590,351**	**32.1**	**171,786**	**9.3**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	8,141	4.5	7,269	4.5	829	4.5	43	3.4
Moderate-income	31,955	17.6	28,390	17.5	3,310	18.1	255	20.0
Middle-income	65,628	36.2	58,482	36.1	6,696	36.7	450	35.3
Upper-income	74,629	41.1	67,000	41.4	7,106	38.9	523	41.0
Unknown-income	1,082	0.6	758	0.5	319	1.7	5	0.4
Total Assessment Area	**181,435**	**100.0**	**161,899**	**100.0**	**18,260**	**100.0**	**1,276**	**100.0**
	Percentage of Total Businesses:		**89.2**		**10.1**		**0.7**	
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low-income	14	1.4	13	1.4	1	1.3	0	0.0
Moderate-income	149	14.4	141	14.7	8	10.1	0	0.0
Middle-income	496	47.9	454	47.5	42	53.2	0	0.0
Upper-income	373	36.0	346	36.2	27	34.2	0	0.0
Unknown-income	3	0.3	2	0.2	1	1.3	0	0.0
Total Assessment Area	**1,035**	**100.0**	**956**	**100.0**	**79**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**92.4**		**7.6**			**0.0**

Information Based on 2015 ACS Data and 2017 Dun & Bradstreet Information

Bryn Mawr Trust Company Philadelphia Assessment Area Assessment Area Demographics 2018								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	95	8.5	77,756	7.4	30,751	39.5	240,198	23.0
Moderate-income	278	25.0	230,872	22.1	44,389	19.2	177,336	16.9
Middle-income	377	33.9	388,524	37.1	26,044	6.7	200,994	19.2
Upper-income	344	30.9	347,809	33.2	11,121	3.2	427,747	40.9
Unknown-income	19	1.7	1,314	0.1	518	39.4	0	0.0
Total Assessment Area	**1,113**	**100.0**	**1,046,275**	**100.0**	**112,823**	**10.8**	**1,046,275**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	156,303	50,718	4.7	32.4	78,840	50.4	26,745	17.1
Moderate-income	458,718	210,487	19.5	45.9	185,973	40.5	62,258	13.6
Middle-income	644,829	415,922	38.6	64.5	182,821	28.4	46,086	7.1
Upper-income	575,728	400,243	37.1	69.5	139,286	24.2	36,199	6.3
Unknown-income	4,127	198	0.0	4.8	3,431	83.1	498	12.1
Total Assessment Area	**1,839,705**	**1,077,568**	**100.0**	**58.6**	**590,351**	**32.1**	**171,786**	**9.3**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	9,875	4.6	8,975	4.6	831	4.4	69	3.8
Moderate-income	38,908	18.1	35,218	18.1	3,331	17.8	359	19.5
Middle-income	77,998	36.2	70,459	36.2	6,877	36.8	662	36.0
Upper-income	87,304	40.5	79,235	40.7	7,329	39.2	740	40.2
Unknown-income	1,311	0.6	960	0.5	341	1.8	10	0.5
Total Assessment Area	**215,396**	**100.0**	**194,847**	**100.0**	**18,709**	**100.0**	**1,840**	**100.0**
	Percentage of Total Businesses:		**90.5**		**8.7**			**0.9**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	16	1.3	16	1.4	0	0.0	0	0.0
Moderate-income	188	15.2	178	15.4	10	12.3	0	0.0
Middle-income	577	46.5	533	46.0	44	54.3	0	0.0
Upper-income	457	36.9	430	37.1	27	33.3	0	0.0
Unknown-income	2	0.2	2	0.2	0	0.0	0	0.0
Total Assessment Area	**1,240**	**100.0**	**1,159**	**100.0**	**81**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**93.5**		**6.5**			**0.0**

Information Based on 2015 ACS Data and 2018 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers, and businesses of all sizes, including small businesses;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to credit needs of low-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Performance under the lending test is rated high satisfactory in Philadelphia assessment area.

Lending Activity

Bryn Mawr's lending levels in the Philadelphia assessment area reflect excellent responsiveness to the assessment area's credit needs. During the evaluation period, lending activity in the Philadelphia assessment area represented over 99% of the bank's overall lending by both number and dollar amount of loans. During the evaluation period, Bryn Mawr made 2,173 HMDA loans totaling over $662 million and 962 small business loans totaling nearly $344 million in the Philadelphia assessment area.

Borrower Distribution of Lending

Given the assessment area's demographics and economic characteristics, the borrower distribution reflects, given the product lines offered, adequate penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses of different sizes, including small businesses. As stated previously, HMDA loans are given more weight in determining the overall borrower distribution performance due to volume by number and dollar amount.

Home-Mortgage Lending

Bryn Mawr's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers, is adequate. Over the evaluation period, Bryn Mawr originated 2,173 home-mortgage loans, totaling $662 million, in its assessment area[9]. This was an increase in lending activity from the previous CRA evaluation where the bank made 1,781 HMDA loans in the assessment area in 2013, 2014, and 2015, in an aggregate amount of $614 million.

---

[9] The evaluation includes Bryn Mawr's HMDA loans originated during calendar years 2016, 2017, and 2018. The information used to evaluate HMDA lending activity is detailed in the Loan Distribution Tables contained in Appendix E.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. Further, the respective percentages of low-, moderate-, middle- and upper-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentage of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2010 Census data, approximately 22% of assessment area families were low-income, 17% were moderate-income, 20% were middle-income, and 41% were upper-income. Similarly, according to the updated 2015 ACS data, 23% of assessment area families were low-income, 17% were moderate-income, 19% were middle-income, and 41% were upper-income.

According to available data, well over a third of the families in the assessment area (39% using 2010 Census data, and 40% using 2015 ACS data) were designated as low- or moderate-income families, indicating a significant need for home-mortgage credit among this segment of the population.

The tables on the following page compare Bryn Mawr's home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The first table, used to evaluate lending in 2016, relies on 2010 Census data to estimate demand for home-mortgage credit among low- and moderate-income families. The second table, used to evaluate 2017 lending relies on updated 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families. The third table, used to evaluate 2018 lending relies on both the updated 2015 ACS data along with the updated HMDA data, following requirements under Regulation C.

Bryn Mawr Trust Company Philadelphia Assessment Area Distribution of HMDA Loans by Borrower Income Level 2016			
Income Level	% Families by Family Income Level (2010 Census Data)	Aggregate Comparison	
		2016	
		% Bryn Mawr Lending	% Aggregate Lending
Low	22.2	4.0	6.2
Moderate	17.0	10.0	15.2
Middle	20.1	15.4	19.5
Upper	40.6	62.8	38.9
Unknown	0.0	7.8	20.2
Total	**100%**	**100%**	**100%**

Bryn Mawr Trust Company Philadelphia Assessment Area Distribution of HMDA Loans by Borrower Income Level 2017			
Income Level	% Families by Family Income Level (2015 ACS Data)	Aggregate Comparison	
		2017	
		% Bryn Mawr Lending	% Aggregate Lending
Low	23.0	5.7	7.6
Moderate	16.9	13.1	17.0
Middle	19.2	14.7	20.0
Upper	40.9	50.3	38.1
Unknown	0.0	16.2	17.3
Total	**100%**	**100%**	**100%**

Bryn Mawr Trust Company Philadelphia Assessment Area Distribution of HMDA Loans by Borrower Income Level 2018			
Income Level	% Families by Family Income Level (2015 ACS Data)	Aggregate Comparison	
		2018	
		% Bryn Mawr Lending	% Aggregate Lending
Low	23.0	6.6	8.5
Moderate	16.9	15.5	17.9
Middle	19.2	17.7	20.7
Upper	40.9	53.6	36.5
Unknown	0.0	6.5	16.4
Total	**100%**	**100%**	**100%**

Lending to Low-Income Borrowers

For the period under review, Bryn Mawr's lending to low-income borrowers was adequate.

2010 Census Data

According to the 2010 Census, approximately 22% of the families in the assessment area were low-income. In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration that the home-mortgage credit needs of such individuals and families can be a challenge to address through conventional loan products, presenting a significant obstacle to homeownership.

Bryn Mawr's lending in 2016 to low-income borrowers was adequate. In 2016, 4% of the bank's HMDA loans were to low-income borrowers in the assessment area, which was below the aggregate lending level of 6%. Both the bank and aggregate lending levels were below the proxy of 22% of low-income families, suggesting that lending opportunities are somewhat limited with low-income borrowers for all banks in the assessment area, and that conventional products may not meet the credit needs of low-income borrowers. By product type, Bryn Mawr originated 4% of its home-purchase loans (13 loans), 4% of refinance loans (11 loans), 3% of home-improvement loans (4 loans), and no multifamily loans to low-income borrowers. In comparison, 2016 aggregate lending data shows that 7% of home-purchase loans, 15% of refinance loans, 9% of home-improvement loans, and no multifamily loans were made to low-income borrowers.

2015 ACS Data

Bryn Mawr's lending in 2017 to low-income borrowers was adequate. The bank's lending to low-income borrowers increased to 6%, once again trailing the aggregate lending level of 8%. Both the bank and aggregate lending levels were below the proxy of 23% of low-income families. Bryn Mawr originated 5% of its home-purchase loans (18 loans), 8% of refinance loans (12 loans), and 5% of home-improvement loans (2 loans) to low-income borrowers. The bank made no multifamily loans to low-income borrowers in 2017. Aggregate 2017 lending data shows that 8% of home-purchase loans, 7% of refinance loans, 10% of home-improvement loans, and no multifamily loans were made to low-income borrowers.

Bryn Mawr's lending in 2018 to low-income borrowers was adequate. The bank's lending to low-income borrowers increased to 7%, but was below the aggregate lending level of 9%. Both bank and aggregate levels were once again well below the proxy of 23% of low-income families. By product type, Bryn Mawr originated 10% of its home-purchase loans (34 loans), 3% of its refinance loans (10 loans), 7% of home-improvement loans (12 loans), and 5% of multifamily loans (1 loan) to low-income borrowers in 2018. The bank made no loans with purpose "not applicable." Aggregate 2018 lending data shows that 8% of home-purchase loans, 9% of refinance loans, 8% of home-improvement loans, 1% of multifamily loans, and 2% of loans with purpose "not applicable" were made to low-income borrowers.

Lending to Moderate-Income Borrowers

For the period under review, the bank's lending to moderate-income borrowers was adequate.

2010 Census Data

Bryn Mawr's lending in 2016 to moderate-income borrowers was poor. In 2016, 10% of the bank's HMDA loans were to moderate-income borrowers in the assessment area, which was below the aggregate lending level of 15% and the proxy of 17% of moderate-income families. Bryn Mawr originated 14% of its home-purchase loans (41 loans), 6% of its refinance loans (16 loans), and 10% of its home-improvement loans (13 loans) to moderate-income borrowers. The bank made no multifamily loans to moderate-income borrowers in 2016. Aggregate lending data shows that 18% of home-purchase loans, 12% of refinance loans, 16% of home-improvement loans, and no multifamily loans were made to moderate-income borrowers in 2016.

2015 ACS Data

Bryn Mawr's lending in 2017 to moderate-income borrowers was adequate. In total, 13% of the bank's HMDA loans were originated to moderate-income borrowers, as compared to the aggregate lending level of 17% and proxy of 17%. By product type, Bryn Mawr originated 14% of its home-purchase loans (46 loans), 17% of its refinance loans (26 loans), 5% of its home-improvement loans (2 loans), and no multifamily loans to moderate-income borrowers in 2017. In comparison, aggregate lenders originated 18% of home-purchase loans, 14% of refinance loans, 17% of home-improvement loans, and no multifamily loans to moderate-income borrowers in 2017.

Bryn Mawr's lending in 2018 to moderate-income borrowers was adequate. The bank's lending to moderate-income borrowers increased to 16%, but remained below that of the aggregate lending level of 18% and proxy of 17%. It is noteworthy that Bryn Mawr's lending to moderate-income borrowers increased and therefore improved in 2017 and again in 2018. By product type, Bryn Mawr originated 22% of its home-purchase loans (79 loans), 13% of its refinance loans (40 loans), 8% of home-improvement loans (13 loans), and no multifamily loans or loans with purpose "not applicable" to moderate-income borrowers. Aggregate 2018 lending data shows that 20% of home-purchase loans, 17% of refinance loans, 17% of home-improvement loans, less than 1% of multifamily loans, and 4% of loans with purpose "not applicable" were made to moderate-income borrowers.

Small Business Lending

An analysis of Bryn Mawr's borrower distribution of small business loans reflects adequate penetration among business customers of different sizes, including small businesses. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less. Small business loans are further analyzed to identify those loans to businesses with gross annual revenues of $1 million or less, namely small businesses[10].

The number of businesses operating in the bank's assessment area is used as a proxy to estimate demand for business credit in that assessment area. According to available Dun & Bradstreet business demographic data, in 2016 there were 201,390 businesses in the assessment area, with 181,193 (90%) designated as small businesses. In 2017, there were 181,435 businesses in the assessment area, 161,899 (89%) of which were small businesses. In 2018, there were 215,396 businesses in the assessment area, 194,847 (91%) of which were small businesses.

2010 Census Data

In 2016, the bank's borrower distribution of small business loans was good. In 2016, Bryn Mawr originated 350 small business loans, aggregating $127 million within the assessment area. Of these loans, 51% were originated to small businesses. This performance was above the aggregate lending level of 46% to small businesses, but below the proxy of 90%.

Small business loans were further analyzed to determine the extent of loans originated in an amount of $100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses. In 2016, 25% of Bryn Mawr's small business loans were extended in amounts of $100 thousand or less. Aggregate data indicates that 93% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

---

[10]The information used to evaluate small business lending activity is detailed in the Loan Distribution Tables contained in Appendix E.

2015 ACS Data

The bank's borrower distribution of small business loans in 2017 was adequate. In 2017, Bryn Mawr originated 307 small business loans, aggregating $110 million within the assessment area, of which 45% were originated to small businesses. This performance was slightly below the aggregate lending level of 49% to small businesses, and below the proxy of 89%. In 2017, 30% of Bryn Mawr's small business loans were extended in amounts of $100 thousand or less. Aggregate data indicates that 93% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

In 2018, the bank's borrower distribution of small business loans was adequate. In 2018, Bryn Mawr originated 305 small business loans, aggregating $106 million within the assessment area, of which 43% were originated to small businesses. This performance was below the aggregate lending level of 45% to small businesses, and below the proxy of 90%. In 2018, 27% of Bryn Mawr's small business loans were extended in amounts of $100 thousand or less. Aggregate data indicates that 93% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

In considering aggregate data, it should be noted that small business data includes credit card loans made by large credit card issuers. As discussed previously, in all years, such lenders led the market. Credit card loans are generally in smaller dollar amounts, which can skew aggregate small business loan data.

Geographic Distribution of Lending

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The overall analysis reflects adequate penetration throughout the Philadelphia assessment area, including low- and moderate-income tracts. Once again, it is noted that HMDA loans were given greater weight in determining this conclusion, given their higher volume by number and dollar amount.

Home-Mortgage Lending

Bryn Mawr's distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts is adequate. The percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage credit within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit is in the tract.

According to 2010 Census data, 5% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 19% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (39% and 37%, respectively).

Likewise, according to 2015 ACS data, 5% of the owner-occupied housing stock was located in low-income census tracts, and 20% was located in moderate-income tracts. Again, the majority of owner-occupied units were located in middle- and upper-income tracts (39% and 37%, respectively).

It is noteworthy that at the time of the previous CRA evaluation, Bryn Mawr had just acquired Continental Bank, and added one branch office in the city of Philadelphia from the acquisition. Prior to that time, Bryn Mawr had not operated any branches in Philadelphia County; however, the bank had included Philadelphia County in its assessment area because of its lending profile and its desire to comply with the spirit and intent of the CRA. The vast majority of the low- and moderate-income tracts are located in Philadelphia County.

Additionally, in December 2017, Bryn Mawr acquired Royal Bank, and gained four additional branch locations in the city of Philadelphia. The bank was previously challenged in making loans in low-income areas in the city of Philadelphia; however, lending numbers and trends indicate that the bank's opportunities to lend in low- and moderate-income areas have increased, and the bank is better able to meet the credit needs in Philadelphia County as a result of these acquisitions.

The following tables present Bryn Mawr's geographic distribution of HMDA loans from 2016 through 2018, in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area. The first table, used for lending in 2016, relies on 2010 Census data. The second table, used for 2017 lending, relies on updated 2015 ACS data. Finally, the third table, used to evaluate 2018 lending, uses 2015 ACS data, along with HMDA data which follows Regulation C updated requirements.

Bryn Mawr Trust Company **Philadelphia Assessment Area** **Geographic Distribution of HMDA Loans** **2016**			
Income Level	**%** **Owner-Occupied Units** **(2010 Census Data)**	**Aggregate Comparison** **2016**	
		% **Bryn Mawr Lending**	**%** **Aggregate Lending**
Low	4.8	3.4	2.6
Moderate	19.1	8.1	16.1
Middle	39.2	24.2	39.9
Upper	37.0	64.1	41.4
Unknown	0.0	0.1	0.0
Total	**100%**	**100%**	**100%**

Bryn Mawr Trust Company **Philadelphia Assessment Area** **Geographic Distribution of HMDA Loans** **2017**			
Income Level	**%** **Owner-Occupied Units** **(2015 ACS Data)**	**Aggregate Comparison** **2017**	
		% **Bryn Mawr Lending**	**%** **Aggregate Lending**
Low	4.7	4.4	2.9
Moderate	19.5	12,6	18.7
Middle	38.6	27.9	39.8
Upper	37.1	54.9	38.6
Unknown	0.0	0.2	0.0
Total	**100%**	**100%**	**100%**

Bryn Mawr Trust Company Philadelphia Assessment Area Geographic Distribution of HMDA Loans 2018			
Income Level	**% Owner-Occupied Units (2015 ACS Data)**	**Aggregate Comparison**	
		2018	
		% Bryn Mawr Lending	**% Aggregate Lending**
Low	4.7	2.5	3.0
Moderate	19.5	13.0	18.8
Middle	38.6	23.7	38.9
Upper	37.1	60.8	39.2
Unknown	0.0	0.0	0.0
Total	**100%**	**100%**	**100%**

Lending in Low-Income Census Tracts

Based on assessment area demographics, there were less HMDA lending opportunities in low-income census tracts compared to moderate-income tracts. Bryn Mawr's overall HMDA lending in low-income tracts was considered good.

2010 Census Data

Bryn Mawr's lending in low-income census tracts in 2016 was considered good. Bryn Mawr originated 3% of HMDA loans in low-income tracts in 2016, which was below the proxy of 5%, but equal to the aggregate lending level of 3%. Categorized by loan product type, Bryn Mawr made 5% of its home-purchase loans (14 loans) in low-income tracts, 3% of its refinance loans (9 loans) and 1% of its home-improvement loans (1 loan) in low-income tracts in 2016. The bank made no multifamily loans in low-income tracts. Aggregate 2016 lending data show that 3% of home-purchase loans, 2% of refinance loans, 4% of home-improvement loans, and 9% of multifamily loans were made in low-income tracts in the assessment area.

2015 ACS Data

Bryn Mawr's lending in low-income census tracts in 2017 was considered good. Bryn Mawr's HMDA lending in low-income tracts was 4%, exceeding aggregate lending of 3% but slightly below the proxy of 5%. Categorized by loan product type, Bryn Mawr made 3% of its home-purchase loans (11 loans), 7% of refinance loans (11 loans), 2% of home-improvement loans (1 loan), and 7% of multifamily loans (2 loans) in low-income tracts in 2017. Aggregate 2017 lending data shows that 3% of home-purchase loans, 2% of refinance loans, 4% of home-improvement loans, and 8% of multifamily loans were made in low-income tracts in the assessment area.

Bryn Mawr's lending in low-income census tracts in 2018 was considered good. Bryn Mawr's HMDA lending in low-income tracts was 3%, equal to aggregate lending of 3% but below the proxy of 5%. Categorized by loan product type, Bryn Mawr made 4% of its home-purchase loans (13 loans) in low-income tracts. The bank made 1% of refinance loans (4 loans), 1% of home-improvement loans (1 loan), 5% of multifamily loans (1 loan), and 33% of loan purpose "not applicable" loans (1 loan) in low-income tracts in 2018. Aggregate 2018 lending data shows that 3% of home-purchase loans, 3% of refinance loans, 2% of home-improvement loans, 11% of multifamily loans, and 6% of loan purpose "not applicable" loans were made in low-income tracts in the assessment area.

Lending in Moderate-Income Census Tracts

Bryn Mawr's overall HMDA lending in moderate-income tracts was considered adequate.

2010 Census Data

Bryn Mawr's lending in moderate-income census tracts in 2016 was considered poor. In 2016, Bryn Mawr's HMDA lending in moderate-income tracts was 8%, which measured well below the proxy of 19% of owner-occupied housing in moderate-income tracts, and below the aggregate performance of 16%. Categorized by loan product type, Bryn Mawr made 9% of its home-purchase loans (28 loans), 7% of refinance loans (19 loans), 6% of its home-improvement loans (8 loans), and 50% of its multifamily loans (2 loans) in moderate-income tracts in 2016. Aggregate lending data shows that 18% of home-purchase loans, 14% of refinance loans, 17% of home-improvement loans, and 30% of multifamily loans were made in moderate-income tracts in the assessment area in 2016.

2015 ACS Data

Bryn Mawr's lending in moderate-income census tracts in 2017 was considered adequate. Bryn Mawr's HMDA lending in moderate-income tracts was 13%, which was below aggregate lending of 19%, and the proxy of 20%. Categorized by loan product type, Bryn Mawr made 13% of its home-purchase loans (43 loans), 9% of refinance loans (14 loans), 15% of home-improvement loans (6 loans), and 30% of multifamily loans (8 loans) in moderate-income tracts in 2017. Aggregate lending data shows that 20% of home-purchase loans, 17% of refinance loans, 20% of home-improvement loans, and 34% of multifamily loans were in moderate-income tracts in the assessment area in 2017.

Bryn Mawr's lending in moderate-income census tracts in 2018 was considered adequate. Bryn Mawr's HMDA lending in moderate-income tracts was 13%, which was below aggregate lending of 19%, and the proxy of 20%. Categorized by loan product type, Bryn Mawr made 22% of its home-purchase loans (79 loans), 8% of refinance loans (23 loans), 2% of home-improvement loans (4 loans), 43% of multifamily loans (9 loans), and no loans of loan purpose "not applicable" in moderate-income tracts in 2018. Aggregate lending data shows that 20% of home-purchase loans, 16% of refinance loans, 15% of home-improvement loans, 34% of multifamily loans, and 30% of loan purpose "not applicable" were made in low-income tracts in the assessment area were in moderate-income tracts in the assessment area in 2018.

Small Business Lending

The geographic distribution of Bryn Mawr's small business loans in the Philadelphia assessment is adequate, in the context of demographic and economic characteristics during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for small business loans in the tract. Based on available business data in 2016, 5% of the assessment area's businesses were located in low-income tracts, and 17% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (35% and 43%, respectively). In both 2017 and 2018, 5% of businesses in the assessment area were located in low-income tracts and 18% of businesses were located in moderate-income tracts. Again, the majority of businesses were located in middle- and upper-income tracts (36% and 41%, respectively).

The tables below present Bryn Mawr's small business lending distribution, in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the years evaluated.

Bryn Mawr Trust Company Philadelphia Assessment Area Geographic Distribution of Small Business Loans 2016			
		Aggregate Comparison	
Census Tract Income Level	% Businesses By Tract Income Level (2010 Census Data)	2016	
		% Bryn Mawr Lending	% Aggregate Lending
Low	4.9	2.0	4.1
Moderate	16.8	9.7	15.7
Middle	34.9	26.3	34.7
Upper	42.8	59.4	45.0
Unknown	0.5	2.6	0.5
Total	**100%**	**100%**	**100%**

Bryn Mawr Trust Company Philadelphia Assessment Area Geographic Distribution of Small Business Loans 2017			
		Aggregate Comparison	
Census Tract Income Level	% Businesses By Tract IncomeLevel (2015 ACS Data)	2017	
		% Bryn Mawr Lending	% Aggregate Lending
Low	4.5	2.3	3.9
Moderate	17.6	9.1	16.5
Middle	36.2	34.2	36.4
Upper	41.1	53.4	41.7
Unknown	0.6	1.0	1.4
Total	**100%**	**100%**	**100%**

Bryn Mawr Trust Company Philadelphia Assessment Area Geographic Distribution of Small Business Loans 2018			
Census Tract Income Level	**% Businesses By Tract Income Level (2015 ACS Data)**	**Aggregate Comparison**	
		2018	
		% Bryn Mawr Lending	**% Aggregate Lending**
Low	4.6	5.2	4.0
Moderate	18.1	10.2	17.0
Middle	36.2	31.5	35.8
Upper	40.5	51.8	41.9
Unknown	0.6	1.3	1.2
Total	**100%**	**100%**	**100%**

Lending in Low-Income Census Tracts

Bryn Mawr's small business lending in low-income tracts is adequate.

2010 Census Data

In 2016, the geographic distribution of the bank's small business lending in low-income census tracts was adequate. Bryn Mawr originated 2% of its small business loans (7 loans) in the assessment area's low-income census tracts. The bank's lending level was below both the applicable business loan demand proxy of 5% and the 2016 aggregate small business lending level of 4%.

2015 ACS Data

In 2017, Bryn Mawr's small business lending in low-income tracts was adequate. The bank's lending (2% or 7 loans) lagged both the proxy of businesses located in the low-income tracts (5%), and aggregate lending levels (4%).

Small business lending to low-income tracts was good in 2018. Bryn Mawr's lending increased to 5% (16 loans), meeting proxy (5%), and exceeding aggregate lending levels (4%).

Lending in Moderate-Income Census Tracts

Bryn Mawr's small business lending in moderate-income tracts is adequate.

2010 Census Data

In 2016, the geographic distribution of the bank's small business lending in moderate-income census tracts was adequate. Bryn Mawr originated 10% of its small business loans (34 loans) in the assessment area's moderate-income census tracts. The bank's lending level was below both the applicable business loan demand proxy of 17% and the 2016 aggregate small business lending level of 16%.

2015 ACS Data

In 2017, Bryn Mawr's small business lending in moderate-income tracts was poor. The bank's lending (9% or 28 loans) lagged both the proxy of businesses located in the low-income tracts (18%), and aggregate lending levels (17%).

Small business lending to moderate income tracts was adequate in 2018. Bryn Mawr's lending (10% or 31 loans) was below both the proxy (18%) and the aggregate (17%) lending levels.

Responsiveness to Credit Needs

Bryn Mawr exhibits a good record of servicing the credit needs of the low-income individuals and areas and very small businesses in its assessment area, consistent with safe and sound banking practices.

The bank achieved this record largely through its community development lending and the use of innovative and flexible retail lending practices. Community contacts identified affordable housing and small business lending to start-ups as specific needs within the Philadelphia assessment area. Over $7 million of the bank's community development loans, and over $86 million of NOP, Home Ready, FHA and First Front Door loans benefitted low- and moderate-income borrowers in the assessment area. In addition, over $5.6 million in community development loans, and over $22 million in SBA loans financed small businesses in the Philadelphia assessment area.

Innovative and/or Flexible Lending Practices

Bryn Mawr makes use of innovative and/or flexible lending practices in serving the Philadelphia assessment area credit needs.

Often, the home-mortgage credit needs of low- and moderate-income individuals and families can be addressed more effectively by alternative mortgage products. In an effort to address the credit needs of such borrowers in its assessment area, the bank offers several mortgage products for first-time homebuyers. Bryn Mawr offers a proprietary residential mortgage product (NOP) developed for low- and moderate-income borrowers. The product allows for flexible underwriting standards and a slightly higher debt-to-income ratio, and offers below market interest rates. During the evaluation period, the bank originated 372 loans aggregating just under $70 million in the Philadelphia assessment area.

In addition to Bryn Mawr's proprietary product, the bank also offers programs for first-time homebuyers through the Fannie Mae Home Ready, the FHA, and the Federal Home Loan Bank (FHLB) of Pittsburgh's First Front Door programs. Through these programs, the bank makes home-mortgage loans to low- and moderate-income borrowers in conjunction with grants and forgivable loans. The programs have income parameters that effectively restrict them to low- and moderate-income borrowers. The First Front Door program provides first-time homebuyers with down payment and closing cost assistance. Under the program, homebuyers receive three dollars for every one dollar paid themselves for closing costs. During the evaluation period, Bryn Mawr made 37 Fannie Mae Home Ready loans totaling $8 million, 45 FHA loans totaling over $8.2 million, and 91 FHLB First Front Door grants totaling over $450 thousand in the Philadelphia assessment area.

Similarly, the credit needs of small businesses can be addressed more effectively by alternative products. In an effort to address the credit needs of such borrowers in the bank's assessment area, Bryn Mawr participates in several Small Business Administration (SBA) lending programs and is a preferred lender under the SBA. Since the previous CRA evaluation, Bryn Mawr has participated in extending SBA loans under the SBA Express Line of Credit program. During the evaluation period, the bank originated 19 loans in the Philadelphia assessment area totaling over $22 million.

The bank made additional efforts to support affordable housing initiatives in its assessment area by participating in Community Lenders. Community Lenders is a consortium of 29 member banks, operating in Bucks, Montgomery, Delaware, and Philadelphia Counties which serves as a vehicle for community revitalization by financing and investing in housing and related community activities that address the needs of low- and moderate-income persons and areas. During the evaluation period, Bryn Mawr committed $1 million in loan pool financing and also participated in 11 Community Lenders' loans, with a participation share of $315 thousand.

Community Development Lending

Bryn Mawr makes a relatively high level of community development loans in the Philadelphia assessment area. During the period evaluated, which included the timeframe between February 23, 2016 through December 2, 2019, the bank made 21 community development loans, totaling $79 million in the assessment area. Five of the loans, totaling just over $7.3 million (9%) support affordable housing initiatives for low- and moderate-income individuals. Seven loans totaling nearly $50 million (62%) support activities for community services to low- and moderate-income individuals and areas. Three loans totaling $5.6 million (7%) support economic development, while six loans totaling $16 million (21%) support revitalization and stabilization initiatives within the Philadelphia assessment area.

Bryn Mawr's level of community development loans had a positive impact on the bank's overall lending performance. Community development lending showed a substantial increase from the previous examination when community development loans totaled $25 million (11 loans). A total of 11 new community loans were originated during the exam period totaling $31 million, while 10 community development loan renewals were reviewed for a total of $48 million.

The following table includes the bank's community development loans, broken out by community development purpose.

Bryn Mawr Trust Company Community Development Lending Philadelphia Assessment Area									
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000)	#	$(000s)
2016	1	1,893	3	22,171	1	1,500	1	1,000	6	26,564
2017	0	0	2	14,500	0	0	1	1,000	3	15,500
2018	0	0	2	13,000	1	2,000	3	8,419	6	23,419
2019	4	5,454	0	$0	1	2,100	1	5,975	6	13,529
TOTAL	5	7,347	7	49,671	3	5,600	7	16,394	21	79,012

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment; deposit; membership share; or grant, including a donation or in-kind contribution of property that has as its primary purpose, community development.

Performance under the investment test is assessed as high satisfactory.

Volume of Investment and Grant Activity

Bryn Mawr has a significant level of qualified community development investments and grants, occasionally in a leadership position. Qualified investments, grants, and donations for the Philadelphia assessment area totaled just under $19 million, which is significantly above the investment level of $2.8 million at the prior examination. Of the bank's overall investments, 92% were within the Philadelphia assessment area.

Investments totaling $12.3 million support affordable housing initiatives (66%), while nearly $3.3 million (18%) support economic development in the assessment area, almost $2.5 million (13%) support the provision of community development services, and over $500 thousand (3%) support revitalization and stabilization initiatives in the assessment area.

It is notable that the vast majority of the bank's $12.3 million affordable housing investment was through investments in mortgage-backed securities (MBS) that aided low- and moderate-income borrowers. The bank's investment in ten MBS's supported 74 affordable housing units in the Philadelphia assessment area during the evaluation period.

Of the $19 million in qualified investments in the Philadelphia assessment area, $17.2 million (92%) were comprised of the MBS and other similar investments in area loan funds that provide community development services, economic development, and revitalization and stabilization to the assessment area. Another $1 million (6%) of the investment funds supported earned-income tax credits, which provided needed community development services to low- and moderate-income individuals in the assessment area. Finally, the remaining $337 thousand of investments (2%) took the form of donations and grants to a variety of community development organizations.

Responsiveness to Credit and Community Development Needs

Bryn Mawr exhibits good responsiveness to credit and community development needs of the assessment area. Qualified investments and grants increased significantly since the prior evaluation. As mentioned previously, the majority of investment and grant activity went to affordable housing (66%) targeted to low- and moderate-income individuals, and economic development through the financing of small businesses and farms (18%). Both of these were needs identified by community contacts in the Philadelphia assessment area.

Community Development Initiatives

Bryn Mawr makes significant use of innovative and/or complex investments to support community development initiatives. The bank made a $250 thousand investment to a Minority Depository Institution (MDI) which provides valuable retail services to local urban communities within the Philadelphia assessment area. Bryn Mawr is one of only two local financial institutions to provide investments into the MDI, which plans to utilize the funds to boost lending to minority, immigrant, and female small-business owners within the Philadelphia assessment area. Bryn Mawr also participated in the Neighborhood Assistance Program, a state tax credit initiative, providing a total of $75,000 to two non-profit agencies serving low- and moderate-income residents in the assessment area.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- The accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- The impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- The reasonableness of business hours and services in meeting assessment area needs; and
- The extent to which an institution provides community development services.

Performance under the service test is assessed as high satisfactory in the Philadelphia assessment area.

Accessibility of Delivery Systems

Delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment areas. In 2016, Bryn Mawr operated 26 full-service branches and eight limited-service branches in the Philadelphia assessment area with three of those branches, or 9%, located in low- or moderate-income census tracts. By comparison, 32% of the assessment area population resided in the low- and moderate income tracts. The eight limited-service branches were not open to the general public and were all located within retirement communities in upper-income census tracts.

The table below details the locations of the bank's branches in the Philadelphia assessment area from 2016, with a comparison to 2010 Census data demographics.

Bryn Mawr Trust Company Retail Branch Distribution Philadelphia Assessment Area 2010 Census Data				
Census Tract Type	**Number of Branches**	**Percent Branches**	**Population**	**Percent Population**
Low	1	2.9	385,830	8.7
Moderate	2	5.9	1,015,542	22.9
Middle	9	26.5	1,578,856	35.6
Upper	22	64.7	1,439,264	32.4
Unknown Income	0	0.0	16,389	0.4
Totals	**34**	**100%**	**4,435,881**	**100%**

A number of census tracts shifted income levels with the 2015 ACS update. In 2018, there were 34 full-service branches and eight limited-service branches in the assessment area, with five of those branches, or 12%, located in low- or moderate-income tracts. By comparison, 33% of the assessment area population resided in the low- and moderate-income tracts.

The table below details the locations of the bank's full-service branches in the Philadelphia assessment area with a comparison to 2015 ACS data demographics.

Bryn Mawr Trust Company Retail Branch Distribution Philadelphia Assessment Area 2015 ACS Data				
Census Tract Type	**Number of Branches**	**Percent Branches**	**Population**	**Percent Population**
Low	1	2.4	379,311	8.4
Moderate	4	9.5	1,084,593	24.1
Middle	12	28.6	1,603,719	35.6
Upper	25	59.5	1,413,928	31.4
Unknown Income	0	0.0	19,612	0.5
Totals	**42**	**100%**	**4,501,163**	**100%**

To supplement traditional branch services, the bank provides alternative delivery systems that include remote deposit capture, night deposit, telephone banking, online banking, and mobile banking, which allow customers to obtain deposit and loan account information, transfer funds, and make loan and other bill payments. The bank's website (https://www.bmt.com) is fully functional and allows customers to open accounts and apply for loans online.

Changes in Branch Locations

Bryn Mawr's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals.

The bank has completed 18 branch changes in the Philadelphia assessment area since the previous CRA evaluation. In all, 13 branches have opened, while five have been closed and/or relocated to nearby offices.

Of the 13 branch openings, one opened in a low-income tract (7%), while three (21%) have been opened in moderate-income census tracts. Of the five closures, no branches were closed in low- or moderate-income census tracts. One branch in Chester is located in a census tract which changed from a low-income to a moderate-income tract due to the changes from the 2015 ACS update.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences Bryn Mawr's assessment area, particularly low- and moderate-income census tracts or individuals. All of the bank's full-service branches along with two limited-service branches in the Philadelphia assessment area include ATMs, and all but four full-service branches in the assessment area have drive-up facilities. All full-service branches within the assessment area operate Monday through Friday, with extended hours on Friday, and offer Saturday morning hours. Changes from the last examination include, installation of an ATM at the Chester branch, along with extended lobby and drive-in hours on Friday at that branch. As mentioned previously, the Chester office is located in a moderate-income census tract as a result of changes from the 2015 ACS, and these changes increase accessibility at this branch.

Bank Products

Bryn Mawr offers products that provide greater access to banking services for low- and moderate-income customers and small businesses, including:

- BMT Checking, a consumer account with unlimited check writing, no minimum balance requirement, and no monthly service fee. The account includes a $2 paper statement fee if the consumer does not enroll in the eStatement program;

- Small Business Checking for small businesses, with no monthly service fee, no minimum balance requirement, and up to 500 items per month with no fee. The account includes a paper statement fee if the consumer does not enroll in the eStatement program. This account allows very small businesses access to banking services; and

- Online and Mobile Banking are available for all accounts at no additional cost.

In addition to the above products, Bryn Mawr offers the Individual Development Account (IDA) savings account, which is available to low- and moderate-income residents of Delaware County. IDAs are a responsive and innovative lending program to encourage asset building for low- and moderate-income individuals. The account requires a $10 minimum balance to open, and regular deposits are required. Individuals receive matching funds for each dollar saved; matching funds are contributed by Bryn Mawr and administered by the Community Action Agency of Delaware County. As of the examination date, Bryn Mawr oversaw 41 IDAs under the program.

In 2019, Bryn Mawr developed a partnership with North Light Community Center, a Philadelphia non-profit agency serving at-risk youth and families to provide financial literacy training to youth enrolled in the Teen Employment Engagement Mentorship works (TEEMworks) initiative. TEEMworks is a new program launched under North Light's Youth Workforce Development Initiative (YWDI). The program's goal is to empower future leaders for job market readiness upon graduating from a customized STEM & trades-related training program. As part of the YWDI, Bryn Mawr provides financial literacy training to the students and then establishes a deposit account for each student who successfully completes the program. The bank contributes $200 to every graduate of the program by way of an automatic deposit into their account. To date, the bank has funded 23 accounts for a total of nearly $6 thousand.

Community Development Services

Bryn Mawr provides a relatively high level of community development services in this assessment area. Over the evaluation period, many officers and employees serve in various capacities on boards of community development organizations, participate on loan and finance committees, and make presentations for small business development, homeownership, and financial literacy programs. Most notably:

- A bank officer serves as board chair of the Latin American Economic Development Association, an economic development organization based in Camden, NJ dedicated to creating small business opportunities for economically-disadvantaged minority residents within the Delaware Valley.

- An employee serves as a board member of AchieveAbility. This Philadelphia based non-profit organization works to permanently break the generational cycle of poverty for low-income, single-parent, and homeless families through higher education, affordable housing, supportive services, community and economic development.

- A bank officer serves as a board member for the Housing Partnership of Chester County. The Housing Partnership provides home ownership opportunities to low- and moderate-income residents of Chester County.

- Three employees serve on the board of directors, and one employee also serves on loan review committee of Community Lenders Community Development Corporation. This organization provides financing for community redevelopment and revitalization projects in Bucks, Chester, Delaware, Lehigh, Montgomery, Northampton and Philadelphia Counties.

- A bank employee serves as board director for the Food Bank of Delaware. Based in Newark, Delaware, the agency provides nutritious foods to low-income people in need and facilitates long-term solutions to the problems of hunger and poverty through community education and advocacy.

- Two bank officers serve as committee members for the Urban Affairs Coalition. The agency unites government, business, neighborhoods, and individuals to improve the quality of life in the Philadelphia region, build wealth in urban communities, and solve emerging issues.

- A bank executive serves as a committee member for the Montgomery County Opportunity Loan Program. The loan program, administered by the County government, the Montgomery County Development Corporation, and the Montgomery County Industrial Development Authority, offers fixed-rate and term loans to help businesses grow, increase productivity, and maximize the value of their investments in Montgomery County, Pennsylvania.

- As described above, four bank employees presented financial literacy training through Bryn Mawr's partnership with North Light Community Center's TEEMworks initiative.

COMMONWEALTH OF PENNSYLVANIA / FULL-SCOPE REVIEW ASSESSMENT AREA-

HARRISBURG ASSESSMENT AREA

COMMONWEALTH OF PENNSYLVANIA CRA RATING

Performance Test	Performance Level
Lending	Needs to Improve
Investment	Needs to Improve
Service	Low Satisfactory
Overall	Needs to Improve

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to the state rating include the following:

- Lending levels reflect poor responsiveness to assessment area credit needs;
- The borrower distribution of HMDA loans reflects poor penetration;
- The geographic distribution of HMDA loans reflects poor penetration;
- The bank exhibits a poor record of serving the credit needs of low-income individuals and areas, and very small businesses;
- The bank makes little use of innovative and/or flexible lending practices;
- The bank makes few, if any, community development loans;
- The bank has a poor level of qualified community development investments and grants; and
- The bank provides few, if any, community development services.

SCOPE OF EXAMINATION

For purposes of this CRA evaluation, the state rating is based solely on the bank's performance in the Harrisburg assessment area, which was evaluated using full-scope review procedures. Bryn Mawr operates one branch in the Harrisburg-Carlisle MSA, in Hershey, PA.

Bryn Mawr's CRA performance in Pennsylvania was evaluated for the period from February 23, 2016 through December 2, 2019. The lending, investment and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans[11] and other loans that qualified as community development. Due to the low loan volume, small business and small farm loans are not included in the analysis, as they would not have had a significant effect on the bank's overall performance in the Harrisburg assessment area. However, data on small business and small farm loans is included in Appendix E, for context only.

---

[11] Excluded in the analysis of 2018 HMDA data are loans with a purpose of "other". The 2018 and subsequent-year HMDA data is under review by the Board of Governors to determine how this new data should be utilized in CRA analyses.

DESCRIPTION OF INSTITUTION'S OPERATIONS

Description of Assessment Area

Bryn Mawr operates one branch in the Harrisburg assessment area. The branch is situated in a middle-income census tract and resides within the bank's wealth management office. The assessment area was added to the bank's footprint in April 2016. Notably, less than 1% of the bank's deposits are maintained in the assessment area. Lending in the Harrisburg assessment area also accounted for less than 1% of Bryn Mawr's overall HMDA and small business lending.

For purposes of assessing Bryn Mawr's overall CRA performance, very little weight was given to the bank's performance in the Commonwealth of Pennsylvania / Harrisburg assessment area, as the overwhelming majority of the bank's operations are located in the Philadelphia assessment area.

2010 Census Data

The Harrisburg assessment area consists of Dauphin County, and is part of the Harrisburg-Carlisle MSA. According to the 2010 Census, the assessment area consisted of 65 census tracts, 7 of which were designated as low-income, 18 of which were moderate-income, 29 of which were middle-income, and 11 of which were upper-income tracts. All 7 low-income tracts and 8 of the 18 moderate-income tracts were located in the city of Harrisburg, the largest urban center in the MSA. Of the assessment area's population of 268,100, 32% of individuals resided within these low- and moderate-income census tracts.

2015 ACS Data

According to the updated 2017 ACS data, the assessment area consisted of 65 census tracts, 8 of which were low-income, 19 of which were moderate-income, 28 of which were middle-income, 10 of which were upper-income. All eight of the low-income tracts and seven of the moderate-income tracts were located in the city of Harrisburg. Of the assessment area's population of 271,094, 32% of individuals resided within these low- and moderate-income census tracts.

Maps of the Harrisburg assessment area, at both the 2010 Census and the 2015 ACS update, are available in Appendix F.

Bryn Mawr's performance was evaluated in terms of the demographic and economic context in which the bank operates. According to the FDIC's Summary of Deposits, as of June 30, 2019, there were 17 depository institutions operating in Dauphin County. These institutions maintained a total of 80 branches holding over $6 billion in deposits. Bryn Mawr ranks sixteenth, with just under $11 million and less than 1% of the retail deposit market. First National Bank of Pennsylvania has a strong presence in the market, ranking first, with almost 15% of the market, followed by both Manufacturers and Traders Trust Company with 13%, and Mid Penn Bank with 12% of the deposit market.

Bryn Mawr reports HMDA loans pursuant to HMDA, and therefore Bryn Mawr's home-mortgage loans were compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. In 2016, a total of 312 institutions reported 7,711 HMDA loan originations and purchases within the assessment area. Data shows that Wells Fargo Bank, N.A. ranked first among these institutions with 10% of all loan originations and purchases. Members 1st Federal Credit Union ranked second with 6% of HMDA originations and purchases, followed by Quicken Loans, Inc., with 4% of the market. Bryn Mawr ranked seventy-third, with far under 1% of the market.

The 2017 aggregate HMDA data reveals that HMDA lending levels remained relatively steady when compared to 2016. Lenders originated a total of 7,126 home-mortgage loans in the assessment area. The number of institutions reporting real estate loans pursuant to HMDA in the assessment area decreased to 299. As in 2016, Wells Fargo Bank, N.A. ranked first among these institutions with 8% of all loans originated and purchased, followed closely by Members 1st Federal Credit Union with under 7% of the market, and Quicken Loans, Inc. with 4% of the HMDA market. Bryn Mawr ranked sixty-fourth, with less than 1% of the market.

Finally, 2018 aggregate HMDA data showed a 15% increase in overall HMDA lending compared to 2017. Lenders originated a total of 8,193 home-mortgage loans in the assessment area. The number of institutions reporting real estate loans pursuant to HMDA in the assessment area decreased to 286. Members 1st Federal Credit Union ranked first among these institutions with 11% of all loans originated and purchased, followed by Pennsylvania State Employees Credit Union with 8% of the market, and Wells Fargo Bank, N.A with 7% of the HMDA market. Bryn Mawr ranked sixty-ninth, with well under 1% of the market.

Though small business loans were not considered in the analysis for the Harrisburg assessment area due to the very low volume of loans (a total of three loans from 2016 through 2018), market share information is provided for context only. Aggregate CRA data is reported annually. According to the aggregate CRA data, the assessment area had a total of 77 small business reporters in 2016, who collectively reported 4,437 small business loans. Citibank, N.A ranked first, with 24% of all small business originations and purchases, followed by American Express Bank, FSB with 16% of CRA originations and purchases, and US Bank, N.A. with 8% of the market. Bryn Mawr originated no small business loans in 2016.

There were 73 small business reporters who collectively reported 3,754 small business loans in 2017. American Express Bank, FSB ranked first, with 18% of all small business originations and purchases, followed by both US Bank, N.A. and Citibank, N.A., each with 9% of the market. In 2017, Bryn Mawr originated two small business loans.

In 2018, small business reporters increased to 82, who collectively reported 3,975 small business loans. American Express Bank, FSB ranked first, with over 16% of all small business originations and purchases, followed by Chase Bank USA, N.A. with another 11% of the market, and Citibank, N.A. with 8% of small business originations and purchases. Bryn Mawr originated one small business loan in 2018.

To supplement the demographic and economic data for the Harrisburg assessment area, one interview was conducted with a community development representative to provide perspective on the credit needs of the Harrisburg assessment area. More specifically, an interview was held with an individual representing a local economic development agency. According to the community contact, the Harrisburg area was experiencing noteworthy commercial growth due to its proximity to major transportation hubs, which have boosted logistics and warehousing sector jobs. Though commercial credit for larger companies was plentiful, the contact identified that an important credit need in the Harrisburg assessment area is financing for smaller startup businesses.

Economic Characteristics

Cumberland, Perry, and Dauphin Counties comprise the Harrisburg-Carlisle, PA MSA, which includes the City of Harrisburg, the state capital of Pennsylvania. The economy of the MSA is strong with the unemployment rate reaching its lowest level in twenty years. According to Moody's Analytics[12], the MSA's labor force participation continues to grow and expansion persists in the healthcare, transportation, and warehousing sectors. Low business costs and living costs, proximity to northeastern consumers, and major highway infrastructure have made central Pennsylvania a transportation hub. Additionally, several healthcare companies, teaching hospitals, and medical research facilities are clustered around Hershey, PA, which is just 14 miles east of Harrisburg.

Economic strengths of the Harrisburg-Carlisle MSA include its central location with strong transportation and distribution assets. Further, the cost of living in the MSA is low compared to other large northeast metropolitan areas. Weaknesses include a shrinking industrial base and aging infrastructure. The city of Harrisburg still suffers from the long-term stigma associated with its distressed city receivership status under PA Act 47. The area is also heavily dependent on state government. Pennsylvania's fiscal problems, including underfunded pension programs and rising healthcare costs for retired workers, have led to spending cuts and elimination of state jobs.

In the MSA, the largest employment sectors are education and health services, along with government (federal, state, and local) accounting for 17% of the labor force. The next largest employment segment is professional and business services at slightly more than 14%, followed by the leisure and hospitality sector with 9% of the jobs. The largest private employers in the Harrisburg MSA are the Penn State Hershey Medical Center, Giant Food Stores, Hershey Entertainment & Resorts Company, The Hershey Company, and Wal-Mart Stores, Inc.

During 2016, 2017 and 2018, unemployment rates in Dauphin County were lower than statewide unemployment rates but slightly higher than rates in the Harrisburg-Carlisle MSA. Unemployment rates for the assessment area are presented in the table on the following page.

---

[12] Moody's Analytics Précis® U.S. Metro Report - May 2019.

Bryn Mawr Trust Company Unemployment Rates Harrisburg Assessment Area			
Geographical Area	**2016 Annual**	**2017 Annual**	**2018 Annual**
Dauphin County, PA	4.8	4.5	3.9
Harrisburg – Carlisle, PA MSA	4.4	4.2	3.6
Commonwealth of Pennsylvania	5.4	4.9	4.2
United States	4.9	4.4	3.9

Housing

2010 Census Data

According to the 2010 Census data, the Harrisburg assessment area contained 119,264 housing units, of which 59% were owner-occupied, 31% were rental, and 10% were vacant units. The overall owner-occupancy rate in the assessment area (59%) was lower than that in the Commonwealth as a whole (63%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate the demand for residential mortgage lending within such tracts. Based on the 2010 Census, 5% of owner-occupied housing was located in the assessment area's low-income census tracts, and 19% in the moderate-income census tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (52% and 24%, respectively).

Census data for 2010 show that 73% of the housing units in the Harrisburg assessment area were single family units, while 9% were two-to-four family units, 15% were multifamily units, and 3% were mobile homes. The median age of the housing stock was 47 years, just below that in the Commonwealth as a whole (50 years). Data show that housing in the assessment area was more affordable than in the Commonwealth overall. The 2010 Census data show that the median value of the housing stock in the assessment area was $153,055, which was lower than the median housing value in Pennsylvania ($159,300). The median housing value in the assessment area's low-income tracts was $67,788, and the median value in moderate-income tracts was $100,027. Median housing values were notably higher in middle-income tracts ($154,096), and in upper-income tracts ($220,614).

It is noteworthy that although median housing values were lower in the assessment area than in Pennsylvania, the opposite was true for rents. Median rent (rent plus utilities) in the Harrisburg assessment area was $765, which exceeds rent in the Commonwealth ($739).

2015 ACS Data

According to the updated 2017 ACS data, the Harrisburg assessment area contained 121,546 housing units, 57% of which were owner-occupied, 33% of which were rental units and 10% of which were vacant. The overall owner-occupancy rate in the assessment area (57%) continued to trail that in the Commonwealth (61%).

Little change was noted in the distribution of owner-occupied housing among the income tract types in the assessment area using updated 2015 ACS data. According to the 2015 ACS data, 4% of owner-occupied housing was in low-income census tracts, and 19% was in moderate-income tracts. As with the 2010 Census, most owner-occupied units were located in middle-income and upper-income census tracts (53% and 24%, respectively).

Of the total existing housing units, 72% were single-family units, 9% were two-to-four family units, 16% were multi-family units and 3% were mobile homes. The median age of the housing stock was 56 years, making it comparable with the Commonwealth (54 years). The 2017 ACS data show that the median value of the housing stock in the assessment area was $159,221, which is lower than the median housing value in Pennsylvania ($166,000). Within the assessment area, median housing values were much lower in low- and moderate-income tracts ($72,328 and $108,136, respectively), as compared to middle- and upper-income tracts ($160,087 and $227,954, respectively).

Again, though median housing values in the assessment area lagged those in the Commonwealth overall, rents in the assessment area were slightly higher than statewide levels ($847 versus $840, respectively).

Borrower Income Data

2010 Census Data

The percentage of low- and moderate-income families is used as a proxy to estimate demand for home-mortgage lending in the assessment area. According to the 2010 Census, of the 66,883 families in the assessment area, 23% were designated as low-income, 18% were designated as moderate-income, 22% were middle-income, and 37% were upper-income. Families living below the poverty level represented 9% of families in the assessment area, which matched that in the Commonwealth of Pennsylvania (9%).

2015 ACS Data

According to the 2015 ACS, there were 69,264 households that were families in the assessment area. Of the total number of families in the assessment area at the 2015 ACS, just under 23% of families were designated low-income, 19% were moderate- income, 21% were middle-income, and 37% were upper-income. Of the families in the assessment area, 9% were living below the poverty level, which is equivalent to the Commonwealth overall.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon HUD annually-adjusted median family income data made available by the FFIEC.

Median family incomes for 2016, 2017 and 2018 are listed in the table on the following page, and are categorized by the dollar amounts recognized as low-, moderate-, middle-, and upper-income.

Year	FFIEC-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2016	$72,500	$36,250	$36,250 - $57,999	$58,000 - $86,999	$87,000 or more
2017	$74,700	$37,350	$37,350 - $59,759	$59,760 - $89,639	$89,640 or more
2018	$75,200	$37,600	$37,600 - $60,159	$60,160 - $90,239	$90,240 or more

Geographic Business Data

As discussed previously, because the low volume of Bryn Mawr's small business lending would preclude meaningful analysis, this product line was not evaluated in the Harrisburg assessment area. Therefore, demographic statistics are presented for contextual purposes only.

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for small business credit within such tracts. According to Dun & Bradstreet, in 2016, 5% of businesses were located in low-income census tracts, and 26% were located in moderate-income census tracts. The vast majority of businesses were located in middle- and upper-income census tracts (48% and 22%, respectively). Business demographic data also revealed that of the 12,622 businesses in the assessment area, 88% were small businesses with gross annual revenues of $1 million or less.

In 2017, there were 11,281 businesses located in the assessment area. Of these businesses, 6% were located in low-income tracts, and 26% in moderate-income tracts. Again, the majority of businesses were located in middle- and upper-income geographies (48% and 21%, respectively). Of the total businesses, 88% were businesses with gross annual revenues of $1 million or less.

Finally, in 2018, though the number of businesses increased significantly, to 12,954, the geographic distribution of those businesses remained constant. In 2018, 6% of businesses were located in low-income tracts, and 26% were in moderate-income tracts. Again, 48% of businesses were in middle-income tracts, and 20% were in upper-income tracts. Finally, of the 12,954 businesses, 89% were businesses with gross annual revenues of $1 million or less.

The assessment area demographics used to evaluate Bryn Mawr's performance in the Harrisburg assessment area included in the tables on the following pages.

Bryn Mawr Trust Company Harrisburg Assessment Area Assessment Area Demographics 2016								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	7	10.8	5,638	8.4	2,179	38.6	15,199	22.7
Moderate-income	18	27.7	13,904	20.8	1,978	14.2	12,109	18.1
Middle-income	29	44.6	32,498	48.6	1,590	4.9	14,591	21.8
Upper-income	11	16.9	14,843	22.2	186	1.3	24,984	37.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**65**	**100.0**	**66,883**	**100.0**	**5,933**	**8.9**	**66,883**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	11,862	3,416	4.8	28.8	5,833	49.2	2,613	22.0
Moderate-income	28,978	13,344	18.9	46.0	12,012	41.5	3,622	12.5
Middle-income	55,500	36,658	51.9	66.1	15,219	27.4	3,623	6.5
Upper-income	22,924	17,163	24.3	74.9	4,163	18.2	1,598	7.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**119,264**	**70,581**	**100.0**	**59.2**	**37,227**	**31.2**	**11,456**	**9.6**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	609	4.8	550	4.9	48	4.0	11	3.9
Moderate-income	3,259	25.8	2,701	24.3	406	33.7	152	53.9
Middle-income	6,014	47.6	5,368	48.2	546	45.3	100	35.5
Upper-income	2,740	21.7	2,516	22.6	205	17.0	19	6.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**12,622**	**100.0**	**11,135**	**100.0**	**1,205**	**100.0**	**282**	**100.0**
	Percentage of Total Businesses:		**88.2**		**9.5**			**2.2**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	1	0.6	0	0.0	1	14.3	0	0.0
Moderate-income	39	22.4	37	22.2	2	28.6	0	0,0
Middle-income	102	58.6	98	58.7	4	57.1	0	0,0
Upper-income	32	18.4	32	19.2	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**174**	**100.0**	**167**	**100.0**	**7**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**96.0**		**4.0**			**0.0**

Information Based on 2010 Census Data and 2016 Dun & Bradstreet Information

Bryn Mawr Trust Company Harrisburg Assessment Area Assessment Area Demographics 2017							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	8	12.3	5,592	8.1	2,060	36.8	15,865	22.9
Moderate-income	19	29.2	14,504	20.9	2,005	13.8	12,953	18.7
Middle-income	28	43.1	34,208	49.4	1,966	5.7	14,642	21.1
Upper-income	10	15.4	14,960	21.6	475	3.2	25,804	37.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**65**	**100.0**	**69,264**	**100.0**	**6,506**	**9.4**	**69,264**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	12,072	3,095	4.4	25.6	6,368	52.8	2,609	21.6
Moderate-income	30,680	13,001	18.7	42.4	13,375	43.6	4,304	14.0
Middle-income	55,753	36,544	52.5	65.5	15,123	27.1	4,086	7.3
Upper-income	23,041	16,946	24.4	73.5	5,171	22.4	924	4.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**121,546**	**69,586**	**100.0**	**57.3**	**40,037**	**32.9**	**11,923**	**9.8**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	688	6.1	595	6.0	86	7.2	7	3.0
Moderate-income	2,888	25.6	2,378	24.1	386	32.4	124	53.9
Middle-income	5,392	47.8	4,739	48.1	570	47.9	83	36.1
Upper-income	2,313	20.5	2,148	21.8	149	12.5	16	7.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**11,281**	**100.0**	**9,860**	**100.0**	**1,191**	**100.0**	**230**	**100.0**
	Percentage of Total Businesses:		**87.4**		**10.6**		**2.0**	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	1	0.6	0	0.0	1	14.3	0	0.0
Moderate-income	9	5.8	9	6.1	0	0.0	0	0.0
Middle-income	115	74.7	109	74.1	6	85.7	0	0.0
Upper-income	29	18.8	29	19.7	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**154**	**100.0**	**147**	**100.0**	**7**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**95.5**		**4.5**		**0.0**	

Information Based on 2015 ACS Data and 2017 Dun & Bradstreet Information

Bryn Mawr Trust Company Harrisburg Assessment Area Assessment Area Demographics 2018								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	8	12.3	5,592	8.1	2,060	36.8	15,865	22.9
Moderate-income	19	29.2	14,504	20.9	2,005	13.8	12,953	18.7
Middle-income	28	43.1	34,208	49.4	1,966	5.7	14,642	21.1
Upper-income	10	15.4	14,960	21.6	475	3.2	25,804	37.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**65**	**100.0**	**69,264**	**100.0**	**6,506**	**9.4**	**69,264**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	12,072	3,095	4.4	25.6	6,368	52.8	2,609	21.6
Moderate-income	30,680	13,001	18.7	42.4	13,375	43.6	4,304	14.0
Middle-income	55,753	36,544	52.5	65.5	15,123	27.1	4,086	7.3
Upper-income	23,041	16,946	24.4	73.5	5,171	22.4	924	4.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**121,546**	**69,586**	**100.0**	**57.3**	**40,037**	**32.9**	**11,923**	**9.8**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	784	6.1	690	6.0	86	7.3	8	3.0
Moderate-income	3,377	26.1	2,843	24.7	383	32.7	151	56.1
Middle-income	6,186	47.8	5,545	48.2	555	47.4	86	32.0
Upper-income	2,607	20.1	2,436	21.2	147	12.6	24	8.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**12,954**	**100.0**	**11,514**	**100.0**	**1,171**	**100.0**	**269**	**100.0**
	Percentage of Total Businesses:		**88.9**		**9.0**		**2.1**	
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	1	0.6	0	0.0	1	14.3	0	0.0
Moderate-income	10	6.0	9	5.6	1	14.3	0	0.0
Middle-income	125	74.4	120	74.5	5	71.4	0	0.0
Upper-income	32	19.0	32	19.9	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**168**	**100.0**	**161**	**100.0**	**7**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**95.8**		**4.2**		**0.0**	

Information Based on 2015 ACS Data and 2018 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers and businesses of all sizes, including small businesses[13];
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts[14];
- Responsiveness to credit needs of low-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Performance under the lending test is rated needs to improve in the Harrisburg assessment area.

Lending Activity

The bank's lending levels in the Harrisburg assessment area reflect poor responsiveness to the area's credit needs. During the evaluation period, lending activity in the Harrisburg assessment area represented less than 1% of the bank's overall lending by both number of loans, and by dollar volume. During the evaluation period, Bryn Mawr made only 13 HMDA loans totaling just under $3 million, and three small business loans totaling $1.5 million in the bank's Harrisburg assessment area.

Borrower Distribution of Lending

Given the assessment area's demographics and economic characteristics, the borrower distribution of HMDA loans reflects poor penetration among individuals of different income levels, including low- and moderate-income individuals. As mentioned previously, analysis of small business loans was not included in the borrower distribution assessment for this assessment area, due to low loan volumes, which would not have had a significant effect on the bank's overall performance. However, data on small business lending is included for reference in Appendix E.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area.

---

[13] Borrower distribution of small business loans is not included in the analysis for the Harrisburg assessment area due to low loan volume.

[14] Geographic distribution of small business loans is not included in the analysis for the Harrisburg assessment area due to low loan volume.

In 2016, according to the 2010 Census, 23% of families in the assessment area were low-income, 18% were moderate-income, 22% were middle-income, and 37% were upper-income. According to the 2015 ACS update, very little change was noted, as 23% of assessment area families were low-income, 19% were moderate-income, 21% were middle-income, and 37% were upper-income.

The fact that 41% of families in the assessment area were designated as low- or moderate-income families at the 2010 Census indicates a significant need for affordable rental housing and home-mortgage credit among this segment of the population. Using 2015 ACS data, the percentage of low- and moderate-income families rose to 42%.

The following tables compare Bryn Mawr's 2016, 2017 and 2018 home-mortgage lending to aggregate home-mortgage lending levels, using median family income as a proxy for loan demand.

Bryn Mawr Trust Company Harrisburg Assessment Area Distribution of HMDA Loans by Borrower Income Level 2016			
		Aggregate Comparison	
Income Level	% Families by Family Income Level (2010 Census Data)	2016	
		% Bryn Mawr Lending	% Aggregate Lending
Low	22.7	0.0	8.8
Moderate	18.1	0.0	19.4
Middle	21.8	0.0	20.0
Upper	37.4	100.0	30.7
Unknown	0.0	0.0	20.9
Total	**100%**	**100%**	**100%**

Bryn Mawr Trust Company Harrisburg Assessment Area Distribution of HMDA Loans by Borrower Income Level 2017			
		Aggregate Comparison	
Income Level	% Families by Family Income Level (2015 ACS Data)	2017	
		% Bryn Mawr Lending	% Aggregate Lending
Low	22.9	25.0	9.5
Moderate	18.7	25.0	21.8
Middle	21.1	50.0	21.3
Upper	37.3	0.0	31.3
Unknown	0.0	0.0	16.1
Total	**100%**	**100%**	**100%**

Bryn Mawr Trust Company Harrisburg Assessment Area Distribution of HMDA Loans by Borrower Income Level 2018			
		Aggregate Comparison	
	% Families by Family Income Level (2015 ACS Data)	**2018**	
Income Level		**% Bryn Mawr Lending**	**% Aggregate Lending**
Low	22.9	0.0	10.3
Moderate	18.7	0.0	24.0
Middle	21.1	0.0	21.2
Upper	37.3	100.0	32.5
Unknown	0.0	0.0	12.0
Total	**100%**	**100%**	**100%**

It is noted that Bryn Mawr made very few home-mortgage loans in the Harrisburg assessment area. In 2016, the bank reported four HMDA loans, aggregating $1.7 million. In 2017, the bank reported four HMDA loans, aggregating $516 thousand. Finally, in 2018, the bank reported five HMDA loans, aggregating $694 thousand. The borrower distribution analysis takes into consideration the bank's limited HMDA lending.

Lending to Low-Income Borrowers

Overall, Bryn Mawr's HMDA lending to low-income borrowers was poor.

2010 Census Data

In 2016, lending to low-income borrowers was poor. Of Bryn Mawr's four HMDA loans, none were made to low-income borrowers, compared to a proxy of 23%, and aggregate lending to low-income borrowers of 9%. The fact that the performance of aggregate lenders is so much below proxy suggests that banks struggled to reach qualified low-income borrowers in this market, and this is taken into consideration. For contextual purposes, aggregate borrowers made 10% of home-purchase loans, 8% of refinance loans, 10% of home-improvement loans, and no multifamily loans to low-income borrowers in 2016.

2015 ACS Data

In 2017, the bank's lending to low-income borrowers was adequate. Of the bank's four loans, one home-purchase loan (25%) was made to a low-income borrower. This compared slightly above the proxy of 23% and also above aggregate lenders, who made 10% of HMDA loans to low-income borrowers. By loan type, aggregate lenders made 11% of home-purchase loans, 8% of refinance loans, 9% of home-improvement loans, and no multifamily loans to low-income borrowers in 2017.

In 2018, Bryn Mawr's lending to low-income borrowers was poor. Of the bank's five HMDA loans, none were made to low-income borrowers, compared to a proxy of 23% and aggregate lending to low-income borrowers of 10%. By product, aggregate lenders made 11% of home-purchase loans, 11% of refinance loans, 8% of home-improvement loans, and no multifamily loans to low-income borrowers.

Lending to Moderate-Income Borrowers

The bank's HMDA lending to moderate-income borrowers was poor.

2010 Census Data

In 2016, Bryn Mawr's overall lending to moderate-income borrowers was poor. Of Bryn Mawr's four HMDA loans, none were made to moderate-income borrowers, compared to a proxy of 18%, and aggregate lending to moderate-income borrowers of 19%. For contextual purposes, aggregate lenders made 24% of home-purchase loans, 14% of refinance loans, 17% of home-improvement loans, and no multifamily loans to moderate-income borrowers.

2015 ACS Data

In 2017, the bank's lending to moderate-income borrowers was adequate. Of the bank's four loans, one home-purchase loan (25%) was made to a moderate-income borrower. This compares above the proxy of 19% and slightly above aggregate lenders, who made 22% of HMDA loans to moderate-income borrowers. By product type, aggregate lenders made 24% of home-purchase loans, 18% of refinance loans, 20% of home-improvement loans, and no multifamily loans moderate-income borrowers.

In 2018, Bryn Mawr's overall lending to moderate-income borrowers was poor. Of the bank's five HMDA loans, none were made to moderate-income borrowers. This compares well below both the proxy of 19% and aggregate lending of 24% to moderate-income borrowers. Aggregate lenders made 27% of home-mortgage loans, 22% of refinance loans, 21% of home-improvement loans, and 2% of multifamily loans to moderate-income borrowers.

Geographic Distribution of Lending

The geographic distribution of HMDA loans reflects poor penetration throughout the Harrisburg assessment area, taking into consideration the bank's business strategy and the demographic and economic characteristics of the assessment area, and the limited level of lending in this area. Analysis of small business loans is not included in this evaluation, as the small loan volumes would not have yielded a meaningful conclusion. However, data on small business is included for reference in Appendix E.

As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage credit within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand is for home-mortgage credit in the tract. 2010 Census data indicated that 5% of owner-occupied housing was located in low-income census tracts, and 19% in moderate-income tracts. The vast majority of owner-occupied housing was located in middle- and upper-income tracts (52% and 24%, respectively). Very little change was seen in 2015 ACS data, as noted in the tables below.

The tables below present Bryn Mawr's geographic HMDA lending distribution for 2016, 2017, and 2018, compared to the owner-occupancy housing proxy and aggregate lending levels.

<table>
<tr><td colspan="4">Bryn Mawr Trust Company
Harrisburg Assessment Area
Geographic Distribution of HMDA Loans
2016</td></tr>
<tr><td rowspan="3">Income Level</td><td rowspan="3">%
Owner-Occupied Housing Units
(2010 Census Data)</td><td colspan="2">Aggregate Comparison</td></tr>
<tr><td colspan="2">2016</td></tr>
<tr><td>%
Bryn Mawr Lending</td><td>%
Aggregate Lending</td></tr>
<tr><td>Low</td><td>4.8</td><td>0.0</td><td>1.9</td></tr>
<tr><td>Moderate</td><td>18.9</td><td>0.0</td><td>16.4</td></tr>
<tr><td>Middle</td><td>51.9</td><td>50.0</td><td>52.5</td></tr>
<tr><td>Upper</td><td>24.3</td><td>50.0</td><td>29.2</td></tr>
<tr><td>Unknown</td><td>0.0</td><td>0.0</td><td>0.0</td></tr>
<tr><td>Total</td><td>100%</td><td>100%</td><td>100%</td></tr>
</table>

<table>
<tr><td colspan="4">Bryn Mawr Trust Company
Harrisburg Assessment Area
Geographic Distribution of HMDA Loans
2017</td></tr>
<tr><td rowspan="3">Income Level</td><td rowspan="3">%
Owner-Occupied Housing Units
(2015 ACS Data)</td><td colspan="2">Aggregate Comparison</td></tr>
<tr><td colspan="2">2017</td></tr>
<tr><td>%
Bryn Mawr Lending</td><td>%
Aggregate Lending</td></tr>
<tr><td>Low</td><td>4.4</td><td>0.0</td><td>2.8</td></tr>
<tr><td>Moderate</td><td>18.7</td><td>0.0</td><td>17.6</td></tr>
<tr><td>Middle</td><td>52.5</td><td>75.0</td><td>51.1</td></tr>
<tr><td>Upper</td><td>24.4</td><td>25.0</td><td>28.5</td></tr>
<tr><td>Unknown</td><td>0.0</td><td>0.0</td><td>0.0</td></tr>
<tr><td>Total</td><td>100%</td><td>100%</td><td>100%</td></tr>
</table>

Bryn Mawr Trust Company Harrisburg Assessment Area Geographic Distribution of HMDA Loans 2018			
Income Level	% Owner-Occupied Housing Units (2015 ACS Data)	Aggregate Comparison 2018	
		% Bryn Mawr Lending	% Aggregate Lending
Low	4.4	0.0	3.2
Moderate	18.7	0.0	16.7
Middle	52.5	40.0	51.8
Upper	24.4	60.0	28.4
Unknown	0.0	0.0	0.0
Total	**100%**	**100%**	**100%**

As mentioned previously, Bryn Mawr made a limited number of home-mortgage loans in Harrisburg. In 2016, only four loans totaling $1.7 million were made. In 2017, four loans totaling $516 thousand were originated, while in 2018, five HMDA loans were made, totaling $694 thousand. The geographic distribution analysis takes this low level of lending into consideration.

Lending in Low-Income Census Tracts

For the period under review, Bryn Mawr's overall HMDA lending in low-income tracts was considered poor.

2010 Census Data

In 2016, the bank's HMDA lending in low-income census tracts was poor. 2010 Census data showed 5% of owner-occupied housing units were located in low-income census tracts. The bank made no HMDA loans in low-income tracts, while aggregate lenders made just under 2% of HMDA loans in these tracts. For contextual purposes, aggregate lenders made 2% of home-purchase, refinance and home-improvement loans, and 11% of multifamily loans in low-income tracts in 2016.

2015 ACS Data

In 2017, the bank's HMDA lending in low-income census tracts was poor. ACS-updated data showed 4% of owner-occupied housing units were located in low-income census tracts. The bank made no HMDA loans in low-income tracts in 2017, while aggregate lenders made 3% of loans in low-income census tracts. By loan type, aggregate lenders made 3% of home-purchase loans, 2% of refinance and home-improvement loans, and 23% of multifamily loans in low-income tracts.

Finally, the bank's lending in low-income tracts in 2018 was poor. In 2018, Bryn Mawr again made no loans in low-income tracts while aggregate lenders made just over 3%, and proxy remained at 4% of owner-occupied units located in low-income tracts. Aggregate lenders made 4% of home-purchase loans, 3% of refinance loans, 1% of home-improvement loans, and 26% of multifamily loans in low-income tracts.

Lending in Moderate-Income Census Tracts

Bryn Mawr's overall HMDA lending in moderate-income tracts was considered poor.

2010 Census Data

Bryn Mawr's lending in moderate-income tracts in 2016 was poor. 2010 Census data showed 19% of owner-occupied housing units were located in moderate-income census tracts. The bank made no HMDA loans in moderate-income tracts, while aggregate lenders made slightly over 16%. By loan type, aggregate lenders made 17% of home-purchase loans, 15% of refinance loans, 17% of home-improvement loans, and 47% of multifamily loans in moderate-income census tracts.

2015 ACS Data

The bank's HMDA lending in moderate-income census tracts in 2017 was poor. ACS data showed 19% of owner-occupied housing units were located in moderate-income census tracts. The bank made no HMDA loans in moderate-income tracts in 2017, while aggregate lenders made 18% of loans in moderate-income census tracts. By product type, aggregate lenders made 19% of home-purchase loans, 15% of refinance loans, 18% of home-improvement loans, and 34% of multifamily loans in moderate-income tracts in 2017.

The bank's 2018 lending in moderate-income tracts was poor. In 2018, Bryn Mawr again made no loans in moderate-income tracts while aggregate lenders made just over 17%, and proxy remained at 19%. Aggregate lenders made 18% of home-purchase loans, 13% of refinance loans, 11% of home-improvement loans, and 38% of multifamily loans in moderate-income tracts in 2018.

Responsiveness to Credit Needs

Bryn Mawr exhibits a poor record of serving the credit needs of low- and moderate-income individuals and areas and very small businesses in its Harrisburg assessment area, consistent with safe and sound banking practices. No credit needs were met through community development lending in the Harrisburg assessment area, and only three NOP loans were made in this assessment area. Though community contacts indicated a need for small business financing for start-up businesses, no SBA loans were made in the Harrisburg assessment area, and very few CRA-reportable small business loans were made by the bank in the assessment area.

Innovative and/or Flexible Lending Practices

Bryn Mawr makes little use of innovative and/or flexible lending practices in serving the assessment area's credit needs. The bank offers several mortgage products for first-time homebuyers, including a portfolio mortgage product (NOP), along with the Fannie Mae HomeReady® mortgage program, the FHA loan program, and the FHLB First Front Door program. However, during the review period, the bank originated only three NOP loans totaling just over $333 thousand.

Finally, to enhance its small business lending profile, Bryn Mawr participates in the SBA loan programs. However, Bryn Mawr did not originate any loans under the SBA programs in the assessment area during the evaluation period.

Community Development Lending

Bryn Mawr makes few, if any, community development loans in the assessment area. The bank made no community development loans in the Harrisburg assessment area during the evaluation period.

INVESTMENT TEST

The investment test evaluates a financial institution's level of qualified investments that serve low- or moderate-income areas or individuals, together with the responsiveness, innovativeness and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment; deposit; membership share; or grant, including a donation or in-kind contribution of property that has as its primary purpose, community development.

Performance under the investment test is assessed as needs to improve.

Volume of Investment and Grant Activity

Bryn Mawr has a poor level of qualified community development investments and grants in the Harrisburg assessment area. During the evaluation period, Bryn Mawr made four qualified community development investments totaling over $542 thousand in the Harrisburg assessment area. Two investments totaled over $292 thousand, and consisted of loans in a MBS, which benefited affordable housing needs. In addition, the bank made two investments totaling $250 thousand in loan funds which benefited economic development projects in the assessment area. All four investments were new since the last examination.

There were no reported grants or donations made in the assessment area during the evaluation period.

Responsiveness to Credit and Community Development Needs

Bryn Mawr exhibits poor responsiveness to credit and community development needs of the assessment area. Though community contacts noted a perceived need for small business lending to startup enterprises, Bryn Mawr's qualified investments did not support efforts to address small business lending in the Harrisburg assessment area during the evaluation period.

Community Development Initiatives

Bryn Mawr makes rare use of innovative and/or complex investments to support community development initiatives. The bank's two investments in MBS are not considered particularly innovative or complex. The remaining two economic development investments carried modest innovativeness and complexity.

SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- The accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- The impact of changes in branch locations upon low- and moderate-income census tracts, or to low- and moderate-income persons in the assessment area;
- The reasonableness of business hours and services in meeting assessment area needs; and
- The extent to which an institution provides community development services.

Performance under the service test is assessed as low satisfactory in the Harrisburg assessment area.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to the bank's geographies, and to individuals of different income levels, in its assessment area. The bank currently operates one full-service branch in the Harrisburg assessment area, in a middle-income tract. By comparison, the 2010 Census and 2015 ACS update both showed that 47% of the population resided in the middle-income tracts.

To supplement traditional retail banking services, Bryn Mawr provides online banking services, remote deposit capture, telephone banking services and a smart phone mobile banking application. In addition, bank customers can pay bills, open accounts and apply for loan products via the bank's website, at https://www.bmt.com/.

Changes in Branch Locations

Bryn Mawr's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals. In April 2016, Bryn Mawr established a full-service branch within the assessment area. The branch is located in Dauphin County, and is in a middle-income census tract. Bryn Mawr did not close any branches in the assessment area.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services vary in a way that inconveniences the assessment area, particularly low- and moderate-income census tracts or individuals. The single branch in the assessment area does not include an ATM or a drive-through facility, as it resides within a wealth management office. The branch operates Monday through Friday from 9 a.m. to 3 p.m., and does not offer extended weekday or Saturday hours.

<ins>Bank Products</ins>

Bryn Mawr offers a deposit product that provides greater access to banking services for low- and moderate-income customers. The bank's BMT Checking Account is a consumer account with no minimum daily balance requirement and no monthly service fee. The bank also offers a Small Business Checking account for small businesses with limited transaction activity. The account offers 500 free transaction items, with no monthly service charge and no monthly minimum balance. This account allows very small businesses access to banking services that meet their needs.

Community Development Services

Bryn Mawr provides few, if any, community development services in this assessment area. No community development service activities were reported in the Harrisburg assessment area during the evaluation period.

CRA APPENDICES

CRA APPENDIX A: SCOPE OF EXAMINATION TABLE

SCOPE OF EXAMINATION			
Time Period Reviewed			
2/23/16 - 12/2/19			
Financial Institution		**Products Reviewed**	
Bryn Mawr Trust Company		HMDA	
		Small Business	
Affiliates	**Affiliate Relationship**	**Products Reviewed**	
N/A	N/A	N/A	
List of Assessment Areas and Type of Examination			
Assessment Area	**Type of Examination**	**Branches Visited**[15]	**Other Information**
Philadelphia Assessment Area	Full-Scope	N/A	N/A
Harrisburg Assessment Area	Full-Scope	N/A	No small business lending included, due to low volume.

---

[15] No branch visits were performed in accordance with the scoping process for this evaluation. The institution's Public File was reviewed electronically.

CRA APPENDIX B: SUMMARY OF STATE AND MULTISTATE MSA RATINGS

State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Multi-State Metropolitan Area				**Satisfactory**
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Commonwealth of Pennsylvania / Full-Scope Review Assessment Area				**Needs to Improve**
Harrisburg-Carlisle, PA MSA	Needs to Improve	Needs to Improve	Low Satisfactory	Needs to Improve

CRA APPENDIX C: GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area or 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 its 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.
(1) Affordable housing (including multifamily rental housing) for low- or moderate-income individuals;
(2) Community services targeted to low- or moderate-income individuals;
(3) 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;
(4) 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 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; or
(5) Loans, investments, and services that-
    (i) Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
    (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; and
    (iii)Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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, investment, and service 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, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of 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, investment, and service 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.

CRA APPENDIX D: HMDA LOAN DISTRIBUTION TABLES

2016 HMDA LOAN DISTRIBUTION TABLE – PHILADELPHIA ASSESSMENT AREA

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	14	4.6%	4,369	4.1%	13	4.3%	1,733	1.6%
Moderate	28	9.2%	6,033	5.7%	41	13.5%	6,995	6.6%
Middle	70	23.0%	18,477	17.5%	56	18.4%	11,419	10.8%
Upper	191	62.8%	76,479	72.3%	170	55.9%	73,048	69.1%
Unknown	1	0.3%	392	0.4%	24	7.9%	12,555	11.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**304**	**100.0%**	**105,750**	**100.0%**	**304**	**100.0%**	**105,750**	**100.0%**
	Refinance							
Low	9	3.4%	3,045	4.0%	11	4.1%	1,447	1.9%
Moderate	19	7.1%	2,946	3.9%	16	6.0%	2,337	3.1%
Middle	70	26.3%	19,568	25.9%	35	13.2%	8,596	11.4%
Upper	168	63.2%	49,932	66.1%	182	68.4%	53,449	70.8%
Unknown	0	0.0%	0	0.0%	22	8.3%	9,662	12.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**266**	**100.0%**	**75,491**	**100.0%**	**266**	**100.0%**	**75,491**	**100.0%**
	Home Improvement							
Low	1	0.8%	45	0.1%	4	3.1%	330	1.0%
Moderate	8	6.3%	1,557	4.5%	13	10.2%	2,372	6.9%
Middle	29	22.7%	7,114	20.7%	17	13.3%	2,892	8.4%
Upper	90	70.3%	25,721	74.7%	89	69.5%	26,472	76.9%
Unknown	0	0.0%	0	0.0%	5	3.9%	2,371	6.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**128**	**100.0%**	**34,437**	**100.0%**	**128**	**100.0%**	**34,437**	**100.0%**
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	50.0%	2,235	58.3%	0	0.0%	0	0.0%
Middle	1	25.0%	100	2.6%	0	0.0%	0	0.0%
Upper	1	25.0%	1,500	39.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	4	100.0%	3,835	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**3,835**	**100.0%**	**4**	**100.0%**	**3,835**	**100.0%**
	HMDA Totals							
Low	24	3.4%	7,459	3.4%	28	4.0%	3,510	1.6%
Moderate	57	8.1%	12,771	5.8%	70	10.0%	11,704	5.3%
Middle	170	24.2%	45,259	20.6%	108	15.4%	22,907	10.4%
Upper	450	64.1%	153,632	70.0%	441	62.8%	152,969	69.7%
Unknown	1	0.1%	392	0.2%	55	7.8%	28,423	12.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**702**	**100.0%**	**219,513**	**100.0%**	**702**	**100.0%**	**219,513**	**100.0%**

2017 HMDA LOAN DISTRIBUTION TABLE – PHILADELPHIA ASSESSMENT AREA

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	11	3.3%	2,130	1.9%	18	5.3%	2,451	2.2%
Moderate	43	12.8%	12,971	11.8%	46	13.6%	7,675	7.0%
Middle	100	29.7%	26,183	23.9%	57	16.9%	13,080	11.9%
Upper	183	54.3%	68,194	62.3%	183	54.3%	68,147	62.2%
Unknown	0	0.0%	0	0.0%	33	9.8%	18,125	16.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**337**	**100.0%**	**109,478**	**100.0%**	**337**	**100.0%**	**109,478**	**100.0%**
	Refinance							
Low	11	7.0%	3,130	5.5%	12	7.6%	1,439	2.5%
Moderate	14	8.9%	2,510	4.4%	26	16.5%	5,127	9.1%
Middle	38	24.1%	21,461	37.9%	18	11.4%	3,244	5.7%
Upper	94	59.5%	29,384	52.0%	82	51.9%	28,396	50.2%
Unknown	1	0.6%	75	0.1%	20	12.7%	18,354	32.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**158**	**100.0%**	**56,560**	**100.0%**	**158**	**100.0%**	**56,560**	**100.0%**
	Home Improvement							
Low	1	2.4%	262	2.1%	2	4.9%	78	0.6%
Moderate	6	14.6%	2,458	19.5%	2	4.9%	35	0.3%
Middle	13	31.7%	2,547	20.2%	8	19.5%	1,038	8.2%
Upper	21	51.2%	7,326	58.2%	18	43.9%	6,348	50.4%
Unknown	0	0.0%	0	0.0%	11	26.8%	5,094	40.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**41**	**100.0%**	**12,593**	**100.0%**	**41**	**100.0%**	**12,593**	**100.0%**
	Multi-Family							
Low	2	7.4%	1,066	2.4%	0	0.0%	0	0.0%
Moderate	8	29.6%	4,478	10.2%	0	0.0%	0	0.0%
Middle	6	22.2%	27,074	61.5%	0	0.0%	0	0.0%
Upper	11	40.7%	11,412	25.9%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	27	100.0%	44,030	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**27**	**100.0%**	**44,030**	**100.0%**	**27**	**100.0%**	**44,030**	**100.0%**
	HMDA Totals							
Low	25	4.4%	6,588	3.0%	32	5.7%	3,968	1.8%
Moderate	71	12.6%	22,417	10.1%	74	13.1%	12,837	5.8%
Middle	157	27.9%	77,265	34.7%	83	14.7%	17,362	7.8%
Upper	309	54.9%	116,316	52.2%	283	50.3%	102,891	46.2%
Unknown	1	0.2%	75	0.0%	91	16.2%	85,603	38.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**563**	**100.0%**	**222,661**	**100.0%**	**563**	**100.0%**	**222,661**	**100.0%**

2018 HMDA LOAN DISTRIBUTION TABLE – PHILADELPHIA ASSESSMENT AREA

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	13	3.7%	1,919	2.0%	34	9.6%	4,957	5.0%
Moderate	79	22.4%	20,685	21.0%	79	22.4%	13,891	14.1%
Middle	91	25.8%	21,153	21.5%	59	16.7%	13,492	13.7%
Upper	170	48.2%	54,628	55.5%	163	46.2%	56,482	57.4%
Unknown	0	0.0%	0	0.0%	18	5.1%	9,563	9.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**353**	**100.0%**	**98,385**	**100.0%**	**353**	**100.0%**	**98,385**	**100.0%**
	Refinance							
Low	4	1.3%	840	1.3%	10	3.3%	1,169	1.9%
Moderate	23	7.6%	2,664	4.3%	40	13.3%	5,669	9.1%
Middle	59	19.6%	10,434	16.7%	56	18.6%	8,122	13.0%
Upper	215	71.4%	48,580	77.7%	183	60.8%	44,491	71.2%
Unknown	0	0.0%	0	0.0%	12	4.0%	3,067	4.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**301**	**100.0%**	**62,518**	**100.0%**	**301**	**100.0%**	**62,518**	**100.0%**
	Home Improvement							
Low	2	1.2%	49	0.2%	12	7.3%	968	4.6%
Moderate	4	2.4%	150	0.7%	13	7.9%	1,525	7.2%
Middle	45	27.4%	4,628	21.8%	27	16.5%	2,869	13.5%
Upper	113	68.9%	16,420	77.3%	105	64.0%	14,042	66.1%
Unknown	0	0.0%	0	0.0%	7	4.3%	1,843	8.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**164**	**100.0%**	**21,247**	**100.0%**	**164**	**100.0%**	**21,247**	**100.0%**
	Multi-Family							
Low	1	4.8%	2,150	7.5%	1	4.8%	1,300	4.5%
Moderate	9	42.9%	6,013	20.9%	0	0.0%	0	0.0%
Middle	5	23.8%	13,769	47.9%	0	0.0%	0	0.0%
Upper	6	28.6%	6,803	23.7%	1	4.8%	1,043	3.6%
Unknown	0	0.0%	0	0.0%	19	90.5%	26,392	91.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**21**	**100.0%**	**28,735**	**100.0%**	**21**	**100.0%**	**28,735**	**100.0%**
	Other Purpose LOC							
Low	1	1.9%	30	0.4%	3	5.8%	215	3.1%
Moderate	2	3.8%	112	1.6%	6	11.5%	595	8.5%
Middle	11	21.2%	1,274	18.1%	14	26.9%	935	13.3%
Upper	38	73.1%	5,607	79.8%	29	55.8%	5,278	75.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**52**	**100.0%**	**7,023**	**100.0%**	**52**	**100.0%**	**7,023**	**100.0%**

2018 HMDA LOAN DISTRIBUTION TABLE – PHILADELPHIA ASSESSMENT AREA (CONTINUED)

	HMDA							
	By Tract Income				By Borrower Income			
Income Categories	#	%	$(000s)	%	#	%	$(000s)	%
	Other Purpose Closed/Exempt							
Low	1	7.1%	132	8.3%	0	0.0%	0	0.0%
Moderate	1	7.1%	27	1.7%	3	21.4%	290	18.1%
Middle	4	28.6%	684	42.8%	5	35.7%	657	41.1%
Upper	8	57.1%	755	47.2%	6	42.9%	651	40.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**14**	**100.0%**	**1,598**	**100.0%**	**14**	**100.0%**	**1,598**	**100.0%**
	Loan Purpose Not Applicable							
Low	1	33.3%	170	29.2%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	2	66.7%	412	70.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	582	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**3**	**100.0%**	**582**	**100.0%**	**3**	**100.0%**	**582**	**100.0%**
	HMDA Totals							
Low	23	2.5%	5,290	2.4%	60	6.6%	8,609	3.9%
Moderate	118	13.0%	29,651	13.5%	141	15.5%	21,970	10.0%
Middle	215	23.7%	51,942	23.6%	161	17.7%	26,075	11.8%
Upper	552	60.8%	133,205	60.5%	487	53.6%	121,987	55.4%
Unknown	0	0.0%	0	0.0%	59	6.5%	41,447	18.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**908**	**100.0%**	**220,088**	**100.0%**	**908**	**100.0%**	**220,088**	**100.0%**

2016 HMDA LOAN DISTRIBUTION TABLE - HARRISBURG ASSESSMENT AREA

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	66.7%	1,432	92.5%	0	0.0%	0	0.0%
Upper	1	33.3%	116	7.5%	3	100.0%	1,548	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**3**	**100.0%**	**1,548**	**100.0%**	**3**	**100.0%**	**1,548**	**100.0%**
	Refinance							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	150	100.0%	1	100.0%	150	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**150**	**100.0%**	**1**	**100.0%**	**150**	**100.0%**
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
	HMDA Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	50.0%	1,432	84.3%	0	0.0%	0	0.0%
Upper	2	50.0%	266	15.7%	4	100.0%	1,698	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**1,698**	**100.0%**	**4**	**100.0%**	**1,698**	**100.0%**

2017 HMDA LOAN DISTRIBUTION TABLE - HARRISBURG ASSESSMENT AREA

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	1	25.0%	101	19.6%
Moderate	0	0.0%	0	0.0%	1	25.0%	92	17.8%
Middle	3	75.0%	265	51.4%	2	50.0%	323	62.6%
Upper	1	25.0%	251	48.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**516**	**100.0%**	**4**	**100.0%**	**516**	**100.0%**
	Refinance							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
	HMDA Totals							
Low	0	0.0%	0	0.0%	1	25.0%	101	19.6%
Moderate	0	0.0%	0	0.0%	1	25.0%	92	17.8%
Middle	3	75.0%	265	51.4%	2	50.0%	323	62.6%
Upper	1	25.0%	251	48.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**516**	**100.0%**	**4**	**100.0%**	**516**	**100.0%**

2018 HMDA LOAN DISTRIBUTION TABLE - HARRISBURG ASSESSMENT AREA

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	290	100.0%	1	100.0%	290	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**290**	**100.0%**	**1**	**100.0%**	**290**	**100.0%**
	Refinance							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	100.0%	28	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	28	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**28**	**100.0%**	**1**	**100.0%**	**28**	**100.0%**
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
	Other Purpose LOC							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	33.3%	300	79.8%	0	0.0%	0	0.0%
Upper	2	66.7%	76	20.2%	3	100.0%	376	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**3**	**100.0%**	**376**	**100.0%**	**3**	**100.0%**	**376**	**100.0%**

2018 HMDA LOAN DISTRIBUTION TABLE - HARRISBURG ASSESSMENT AREA (CONTINUED)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
	Loan Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
	HMDA Totals							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	40.0%	328	47.3%	0	0.0%	0	0.0%
Upper	3	60.0%	366	52.7%	5	100.0%	694	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**5**	**100.0%**	**694**	**100.0%**	**5**	**100.0%**	**694**	**100.0%**

CRA APPENDIX E: SMALL BUSINESS LOAN DISTRIBUTION TABLES

2016 SMALL BUSINESS LOAN DISTRIBUTION TABLE – PHILADELPHIA ASSESSMENT AREA

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
	By Tract Income							
Low	7	2.0%	3,060	2.4%	0	0.0%	0	0.0%
Moderate	34	9.7%	12,007	9.4%	0	0.0%	0	0.0%
Middle	92	26.3%	35,859	28.2%	0	0.0%	0	0.0%
Upper	208	59.4%	74,034	58.1%	0	0.0%	0	0.0%
Unknown	9	2.6%	2,375	1.9%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**350**	**100.0%**	**127,335**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	By Revenue							
Total $1 Million or Less	177	50.6%	53,537	42.0%	0	0.0%	0	0.0%
Over $1 Million	170	48.6%	73,048	57.4%	0	0.0%	0	0.0%
Not Known	3	0.9%	750	0.6%	0	0.0%	0	0.0%
Total	**350**	**100.0%**	**127,335**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	By Loan Size							
$100,000 or less	87	24.9%	5,599	4.4%	0	0.0%	0	0.0%
$100,001 - $250,000	83	23.7%	16,363	12.9%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	180	51.4%	105,373	82.8%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**350**	**100.0%**	**127,335**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	By Loan Size and Revenue $1 Million or Less							
$100,000 or less	65	36.7%	3,949	7.4%	0	0.0%	0	0.0%
$100,001 - $250,000	38	21.5%	7,088	13.2%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)- $500k (Farm)	74	41.8%	42,500	79.4%	0	0.0%	0	0.0%
Over $1 Million (Bus) -$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**177**	**100.0%**	**53,537**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE – PHILADELPHIA ASSESSMENT AREA

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	7	2.3%	2,481	2.3%	0	0.0%	0	0.0%
Moderate	28	9.1%	13,455	12.2%	0	0.0%	0	0.0%
Middle	105	34.2%	30,848	28.0%	0	0.0%	0	0.0%
Upper	164	53.4%	60,778	55.2%	0	0.0%	0	0.0%
Unknown	3	1.0%	2,500	2.3%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**307**	**100.0%**	**110,062**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	139	45.3%	42,530	38.6%	0	0.0%	0	0.0%
Over $1 Million	168	54.7%	67,532	61.4%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**307**	**100.0%**	**110,062**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	66	21.5%	3,935	3.6%	0	0.0%	0	0.0%
$100,001 - $250,000	92	30.0%	17,616	16.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	149	48.5%	88,511	80.4%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**307**	**100.0%**	**110,062**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	41	29.5%	2,309	5.4%	0	0.0%	0	0.0%
$100,001 - $250,000	40	28.8%	7,601	17.9%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)- $500k (Farm)	58	41.7%	32,620	76.7%	0	0.0%	0	0.0%
Over $1 Million (Bus) -$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	139	100.0%	42,530	100.0%	**0**	**0.0%**	**0**	**0.0%**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE – PHILADELPHIA ASSESSMENT AREA

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	16	5.2%	6,290	5.9%	0	0.0%	0	0.0%
Moderate	31	10.2%	11,423	10.7%	0	0.0%	0	0.0%
Middle	96	31.5%	37,031	34.8%	0	0.0%	0	0.0%
Upper	158	51.8%	49,309	46.4%	1	100.0%	500	100.0%
Unknown	4	1.3%	2,250	2.1%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**305**	**100.0%**	**106,303**	**100.0%**	**1**	**100.0%**	**500**	**100.0%**
By Revenue								
Total $1 Million or Less	131	43.0%	36,360	34.2%	1	100.0%	500	100.0%
Over $1 Million	174	57.0%	69,943	65.8%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**305**	**100.0%**	**106,303**	**100.0%**	**1**	**100.0%**	**500**	**100.0%**
By Loan Size								
$100,000 or less	83	27.2%	5,283	5.0%	0	0.0%	0	0.0%
$100,001 - $250,000	76	24.9%	14,673	13.8%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	146	47.9%	86,347	81.2%	1	100.0%	500	100.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**305**	**100.0%**	**106,303**	**100.0%**	**1**	**100.0%**	**500**	**100.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	49	37.4%	2,887	7.9%	0	0.0%	0	0.0%
$100,001 - $250,000	30	22.9%	5,643	15.5%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)- $500k (Farm)	52	39.7%	27,830	76.5%	1	100.0%	500	100.0%
Over $1 Million (Bus) -$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**131**	**100.0%**	**36,360**	**100.0%**	**1**	**100.0%**	**500**	**100.0%**

2016 SMALL BUSINESS LOAN DISTRIBUTION TABLE – HARRISBURG ASSESSMENT AREA

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over $1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)- $500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over $1 Million (Bus) -$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE – HARRISBURG ASSESSMENT AREA

| Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	100.0%	1,000	100.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**2**	**100.0%**	**1,000**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	1	50.0%	500	50.0%	0	0.0%	0	0.0%
Over $1 Million	1	50.0%	500	50.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**2**	**100.0%**	**1,000**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	2	100.0%	1,000	100.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**2**	**100.0%**	**1,000**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)- $500k (Farm)	1	100.0%	500	100.0%	0	0.0%	0	0.0%
Over $1 Million (Bus) -$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**500**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE – HARRISBURG ASSESSMENT AREA

| Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	500	100.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**500**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over $1 Million	1	100.0%	500	100.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**500**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	1	100.0%	500	100.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**500**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)- $500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over $1 Million (Bus) -$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

<u>**CRA APPENDIX F: ASSESSMENT AREA MAPS**</u>

Philadelphia Assessment Area – 2010 Census Data
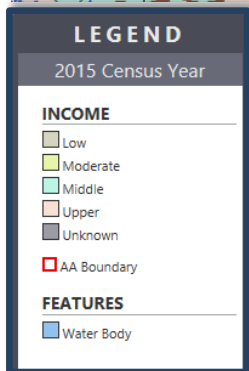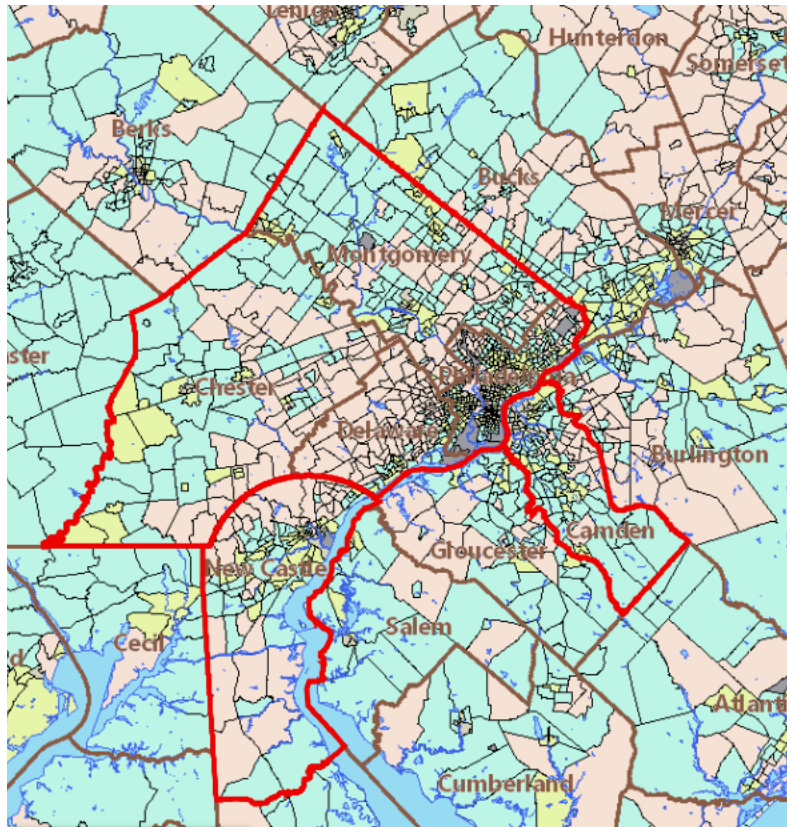
Philadelphia Assessment Area – 2015 ACS Data
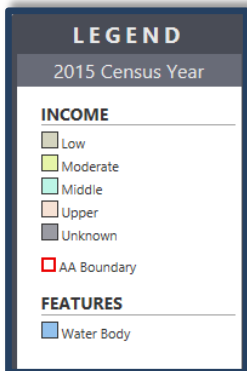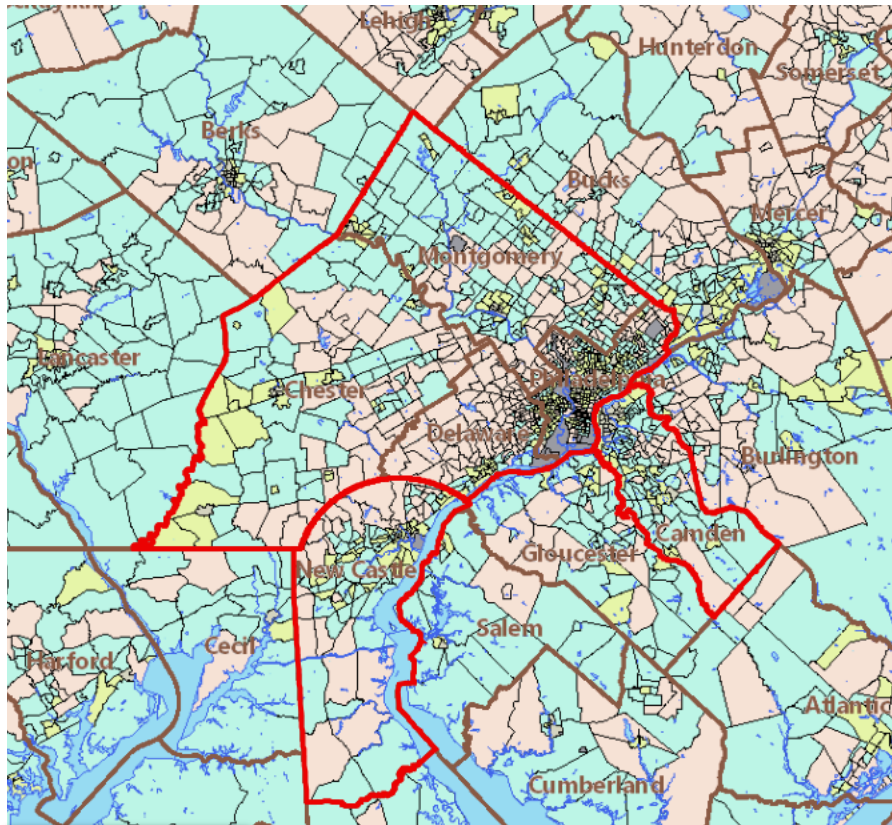
Harrisburg Assessment Area- 2010 Census Data
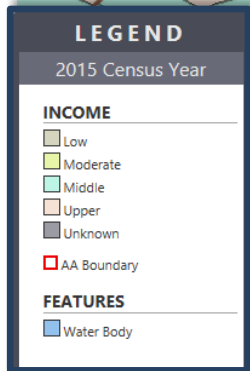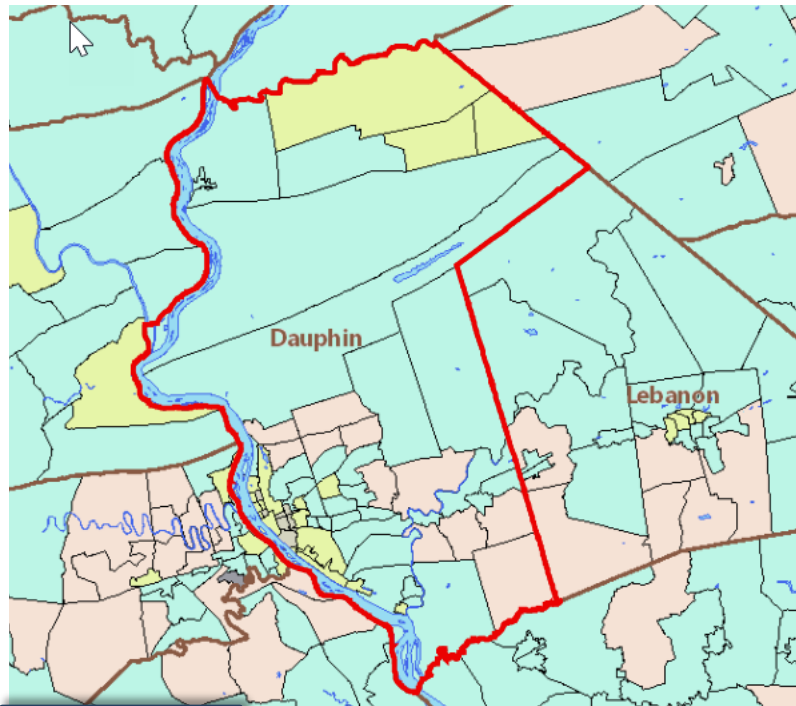
Harrisburg-Carlisle, PA MSA – 2015 ACS Data