

# **PUBLIC DISCLOSURE**

January 13, 2020

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Banco Popular de Puerto Rico

RSSD No. 940311

209 Munoz Rivera Avenue

San Juan, PR 00918

FEDERAL RESERVE BANK OF NEW YORK

33 LIBERTY STREET

NEW YORK, NY 10045

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, 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**

Institution's CRA Rating ..... 1  
Performance Test Ratings Table ..... 1  
Summary of Major Factors Supporting Ratings ..... 1

**INSTITUTION**

Description Of Institution ..... 3  
Scope of Examination ..... 5  
Conclusion With Respect To Performance Tests..... 9

**COMMONWEALTH OF PUERTO RICO**

CRA Rating For Puerto Rico ..... 19  
Description of Institution's Operations ..... 20  
Conclusions With Respect To Performance Tests ..... 23

**MSA 41980 (San Juan-Carolina-Caguas, PR) (Full Review)**

Description of Institution's Operations ..... 29  
Conclusions With Respect To Performance Tests ..... 32

**MSA 10380 (Aguadilla-Isabela-San Sebastian, PR) (Full Review)**

Description of Institution's Operations ..... 42  
Conclusions With Respect To Performance Tests ..... 45

**MSA 38660 (Ponce, PR) (Full Review)**

Description of Institution's Operations ..... 54  
Conclusions With Respect To Performance Tests ..... 57

**MSA 11640 (Arecibo, PR) (Limited Review)**

Description of Institution's Operations ..... 66  
Conclusions With Respect To Performance Tests ..... 67

**MSA 25020 (Guayama, PR) (Limited Review)**

Description of Institution's Operations ..... 68  
Conclusions With Respect To Performance Tests ..... 69

**MSA 32420 (Mayaguez, P.R.) (Limited Review)**

Description of Institution's Operations ..... 70  
Conclusions With Respect To Performance Tests ..... 71

MSA 41900 (San German-Cabo Rojo, PR) (Limited Review)	
Description of Institution's Operations .....	72
Conclusions With Respect To Performance Tests .....	73
Non-Metropolitan Puerto Rico Assessment Area (Limited Review)	
Description of Institution's Operations .....	74
Conclusions With Respect To Performance Tests .....	75
U.S. VIRGIN ISLANDS	
CRA Rating For U.S. Virgin Islands .....	76
Description of Institution's Operations .....	77
Conclusions With Respect To Performance Tests .....	78
CRA Appendix A - Aggregate Comparison Loan Distribution Tables 2017-2015 .....	83
CRA Appendix B - Summary of Ratings.....	119
CRA Appendix C - Scope of Examination .....	120
CRA Appendix D - Map of Assessment Areas .....	122
CRA Appendix E - Glossary .....	123

## INSTITUTION'S CRA RATING

**INSTITUTION'S CRA RATING: Outstanding.**

*The following table indicates the performance level of Banco Popular de Puerto Rico with respect to the lending, investment and service tests.*

PERFORMANCE LEVELS	BANCO POPULAR DE PUERTO RICO		
	PERFORMANCE TESTS		
PERFORMANCE LEVELS	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory			
Low Satisfactory		X	
Needs to Improve			
Substantial Non-compliance			

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

### Summary of Major Factors Supporting Ratings

Lending Test:

- Lending levels reflect excellent responsiveness to assessment area (AA) credit needs.
- A substantial majority of loans are made in the bank's AA.
- The geographic distribution of loans reflects good penetration throughout the AA.

- The distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibits an excellent record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making community development (CD) loans.
- Makes extensive use of innovative and/or flexible lending practices in serving AA credit needs.

Investment Test:

- An adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position.
- Makes occasional use of innovative and/or complex investments to support CD initiatives.
- Exhibits adequate responsiveness to credit and CD needs.

Service Test:

- Delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its AA.
- Record of opening and closing of branches has not adversely affected the accessibility of its delivery system, particularly to low- or moderate-income (LMI) geographies and/or LMI individuals.
- Services are tailored to convenience and needs of its AA, particularly LMI geographies and/or LMI individuals.
- A leader in providing CD services.

## INSTITUTION

### DESCRIPTION OF INSTITUTION

<b>Total assets</b>	<b>\$41.6 billion</b>
<b>Net loans &amp; leases</b>	<b>\$19.5 billion</b>
<b>Total domestic deposits</b>	<b>\$36.1 billion</b>
<b>Number of branches</b>	<b>171</b>
<b>Headquarters</b>	<b>San Juan, P.R.</b>
<b>Bank holding company</b>	<b>Popular Inc.</b>

\*Data as of December 31, 2019

Banco Popular de Puerto Rico (“Banco Popular” or “BPPR”) is a full-service commercial bank headquartered in San Juan, Puerto Rico. Banco Popular is primarily engaged in retail and commercial banking services, including automobile and equipment financing, investment banking, and broker-dealer and insurance services through specialized subsidiaries. All products and services are offered through Banco Popular’s 171 branch network and alternative delivery channels, such as by telephone, internet, or through automated teller machines (“ATMs”). BPPR is a publicly traded, wholly-owned subsidiary of Popular Inc., a multi-regional diversified financial holding company with \$52.1 billion in combined total assets as of December 31, 2019.

During the review period, BPPR was the leading financial institution in the Commonwealth of Puerto Rico (“Puerto Rico”), ranking first in deposit market share, small business lending, home purchase, refinance, and home improvement lending, and was a leader in community development lending over the examination period. BPPR operated 163 retail branches in its Puerto Rico assessment area and eight branches in the United States Virgin Islands (“USVI”) assessment area. Major competitors included Citibank N.A., HR Mortgage Corporation, First Bank Puerto Rico, Oriental Bank and Scotiabank de Puerto Rico.

Banco Popular’s assessment areas included all of Puerto Rico and the U.S. Virgin Islands. Within Puerto Rico, the assessment areas included seven Metropolitan Statistical Area (“MSAs”) assessment areas and a non-metropolitan assessment area (“non-MSA”). In the United States Virgin Islands (USVI) the assessment area consisted of one non-MSA assessment area. The assessment areas were as follows:

### **Commonwealth of Puerto Rico**

- MSA 41980 (San Juan-Carolina-Caguas, PR)
- MSA 10380 (Aguadilla-Isabela-San Sebastian, PR)
- MSA 38660 (Ponce, PR)
- MSA 11640 (Arecibo, PR) New - 2014
- MSA 25020 (Guayama, PR)
- MSA 32420 (Mayaguez, PR)
- MSA 41900 (San German-Cabo Rojo, PR)
- Non-MSA Assessment Area (Municipios of Adjuntas, Coamo, Culebra, Jayuya, Las Marias, and Maricao, Salinas and Santa Isabel, Utuado, Vieques.)

### **United States Virgin Islands**

- Non-MSA United States Virgin Islands: (Islands of St. Thomas, St. Croix and St. John)

Full scope assessment areas within Puerto Rico included: MSA 41980 (San Juan-Caguas-Guaynabo, PR), MSA 10380 (Aguadilla-Isabela-San Sebastian, PR), and MSA 38660 (Ponce, PR). The remaining assessment areas were given limited scope review due to limited lending and deposit market share and included: MSA 11640 (Arecibo, PR), MSA 25020 (Guayama, PR), MSA 32420 (Mayaguez, PR), MSA 41900 (San German-Cabo Rojo, PR), and the non-MSA assessment area.

The USVI non-MSA assessment area was given full scope review, since this was the only assessment area in the territory.

Banco Popular's assessment areas were in compliance with the requirements of Section 228.41 of Regulation BB and did not arbitrarily exclude any LMI geographies. There were no financial or legal factors that would prevent the bank from fulfilling its responsibilities under CRA.

### **Previous Performance Evaluation**

Banco Popular received an "Outstanding" rating as a result of the April 27, 2015 performance evaluation by the Federal Reserve Bank of New York. The lending test was rated "Outstanding," the investment test was rated "High Satisfactory," and the service test was rated "Outstanding."

## SCOPE OF EXAMINATION

### Procedures

BPPR's CRA performance was evaluated using the Federal Financial Institutions Examination Council's ("FFIEC") Interagency CRA Procedures for Large Retail Institutions, which consists of the lending, investment, and service tests. The evaluation considered the CRA performance context, including the bank's asset size, financial condition, market competition, assessment area demographics and credit and community development needs.

### Products

Home purchase, refinance, and home improvement loans reportable under the Home Mortgage Disclosure Act ("HMDA") and small business loans reportable under CRA were analyzed for overall lending activity. Examiners verified the integrity of a sample of 2015, 2016, 2017 and 2018 HMDA and small business loans reported by BPPR.

### Evaluation Period

HMDA-related and CRA small business loans originated or purchased between January 1, 2015, and December 31, 2018, were verified and analyzed. Due to changes in HMDA reporting requirements in 2018, 2018 loan data is separate from 2017, 2016, and 2015 loan data. Examiners also evaluated community development loans, qualified investments, and community development services from April 1, 2015 and June 30, 2019.

### Lending Distribution Analysis

The analyses of borrower and geographic distribution were based on loans made in BPPR's assessment areas.

In order to analyze the borrower characteristics of HMDA-related loans, the proportion of originations to LMI and non-LMI borrowers was compared with the proportion of LMI families and non-LMI families in the assessment areas. Income estimates from the American Community Survey ("ACS") were used to categorize borrower income. ACS-adjusted median family income ("MFI") figures for 2015 were used to categorize borrower income level for 2015 loans, ACS-adjusted MFI figures for 2016 were used to categorize 2016 loans, ACS-adjusted MFI figures for 2017 were used to categorize 2017 loans, and ACS-adjusted MFI figures for 2018 were used to categorize borrower income level for 2018 loans. Dun and Bradstreet (D&B) data for 2015, 2016, 2017 and 2018 were used for demographic information relating to the proportion of businesses with gross annual revenues ("GAR") of less than or equal to \$1 million. The size of the small business loans were also used as a proxy to identify lending to smaller businesses.



To evaluate geographic distribution of HMDA-related loans, examiners analyzed the proportion of loan originations in LMI and non-LMI geographies compared with the proportion of owner-occupied housing units in those geographies. With regard to small business loans, the analysis compared the proportion of loan originations with the proportions of businesses located in LMI and non-LMI geographies. Performance with regard to geographic distribution in low-income geographies was analyzed separately from performance in moderate-income geographies.

BPPR's HMDA and small business lending performances for 2015, 2016, 2017 and 2018 were also compared with the 2015, 2016, 2017 and 2018 aggregate performance of all lenders in BPPR's assessment areas subject to HMDA and/or CRA small business reporting, except the USVI. Market aggregate data for HMDA-related and small business data was not available for the USVI.

Only loans inside the assessment areas were included in the analysis of geographic and borrower distribution. Before reaching a conclusion about the bank's overall performance regarding geographic distribution and borrower characteristics in each assessment area, examiners gave greater weight to certain loan products. In each assessment area, a product's volume compared with total retail lending volume determined the weight of a product's performance in the overall conclusion. Multifamily loans were not analyzed for geographic and borrower loan distribution in any assessment area, as the volume was insufficient; however, multifamily loans were considered in the evaluation of assessment area concentration and community development lending.

### **Community Development Activity Analysis**

Community development activities were reviewed to determine whether activities had community development as a primary purpose and whether the community development activities benefitted the assessment area. The eligibility of a loan, investment, or service as a community development activity was based on demographic information at the time the community development activity was undertaken. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to understand the volume of activity impacting a particular assessment area, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted using annualized metrics to gauge the relative performance of the institution in a particular assessment area.

Summary of Key Assessment Area Data			
	PUERTO RICO	USVI	TOTAL
<b>Total Population*</b>	<b>3,808,610</b>	<b>96,815</b>	<b>3,905,425</b>
<b>Population % of AA population</b>	<b>98%</b>	<b>2%</b>	<b>100%</b>
<b>Families</b>	<b>1,008,555</b>	<b>26,636</b>	<b>1,035,191</b>
<b>Families % of AA families</b>	<b>97%</b>	<b>3%</b>	<b>100%</b>
<b>Total Census Tracts*</b>	<b>823</b>	<b>32</b>	<b>855</b>
<b>Tracts % AA tracts</b>	<b>96%</b>	<b>4%</b>	<b>100%</b>
<b>LMI tracts</b>	<b>219</b>	<b>8</b>	<b>227</b>
<b>LMI tracts % all AA LMI tracts</b>	<b>96%</b>	<b>4%</b>	<b>100%</b>
<b>Total Owner-Occupied Units*</b>	<b>919,711</b>	<b>18,678</b>	<b>938,389</b>
<b>Units % of AA units</b>	<b>98%</b>	<b>2%</b>	<b>100%</b>
<b>Business Establishments **</b>	<b>31,446</b>	<b>1,331</b>	<b>32,777</b>
<b>Bus. est. % AA bus. est.</b>	<b>96%</b>	<b>4%</b>	<b>100%</b>
<b>Number of Branches *</b>	<b>163</b>	<b>8</b>	<b>171</b>
<b>Branches % all branches</b>	<b>95%</b>	<b>5%</b>	<b>100%</b>
<b>Branches in LMI tracts</b>	<b>44</b>	<b>4</b>	<b>48</b>
<b>LMI branches % AA LMI branches</b>	<b>92%</b>	<b>8%</b>	<b>100%</b>
<b>Branch Deposits (\$'000s) ***</b>	<b>31,287,000</b>	<b>1,110,000</b>	<b>32,397,000</b>
<b>Deposits % AA deposits</b>	<b>97%</b>	<b>3%</b>	<b>100%</b>
<b>Deposit Market Share (%)/ Rank in Market***</b>	<b>97%/1</b>	<b>44%/1</b>	
<b>Home Purchase Originations****</b>	<b>18,019</b>	<b>93</b>	<b>18,112</b>
<b>HP originations % AA orig.</b>	<b>99%</b>	<b>1%</b>	<b>100%</b>
<b>Refinance Originations ****</b>	<b>8,301</b>	<b>54</b>	<b>8,355</b>
<b>Refi orig. % AA orig.</b>	<b>99%</b>	<b>1%</b>	<b>100%</b>
<b>Home Improvement Originations****</b>	<b>13,705</b>	<b>6</b>	<b>13,711</b>
<b>Home Improvement orig. % AA orig.</b>	<b>100%</b>	<b>0%</b>	<b>100%</b>
<b>Small Business Originations ****</b>	<b>39,832</b>	<b>304</b>	<b>40,136</b>
<b>SB orig. % AA orig.</b>	<b>99%</b>	<b>1%</b>	<b>100%</b>
<b>Combined Loan Totals****</b>	<b>64,615</b>	<b>457</b>	<b>65,072</b>
<b>% of AA Orig.</b>	<b>99%</b>	<b>1%</b>	<b>100%</b>
* Source: 2010 Census Data.			
** Source: 2018 D&B USVI for CX			
*** Source: FDIC Summary of Deposit Data as of June 30, 2018			
**** Originations include Originations and loans purchased between Jan. 1, 2015 and December 31, 2018			

## **Deriving Overall Conclusions**

In deriving overall conclusions, BPPR's performance in Puerto Rico received the most weight in determining the overall rating because of the high concentration of deposits, branches, and lending in this commonwealth. BPPR's performance in the Puerto Rico assessment areas accounts for 96.6% of its total retail deposits and 99.3% of total HMDA-reportable and small business lending activity. Performance in the USVI had the second highest weight in determining the bank's overall rating.

In reaching a conclusion about BPPR's overall performance within an individual assessment area, products were weighted based on their volume in that area. For additional details, see the Summary of Key Assessment Area Data table, which contains a summary of data for all rated areas.

Demographic and economic information also impacted BPPR's performance context and is discussed in detail within each full-scope assessment area. Information was obtained from publicly available sources including the U.S. Department of Commerce's Bureau of the Census 2010, the American Community Survey, and the U.S. Department of Labor.

In order to derive the Commonwealth rating, full-scope assessment areas were weighted based on the proportion of loan originations and deposits in each. As a result, MSA 41980 (San Juan-Carolina-Caguas, PR) had a significant impact on assessing the overall performance of the bank, capturing 84.9% of the branch deposits and 68.7% of total loans within Puerto Rico. Two additional assessment areas, MSA 10380 (Aguadilla-Isabela-San Sebastian, PR) and MSA 38660 (Ponce, PR), that had lesser but important impacts on the overall rating, were also chosen as full scope assessment areas.

Limited review was conducted of the bank's performance in the other Puerto Rico assessment areas. The combined full-review areas make up 83.4% of the bank's loans by number and 78.3% by dollar volume, 81.6% of the branches, and 91.9% of deposits in the Commonwealth.

## **Community Contacts**

In order to learn more about community credit needs, examiners conducted interviews and received comments from three non-profit agencies.

The first community contact was held with a Community Development Financial Institution ("CDFI") operating throughout the Island of Puerto Rico, and that is now beginning to operate in the U.S. Virgin Islands. The CDFI's main foci include workforce, housing and economic development. The CDFI representative stated that access to capital, particularly for small loans to businesses ranging from \$10,000 to \$100,000 was especially needed, particularly in rural areas and to "mom and pop" small businesses. The representative said that funding had come to the CDFI from mainland banks rather than local banks due to the Interagency Statement on CRA Consideration for Community Development Activities in the U.S. Virgin Islands and Puerto Rico Following Hurricane Maria. The Hurricane disaster waiver provides credit to financial institutions outside of Puerto Rico and the U.S. Virgin Islands that offer community development activities to benefit people and areas impacted by Hurricane Maria. Nonetheless, the

representative positively noted BPPR's Startup Program, which set aside \$1.0 million for lending to businesses; however, many of these businesses might qualify for a loan irrespective. The representative stated that entities with collateral issues or credit blemishes and located in rural areas are especially in need of assistance.

A second community contact was conducted with an organization formed from a consortia of Puerto Rican banks in 1998. Since 2014, they have lent to non-profits through the Community Financing Fund, which focuses on many areas including renewable energy and access to water and takes a holistic approach in working with youth. All banks in Puerto Rico have invested in the Fund, which supports affordable housing and economic development. The representative noted that economic conditions were weak, as poverty and unemployment are still high compared to the mainland. The representative also stated the banks were doing well with community development activities but that they could do more. The representative stated that banks need to become more aggressive and creative, and help small businesses with resiliency, sustainability, and capital access.

A third community contact was held with a representative of the USVI hotel industry. The representative noted that the Hurricanes devastated the Virgin Islands' hotel industry. However, by the end of 2020, the vast majority were expected to re-open. The representative highlighted the need for loans for economic development and for affordable housing. The representative also noted that, prior to the storms, only large-dollar multi-use financing was available, including loans for \$100,000, but not smaller loans. However, with insurance money coming in after the Hurricanes, the representative has seen small and micro-loans recently become available.

## **CONCLUSION WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

BPPR's overall performance in meeting the credit needs of its assessment area is rated *outstanding*, based on excellent performance in Puerto Rico and good performance in the USVI. The major factors contributing to this overall rating are excellent responsiveness to the retail credit needs of the community, leadership in extending community development loans, and good geographic and borrower distribution for HMDA and small business loans.

#### **Lending Activity**

BPPR's responsiveness to the retail credit needs of its assessment areas was excellent, given the bank's capacity to meet assessment area credit needs and overall market conditions including the state of the housing market and overall weak economic conditions. This was determined by evaluating the volume of HMDA-related and small business loans originated or purchased during the evaluation period. This conclusion is based on excellent performance in Puerto Rico and good performance in the USVI. Lending activity is primarily in Puerto Rico, which accounted for 99.3% of all HMDA and small business lending activity.

Overall, 81,011 home purchase, refinance, home improvement, and small business loans were made during the evaluation period, totaling \$7.0 billion as indicated in the Summary of Lending Activity table below. This represents a decline of 10.3% by number and 16.3% dollar volume of loans on an annualized basis compared to the previous evaluation. These declines were attributable to the many performance context challenges described in the Commonwealth of Puerto Rico section below.

<b>SUMMARY OF LENDING ACTIVITY</b> <b>January 1, 2015 – December 31, 2018</b>				
LOAN TYPE	#	%	\$(000s)	%
HOME PURCHASE	18,112	22.5	\$2,440,513	35.1
REFINANCINGS	8,360	10.4	\$1,114,927	16.0
HOME IMPROVEMENT	13,368	16.6	\$264,793	3.8
MULTI-FAMILY	37	0.1	\$52,654	0.8
<b>TOTAL HMDA-RELATED</b>	<b>39,877</b>	<b>49.5</b>	<b>\$3,872,887</b>	<b>55.6</b>
<b>SMALL BUSINESS</b>	<b>40,173</b>	<b>49.8</b>	<b>\$3,030,897</b>	<b>43.5</b>
<b>TOTAL SMALL BUSINESS</b>	<b>40,173</b>	<b>49.8</b>	<b>\$3,030,897</b>	<b>43.5</b>
<b>SMALL FARM</b>	<b>592</b>	<b>0.7</b>	<b>\$58,077</b>	<b>0.8</b>
<b>TOTAL LOANS</b>	<b>80,642</b>	<b>100.0</b>	<b>\$6,961,861</b>	<b>100.0</b>

Note: This table includes bank and affiliate loans made within the evaluation period.

## Assessment Area Concentration

BPPR's responsiveness to the retail credit needs of its assessment areas was excellent. A substantial majority of the loans originated by BPPR were extended in the bank's assessment areas as detailed in the charts below. The Lending Inside and Outside the Assessment Area charts below indicates a substantial majority of HMDA and small business loans within the assessment areas, both from January 1, 2015 through December 31, 2017, and from January 1, 2018 through December 31, 2018. BPPR extended all of its loans in 2015 through 2017, and all but a fraction of a percent of its loans in 2018 to individuals and businesses within its assessment areas demonstrating excellent performance in meeting the credit needs of Puerto Rico and the USVI.

Lending Inside and Outside the Assessment Area								
January 1, 2015 - December 31, 2017								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HOME PURCHASE	14,147	100.0	\$1,887,009	100.0	0	0.0	\$0	0.0
REFINANCINGS	7,549	100.0	\$1,004,631	100.0	0	0.0	\$0	0.0
HOME IMPROVEMENT	13,365	100.0	\$263,863	100.0	0	0.0	\$0	0.0
MULTI-FAMILY	35	100.0	\$51,046	100.0	0	0.0	\$0	0.0
<b>TOTAL HMDA-RELATED</b>	<b>35,096</b>	<b>100.0</b>	<b>\$3,206,549</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>\$0</b>	<b>0.0</b>
<b>TOTAL SMALL BUSINESS RELATED</b>	<b>30,179</b>	<b>100.0</b>	<b>\$2,282,903</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>\$0</b>	<b>0.0</b>
<b>TOTAL SMALL FARM RELATED</b>	<b>468</b>	<b>100.0</b>	<b>\$43,552</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>\$0</b>	<b>0.0</b>
<b>TOTAL LOANS</b>	<b>65,743</b>	<b>100.0</b>	<b>\$5,533,004</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>\$0</b>	<b>0.0</b>

Note: This table includes bank and affiliate loans made within the evaluation period.

Lending Inside and Outside the Assessment Area								
January 1, 2018 - December 31, 2018								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
HOME PURCHASE	3,965	100.0	\$553,504	100.0	0	0.0	\$0	0.0
REFINANCINGS	810	99.9	\$109,946	99.7	1	0.1	\$350	0.3
HOME IMPROVEMENT	3	100.0	\$930	100.0	0	0.0	\$0	0.0
MULTI-FAMILY	2	100.0	\$1,608	100.0	0	0.0	\$0	0.0
<b>TOTAL HMDA-RELATED</b>	<b>4,780</b>	<b>100.0</b>	<b>\$665,988</b>	<b>99.9</b>	<b>1</b>	<b>0.0</b>	<b>\$350</b>	<b>0.1</b>
<b>TOTAL SMALL BUSINESS RELATED</b>	<b>9,994</b>	<b>100.0</b>	<b>\$747,994</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>\$0</b>	<b>0.0</b>
<b>TOTAL SMALL FARM RELATED</b>	<b>124</b>	<b>100.0</b>	<b>\$14,525</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>\$0</b>	<b>0.0</b>
<b>TOTAL LOANS</b>	<b>14,898</b>	<b>100.0</b>	<b>\$1,428,507</b>	<b>100.0</b>	<b>1</b>	<b>0.0</b>	<b>\$350</b>	<b>0.0</b>

Note: This table includes bank and affiliate loans made within the evaluation period.

## Geographic Distribution

BPPR exhibited good overall loan penetration in LMI geographies, based on good performance in Puerto Rico and in the USVI. The analysis considered performance context factors such as the number of owner-occupied housing units in LMI geographies and the market aggregate's performance. Demand for residential mortgage products typically is tied to the availability of owner-occupied housing units. For

HMDA-related loans, conclusions were based primarily on performance in moderate-income geographies, as the very low number of owner-occupied units (OOU) in low-income tracts makes it difficult to extend HMDA-related loans in those geographies.

### **Distribution by Borrower Income and Revenue Size of Business**

The distribution of loans among borrowers of different income levels and businesses of different sizes was good overall based on good performance in Puerto Rico and in the USVI, particularly given the wide disparity between housing prices and incomes, which generally places owner-occupied housing beyond the reach of LMI families. This disparity also makes the available market for refinancings to LMI families very limited. Performance relative to moderate-income borrowers was given the most weight because of housing affordability. This rating also considers the excellent penetration among businesses of different sizes.

### **Innovative or Flexible Lending Practices**

BPPRs makes extensive use of innovative and/or flexible lending practices in serving assessment area credit needs. A number of BPPR's products were responsive to specific community needs in the bank's assessment areas, as illustrated below:

- SBA lender programs were offered, including the Certified Lenders Program (CLP) and Preferred Lenders Program (PLP). In Puerto Rico, only two banks have this certification. Also, the SBA 504 program was offered.
- Pronto Popular (First Home Club) in conjunction with Federal Home Loan Bank, assists LMI borrowers to save by contributing \$4 for every \$1 saved toward down payment or closing costs.
- HOME Investment Partnerships Program provides grants to state and municipalities to promote homeownership through the Puerto Rico Housing Authority and HUD to entitlement Municipalities.
- The Enhanced Portfolio Program, offered by Popular Mortgage, is designed for borrowers with adverse credit histories and limited incomes. The program acts as an alternative for people who do not qualify under FHA or FNMA requirements.
- Puerto Rico Law 87 - The purpose of this program is to provide mortgage insurance for the purchase of a home for low- and moderate-income families, qualified through FHA Mortgage Insurance guidelines through the Puerto Rico Housing Finance Agency ("PRHFA").
- For individuals and businesses impacted by Hurricanes Irma and Maria, payment moratoriums were offered to eligible customers in mortgage, consumer, auto and commercial loans. The bank waived late fees in personal loans, auto loans, mortgages and credit cards between September 18 and

December 31, 2017. Collection efforts, including mortgage foreclosures, were suspended during this period.

- BPPR also offered two Disaster Recovery Grant Programs, the Homeowner Recovery Grant and the Small Business Recovery Grant. These programs were intended to assist homeowners and small businesses in Puerto Rico and the U.S. Virgin Islands that sustained damage as a direct result of Hurricanes Irma and Maria in September 2017. BPPR served as intermediary and was responsible for identifying potential beneficiaries and for collecting, verifying and retaining eligibility documentation.
- StartUp Popular is a strategically structured loan that meets the needs and profiles of start-up clients. It provides lower interest rates and payments during initial repayment. In addition, it provides up to a full year of lower payments to invest the provided funds and build a healthy cash flow. Other benefits include commercial service fee discounts such as: free online banking for 12 months and free commercial checking account for 12 months, direct service with the StartUp team, and free marketing through the StartUp initiative campaign.
- Other programs include:
  - Section 8 to Homeownership – Housing Choice Voucher Program
  - Law 124 payment subsidy
  - Mi Casa Propia – Assistance to working people with limited resources
  - Neighborhood Stabilization Program – LMI receive discount toward down payment toward purchase of foreclosed or abandoned homes
  - Programa Cierro Seguro – provides 100% financing to customers without savings to buy a home
  - Veteran’s Administration Loans
  - Special loan modifications

## **Community Development Lending**

Banco Popular is a leader in making community development loans. During the evaluation period, the bank originated a total of approximately \$2.2 billion in 1,102 loans across its combined assessment area, a substantial increase from its performance at the previous evaluation, representing a 35.2% increase by number and 29.8% increase by dollar amount. BPPR originated 91.7% of the loans by dollar amount in its full review assessment areas. Most notably, community development lending increased by approximately \$565.6 million in MSA 41980 (San Juan-Carolina-Caguas, PR). The increase can be attributed to the bank’s strong presence in the San Juan market area. In addition, mild economic broadening and the 2017 Hurricanes led to further community development lending opportunities. In 2017, 100.0% of Puerto Rico and the USVI were declared disaster areas. Community development loans were originated in all nine assessment areas; please refer to the individual assessment area sections of this evaluation for further details.



As illustrated in the Qualified Community Development Loans table below, the bank primarily provides community development lending for community services and economic development, which combined, account for 91.3% of overall qualified loans by number and 71.0% by dollar amount. The bank’s community development loans were responsive to assessment area needs. Loans included affordable housing, and rehabilitation of property for low- and moderate-income families. All of the development was affordable to 100.0% of residents; no market rate units were anticipated.

<b>Qualified Community Development Loans</b>										
<b>April 1, 2015 – June 30, 2019</b>										
Assessment Area	Affordable Housing		Economic Development		Community Service		Revitalization and Stabilization		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
<b>Puerto Rico</b>										
MSA 41980 (San Juan-Carolina-Caguas, PR) FULL SCOPE	34	\$194,141	94	\$530,113	592	\$731,323	21	\$321,678	741	\$1,777,255
MSA 10380 (Aguadilla-Isabela-San Sebastian, PR) FULL SCOPE	6	\$30	4	\$8,715	84	\$12,335	4	\$12,450	98	\$33,530
MSA 38660 (Ponce, PR) FULL SCOPE	4	\$7,853	10	\$85,190	56	\$21,468	4	\$29,900	74	\$144,411
MSA 11640 - Arecibo, PR	1	\$5	20	\$8,834	14	\$7,693	1	\$50	36	\$16,582
MSA 25020 - Guayama, PR	1	\$6,300	6	\$72,339	3	\$30	0	\$0	10	\$78,669
MSA 32420 - Mayaguez, PR	3	\$1,488	13	\$34,253	36	\$10,383	1	\$188	53	\$46,311
MSA 41900 - San German - Cabo Rojo, PR	3	\$6,054	1	\$1,100	15	\$13,100	0	\$0	19	\$20,254
Non-MSA AA (Municipalities of Adjuntas, Coamo, Culebra, Jayuya, Santa Isabel, Salinas, Utuado, Las Marias, Maricao and Vieques)	5	\$6,815	11	\$15,660	30	\$2,198	0	\$0	46	\$24,673
<b>Puerto Rico</b>	<b>57</b>	<b>\$222,685</b>	<b>159</b>	<b>\$756,204</b>	<b>830</b>	<b>\$798,530</b>	<b>31</b>	<b>\$364,265</b>	<b>1,077</b>	<b>\$2,141,685</b>
<b>U.S. Virgin Islands</b>										
U.S. Virgin Islands	0	\$0	3	\$23,400	14	\$18,670	8	\$65,750	25	\$107,820
<b>Total Community Development Loans</b>	<b>57</b>	<b>\$222,685</b>	<b>162</b>	<b>\$779,604</b>	<b>844</b>	<b>\$817,200</b>	<b>39</b>	<b>\$430,015</b>	<b>1,102</b>	<b>\$2,249,505</b>
<b>Percent of Total</b>	<b>5.2%</b>	<b>9.9%</b>	<b>14.7%</b>	<b>34.7%</b>	<b>76.6%</b>	<b>36.3%</b>	<b>3.5%</b>	<b>19.1%</b>	<b>100%</b>	<b>100%</b>

## INVESTMENT TEST

BPPR's investment test performance is rated *low satisfactory* based on adequate investment activity in its individual full scope assessment areas as well as the combined assessment area.

The bank made an adequate level of qualified investments and donations (also known as grants) during the review period. Over 51 months, the bank invested \$163.7 million through 33 investments, and donated an additional \$18.2 million in 1,982 donations to its combined assessment area. Of the total investments, \$69.6 million represented current period activity, while \$94.1 million represented prior period activity still outstanding. This activity was exclusively mortgage backed securities, each of which benefitted multiple assessment areas. Therefore, during this evaluation, the investments were allocated to the broader Island-wide area and received the same credit as investments targeted to the individual full-scope assessment areas. During the previous evaluation, BPPR invested \$184.0 million and donated \$11.0 million. The decrease in activity was noteworthy considering the difference in the lengths of the review periods: the previous evaluation review period lasted 27 months, while the current evaluation review period lasted 51 months. When these review period lengths are taken into consideration, the bank’s annualized level of investment represented a 52.9% decrease between exams, and the bank’s level of donations represented a 12.4% decrease. Moreover, while BPPR ranked first out of five peers relative to investments as a percentage of Tier 1 capital, it ranked third out of five peers relative to investments made as a percentage of average assets, and fourth out of five peers, relative to investments as a percentage of deposits. At the previous evaluation, BPPR ranked first among peers in all three categories.

There has been a shift in investment opportunity Island-wide since the previous evaluation. Puerto Rico's government was no longer issuing general obligation bonds, in which BPPR invested traditionally, due to increasing economic strain. Government investment was hampered by the continuing recession across the Island; however, new opportunities for both public-private and private investment existed in the wake of Hurricanes Irma and Maria. The Island was declared a disaster area during the review period, making investment in organizations working to revitalize and stabilize available, particularly with respect to infrastructure. In addition, the need for donations has risen substantially since the previous evaluation due to the hurricane. Consequently, while BPPR's performance context relative to investments has changed between examinations, it has not changed to the extent that would completely mitigate the decrease in investment and donations detailed above.

The bank made occasional use of innovative and complex investments to support CD initiatives. Out of 33 total investments, one was complex and another was innovative. BPPR established Popular Community Capital ("PCC") in 2016 aimed at job creation and support services for LMI individuals and communities. PCC accomplishes this by providing capital to small businesses located in LMI census tracts, and to businesses of all sizes serving LMI individuals. PCC qualifies for a New Markets Tax Credit, a complex structure aimed at serving low-income communities. In 2017, BPPR established the Popular Mezzanine Fund, an innovative way to invest in the Island amid the shift in available government investment vehicles. This Fund was aimed exclusively at meeting the credit needs of Puerto Rico communities, including those that were LMI, as public welfare investments. Economic development and job creation were at its forefront, as was providing capital to those unable to obtain traditional financing. Of note, during the review period, the Fund's investments had strictly targeted rehabilitation and growth resulting from Hurricane Maria. BPPR invested a total of \$56.8 million in one innovative and one complex investment during the review period.

BPPR exhibited adequate responsiveness to credit and community development needs. The bank invested and donated approximately \$181.9 million across Puerto Rico during the review period, supporting small businesses, creating jobs, serving LMI individuals, and working to rebuild the Island after Hurricane Maria. Its work was responsive to community needs, given the extent of need demonstrated in the performance context, the length of the review period, and the institution's resources. BPPR's investment activity is illustrated in the Qualified Investments and Grants Summary table below.

Qualified Investments and Grants Summary										
April 1, 2015 - June 30, 2019										
Assessment Area	#	AH (\$000s)	#	CS (\$000s)	#	ED (\$000s)	#	R/S (\$000s)	#	Total (\$000s)
MSA 41980 (San Juan-Carolina- Caguas, PR)	0	\$0	1,331	\$12,719	75	\$1,734	16	\$4,555	1,422	\$19,008
MSA 10380 (Aguadilla-Isabella-San Sebastian, PR)	0	\$0	51	\$305	4	\$45	0	\$0	55	\$350
MSA 38660 (Ponce, PR)	0	\$0	79	\$606	3	\$17	0	\$0	82	\$623
MSA 32420 (Mayaguez, PR)	0	\$0	157	\$696	0	\$0	0	\$0	157	\$696
MSA 41900 (San German-Cabo Rojo, PR)	0	\$0	12	\$19	3	\$4	0	\$0	15	\$23
MSA 25020 (Guayama, PR)	0	\$0	5	\$13	0	\$0	0	\$0	5	\$13
MSA 11640 (Arecibo, PR)	0	\$0	33	\$118	3	\$23	0	\$0	36	\$141
Non-MSA AA (Municipalities of Adjuntas, Coamo, Culebra, Jayuya, Santa Isabel, Salinas, Utuado, Las Marias, Maricao and Vieques)	0	\$0	16	\$148	0	\$0	0	\$0	16	\$148
Broader Statewide or Regional Area	30	\$102,987	46	\$172	2	\$56,800	2	\$697	80	\$160,656
USVI	0	\$0	139	\$219	8	\$31	0	\$0	147	\$250
Total Qualified Investments	30	\$102,987	1,869	\$15,015	98	\$58,654	18	\$5,252	2,015	\$181,908
Percent Total # / \$ Investments	1%	57%	93%	8%	5%	32%	1%	3%	100%	100%

\*For the purposes of this Performance Evaluation, the Broader Statewide or Regional Area reflects activity conducted that benefited the entirety of the Commonwealth of Puerto Rico.

## SERVICE TEST

Service test performance is rated *outstanding* in Puerto Rico and in the USVI. Delivery systems were readily accessible to geographies and individuals of different income levels in both Puerto Rico and the USVI, and the bank was a leader in providing community development services in Puerto Rico, while providing a relatively high level of services in the USVI.

## Retail Services

BPPR's branches were readily accessible to all portions of its assessment areas. The bank operated 171 branches, of which 14 (8.2%) were located in low-income tracts, 34 (19.9%) were in moderate-income

tracts, 61 (35.7%) in middle-income tracts, 60 (35.1%) were in upper-income tracts, and two (1.2%) were in tracts that were not classified. Of the bank's total branches, 48 (28.1%) were in LMI areas, compared to 26.7% of the assessment areas' population residing in LMI areas. Additionally, ten (5.8%) of the branches were in distressed or underserved non-metropolitan middle-income geographies.

Alternative delivery systems somewhat enhanced BPPR's performance in its assessment areas. BPPR operated a total of 633 ATMs throughout its assessment areas, of which 325 ATMs were located on-site at BPPR's branches. Of the 308 ATMs located off-site, 13 (4.2%) were located in low-income geographies and 46 (14.9%) were in moderate-income geographies. BPPR offers alternative delivery systems such as bank-by-mail, internet banking, mobile banking, Mi Banco Alerts, 4 interactive retail kiosks, and 7 kiosks for commercial customers. In addition, BPPR provides 24/7/365 customer service.

BPPR's record of opening and closing branches did not adversely affect the overall accessibility of its delivery systems to low- and moderate-income geographies and individuals. During the evaluation period, BPPR acquired eight branches, each of which were located in middle- and upper-income census tracts. BPPR also consolidated thirteen branches into existing branches, three of which were located in moderate-income census tracts, and relocated two branches, of which one branch was in a moderate-income census tract.

Saturday, Sunday, and holiday hours were widely scheduled and tailored to meet the convenience and needs of the assessment areas, particularly LMI geographies and individuals. Of the 48 branches in LMI areas, 25 (52.1%) had Saturday, Sunday or holiday hours.

### **Community Development Services**

Overall, BPPR was a leader in providing community development services, as the bank was a leader in community development services in Puerto Rico and maintained relatively high performance in the USVI.

The Community Development Services table below illustrates the type and number of community development services provided. These community development events included sponsorship and participation in a significant number of financial education seminars targeted to LMI individuals, and technical assistance provided to community organizations and small businesses.

The following are examples of community development services that target LMI individuals and also provide technical assistance to small businesses and community organizations:

<b>COMMUNITY DEVELOPMENT SERVICES ALL ASSESSMENT AREAS</b>	
<b>PURPOSE</b>	<b>Number</b>
Financial Education	3,645
Economic Development	194
Technical Assistance	254
Board Participations	196
Small Business Seminars	25
<b>TOTAL</b>	<b>4,314</b>

- BPPR was responsive to LMI community needs following Hurricane Maria by launching a relief effort known as *Embracing Puerto Rico*. Various services were performed with the purpose of stabilizing communities and helping them recover after the disaster in areas such as infrastructure, economic development, education, and mental health. Initial efforts following the hurricane included assistance in filing claims with FEMA and other government agencies, and in providing food, first aid supplies, and other needed items.
- *Finanzas en Tus Manos (Finances in Your Hands)* provided financial-related training in areas including the advantages of good saving practices, essential aspects of finance, and offering a platform for users to create a self-assessment to identify how the user is performing with their finances.
- The bank held a series of conferences providing technical assistance to 1,928 business owners by providing information and tools to help small businesses grow.
- BPPR conducted the *Teach Children to Save* program, a national campaign sponsored by the American Bankers Association, which raises awareness about the roles that banks and bankers play in helping young people to develop lifelong savings habits. The program was primarily offered in the public school system in schools where the majority of students qualify for free and reduced rate lunches.
- BPPR offered training and seminars related to homeownership and affordable housing products and programs through its *Vivenda Popular* unit. The training and seminars were provided to professional groups, community-based organizations and government agencies.
- BPPR's *Echar Pa'lante* economic development initiative provided a support network for entrepreneurs through offering entrepreneurship workshops for teachers that provided information on how teachers could develop business clubs in their respective schools. *Echar Pa'lante* also supports local entrepreneurs by providing the necessary tools, tutorships and services to support their businesses.
- An officer served as president of an organization promoting economic development by providing operational and technical assistance, as well as providing training and financing to non-profit community organizations through-out Puerto Rico.

In addition, BPPR employees served on numerous boards or as key members of committees of 196 community development organizations, providing financial management expertise and technical assistance to these organizations. See the Summary of Community Development Services table below. The missions of these organizations were targeted to providing a wide array of affordable housing and community development services.

<b>COMMUNITY DEVELOPMENT SERVICES – ASSISTANCE LEVELS ALL ASSESSMENT AREAS April 1, 2015 – June 30, 2019</b>	
<b>Activity Type</b>	<b>Number of Activities</b>
On-Going Board & Committee Memberships	196
Technical Assistance	254
Seminars and Other Services	3,864
<b>Total Community Development Services</b>	<b>4,314</b>

## **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”) established the Consumer Financial Protection Bureau (CFPB). In general, the Dodd-Frank Act gives the CFPB, among other things, primary examination and enforcement authority over insured depository institutions with total assets of more than \$10 billion when assessing compliance with the requirements of Federal consumer financial laws, including BPPR. The Federal Reserve, however, retains authority to enforce compliance with BPPR’s CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation from January 1, 2015 through December 31, 2018, the Federal Reserve did not cite violations involving discriminatory or other illegal credit practices that adversely affected the Federal Reserve's evaluation of the bank's CRA performance.

## COMMONWEALTH OF PUERTO RICO

### ***CRA RATING FOR PUERTO RICO: Outstanding***

***The Lending Test is rated: Outstanding.***

***The Investment Test is rated: Low Satisfactory.***

***The Service Test is rated: Outstanding.***

The major factors supporting the rating include:

Lending Test:

- Lending levels reflect excellent responsiveness to AA credit needs.
- A substantial majority of loans are made in the bank's AA.
- The geographic distribution of loans reflects good penetration throughout the AA.
- The distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibits an excellent record of serving the credit needs of low-income individuals and areas and very small businesses.
- A leader in making CD loans.
- Makes extensive use of innovative and/or flexible lending practices in serving AA credit needs.

Investment Test:

- An adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position.
- Makes occasional use of innovative and/or complex investments to support CD initiatives.
- Exhibits adequate responsiveness to credit and CD needs.

Service Test:

- Delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its AA.
- Records of opening and closing of branches has not adversely affected the accessibility of its delivery system, particularly to LMI geographies and/or LMI individuals.
- Services are tailored to convenience and needs of its AA, particularly LMI geographies and/or LMI individuals.
- A leader in providing CD services.

## DESCRIPTION OF INSTITUTION'S OPERATIONS

As of December 31, 2018, BPPR operated the largest bank branch network in Puerto Rico with 163 branches and 308 off-site ATMs. Branches in Puerto Rico accounted for \$31.3 billion in deposits or about 96.6% of the bank's total deposits. Based on deposits reported to the Federal Deposit Insurance Corporation ("FDIC") as of June 30, 2018, BPPR's branch deposits represented 42.3% of all bank deposits in the Commonwealth of Puerto Rico. BPPR's Popular Mortgage division also has 28 mortgage centers located throughout the Island. BPPR's primary bank competitors in Puerto Rico for assessment area deposits included Citibank, N.A., with 32.5% of deposit market share; Firstbank of Puerto Rico, which captured 8.7% of deposit market share; Oriental Bank, with 6.6% of deposit market share; Banco Santander Puerto Rico, with 5.7% of deposit market share; and Scotiabank de Puerto Rico, with 4.1% of deposit market share.

## PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include: the U.S. Department of Commerce's Bureau of the Census, the U.S. Department of Labor, 2010 Census, 2015 ACS, FFIEC, D&B, and Housing and Department of Housing and Urban Development (HUD).

### *Demographic Characteristics*

According to the 2015 ACS demographic data for the Commonwealth of Puerto Rico, the assessment area population was 3.6 million. The Commonwealth assessment area consisted of 945 total census tracts, of which 4.2% were designated low-income and 24.9% were moderate-income census tracts.

The population of the assessment area decreased by 3.8% between 2010 and 2015. Bank management attributed the population decline to migration before and after Hurricane Maria. The declining population led to increased housing unit vacancy and school closures throughout the Commonwealth.

### *Income Characteristics*

According to 2015 ACS data, there were 879,818 families in the Commonwealth, of which 26.7% were low-income families and 14.7% were moderate-income families. The 2015 Median Family Income (MFI) in the assessment area was \$22,976, which represented an increase of 5.6% from the 2010 MFI of \$21,764. Additionally, 41.8% of the families in the Commonwealth lived below the poverty level.

Poverty levels in the Commonwealth were concentrated geographically with 60.2% of families in Adjuntas, 60.1% of families in Guanica, and 59.4% of families in Barranquitas, and 57.1% of families in Comerio living below the poverty level. However, within the Commonwealth, the number of families living below poverty did experience a decrease of approximately 2.9% from 378,403 families in 2010 to 367,374 families in 2015.



### *Housing Characteristics*

According to the 2015 ACS housing data, the Commonwealth was comprised of 1,570,637 total housing units, of which 857,710, or 54.6%, were owner-occupied, 24.6% were rental units, and 20.8% were vacant. Of the total owner-occupied units in the assessment area, 13,604 units, or 1.6%, were located in low-income census tracts, and 182,471 owner-occupied housing units, or 21.3%, were located in moderate-income census tracts.

Overall, housing in the assessment area was considered expensive and affordable housing remained a constant need. According to the 2015 ACS data, the median value of owner-occupied units in the Commonwealth was \$120,500, which was a 7.0% increase from 2010. The median family income was \$22,976, in which the median value of OOUs represented five times the median household income. Moreover, the affordability ratio declined from 16.7% in 2010 to 16.1% in 2015.

In addition to the increased median household value, the median gross rent also experienced an increase of 7.3% from 2010 to 2015. The assessment area also saw a 14.3% increase in the number of renters, as well as an 11.4% increase in the number of renters with rent cost greater than 30% of their income.

### *Labor, Employment and Economic Characteristics*

The assessment area was a major center for finance, insurance, real estate, and the arts in the Commonwealth. According to D&B, as of 2018, 9,361 businesses were operating in this assessment area, of which 5.1% were located in low-income census tracts, and 21.9% were located in moderate-income census tracts. Of the total businesses operating in the assessment area, 71.5% had gross annual revenues of \$1 million or less.

The annual unemployment rate for the Commonwealth experienced a downward trend from 2015 to 2018, with the unemployment rate declining from 12.1% in 2015 to 9.2% in 2018. However, Hurricane Maria had a significant impact on Puerto Rico, creating major economic issues for the Island. Therefore, the decreasing unemployment estimates may be less of a clear indicator of an improving economy and more a result of population outflows. Moreover, decreasing labor participation rates are more indicative of the employment challenges throughout the Commonwealth of Puerto Rico.

According to the FRBNY's current regional economic profile, Puerto Rico has suffered from a severe and prolonged economic slump for more than a decade, with gross domestic product, population, and employment all on a downward trend since 2006, when a tax incentive for manufacturers—Section 936—was phased out. The pharmaceutical industry continued as a key part of the Island's economy, though employment in this industry was cut in half since the phase-out began. While Puerto Rico's tourism sector was relatively small, it was one of the few industries that added jobs in recent years. In addition, a fledgling aerospace industry had emerged around Aguadilla and Arecibo. Wages and educational attainment in Puerto Rico tended to be about half the level of the U.S. mainland, and income inequality was considerably higher. The Island also suffered from high sovereign debt and experienced a fiscal crisis. Hurricane Maria

in 2017 had a severe effect on the Island, causing the most extensive blackout in U.S. history, and exacerbating preexisting economic difficulties.

BPPR management noted that the Puerto Rico and U.S. banking sectors' performance trends in the past decade were progressing in opposite directions. Even though the U.S. economy had been expanding since 2010, the Puerto Rican economy had experienced a prolonged economic downturn that extended through the end of the examination review period and beyond. While the unemployment rate improved to 9.2% in 2018, a decline in the labor force participation rate to 40.0% in 2018 from 47.5% in 2007, indicated continued labor market weakness. The multitude of long-term and on-going performance context challenges resulted in stymied growth on the Island, which impacted financial services industry participants including BPPR, the largest bank on the Island.

Puerto Rico has a very high poverty rate; approximately 41.8% of the population live in poverty compared with, for example, approximately 24.0% for Mississippi, 21.9% for New Mexico and 15.8% for the United States overall. This U.S. Commonwealth has experienced an economic crisis, with government funding reductions due to the debt crisis, with oversight by a financial control board under the Puerto Rico Oversight, Management and Economic Stability Act (PROMESA), and from the effects of Hurricane Maria. The PROMESA law required austerity measures, which were anticipated to further negatively impact resident incomes. Dispersion of Hurricane recovery funds from the U.S. government had been awaited. In addition, an outward migration of citizens both before and after Hurricane Maria had led to an approximately 1.0% population reduction each year.

Puerto Rico's property market demand continued to fall during the review period. The House Price Index declined from 161.7 in 1Q2015 to 157.6 1Q2019. Residential construction was at \$609.8 million in 2016, down from \$2.3 billion in 2007.

In 2015, an FDIC-assisted transaction added eight former Doral Bank branches to the BPPR network, expanding the bank's footprint throughout the Island. In February 2018, BPPR announced an acquisition of loan assets from Reliable Financial Services, Inc. and Reliable Finance Holding Company, both subsidiaries of Wells Fargo & Company. As part of that transaction, Popular acquired approximately \$1.5 billion in retail auto loans and \$340.0 million in commercial loans, expanding the auto loans services offered throughout the Island.

The economic challenges also have led to substantial consolidation of the banking industry in Puerto Rico. Management noted that over the past decade, the number of consumer banks had been reduced by half. The Bank of Nova Scotia had been reducing its operations. In 2019, Oriental Bank and First Bank acquired Scotiabank's and Banco Santander SA's operations, respectively.

Since the last exam, credit rating agencies had downgraded Puerto Rico's government-issued bonds, and a smaller number of CRA qualified investments were available in the last seven years. In 2014, the Government of Puerto Rico issued a final series of general-obligation bonds, some to assist making payments on older bonds. Puerto Rico's credit had been downgraded to "junk," and the mutual funds and other conventional bond-buyers grew concerned, so hedge funds became the primary buyers. In the summer

of 2017, Puerto Rico's financial oversight board approved a plan to liquidate the Island's Government Development Bank, bringing the fiscal agent a step closer to settling more than \$5.0 billion in debt.

The economic challenges forced the government to exclude many incentives for LMI first-home buyers that helped create a secondary market for CRA-related investments. Additionally, opportunities for additional federal investment focusing on Puerto Rico had been decreasing and national-level CRA funds barely provided a benefit. For these reasons, CRA-qualified investments became limited in Puerto Rico.

There also were very few OOU's in low-income census tracts. Examiners also recognize recent HMDA reporting changes reduced the bank's reported loan volume, particularly for home improvement loans.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

BPPR's lending test performance was rated *outstanding* based on excellent performance in MSA 41980 (San Juan-Carolina-Caguas, PR), and good performance in both MSA 10380 (Aguadilla-Isabella-San Sebastian, PR) and MSA 38660 (Ponce, PR).

Lending activity reflected excellent responsiveness to assessment area credit needs in relation to the bank's capacity and performance context issues. BPPR was the dominant bank in Puerto Rico in terms of market share for deposits, HMDA-related loans and small business loans.

### **Geographic Distribution of Loans**

The geographic distribution of HMDA-related and small business loans in Puerto Rico reflected good performance in LMI geographies. This conclusion was based on good performance in MSA 41980 (San Juan-Carolina-Caguas, PR) and MSA 10380 (Aguadilla-Isabela-San Sebastian, PR), and adequate performance in MSA 38660 (Ponce, PR).

The analysis considered performance context issues, such as lending opportunities reflected in the number of OOU's, and in the market aggregate's performance. For HMDA-related loans, conclusions were based primarily on performance in moderate-income geographies, as the very low number of owner-occupied housing units in low-income census tracts made it difficult to extend HMDA-related loans in those geographies.

The geographic dispersion of loans was good overall. There were no significant lending gaps in the assessment areas. For details, refer to the analysis of lending gaps in the MSA 41980 (San Juan-Carolina-Caguas, PR), MSA 10380 (Aguadilla-Isabela-San Sebastian, PR), and MSA 38660 (Ponce, PR) sections.

## Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The overall distribution of loans among borrowers of different income levels and businesses of different sizes in Puerto Rico was good. This conclusion was based on good performance in MSA 41980 (San Juan-Carolina-Caguas, PR), MSA 10380 (Aguadilla-Isabela-San Sebastian, PR), and MSA 38660 (Ponce, PR). The analysis also considered performance context factors, such as the high cost of housing for LMI persons, which generally places owner-occupied housing units beyond the reach of LMI families. This disparity also made the available market for refinancings for LMI families very limited. The median housing price for each assessment area was compared to that assessment area's MFI to assess affordability for LMI borrowers.

## Community Development Lending

BPPR was a leader in making community development loans in Puerto Rico and in maintaining a highly responsive community development lending program. The bank's efforts in originating community development loans continued meeting the needs of the assessment area after Hurricanes Irma and Maria. This conclusion was based on performance in the following full review assessment areas: MSA 41980 (San Juan-Carolina-Caguas, PR), MSA 10380 (Aguadilla-Isabela-San Sebastian, PR) and MSA 38660 (Ponce, PR).

During the evaluation period, BPPR originated 1,077 community development loans in Puerto Rico totaling \$2.1 billion, or approximately 5.0% of the bank's total assets. This represented 95.2% of the dollar amount of the bank's total community development lending. The remaining \$108.0 million or 4.8% of total community development lending occurred in the U.S. Virgin Islands. All of the community development lending occurred within the bank's assessment areas. The bank's community development lending increased in total by \$515.8 million, or approximately 29.8% by dollar volume. In comparison to four other banks in Puerto Rico, BPPR was the leading bank in annualized community development lending as a percentage of Tier 1 capital, and ranked third for average assets.

<b>Qualified Community Development Loans</b>										
<b>April 1, 2015 – June 30, 2019</b>										
Assessment Area	Affordable Housing		Economic Development		Community Service		Revitalization and Stabilization		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
<b>Puerto Rico</b>										
MSA 41980 (San Juan-Carolina-Caguas, PR) FULL SCOPE	34	\$194,141	94	\$530,113	592	\$731,323	21	\$321,678	741	\$1,777,255
MSA 10380 (Aguadilla-Isabela-San Sebastian, PR) FULL SCOPE	6	\$30	4	\$8,715	84	\$12,335	4	\$12,450	98	\$33,530
MSA 38660 (Ponce, PR) FULL SCOPE	4	\$7,853	10	\$85,190	56	\$21,468	4	\$29,900	74	\$144,411
MSA 11640 - Arecibo, PR	1	\$5	20	\$8,834	14	\$7,693	1	\$50	36	\$16,582
MSA 25020 - Guayama, PR	1	\$6,300	6	\$72,339	3	\$30	0	\$0	10	\$78,669
MSA 32420 - Mayaguez, PR	3	\$1,488	13	\$34,253	36	\$10,383	1	\$188	53	\$46,311
MSA 41900 - San German - Cabo Rojo, PR	3	\$6,054	1	\$1,100	15	\$13,100	0	\$0	19	\$20,254
Non-MSA AA (Municipalities of Adjuntas, Coamo, Culebra, Jayuya, Santa Isabel, Salinas, Utuado, Las Marias, Maricao and Vieques)	5	\$6,815	11	\$15,660	30	\$2,198	0	\$0	46	\$24,673
<b>Puerto Rico</b>	<b>57</b>	<b>\$222,685</b>	<b>159</b>	<b>\$756,204</b>	<b>830</b>	<b>\$798,530</b>	<b>31</b>	<b>\$364,265</b>	<b>1,077</b>	<b>\$2,141,685</b>
Percent of Total	5.2%	10.4%	14.8%	35.3%	77.1%	37.3%	2.9%	17.0%	100%	100%

## INVESTMENT TEST

BPPR’s performance on the investment test in Puerto Rico was rated *low satisfactory* based on adequate investment activity in its individual full scope assessment areas, as well as the combined assessment area.

The bank made an adequate level of qualified CD investments and donations in Puerto Rico during the review period. The entirety of BPPR’s 33 investments worth \$163.7 million were made in Puerto Rico. During the previous evaluation this was also the case, with all \$183.4 million in investments made within the Commonwealth. The bank also made 1,835 donations representing \$17.9 million, of its total 1,982 donations representing \$18.2 million, in Puerto Rico. Taking into account the performance context, and the difference in the lengths of the review periods, BPPR did not perform as well as it

<b>QUALIFIED INVESTMENTS PUERTO RICO ASSESSMENT AREAS</b>		
<b>PURPOSE</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	30	102,987
Economic Development	2	56,800
Community Services	0	0
Revitalization and Stabilization	1	3,865
<b>TOTAL</b>	<b>33</b>	<b>163,652</b>

did at its previous evaluation. The bank’s investments decreased by 52.9% and its donations decreased by 12.4% on an annualized basis. Additionally, several of the investments were not specific to the assessment area, but rather conducted on the broader regional area.

BPPR made occasional use of innovative and complex investments, with both PCC and the Popular Mezzanine Fund benefitting the entire Island. The bank exhibited adequate responsiveness to credit and community development needs, investing in affordable housing across the Island, as well as making donations across affordable housing, community services, and economic development and revitalization and stabilization categories. Many of the bank’s community development activities went toward helping to rebuild Puerto Rico after Hurricane Maria. The bank engaged in responsive investment and donation activity. Considering Puerto Rico’s need, the length of the review period, and the bank’s resources, the level of responsiveness was deemed adequate.

## SERVICE TEST

BPPR’s performance under the service test was rated *outstanding* in Puerto Rico. This conclusion was based on readily accessible performance in full scope assessment area MSA 41980 (San Juan-Carolina-Caguas, PR), and accessible performance in MSA 10380 (Aguadilla-Isabela, PR) and MSA 38660 (Ponce, PR). Additionally, hours and services were tailored to the convenience and needs of each full scope assessment area in Puerto Rico. Overall, the institution was a leader in providing community development services within the Commonwealth.

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's "Service Test" section in this report.

## **Retail Services**

Overall, retail delivery systems were readily accessible to all geographies, including LMI geographies, and to individuals of different income levels and businesses of different revenue sizes in the institution's assessment areas. Of the 163 branches across Puerto Rico, 91 branches (55.8%) are located in or adjacent to a LMI geography, of which 44 branches (27.0%) are located in LMI geographies. BPPR branches are located in accessible locations including 31.3% in shopping centers, and 11.0% in other accessible facilities such as supermarkets, hospitals and universities. Additionally, approximately 22.0% of the bank's off-site ATMs were located in shopping centers. Retail service distribution was readily accessible in MSA 41980 (San Juan-Carolina-Caguas, PR), and accessible in MSA 10380 (Aguadilla-Isabela, PR) and MSA 38660 (Ponce, PR).

The institution's record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and individuals. During the review period, BPPR acquired eight branches, relocated two branches, and consolidated thirteen branches. During the consolidations, one branch previously located in a moderate-income geography was consolidated into a branch located in a middle-income geography, one moderate-income branch to an upper-income branch, and one middle-income branch to a moderate-income geography. All other consolidations were between branches of similar geographies.

Banking services and business hours were tailored to the convenience and needs of the assessment areas and were consistent with the services and hours discussed in the retail service section of the institutional assessment above.

## **Community Development Services**

BPPR was a leader in providing community development services in MSA 41980 (San Juan-Carolina-Caguas, P.R.) and MSA 10380 (Aguadilla-Isabela, P.R.), and provided a relatively high level of community development services in MSA 38660 (Ponce, PR).

Overall, BPPR provided 4,224 qualified activities in Puerto Rico, which primarily consisted of financial education seminars. In addition, BPPR officers served as directors, advisors, or committee members, providing financial management expertise and technical assistance to 184 non-profit and community based organizations.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>PUERTO RICO ASSESSMENT AREAS</b>	
<b>PURPOSE</b>	<b>Number</b>
Financial Education	3,593
Mortgage Education Seminars	192
Technical Assistance	250
Board Participations	164
Small Business Seminars	25
<b>TOTAL</b>	<b>4,224</b>

The *Summary of Key Assessment Area Data: Puerto Rico Assessment Areas* table on the next page highlights additional key assessment area data for the Puerto Rico assessment areas over the examination period.

Summary of Key Assessment Area Data: Puerto Rico Assessment Areas									
April 1, 2015 - June 30, 2019									
	MSA 41980 San Juan-Caguas- Guaynabo	MSA 10380 Aguadilla- Isabela-San Sebastian	MSA 38660 Ponce	MSA 32420 Mayaguez	MSA 41900 San German- Cabo Rojo	MSA 25020 Guayama	MSA 11640 Arecibo	Non- MSA AA	TOTALS PUERTO RICO
SCOPE	FULL SCOPE	FULL SCOPE	FULL SCOPE	LIMITED SCOPE	LIMITED SCOPE	LIMITED SCOPE	LIMITED SCOPE	LIMITED SCOPE	
<b>Total Population*</b>	2,263,582	325,921	330,891	106,330	137,462	81,159	193,243	154,480	3,593,068
<b>Population % of AA population</b>	63.0%	9.1%	9.2%	3.0%	3.8%	2.3%	5.4%	4.3%	100.0%
<b>Families</b>	558,600	80,862	79,584	23,483	30,609	18,797	50,488	37,395	879,818
<b>Families % of AA families</b>	55.4%	8.0%	7.9%	2.3%	3.0%	1.9%	5.0%	4.3%	100.0%
<b>Total Census Tracts*</b>	598	81	97	31	31	20	45	42	903
<b>Tracts % AA tracts</b>	66.2%	9.0%	10.7%	3.4%	3.4%	2.2%	5.0%	4.7%	100.0%
<b>LMI tracts</b>	190	21	27	12	4	2	10	9	275
<b>LMI tracts % all AA LMI tracts</b>	69.1%	7.6%	9.8%	4.4%	1.5%	0.7%	3.6%	3.3%	100.0%
<b>Total Owner-Occupied Units*</b>	548,972	73,550	78,104	22,766	28,775	20,396	47,016	38,131	819,777
<b>Units % of AA units</b>	67.0%	9.0%	9.5%	2.8%	3.5%	2.5%	5.7%	4.7%	100.0%
<b>Business Establishments **</b>	7,234	544	577	296	165	76	271	198	9,361
<b>Bus. est. % AA bus. est.</b>	77.3%	5.8%	6.2%	3.2%	1.8%	0.8%	2.9%	2.1%	100.0%
<b>Number of Branches</b>	108	12	13	7	4	3	6	10	163
<b>Branches % all branches</b>	66.3%	7.4%	8.0%	4.3%	2.5%	1.8%	3.7%	6.1%	100.0%
<b>Branches in LMI tracts</b>	31	2	3	4	0	0	3	1	44
<b>LMI branches % all LMI branches</b>	70.5%	4.5%	6.8%	9.1%	0.0%	0.0%	6.8%	2.3%	100.0%
<b>Branch Deposits (\$'000s) ***</b>	26,566,000	1,116,000	1,060,000	696,000	560,000	254,000	598,000	437,000	31,287,000
<b>Deposits % AA deposits</b>	84.9%	3.6%	3.4%	2.2%	1.8%	0.8%	1.9%	1.4%	100.0%
<b>Deposits Market Share/Rank</b>	40.0%/1	71.7%/1	47.4%/1	53.1%/1	91.0%/1	70.3%/1	65.2%/1	92.0%/1	27.4%/1
<b>Home Purchase Originations+</b>	13,649	941	1,173	234	608	260	619	535	18,019
<b>HP originations % AA orig.</b>	75.7%	5.2%	6.5%	1.3%	5.0%	1.3%	3.0%	3.0%	100.0%
<b>Refinance Originations+</b>	6,066	502	550	154	353	130	333	213	8,301
<b>Refi orig. % AA orig.</b>	73.1%	5.0%	4.0%	2.3%	2.0%	0.7%	1.8%	1.2%	100.0%
<b>Home Improvement Originations+</b>	8,605	1,118	989	277	1,072	421	643	580	13,705
<b>Home Improvement orig. % AA orig.</b>	62.8%	8.2%	7.2%	2.0%	7.8%	3.1%	4.7%	4.2%	100.0%
<b>Small Business Originations+</b>	26,576	3,506	2,929	1,729	1,463	638	1,889	1,102	39,832
<b>SB orig. % AA orig.</b>	66.7%	8.8%	7.4%	4.3%	3.7%	1.6%	4.7%	2.8%	100.0%
<b>Combined Loan Totals+</b>	54,896	6,067	5,641	2,394	3,496	1,449	3,484	2,430	79,857
<b>% of AA Orig.</b>	68.7%	7.6%	7.1%	3.0%	4.4%	1.8%	4.4%	3.0%	100.0%

(1) Demographic information obtained from the 2010 Census. (2) Business Establishments information reported by D&B for 2018. (3) Branch numbers are as of 6/30/2018. (4) Branch deposits and deposit market share from the FDIC as of 6/30/2018. (5) Loans reported under HMDA or CRA Small Business and Small Farm reporting for years 2015-2018.



## **METROPOLITAN AREA (FULL REVIEW)**

### **MSA 41980 (San Juan-Carolina-Caguas, PR)**

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

As of December 31, 2019, the bank operated 108 branches in the MSA 41980 (San Juan-Carolina-Caguas, PR). The bank operates 31 branches in low- and moderate-income tracts. The assessment area is comprised of 30 low-, 160 moderate-, 215 middle -, and 154 upper-income tracts, as well as 39 unknown income tracts.

BPPR was the leader in terms of MSA 41980 (San Juan-Carolina-Caguas, PR) deposits, according to the June 30, 2018 FDIC Summary of Deposit Report. The bank ranked first out of seven financial institutions in the assessment area with \$26.6 billion in deposits, representing an approximately 40.0% market share and 84.9% of all BPPR's deposits in Puerto Rico. Primary competitors in the area included First Bank de Puerto Rico, Banco Santander Puerto Rico, Oriental Bank and Scotia Bank de Puerto Rico.

#### **PERFORMANCE CONTEXT**

The following demographic and economic information was obtained from publicly available sources that include the U.S. Department of Commerce's Bureau of the Census and the U.S. Department of Labor.

##### *Demographic Characteristics*

During this review period, MSA 41980 (San Juan-Carolina-Caguas, PR) was unchanged from the previous examination. The largest municipalities ("Municipios") included San Juan, Bayamon, Carolina, and Caguas.

According to the 2015 ACS demographic data, the population of the MSA 41980 (San Juan-Carolina-Caguas, PR) assessment area was 2.3 million. The assessment area consisted of 598 total census tracts, of which 5.0% were designated low-income and 26.8% were moderate-income census tracts.

The population of the assessment area decreased by 3.7% between 2010 and 2015. Bank management attributed the population decline, prior to the 2017 Hurricanes, largely to migration coupled with low birth rates and high death rates. After Hurricane Maria, migration intensified, especially among families. Social and demographic impacts from the declining population included an increase in vacancy rates for housing units, and school closures throughout the Island.

### *Income Characteristics*

According to 2015 ACS data, there were 558,600 families in the bank's assessment area, of which 26.5% were low-income families and 15.0% were moderate-income families. The 2015 Median Family Income (MFI) in the assessment area was \$25,577, which represented an increase of 3.1% from the 2010 MFI. In comparison, the entire Commonwealth of Puerto Rico's MFI increased by 5.6%. Additionally, 37.8% of the families in the assessment area lived below the poverty level.

Poverty levels in the MSA were concentrated geographically, with 59.4% of families in Barranquitas living below the poverty level, 57.1% of families in Comerio living below the poverty level, 55.5% of families in Orocovis, and 55.4% of families living below the poverty level in Ciales. However, within the assessment area, the number of families living below poverty did experience a slight decrease of approximately 1.0% from 213,445 families in 2010 to 211,356 families in 2015.

### *Housing Characteristics*

According to the 2015 ACS, housing data, the MSA was comprised of 983,154 total housing units, of which 548,972, or 55.8%, were owner-occupied, 24.9% were rental units, and 19.2% were vacant. Of the total owner-occupied units in the assessment area, 9,762 units, or 1.8%, were located in low-income census tracts, and 134,114 owner-occupied housing units, or 24.4%, were located in moderate-income census tracts.

Overall, housing in the assessment area was considered expensive, while affordable housing remained a constant need. According to the 2015 ACS data, the median value of owner-occupied units in the assessment area was \$134,138, which was a 6.0% increase from 2010. The median family income was \$25,577, in which the median value of OOU's represented five times the median household income. Moreover, the affordability ratio declined from 17.0% in 2010 to 16.3% in 2015.

In addition to the increased median household value, the median gross rent also experienced an increase of 7.6 from 2010 to 2015. The assessment area also saw a 7.4% increase in the number of rental units, as well as a 4.4% increase in the number of renters with rent cost greater than 30% of their income.

### *Labor, Employment and Economic Characteristics*

The assessment area was a major center for finance, insurance, real estate, and the arts in the Commonwealth. According to D&B, as of 2018, 7,234 businesses were operating in this assessment area, of which 4.8% were located in low-income census tracts, and 22.6% were located in moderate-income census tracts. Of the total businesses operating in the assessment area, 69.8% had gross annual revenues of \$1 million or less.

The annual unemployment rate for the MSA experienced a downward trend from 2015 to 2018, with the unemployment rate at 10.2% in 2015, 10.0% in 2016, 9.0% in 2017, and 7.8% in 2018. The unemployment rate throughout the Commonwealth of Puerto Rico was also proportionate with this trend, declining from

12.1% in 2015 to 9.2% in 2018. However, Hurricane Maria had a significant impact on Puerto Rico, creating major economic issues for the Island. Therefore, the decreasing unemployment estimates may be less of a clear indicator of an improving economy and more a result of population outflows. Moreover, decreasing labor participation rates are more indicative of the employment challenges throughout the Commonwealth of Puerto Rico which was described above.

<b>Assessment Area Demographics</b>								
<b>Assessment Area: MSA 41980 - 2018</b>								
<b>Income Categories</b>	<b>Tract Distribution</b>		<b>Families by Tract Income</b>		<b>Families &lt; Poverty Level as % of Families by Tract</b>		<b>Families by Family Income</b>	
	#	%	#	%	#	%	#	%
Low-income	30	5.0	20,516	3.7	15,211	74.1	147,903	26.5
Moderate-income	160	26.8	143,841	25.8	75,826	52.7	83,688	15.0
Middle-income	215	36.0	226,244	40.5	85,298	37.7	87,907	15.7
Upper-income	154	25.8	166,756	29.9	34,207	20.5	239,102	42.8
Unknown-income	39	6.5	1,243	0.2	814	65.5	0	0.0
<b>Total Assessment Area</b>	<b>598</b>	<b>100.0</b>	<b>558,600</b>	<b>100.0</b>	<b>211,356</b>	<b>37.8</b>	<b>558,600</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>		<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%
Low-income	38,616	9,762	1.8	25.3	21,545	55.8	7,309	18.9
Moderate-income	258,726	134,114	24.4	51.8	70,225	27.1	54,387	21.0
Middle-income	386,746	225,949	41.2	58.4	91,178	23.6	69,619	18.0
Upper-income	295,277	178,714	32.6	60.5	60,765	20.6	55,798	18.9
Unknown-income	3,789	433	0.2	11.4	1,557	41.1	1,799	47.5
<b>Total Assessment Area</b>	<b>983,154</b>	<b>548,972</b>	<b>100.0</b>	<b>55.8</b>	<b>245,270</b>	<b>24.9</b>	<b>188,912</b>	<b>19.2</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	%
Low-income	2	2.2	2	2.4	0	0.0	0	0.0
Moderate-income	40	44.4	36	43.4	4	57.1	0	0.0
Middle-income	30	33.3	29	34.9	1	14.3	0	0.0
Upper-income	18	20.0	16	19.3	2	28.6	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>90</b>	<b>100.0</b>	<b>83</b>	<b>100.0</b>	<b>332</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
	<b>Percentage of Total Businesses:</b>			<b>92.2</b>		<b>7.8</b>		<b>0.0</b>

Based on 2018 FFIEC Census Data and 2018 D&B Information

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

BPPR's lending test performance in MSA 41980 was excellent lending activity based excellent responsiveness to the retail credit needs of the community, an excellent level of community development loans, and good geographic and borrower distribution for HMDA and small business loans. The Assessment Area Demographics and the Aggregate Comparison Loan Distribution Tables below contain data used to evaluate the bank's lending by geographic distribution and borrower profile. Greater weight was given to the analysis of small business lending and home purchase lending performance, followed by home improvement and refinance lending in the analysis of geographic and borrower distribution, based on loan volumes. Multifamily loans were not analyzed for geographic and borrower loan distribution, as the volume was insufficient; however, multifamily loans were considered in the evaluation of assessment area concentration and community development lending.

#### Lending Activity

Lending activity reflected excellent responsiveness to assessment area credit needs in relation to the bank's capacity and performance context issues. This was determined through an evaluation of the bank's HMDA-related and small business lending origination volume in comparison to aggregate lending, in addition to a review of the bank's market share.

BPPR was a leader in deposit and loan market share. In 2018, the bank ranked first in deposits (market share 40.0%), first in home purchase lending (market share 32.4%) and first in refinance lending (market share 35.3%). Performance in home improvement lending was not considered in 2018 due to changes in HMDA reporting requirements. In small business lending, BPPR was also first overall (market share 50.4%). In addition, peer comparisons based on the number of loans per million dollars of deposits indicates that BPPR's lending volume compares favorably with the performance of five similarly situated banks. Trends over the examination period indicate a decline of 23.1% on an annualized basis since the last evaluation due to performance context factors; however, aggregate lending also declined 41.7% on an annualized basis over the same period.

#### Geographic Distribution of Loans

BPPR's overall geographic distribution of HMDA-related and small business loans in MSA 41980 (San Juan-Carolina-Caguas, PR) was good, based on good home purchase, refinance and home improvement penetration and excellent small business penetration in LMI geographies. Penetration was good in low-income geographies and in moderate-income geographies.

According to 2015 ACS data, MSA 41980 (San Juan-Carolina-Caguas, PR) has 548,972 owner-occupied housing units, of which 9,762 (1.8%) are located in low-income geographies. Opportunities for HMDA lending increased within the moderate-income census tracts, where 134,114 (24.4%) owner-occupied

housing units are located. Additionally, out of a total of 7,234 small businesses, 348 (4.8%) are located within low-income tracts, while 1,634 (22.6%) are located in moderate-income census tracts. Within the MSA, 74.1% of all families in low-income census tracts have incomes below the poverty level while 52.7% of all families in moderate-income tracts have income below the poverty level. Opportunities for HMDA lending are limited by the high poverty rates prevalent in low- and moderate-income tracts.

### **Analysis of Lending Gaps**

Banco Popular's responsiveness to meeting the needs of its community is also demonstrated through an analysis of conspicuous gaps in lending in LMI census tracts. As shown in the following chart, BPPR demonstrated excellent responsiveness to the credit needs of the assessment area by having excellent penetration rates in LMI census tracts. In each year, the bank's penetration rate in LMI census tracts exceeded 75.0%. The following is a summary of the analysis of lending gaps in the assessment area.

<b>MSA 41980 (San Juan-Carolina-Caguas, PR)</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2018</b>			
Low	30	7	76.7%
Moderate	160	10	93.8%
Middle	215	1	99.5%
Upper	154	0	100.0%
Unknown	39	29	25.6%
<b>Total Tracts</b>	<b>598</b>	<b>47</b>	<b>92.1%</b>
<b>2017</b>			
Low	30	6	80.0%
Moderate	160	2	98.8%
Middle	215	0	100.0%
Upper	154	0	100.0%
Unknown	39	30	23.1%
<b>Total Tracts</b>	<b>598</b>	<b>38</b>	<b>93.6%</b>
<b>2016</b>			
Low	41	7	82.9%
Moderate	159	2	98.7%
Middle	200	0	100.0%
Upper	162	0	100.0%
Unknown	36	29	19.4%
<b>Total Tracts</b>	<b>598</b>	<b>38</b>	<b>93.6%</b>
<b>2015</b>			
Low	41	7	82.9%
Moderate	159	1	99.4%
Middle	200	0	100.0%
Upper	162	0	100.0%
Unknown	36	30	16.7%
<b>Total Tracts</b>	<b>598</b>	<b>38</b>	<b>93.6%</b>

### *Home Purchase Loans*

The geographic distribution of home purchase loans was good considering performance context factors that made HMDA-related lending in LMI geographies challenging. The bank's 2018 lending in low-income geographies at 0.8% by number and 0.5% by dollar volume is comparable to both the aggregate lending data at 1.6% and 1.1% by number and dollar volume, respectively, and the demographic figure of owner-occupied units, at 1.8%. Lending in the moderate-income census tracts at 13.2% by number volume, and 9.1% by dollar volume was comparable to aggregate lending data of 15.1% and 11.7% by number and dollar, respectively; however was significantly below the demographic figure, at 24.4%.

Home purchase lending for 2017 was comparable to 2018 dispersion. However, performance in 2015 and 2016 was based on 2010 census data and exceeded the bank's 2018 lending.

### *Refinance Loans*

BPPR's geographic distribution of refinance loans was good considering performance context factors that made HMDA-related lending in LMI geographies challenging. The bank's 2018 refinance lending in low-income geographies, 0.8% by number and 0.4% by dollar was consistent with both the aggregate lending data at 1.2% by number and 0.9% by dollar and the demographic figure of 1.8%. Lending to the moderate-income tracts, at 15.0% by number and 9.3% by dollar was comparable to aggregate lending data, at 16.2% by number and 11.5% by dollar. However, the bank's lending was below the demographic figure, at 24.4%.

The bank's home refinance lending for 2015, 2016, and 2017 was consistent with 2018 performance.

### *Home Improvement Loans*

BPPR's geographic distribution of home improvement lending was excellent. In 2018, HMDA reporting requirements were changed, causing a reduction in the number of home improvement loans reported by the bank. Therefore, a meaningful analysis could not be provided from 2018 data, and greater weight was placed on the bank's performance in 2017. Lending in 2017 in low-income geographies, at 1.2% by number and 1.2% by dollar, was comparable to aggregate data at 1.1% and 0.9% by number and dollar, respectively, and the percentage of owner-occupied units at 1.8%. The bank's dispersion of lending to moderate-income tracts, at 30.4% by number and 19.8% by dollar was above the aggregate data figure, at 26.8% by number and 19.6% by dollar and the demographic figure at 24.4%. BPPR was the market leader in lending in moderate-income tracts with 52.0% of all home improvement loans.

The bank's performance in 2016 and 2015 was consistent with dispersion in 2017.

### *Small Business Loans*

BPPR's small business lending performance in MSA 41980 (San Juan-Carolina-Caguas, PR) was excellent. BPPR's 2018 small business lending to low-income tracts at, 4.6% by number and 4.6 % by dollar volume was slightly above the aggregate lending data at, 3.4% by number and 3.9% by dollar; however, performance was comparable to the demographic figure of total businesses by tract at, 4.8%. Lending penetration to the moderate-income tracts, at 21.0% by number and 18.7% by dollar was also slightly above the aggregate data figure at, 17.5% by number and 17.7% by dollar and comparable to the demographic figure at, 22.6%.

2017, 2016, and 2015 small business lending is consistent with 2018 lending distribution performance.

## **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

The distribution of loans among borrowers of different income levels and businesses of different sizes was good. The wide disparity between housing prices and incomes of low- and moderate-income individuals generally places owner-occupied housing beyond the reach of LMI families. This disparity also limits the available market for refinance loans to LMI families. According to 2015 Census Bureau adjusted data, the median housing value for MSA 41980 (San Juan-Carolina -Caguas, PR) is estimated to be about ten times the income of a low-income family and six times the income of a moderate-income family, making it very difficult for LMI families in this MSA to own homes. Performance relative to moderate-income borrowers was given the most weight because the income level of low-income borrowers precludes them from most housing-related loans.

This rating also considers the excellent penetration among businesses of different sizes. It is also significant to note that over 50.0% of all home purchase transactions in each year of the review period and refinance loans ranging from 15.0% in 2018 to over 50.0% in 2015 did not have income reported, as the loans were purchased from other loan originators, and were therefore not considered in the borrower distribution analysis.

### *Home Purchase Loans*

BPPR's borrower distribution of home purchase loans is adequate. Performance was adequate considering the challenges in lending to low- and moderate-income borrowers. As noted above, housing costs are at least six times the income of a moderate-income borrower while banks in general consider three to four times the borrower's income to be acceptable. The assessment area also has a high poverty level with 37.8% of all families with incomes below the poverty level. BPPR ranked first in terms of home purchase loans made to all moderate-income borrowers in MSA 41980 (San Juan-Carolina-Caguas, PR) with 15.6% in 2018 and was third in 2017 with 7.3%.

The bank's 2018 lending to low-income borrowers comprised 0.3% by number and 0.1% by dollar, which was comparable to aggregate lending data, at 0.5% by number and 0.2% by dollar. However, performance was significantly below the demographic figure of 26.5%. Lending to moderate-income borrowers, at 2.6% by number and 1.4% by dollar, was below the aggregate lending data at 6.4% by number and 3.4% by dollar and significantly below the demographic figure at 15.0%.

The bank's record of home purchase lending in 2017 reflected consistent performance with 2018. Performance in 2016 and 2015 was also consistent with 2018 lending.

### *Refinance Loans*

The borrower distribution of home refinance loans is adequate considering the challenges in refinance lending to low- and moderate-income borrowers. The bank's 2018 lending to low-income borrowers accounted for only 1.2% by number and 0.4% by dollar, which was comparable to aggregate lending, at 2.5% by number and 1.0% by dollar. However, performance was significantly below the demographic



figure, at 26.5%. The bank's lending to moderate income borrowers was 5.7% by number and 2.7% by dollar, which was comparable to aggregate lending data, at 8.6% and 4.5%, by number and dollar, respectively, but significantly below the demographic figure, at 15.0%.

Refinance performance in 2015, 2016, and 2017 was comparable to performance in 2018.

However, in 2018, BPPR ranked first by count in refinance lending to moderate-income borrowers with 28.8% of all refinance lending and in 2017 it ranked second by count with 17.2% of refinance lending. Performance in 2015 and 2016 was comparable.

### *Home Improvement Loans*

BPPR's borrower distribution of home improvement lending was excellent. In 2018, HMDA reporting requirements were changed, resulting in a reduction of the number of home improvement loans reported by the bank. Due to these changes, BPPR's 2018 volume was insufficient to provide a meaningful analysis; therefore, performance from 2017 will be discussed in more detail and given greater weight for lending performance. In 2017, BPPR ranked first by count for home improvement lending to low-income borrowers with 50.7% of the market share of all home improvement loans. The bank also ranked first in 2016 by count with 59.1% market share all home improvement loans.

In 2017, BPPR originated 8.7% by number and 2.6% by dollar of its home improvement loans to low-income borrowers, which was comparable to aggregate lending data, at 7.9% by number and 2.6% by dollar; however, the bank significantly trailed the demographic figure, 26.5%. Lending to moderate-income borrowers, at 21.3% by number and 9.3% by dollar, was comparable to aggregate lending data, at 22.5% by number and 11.0% by dollar. Lending to moderate borrowers also exceeded the demographic figure, at 15.0%.

Performance in 2015 and 2016 was comparable to 2017's performance.

### *Small Business Loans*

BPPR's borrower distribution of small business loans was excellent. In 2018, the bank originated 72.9% of loans by number and 47.7% by dollar to businesses with gross annual revenues of \$1MM or less. The bank's lending exceeded aggregate lending data, at 60.7% by number and 43.1% by dollar and was consistent with the demographic figure, at 69.8%.

BPPR was the market leader in lending to small businesses with gross annual revenue of less than \$1MM in the assessment area with 51.0% of all small business loans in 2018. Additionally, the bank made 83.0% of its small business loans in amounts of \$100,000 or less in 2018, which is considered the most impactful loan size to small businesses.

Performance in 2015, 2016 and 2017 was also comparable to the excellent performance in 2018.

## Community Development Lending

Banco Popular was a leader in community development lending in MSA 41980 (San Juan-Carolina-Caguas). BPPR’s community development lending was highly responsive to the credit needs within the assessment area. This conclusion was supported by a favorable comparison to similarly-situated large retail banks in the assessment area.

During the evaluation period, community development lending in MSA 41980 (San Juan-Carolina-Caguas) totaled 741 loans for approximately \$1.8 billion. This represents 83.0% of all BPPR’s community development lending activity in Puerto Rico. At the previous evaluation, the bank originated a total of 536 qualified loans for approximately \$1.2 billion. The bank increased the number of loans by 38.2% and increased the dollar amount by approximately 46.8%.

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>MSA 41980 (San Juan-Carolina-Caguas, PR)</b>		
<b>PURPOSE</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	34	194,141
Economic Development	94	530,113
Community Services	592	731,323
Revitalization and Stabilization	21	321,678
<b>TOTAL</b>	<b>741</b>	<b>1,777,255</b>

Within the assessment area, efforts were distributed among the applicable categories of community development lending, with an emphasis, in terms of dollar amounts, on community services, economic development, and revitalization and stabilization, as noted in the table above. The bank’s community development loans were responsive to assessment area needs. A significant majority of the bank’s community development loans were for the purpose of funding community service opportunities. Loans included support efforts to combat hunger, provide job training, rental assistance, educational services, and other necessities for the assessment area’s low- and moderate-income individuals and families. Economic development loans were largely made to local organizations for working capital or equipment purchase, which were identified by community contacts as assessment area needs. These loans furthered the organizations’ ability to employ LMI individuals in the community.

Examples of community development lending included the following:

- The top six largest loans by dollar amount totaled \$226.9 million for community service for organizations that are meeting the needs of low- and moderate-income individuals. Some examples of the types of organizations meeting the needs of LMI individuals included medical and dental facilities, schools and services for disabled individuals.
- A \$265.0 million loan to an organization purchasing an existing distribution facility that had filed for bankruptcy but that later was bought by a new owner. The loan supported economic development by retention of permanent jobs in low- and moderate-income geographies.

- A \$54.9 million economic development loan to a business that created 400 LMI jobs in its initial stage, and 600 other LMI jobs in the distribution center also were created post Hurricane Maria.
- A \$30.0 million line of credit to an organization that provided affordable housing to LMI borrowers. In addition, this organization operates approximately 55,000 public housing units.

**INVESTMENT TEST**

The bank’s performance on the investment test in MSA 41980 (San Juan-Carolina-Caguas, PR) was adequate, based on adequate investment activity rarely in a leadership position, including the broader Island-wide combined assessment area. BPPR made occasional use of innovative and complex investments to support community development initiatives and demonstrated adequate responsiveness to area credit and community development needs. When taking into account performance context needs, particularly those relative to community services and revitalization and stabilization, the bank’s resources put it in a position to invest more heavily in the assessment area, especially in comparison to the previous evaluation.

<b>QUALIFIED INVESTMENTS</b>		
<b>MSA 41980 (San Juan-Carolina-Caguas, PR)</b>		
<b>PURPOSE</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	0	\$0
Economic Development	75	\$1,734
Community Services	1,331	\$12,719
Revitalization and Stabilization	16	\$4,555
<b>TOTAL</b>	<b>1,422</b>	<b>\$19,008</b>

During the review period, BPPR made one new investment specifically targeted to the assessment area worth \$3.9 million, compared to \$116 million during the previous review period. The assessment area also benefitted from the bank’s \$60.7 million investment in the PCC and Popular Mezzanine Funds, as well as a substantial portion of the \$103.0 million of mortgage backed security investments, both of which were made in the broader Island-wide combined assessment area.

The majority of investment activity depicted in the above table was grants activity; the bank made \$15.1 million in grants, exceeding the \$8 million in grants provided during the previous review period. Controlling for the differing lengths of review periods, BPPR’s performance with regards to grants in the assessment area was generally consistent between exams.

Examples of grants included:

- Grants totaling \$4.0 million were made to the Fundación Banco Popular. The foundation provided support to nonprofit and community development organizations supporting LMI residents across the bank’s assessment area.

- The bank made grants worth \$450,000 to Grameen Bank's microfinance operation. The purpose of the grants was to provide micro-loans to low-income entrepreneurs in order to facilitate their success.
- The bank granted \$2.2 million in scholarships to LMI college students from the assessment area, and sponsorships funding organizations that serve LMI individuals and communities in the assessment area.

## **SERVICE TEST**

In MSA 41980 (San Juan-Carolina-Caguas, PR), BPPR was a leader in providing community development services. Delivery systems were readily accessible to all portions of the assessment area and changes in branch locations did not adversely affect accessibility, and BPPR's hours and services were tailored to the convenience and needs of the assessment area.

### **Retail Services**

BPPR's delivery systems in MSA 41980 (San Juan-Carolina-Caguas, PR) were readily accessible to all portions of the assessment area. Of the 108 branches BPPR operated in this assessment area, nine (8.3%) were located in low-income areas and 22 (20.4%) were in moderate-income areas. This was comparable to the 3.9% and 26.5% of the assessment area's population that resided in low- and moderate-income areas, respectively. The branch network included 33.0% of its branches in shopping centers, which were generally accessible to LMI communities in the assessment area by proximity to bus and transportation routes. Approximately 22.0% of BPPR's off-site ATMs were also located in shopping centers.

Alternative delivery systems somewhat enhanced the bank's performance in this assessment area, but were not specifically targeted to LMI individuals. BPPR used multiple alternative delivery systems, such as bank-by-mail, internet banking, mobile banking, Interactive Kiosks, and 24/7/365 live customer service. BPPR maintained 204 off-site ATMs in the MSA, of which nine (4.4%) were located in low-income tracts, and 32 (15.7%) were in moderate-income tracts.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, of the branches BPPR consolidated, two branches in moderate-income census tracts were consolidated but remained in a moderate-income tract, and one branch located in a moderate-income tract was consolidated into an upper-income tract. Additionally, one branch located in a middle-income tract was consolidated into a branch located in a moderate-income tract. In the remaining branch consolidations, both the branch being consolidated and the surviving branch were located in the same tract designation. Two branches were relocated and remained in a moderate-income census tract and in a N/A census tract.

BPPR's hours and services were tailored to the convenience and needs of the assessment area, particularly LMI geographies and/or LMI individuals. Weekend and holiday hours were available at branches in this assessment area. Of the 108 branches in the MSA 41980 (San Juan-Carolina-Caguas, PR) assessment area, 62 branches (57.4%) had Saturday, Sunday or holiday hours. Of the bank's 31 branches in LMI census tracts, 16 branches (51.6%) had Saturday, Sunday or holiday hours.

## Community Development Services

BPPR was a leader in providing community development services throughout MSA 41980 (San Juan-Carolina-Caguas, PR). BPPR provided 2,878 qualified services which primarily consisted of financial literary seminars, participating in economic development activities, technical assistance to entrepreneurs and small businesses, and conducting small business seminars. The seminars exhibited excellent responsiveness to the needs of the assessment area, as economic development was an assessment area need identified by community contacts.

The bank’s management and staff provided financial expertise through serving as board or committee members to 66 community development organizations.

Examples of community development services include:

- An officer served as treasurer of a non-profit dedicated to researching alternatives for economic development in low-income communities.
- A bank officer was a member of the board of directors of an organization focused on assisting the emotional recovery of children following Hurricane Maria, and to provide them with the tools to become resilient, including working with LMI preschools and children living in public housing.
- An officer served as a member of the board of directors of an organization that provided credit counseling and financial education, including in managing budgets, bankruptcy prevention and education to first-time homebuyers.
- A bank officer served as treasurer of an organization that created strategies to address the need of affordable housing.
- An officer served as president of an organization focused on sustainable economic development by helping micro-enterprises to achieve success.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>MSA 41980 (San Juan-Carolina-Caguas, PR)</b>	
Financial Education	2,417
Mortgage Education Seminars	126
Technical Assistance	172
Small Business Seminars	12
Board Participations	151
<b>TOTAL</b>	<b>2,878</b>

## **METROPOLITAN AREA (FULL REVIEW)**

### **MSA 10380 (Aguadilla-Isabela-San Sebastian, PR)**

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

As of December 31, 2019 the bank operated twelve branches in MSA 10380 (Aguadilla-Isabela-Sebastian, PR) (“MSA 10380” or “assessment area”). The bank operated two branches in low- and moderate-income tracts. The assessment area included two low-, 19 moderate-, 39 middle-, and 16 upper-income tracts, as well as five tracts with unknown incomes.

As of June 30, 2018, the bank ranked first out of five financial institutions in the assessment area with \$1.1 billion in deposits, representing a 71.7% market share. MSA 10380 holds the second largest share of the bank’s total deposits and loans, however at only 4.0% and 8.0%, respectively, the overall impact is minimal. Primary competitors in the area include First Bank de Puerto Rico, Banco Santander Puerto Rico, Oriental Bank and Scotia Bank de Puerto Rico.

#### **PERFORMANCE CONTEXT**

The following demographic and economic information was obtained from publicly available sources that include the U.S. Department of Commerce's Bureau of the Census and the U.S. Department of Labor.

##### *Demographic Characteristics*

MSA 10380 is comprised of nine Municipios in their entirety: Aguada, Aguadilla, Anasco, Isabela, Lares, Moca, Rincon, San Sebastian, and Utuado. According to 2015 ACS data, the population of the assessment area was 325,921. The population of the assessment area decreased by 4.0% between 2010 and 2015. The assessment area consisted of 81 total census tracts, of which 2.5% were designated low-income and 23.5% were moderate-income census tracts.

##### *Income Characteristics*

The 2015 ACS data reflected that 80,862 families resided in the bank’s assessment area, of which 26.4% were low-income families and 14.7% were moderate-income families. For MSA 10380, the MFI was \$18,267 in 2015, an increase of 13.2% from the 2010 MFI. The MFI for the assessment area has increased at a greater rate when compared to the MFI of the Commonwealth of Puerto Rico, which only experienced an increase of 5.6%.

In MSA 10380, poverty levels were concentrated geographically, with 56.4% of families living below the poverty level in Lares, 53.6% of families living below the poverty level in San Sebastian, and 51.5% of

families living below the poverty level in Moca. Overall, families within the assessment area that live below the poverty level totaled 49.8%, which represents a decrease of 7.2% from the previous evaluation.

### *Housing Characteristics*

According to the 2015 ACS, MSA 10380 was comprised of 145,862 housing units, of which 73,550, or 50.4%, were owner-occupied units, 25.3% were rental units, and 24.3% were vacant units. Of the owner-occupied units, 655, or 0.9%, were located in low-income census tracts, while 14,193 housing units, or 19.3%, were located in moderate-income census tracts.

Housing in the assessment area is typically considered expensive and a need for affordable housing persists. The median housing value in MSA 10380 was \$106,961, an 11.6% increase from the previous evaluation. However, the current affordability ratio, at 14.6% compared to 13.9% at the previous evaluation, indicates housing may be trending more affordable.

Median gross rent increased 6.8% from 2010 to 2015. In addition, renters with rent cost greater than 30.0% of income in the assessment area increased 3.8% during the same time period.

### *Labor, Employment and Economic Characteristics*

The MSA 10380 was a major center for retail trade, administrative and support services, construction, and professional services in the Commonwealth. According to D&B, as of 2018, there were 544 total businesses operating in the assessment area, of which 8.5% were located in low-income areas, and 10.8% were located in moderate-income areas. Of the total businesses operating in the assessment area, 84.0% were businesses with gross annual revenues of \$1 million or less.

The annual unemployment rate for MSA 10380 has experienced a steady decline from 2015 to 2018, from 15.4% in 2015, to 12.2% in 2018. The unemployment rate within the Commonwealth of Puerto Rico was proportionate with this trend, declining from 12.1% in 2015 to 9.2% in 2018. Hurricane Maria has had a significant impact on Puerto Rico creating major economic issues for the Island and the declining unemployment estimates may not be a clear indicator of an improving economy but more a result impacted by population outflows.

Assessment Area Demographics								
Assessment Area: MSA 10380 - 2018								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	2.5	1,201	1.5	900	74.9	21,363	26.4
Moderate-income	19	23.5	17,562	21.7	10,822	61.6	11,853	14.7
Middle-income	39	48.1	44,605	55.2	21,909	49.1	12,875	15.9
Upper-income	16	19.8	17,494	21.6	6,626	37.9	34,771	43.0
Unknown-income	5	6.2	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>81</b>	<b>100.0</b>	<b>80,862</b>	<b>100.0</b>	<b>40,257</b>	<b>49.8</b>	<b>80,862</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,268	655	0.9	28.9	854	37.7	759	33.5
Moderate-income	32,273	14,193	19.3	44.0	10,565	32.7	7,515	23.3
Middle-income	81,130	41,865	56.9	51.6	18,718	23.1	20,547	25.3
Upper-income	30,191	16,837	22.9	55.8	6,745	22.3	6,609	21.9
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>145,862</b>	<b>73,550</b>	<b>100.0</b>	<b>50.4</b>	<b>36,882</b>	<b>25.3</b>	<b>35,430</b>	<b>24.3</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	46	8.5	45	9.8	1	1.3	0	0.0
Moderate-income	59	10.8	47	10.3	11	13.9	1	12.5
Middle-income	250	46.0	209	45.7	35	44.3	6	75.0
Upper-income	189	34.7	156	34.1	32	40.5	1	12.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>544</b>	<b>100.0</b>	<b>457</b>	<b>100.0</b>	<b>79</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>84.0</b>	<b>14.5</b>	<b>1.5</b>		

Based on 2018 FFIEC Census Data and 2018 D&B Information



## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

BPPR's overall lending performance in MSA 10380 was good. This conclusion is based on good lending activity, including good responsiveness to the retail credit needs of the community, an adequate level of community development loans, and good geographic and borrower distribution of HMDA and small business loans. The Assessment Area Demographics and the Aggregate Comparison Loan Distribution Tables below contain data used to evaluate the bank's lending by geographic and borrower distribution. Greater weight was given to the analysis of small business lending and home purchase lending performance followed by refinance and home improvement lending in the analysis of geographic and borrower distribution based on loan volumes. Multi-family lending was not evaluated except for community development lending, as lending volumes were insufficient for meaningful analysis.

#### Lending Activity

Lending activity reflected good responsiveness to assessment area credit needs in relation to the bank's capacity and performance context issues. This was determined based on market share review, trend analysis, and comparison to peer banks.

BPPR was a leader in deposit and loan market share. In 2018, BPPR ranked first in deposits (market share 71.7%), second in home purchase lending (market share 25.0%) and first in refinance lending (market share 27.0%). Performance in home improvement lending was not evaluated in 2018 due to changes in HMDA reporting requirements. In small business lending, BPPR was also first overall (market share 72.9%). In addition, peer comparisons based on the number of loans per million dollars of deposits indicates that BPPR's lending volume was comparable to the performance of similarly situated banks.

Lending volume trends over the evaluation period indicate a declining trend due to performance context factors as volume declined 23.0% on an annualized basis; however, comparisons to the aggregate indicate the aggregate's volume declined 94.6% over the same period.

#### Geographic Distribution of Loans

BPPR's overall geographic distribution of HMDA-related and small business loans was good. This was based on the bank's 2018 good home purchase penetration, adequate refinance penetration, and good home improvement performance in moderate-income geographies in 2017, in addition to the bank's adequate small business penetration in LMI geographies.

#### Analysis of Lending Gaps

The bank's responsiveness to meeting the credit needs of its community is demonstrated through an analysis of conspicuous gaps in lending in LMI census tracts. As shown in the following chart, BPPR demonstrated

excellent responsiveness to the credit needs of the assessment area by having excellent penetration rates in LMI census tracts. In each year, the bank’s penetration rate in LMI census tracts exceeded 75.0%. The following table is a summary of the analysis of lending gaps in the assessment area.

<b>MSA 10380 (Aquadilla-Isabela, PR)</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2018</b>			
Low	2	0	100.0%
Moderate	19	1	94.7%
Middle	39	0	100.0%
Upper	16	0	100.0%
Unknown	5	5	0.0%
<b>Total Tracts</b>	<b>81</b>	<b>6</b>	<b>92.6%</b>
<b>2017</b>			
Low	2	0	100.0%
Moderate	19	1	94.7%
Middle	39	0	100.0%
Upper	16	0	100.0%
Unknown	5	5	0.0%
<b>Total Tracts</b>	<b>81</b>	<b>6</b>	<b>92.6%</b>
<b>2016</b>			
Low	2	0	100.0%
Moderate	11	0	100.0%
Middle	47	0	100.0%
Upper	16	0	100.0%
Unknown	5	5	0.0%
<b>Total Tracts</b>	<b>81</b>	<b>5</b>	<b>93.8%</b>
<b>2015</b>			
Low	2	0	100.0%
Moderate	11	0	100.0%
Middle	47	0	100.0%
Upper	16	0	100.0%
Unknown	5	5	0.0%
<b>Total Tracts</b>	<b>81</b>	<b>5</b>	<b>93.8%</b>

### *Home Purchase Loans*

BPPR's home purchase lending geographic distribution in MSA 10380 was good primarily based on the bank's performance in moderate-income geographies. BPPR's home purchase lending in 2018 in low-income geographies was considered adequate in light of demographic and performance context challenges relating to housing affordability and the availability of owner-occupied housing in low-income geographies in the assessment area. While less than 1.0% by number and dollar volume of BPPR's home purchase loans in both 2018 and 2017 were originated in low-income geographies, less than 1.0% of all owner-occupied housing units in the assessment area were located in the low-income geographies, indicating limited opportunities. Furthermore, this performance context consideration was confirmed by the performance of the aggregate lending, which in 2018 made 1.5% by number and 0.6% by dollar volume of its home purchase loans in low-income geographies, and in 2017 made 0.2% by number and 0.1% by dollar volume of its home purchase loans in low-income geographies.

The bank's 2018 home purchase lending in the moderate-income geographies, at 12.3% by number and 8.3% by dollar was consistent with aggregate lending data, at 13.9% number and 12.3% dollar. However, the bank's lending was below the demographic figure, at 19.3%.

In 2017, the bank's performance was above the aggregate lending data, but still trailed the demographic figure. Performance in 2015 and 2016 was more comparable with 2018 performance, with lending consistent with aggregate data. However, by count, BPPR was the market leader in moderate-income geographies with 33.3% in 2017 and 31.7% in 2018 of all home purchase loans in moderate-income geographies.

### *Refinance Loans*

BPPR's overall refinance lending performance in the LMI geographies of MSA 10380 was adequate. The bank's performance was primarily based on lending in the moderate-income geographies. The bank's refinance lending in low-income geographies in 2018 was considered adequate considering performance context factors that make HMDA-related lending challenging in low-income geographies. While BPPR did not originate any refinance loans in low-income geographies in all years of the evaluation period, ACS data show less than one percent of the total owner-occupied units in the assessment area are located in low-income census tracts. This is indicative of limited lending opportunities. Additionally, in 2018, the aggregate lending data, at 1.5% by number volume also supports the limited opportunities in the geography.

The bank's refinance lending performance in 2018 in moderate-income geographies, at 9.3% by number and 6.2% by dollar volume, was comparable to the aggregate data lending, 12.0% by number and 11.6% by dollar. However, the bank's performance fell below the demographic figure, at 19.3%.

In 2017, the bank's performance was above the aggregate lending data, and comparable to the demographic figure. Performance in 2015 and 2016 was more comparable with 2018 performance, with lending consistent with aggregate data.

In addition, BPPR was a joint market leader in the count of refinance loans in moderate-income geographies in 2018 with 26.3% of all refinance loans and was the second leading lender in 2017, with 27.3% of all refinance loans.

### *Home Improvement Loans*

BPPR's home improvement lending performance was good. As stated above, this conclusion is based on the evaluation of the bank's 2017 performance, primarily in the moderate-income tracts. BPPR's home improvement lending in low-income geographies was considered adequate considering performance context factors that make HMDA-related lending challenging in low-income geographies. Less than one percent of owner-occupied units are located the in low-income census tracts.

BPPR's home improvement lending performance in 2017 in moderate-income census tracts, at 19.6% by number and 15.8% by dollar, was consistent with aggregate lending data, at 17.8% and 17.6%, by number and dollar volume, respectively. The bank's performance was also consistent with the demographic figure, at 19.3%. In 2017, BPPR was the market leader in home improvement lending by count in moderate-income census tracts with 56.0% of all home improvement loans in the MSA 10380.

Performance in 2016 and 2015 was comparable to the bank's lending in 2017.

### *Small Business Loans*

Overall, BPPR's 2018 small business lending performance in MSA 10380 was adequate. BPPR's performance in low-income geographies, at 2.6% by number and 1.6% by dollar was consistent with aggregate lending data, 3.1% by number and 1.5% by dollar. However, when compared to the demographic figure, at 8.5%, the bank's performance fell below. Lending in the moderate-income tracts, at 18.5% and 19.9% by number and dollar volume, respectively, was consistent with the aggregate lending data, at 18.4% by number and 23.8% by dollar. The bank's performance when compared to the demographic figure, of 10.8%, exceeded.

The bank's geographic distribution of small business lending for 2017, 2016, and 2015, was consistent with the bank's lending for 2018.

BPPR was the market leader in small business lending by count in low-income geographies with over 61.5% of all small business loans in 2018, 73.5% in 2017, 75.6% in 2016 and 72.5% in 2015. Additionally, BPPR was the market leader by count in all four years in the moderate-income tracts with 74.3% of all small business lending in 2018, 80.7% in 2017, 88.2% in 2016 and 83.6% in 2015.

## **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

The distribution of loans among borrowers of different income levels and businesses of different sizes was good. Lending to small businesses was excellent while lending to low-income and moderate-income

borrowers, overall, was considered adequate. In reaching conclusions, consideration was given to performance context factors, such as the high cost of housing for LMI persons and the high poverty rate of 49.8% of all families. As noted in the performance context section, the median housing value for the MSA 10380 in 2018 was estimated to be about eleven times the income of a low-income family and seven times the income of a moderate-income family.

### *Home Purchase Loans*

The borrower distribution of home purchase lending to low- and moderate-income borrowers was adequate based on adequate home purchase lending to moderate-income borrowers. In 2018, the bank did not originate any loans to borrowers of low-income. Aggregate lending data, also did not originate any loans to borrowers of low-income. The bank's lack of lending to borrowers of low-income did fall significantly below the demographic figure, of 26.4%. Consideration was given to the performance context factors, such as high housing cost, and the high poverty rate of 49.8% of all families that makes lending to low-incomes in this assessment area difficult. The bank's lending to moderate-income borrowers, at 2.6% by number and 0.9% by dollar, was consistent with aggregate lending data, at 2.9% by number and 1.3% by dollar, while falling below the demographic figure, at 14.7%.

BPPR home purchase lending in 2017, 2016, and 2015 was consistent with 2018 performance. While the bank did not originate any home purchase loans to low-income borrowers in 2016 or 2017 and made only one home purchase loan in 2015 to a low-income borrower, when compared to the aggregate lending data, the bank's performance was consistent with peers.

### *Refinance Loans*

The borrower distribution of refinance lending to low- and moderate-income borrowers was poor. Performance context consideration was given to the high poverty rate of 49.8% of all families that makes lending to low-income families in this assessment area difficult. The bank did not originate any loans to low-income borrowers in 2018. While aggregate refinance lending data was only at 0.5% by number and 0.2% by dollar; the demographic figure, percentage of families by family income, was 26.4%. BPPR's 2018 refinance lending to moderate-income borrowers, at 1.9% by number and 0.5% by dollar, fell below the aggregate lending data, at 4.5% by number and 2.5% by dollar, and also fell below the demographic figure of 14.7%.

The bank's performance in 2017, 2016 and 2015 was consistent with lending in 2018.

### *Home Improvement Loans*

BPPR's home improvement lending was excellent. In 2018, HMDA reporting requirements for home improvement loans were changed, thereby reducing the number of home improvement loans reported by BPPR. BPPR's 2018 volume was insufficient to obtain meaningful conclusions; therefore, the bank's home improvement lending was evaluated primarily on 2017 data. Lending to low-income borrowers in 2017, at 1.2% by number and 0.2% by dollar, was comparable to aggregate lending data, at 1.7% by number and

0.4% by dollar. The bank’s lending to low income borrowers, was significantly below the demographic figure, at 26.4%. The bank’s lending to moderate-income borrowers, at 19.2% by number and 7.1% by dollar, exceeded the aggregate lending, at 16.9% by number and 6.6% by dollar, as well as the demographic figure, at 14.7%.

The bank’s performance in 2016 and 2015 was consistent with lending in 2017.

*Small Business Loans*

The borrower distribution of small business loans was excellent. In 2018, the bank made 80.3% by number and 61.0% by dollar volume of its small business loans to businesses with gross annual revenues of \$1 MM or less, which exceeded aggregate lending data, at 72.9% by number and 54.7% by dollar. The bank’s performance was just slightly below the demographic figure at, 84.0% of business establishments in the MSA 10380 with GAR of \$1 MM or less.

While the bank’s lending performance to small businesses in 2017 was below 2018 performance, it was consistent with aggregate lending data. However, the bank’s performance in 2016 and 2015 was consistent with 2018, and slightly exceeded aggregate lending.

The bank made 88.5% of its small business loans in amounts of \$100,000 or less, which is indicative of amounts needed by smaller business entities.

**Community Development Lending**

BPPR makes an adequate level of community development lending in MSA 10380 (Aguadilla-Isabella-San Sebastian, PR). This conclusion was supported by a favorable comparison to similarly-situated large retail banks in the assessment area. During the evaluation, community development lending in MSA 10380 (Aguadilla-Isabella-San Sebastian, PR) totaled 98 loans for \$33.5 million.

The lending in this MSA represented 1.6% of all BPPR’s community development lending activity in Puerto Rico. At the previous evaluation, the bank originated a total of 59 qualified loans for approximately \$51.2 million. The bank increased the number of loans by 66.1% and decreased the dollar amount by approximately 34.5%. The bank originated many more loans but in smaller increments. As illustrated in the table to the right, the breakdown of community development loans in the assessment area were primarily provided for community services, representing 85.7% by number and 36.8% by dollar amount of qualified loans.

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>MSA 10380 (Aguadilla-Isabella-San Sebastian, PR)</b>		
<b>PURPOSE</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	6	30
Economic Development	4	8,715
Community Services	84	12,335
Revitalization and Stabilization	4	12,450
<b>TOTAL</b>	<b>98</b>	<b>33,530</b>

Examples of community development lending include the following:

- The majority of the loans for community service were to support low-income counseling, foster care, and to combat the cycle of poverty in families.
- Two loans totaling \$4.0 million were originated to revitalize/stabilize a renewable energy organization. This organization was providing clean, renewable, locally produced electricity to low- and moderate income individuals residing in low- and moderate-income census tracts post Hurricane Maria, where several areas were without power.
- Five of the six loans for affordable housing were to organizations that are working on projects for elderly and disabled low- and moderate-income individuals.
- The bank made two loans worth \$6.2 million dollars to provide working capital to organizations, which provided new jobs and retained or helped retain existing jobs to low- and moderate income individuals.

**INVESTMENT TEST**

BPPR’s performance with respect to the Investment Test in the MSA 10380 (Aguadilla-Isabella-San Sebastian, PR) assessment area was adequate. The bank made an adequate level of qualified investments and grants, rarely in a leadership position, made occasional use of innovative and complex investments to support CD initiatives, and exhibited adequate responsiveness to credit and CD needs.

BPPR did not make any investments that specifically targeted the MSA 10380 (Aguadilla-Isabella-San Sebastian, PR) assessment area during the review period. However, the assessment area benefitted from a portion of the \$103.0 million of MBS investments, as well as the PCC and Popular Mezzanine investments, all of which served the entire Island. These latter investments were complex and innovative, respectively. In addition, as noted in the table, BPPR made grants worth \$350,000 throughout the assessment area, a 125.8% increase in donation activity since the previous evaluation, during which time it made donations worth \$155,000.

<b>QUALIFIED INVESTMENTS</b>		
<b>MSA 10380 (Aguadilla-Isabella-San Sebastian, PR)</b>		
<b>PURPOSE</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	0	\$0
Economic Development	4	\$45
Community Services	51	\$305
Revitalization and Stabilization	0	\$0
<b>TOTAL</b>	<b>55</b>	<b>\$350</b>

Examples of grants included:

- BPPR provided six grants, the largest which was worth \$35,000, to Centro de Ayuda y Terapia al Niño con Impedimento (AYANI). The organization provides a wide range of services for LMI

children and young adults with disabilities. These include independent living, speech therapy, physical and occupational therapy, as well as psychological therapy.

- The bank made four grants of approximately \$25,000 each to Programa de Apoyo y Enlace Comunitario, Inc. The organization is engaged in the prevention of criminal activity, and provides mentorship to LMI youth whose parents are incarcerated.
- BPPR made four grants, totaling \$45,000, to Casa Juan Bosco, Inc. The organization provides support to LMI children in high risk communities by involving them in sports, providing academic tutoring, exposing them to arts and music and otherwise supporting their social development.

The bank's investment activity was responsive to community needs, as primarily demonstrated by the level of growth in its donations. Nevertheless, it would be expected that the institution would make direct investments in the assessment area and more substantially increase its rate of donations in order to demonstrate good responsiveness given the assessment area's disaster designation and the bank's resources.

## **SERVICE TEST**

BPPR provided a relatively high level of community development services in MSA 10380 (Aguadilla-Isabela-San Sebastian, PR). Delivery systems were accessible to the bank's geographies and individuals of different income levels in its assessment area, changes in branch locations did not adversely impact the accessibility of delivery systems, and hours and services were tailored to the convenience and needs of the assessment area.

### **Retail Services**

BPPR's delivery systems in MSA 10380 (Aguadilla-Isabela-San Sebastian, PR) were accessible to all portions of the bank's assessment area, when compared with the percentage of population residing in LMI geographies. BPPR operated 12 branches in this assessment area, of which two (16.7%) were located in moderate-income areas, compared to 23.2% of the MSA's population residing in LMI areas.

Alternative delivery systems slightly enhanced the bank's performance in this assessment area. BPPR used multiple alternative delivery systems not specifically targeted to LMI individuals, such as bank-by-mail, internet banking, mobile banking, Mi Banco Alerts, Interactive Kiosks and 24/7/365 live customer service. BPPR maintained 25 off-site ATMs in this assessment area, of which three or 12.0% were located in a moderate-income tract.

Changes in branch locations did not adversely impact the accessibility of BPPR's delivery systems, particularly to LMI geographies and/or LMI individuals. During the examination period, BPPR consolidated one branch located in a moderate-income census tract into an existing branch also located in a moderate-income census tract. No branches were closed in the assessment area during the evaluation period.



BPPR’s hours and services are tailored to the convenience and needs of the assessment area, particularly LMI geographies and/or individuals. Extended morning, late afternoon, weekend and holiday hours were available at most branches in this assessment area. Of the 12 branches in the MSA, 11 branches (91.7%) had Saturday or holiday hours. Two branches were located in moderate-income tracts, both of which offered Saturday hours.

### Community Development Services

In MSA 10380 (Aguadilla-Isabela-San Sebastian, PR), BPPR provided a relatively high level of community development services providing 370 qualified activities, which primarily consisted of financial education seminars. Additionally, management and staff provided financial expertise by serving as board or committee members to three non-profit and community based organizations based in the assessment area. The table to the right shows the number and type of services provided during the evaluation period.

Examples of community development services include:

- An officer served as president of an organization, which promotes sustainable economic production and food security.
- An officer served as secretary of the board of directors of an organization providing strategies and tools to improve the health of immigrant families, as well as operating a mentoring project for their children.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>MSA 10380 (Aguadilla-Isabela-San Sebastian, PR)</b>	
Financial Education	329
Mortgage Education Seminars	7
Technical Assistance	11
Small Business Seminars	13
Board Participations	10
<b>TOTAL</b>	<b>370</b>

- An officer served as a member of the board of directors of a non-profit organization with a mission of helping LMI individuals and families by providing a variety of services to improve their quality of life.

## **METROPOLITAN AREA (FULL REVIEW)**

### **MSA 38660 (Ponce, PR)**

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

As of December 31, 2019, the bank operated 13 branches in MSA 38660 (Ponce, PR). The bank operated three branches in low- and moderate-income tracts. The assessment area consists of 97 total tracts, five low-, 22 moderate-, 39 middle-, and 24 upper-income tracts, as well as seven tracts with unknown incomes.

As of June 30, 2018, the bank ranked first out of five financial institutions in the assessment area, with approximately \$1.1 billion in deposits, representing a 47.4% market share. MSA 38660 holds the third largest share of the bank's total deposits and loans; however, at only 3.0% and 7.0%, respectively, the overall impact is minimal. Primary competitors in the area include: First Bank de Puerto Rico, Banco Santander Puerto Rico, Oriental Bank and Scotia Bank de Puerto Rico.

#### **PERFORMANCE CONTEXT**

The following demographic and economic information was obtained from publicly available sources that include the U.S. Department of Commerce's Bureau of Census and the U.S. Department of Labor.

##### *Demographic Characteristics*

MSA 38660 was comprised of seven Municipios in their entirety, Guanica, Guayanilla, Juana Diaz, Penuelas, Ponce, Villalba, and Yauco. According to the 2015 ACS, the population of the assessment area was 330,891, with Municipio Ponce, accounting for 47.2% of the total assessment area population. From the previous evaluation and 2010 ACS data, MSA 38660 experienced a 5.6% population decline. The assessment area consisted of 97 total census tracts, of which 5.2% were designated low-income and 22.7% were moderate-income census tracts.

##### *Income Characteristics*

According to 2015 ACS data, 79,584 families resided in the bank's assessment area, of which 27.5% were low-income families and 13.8% were moderate-income families. The 2015 ACS-estimated MFI for the assessment area, was \$19,046, which was an increase of approximately 4.3 from the 2010 MFI. This was just slightly below the MFI growth rate for the Commonwealth of Puerto Rico, at 5.6%, for the same time period. In the assessment area, 49.7% of families lived below the poverty level, which is higher than the Commonwealth of Puerto Rico, at 41.8%.

In MSA 38660, poverty levels were concentrated geographically, with 60.1% of families living below the poverty level in Guanica, 57.4% in Penuelas, and 49.8% of families living below the poverty level in Yauco. However, from 2010 to 2015, the number of families living below poverty in the assessment area decreased by 6.7%.

### *Housing Characteristics*

According to 2015 ACS data, the assessment area contained 138,979 total housing units, of which 78,104, or 56.2%, were owner-occupied, 23.1% were rental units, and 20.7% were vacant. Of these owner-occupied units, only 2.9% were located in low-income census tracts, while 17.6% were located in moderate-income census tracts.

Overall in the assessment area, housing remains generally expensive and affordable housing remains a considerable need. The 2015 median housing value, at \$96,927 for the assessment area, increased 4.2% from 2010. The affordability ratio for the assessment area, at 16.8%, was comparable to the Commonwealth of Puerto Rico in 2015 (16.1%), and represented no measurable change from 2010 data (16.8%).

Median gross rent in the assessment area increased by 6.4% from 2010 to 2015. However, total renters with rent cost greater than 30.0% of income only increased from 9,288 in 2010 to 9,347 in 2015 (.64%).

### *Labor, Employment and Economic Characteristics*

The MSA 38660 assessment area was a major center for retail trade, health care, professional services and construction. According to D&B, as of 2018, there were 577 total businesses operating in this assessment area, of which 11.1% were located in low-income areas, and 29.5% were located in moderate-income areas. Of the total businesses operating in the assessment area, 73.5% were businesses with gross annual revenues of \$1 million or less.

The annual unemployment rate for MSA 38660, from 2015 to 2018, has trended downward, with the unemployment rate at 15.9% in 2015, 15.4% in 2016, 14.0% in 2017, and 11.7% in 2018. The downward trend is similar to the unemployment rate for the Commonwealth of Puerto Rico, at 12.1% in 2015 to 9.2% in 2018. However, Hurricane Maria has had a significant impact on Puerto Rico, creating major economic issues for the Island. The decreasing unemployment estimates may be less of a clear trend of an improving economy and more a result of population outflows. Moreover, declines in the labor force participation rate may indicate labor market challenges.

Assessment Area Demographics								
Assessment Area: MSA 38660 - 2018								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	5.2	4,342	5.5	3,408	78.5	21,874	27.5
Moderate-income	22	22.7	13,917	17.5	9,152	65.8	10,957	13.8
Middle-income	39	40.2	37,449	47.1	18,881	50.4	12,339	15.5
Upper-income	24	24.7	23,493	29.5	7,835	33.4	34,414	43.2
Unknown-income	7	7.2	383	0.5	279	72.8	0	0.0
<b>Total Assessment Area</b>	<b>97</b>	<b>100.0</b>	<b>79,584</b>	<b>100.0</b>	<b>39,555</b>	<b>49.7</b>	<b>79,584</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,297	2,271	2.9	31.1	4,037	55.3	989	13.6
Moderate-income	29,455	13,762	17.6	46.7	7,075	24.0	8,618	29.3
Middle-income	62,563	36,827	47.2	58.9	12,876	20.6	12,860	20.6
Upper-income	38,490	24,995	32.0	64.9	7,598	19.7	5,897	15.3
Unknown-income	1,174	249	0.3	21.2	572	48.7	353	30.1
<b>Total Assessment Area</b>	<b>138,979</b>	<b>78,104</b>	<b>100.0</b>	<b>56.2</b>	<b>32,158</b>	<b>23.1</b>	<b>28,717</b>	<b>20.7</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	64	11.1	48	11.3	16	11.3	0	0.0
Moderate-income	170	29.5	124	29.2	41	28.9	5	12.5
Middle-income	195	33.8	145	34.2	46	32.4	4	75.0
Upper-income	132	22.9	99	23.3	33	23.2	0	12.5
Unknown-income	16	2.8	8	1.9	6	4.2	2	0.0
<b>Total Assessment Area</b>	<b>577</b>	<b>100.0</b>	<b>424</b>	<b>100.0</b>	<b>142</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>73.5</b>	<b>24.6</b>	<b>1.9</b>		

Based on 2018 FFIEC Census Data and 2018 D&B Information

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

BPPR's lending test performance in MSA 38660 was good. This conclusion was based on excellent lending activity, excellent responsiveness to the retail credit needs of the community, a relatively high level of community development loans, and adequate geographic distribution and good borrower distribution for HMDA and small business loans. The Assessment Area Demographics and the Aggregate Comparison Loan Distribution Tables below contain data used to evaluate the bank's geographic and borrower distribution. Greater weight was given to small business and home purchase lending performance in the analysis of geographic and borrower distribution based on loan volumes. Multi-family lending was not evaluated, except in the evaluation of community development lending, as lending volumes were insufficient to provide meaningful analysis.

#### Lending Activity

Lending activity reflected excellent responsiveness to assessment area credit needs in relation to the bank's capacity and performance context issues. This was determined based on market share review, trend analysis, and comparison to peer banks.

BPPR was a leader in deposit and loan market share. In 2018, the bank ranked first in deposits (market share 47.4%), first in home purchase lending (market share 27.5%) and first in refinance lending (market share 28.7%). Performance in home improvement lending was not considered in 2018 due to changes in HMDA reporting requirements. In small business lending, BPPR was also ranked first overall (market share 58.3%). In addition, peer comparisons based on the number of loans per million dollars of deposits indicates that BPPR's lending volume compared favorably with the performance of similarly situated banks.

Lending volume trends over the evaluation period indicated a declining trend due to performance context factors, as volume declined 22.0% on an annualized basis; however, comparisons to the aggregate indicate the aggregate's volume declined 30.8% over the same period.

#### Geographic Distribution of Loans

The geographic distribution of HMDA-related and small business loans was adequate. This was based on the bank's adequate home purchase, refinance and small business lending in 2018, and adequate home improvement lending in 2017.

#### Analysis of Lending Gaps

BPPR's responsiveness in meeting the needs of its community is also demonstrated through analysis of conspicuous gaps in lending in LMI census tracts. As shown in the chart below, the bank demonstrated

excellent responsiveness to the credit needs of the assessment area by having excellent penetration rates in LMI census tracts. In each year, the bank’s penetration rate in LMI census tracts exceeded 75.0%. The following table is a summary of the analysis of lending gaps in the assessment area.

<b>MSA 38660 (Ponce, PR)</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2018</b>			
Low	5	0	100.0%
Moderate	22	2	90.9%
Middle	39	1	97.4%
Upper	24	0	100.0%
Unknown	7	6	14.3%
<b>Total Tracts</b>	<b>97</b>	<b>9</b>	<b>90.7%</b>
<b>2017</b>			
Low	5	0	100.0%
Moderate	22	1	95.5%
Middle	39	0	100.0%
Upper	24	0	100.0%
Unknown	7	6	14.3%
<b>Total Tracts</b>	<b>97</b>	<b>7</b>	<b>92.8%</b>
<b>2016</b>			
Low	4	0	100.0%
Moderate	23	1	95.7%
Middle	38	0	100.0%
Upper	26	0	100.0%
Unknown	6	6	0.0%
<b>Total Tracts</b>	<b>97</b>	<b>7</b>	<b>92.8%</b>
<b>2015</b>			
Low	4	0	100.0%
Moderate	23	0	100.0%
Middle	38	0	100.0%
Upper	26	0	100.0%
Unknown	6	5	16.7%
<b>Total Tracts</b>	<b>97</b>	<b>5</b>	<b>94.8%</b>

### *Home Purchase Loans*

The 2018 geographic distribution of home purchase loans was adequate. BPPR’s home purchase lending distribution in the assessment area was considered adequate based on performance context, which indicated limited opportunities to lend in low-income tracts in the assessment area. The bank’s lending in low-income tracts in 2018, at 0.9% by number and 0.8% by dollar, was below both the aggregate lending data, at 2.4%

by number and 1.7% by dollar, and the demographic figure, at 2.9%. Lending performance to the moderate-income tracts, at 8.3% by number and 6.5% by dollar, was consistent with aggregate lending data, at 9.5% by number and 7.9% by dollar. However, the bank's lending did fall below the demographic figure, at 17.6%.

Home purchase performance in 2017, 2016, and 2015 in the low-income census tracts was comparable to performance in 2018. However, performance in the moderate-income tracts fell below 2018 performance.

### *Refinance Loans*

BPPR's geographic distribution of refinance lending performance in the LMI geographies of MSA 38660 was adequate. Based on the performance context, opportunities were limited for refinance loans in low-income geographies. BPPR's performance in low-income geographies in 2018, at 2.1% by number and 0.8% by dollar volume was comparable to both aggregate lending data, at 1.8% and 1.3% by number and dollar volume, respectively, as well as the demographic figure, at 2.9%. The bank's refinance lending to the moderate-income tracts, at 4.3% for both number and dollar volume, was below the aggregate lending data, at 9.1% by number and 6.9% by dollar. In addition, the bank's performance in the moderate-income tracts was significantly below the demographic figure, at 17.6%.

The bank's performance in the low-income tracts for 2017, 2016, and 2015 was consistent with aggregate lending data and consistent with 2018 performance. 2017 performance in the moderate-income tracts was comparable to aggregate lending data, and exceeded 2018 performance. The bank's 2016 and 2015 performance was below aggregate lending data and more comparable to 2018 performance.

### *Home Improvement Loans*

BPPR's home improvement lending performance in the LMI geographies of MSA 38660 was adequate. Evaluation of home improvement lending was primarily based on performance in 2017. In 2018, HMDA reporting requirements were changed reducing the number of BPPR's reportable home improvement loans; therefore, BPPR's 2018 volume was insufficient to obtain meaningful conclusions. Home improvement lending in low-income geographies in 2017, at 1.3% by number and 0.9% by dollar, was comparable to aggregate lending data at 1.7% by number and 1.3% by dollar. The bank's lending was just slightly below the demographic figure, at 2.9%. The bank's lending to moderate-income tracts, at 19.8% by number and 13.7% by dollar was consistent with aggregate lending data, at 21.0% by number and 15.0% by dollar, and the demographic figure of 17.6%.

BPPR's performance in 2015 and 2016 in both the low- and moderate-income tracts was consistent with aggregate lending data as well the bank's performance in 2017.

### *Small Business Loans*

BPPR's small business lending performance was adequate. The bank's small business lending in 2018 in the low-income tracts, at 4.0% by number and 6.4% by dollar, was consistent with aggregate lending data

at 4.5% by number and 5.2% by dollar. However, the bank's performance was below the percentage of businesses in the low-income tracts at 11.1%. Lending to the moderate-income tracts, at 15.9% by number and 18.5% by dollar, was also consistent with the aggregate lending data, at 15.9% by number and 17.5% by dollar, but below the demographic figure, at 29.5%.

The bank's small business lending performance in 2017, 2016 and 2015, in both the low-income and moderate-income tracts was consistent with the aggregate lending data. This was also consistent with the bank's 2018 small business lending performance.

BPPR was the market leader by count for small business loans in both 2018 and 2017, with 58.3% and 62.3% of market share, respectively.

### **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

BPPR's distribution of loans to borrowers in the MSA 38660 reflected good overall penetration among borrowers of different income levels and businesses of different sizes. In reaching conclusions about performance, consideration was given to performance context factors, such as the high cost of housing for LMI persons and the high poverty rate. Overall, lending to small businesses was excellent while lending to low-income and moderate-income borrowers overall, was adequate.

#### *Home Purchase Loans*

BPPR's home purchase lending was adequate. In 2018, the bank did not originate any home purchase loans to individuals of low-income, however this is consistent with aggregate lending data, which also reported zero loans originated to low-income borrowers. The demographic figure reported 27.5% of families by family Income, were of low income. However, considering performance context factors such as the high cost of housing, where the median value of a home in the assessment area is at least 10 times the income of a low-income borrower, opportunity may not equal capacity. The bank's lending to moderate-income borrowers, at 0.9% and 0.6%, by number and dollar volume, respectively, is slightly below the aggregate lending data, at 3.3% by number and 1.9% by dollar. The bank's performance fell significantly below the demographic figure, at 27.5%.

The bank's home purchase lending in 2017, 2016, and 2015 to low-income borrowers was consistent with aggregate lending data, and with the bank's performance in 2018. Lending to moderate-income borrowers for 2017, 2016, and 2015 was also consistent with aggregate lending data, and exceeded the bank's performance in 2018.

#### *Refinance Loans*

The bank's borrower distribution of home refinance lending was adequate. In 2018, the bank did not originate any home refinance loans to low-income borrowers. This was comparable to the aggregate lending data at 0.6% by both number and dollar volume but fell significantly below the demographic figure, at 27.5%. When considering the performance context factors, refinance lending to low-income borrowers



can be challenging. The bank's lending to moderate-income borrowers, at 2.1% by number and 1.0% by dollar was slightly below the aggregate lending data, at 4.3% by number and 2.7% by dollar. Additionally, the bank's performance fell below the demographic figure, at 13.8%.

The bank's home refinance lending for 2017, 2016, and 2015 in both the low- and moderate-income tracts was consistent with the bank's 2018 lending performance, and comparable to the performance of aggregate lending data in the low-income tracts, while just slightly below the performance in moderate-income tracts.

### *Home Improvement Loans*

BPPR's home improvement lending was good. In 2018, HMDA reporting requirements were changed reducing the number of BPPR's reported home improvement loans. BPPR's 2018 volume was insufficient to obtain meaningful conclusions; therefore, the home improvement lending analysis was primarily based on the bank's 2017 home improvement lending. The bank's lending to low-income borrowers in 2017, at 3.0% by number and 0.9% by dollar was comparable to aggregate lending, at 4.2% by number and 1.3% by dollar. However, performance was significantly below the demographic figure at 27.5%. The bank's lending to moderate-income borrowers, at 22.0% by number and 10.4% by dollar, was slightly above aggregate lending data, at 19.5% by number and 8.8% by dollar. The bank's performance also exceeded the demographic figure, at 13.8%.

The bank's home improvement lending for 2016 and 2015 is consistent with the bank's 2017 lending. The bank's lending to low income borrowers was comparable to aggregate lending data, while slightly exceeding lending to moderate-income borrowers.

### *Small Business Loans*

BPPR provided an excellent level of lending to small business borrowers with gross annual revenue of \$1 million or less. In 2018, the bank's small business lending, at 75.3% by number and 51.1% by dollar volume, was comparable to the demographic figure, at 73.5%. The bank's performance exceeded the aggregate lending data, at 63.5% of its loans by number and 44.3% by dollar volume. The bank's 2017, 2016, and 2015 lending to small businesses was consistent with the bank's 2018 lending as performance exceeded the aggregate lending data.

In addition, the bank made 89.7% of its small business loans in amounts of \$100,000 or less, which is indicative of amounts needed by smaller business entities. Typically, the extent to which a bank is willing to extend loans in the amounts of \$100,000 or less is reviewed because small businesses have a greater need for small dollar loans. The average loan size was \$60,000, an amount that addresses the needs of small businesses.

### **Community Development Lending**

BPPR made a relatively high level of community development loans in MSA 38660 (Ponce, PR). The bank's community development lending was highly responsive to the credit needs within the assessment

area. This conclusion was supported by a favorable comparison to similarly-situated large retail banks in the assessment area.

During the examination period, community development lending in MSA 38660 (Ponce, PR) totaled 74 loans for \$144.4 million, representing 6.7% of all BPPR’s community development lending activity in Puerto Rico. At the previous evaluation, the bank originated a total of 77 qualified loans for approximately \$201.2 million. The current lending activity for this review period represents a decrease of 3.9% by the number of loans and a decrease of 28.1% by the dollar amount.

The bank’s community development loans were responsive to assessment area needs. A significant majority of the bank’s community development loans were for the purpose of funding community service opportunities. These were an identified need with the prolonged economic recession and expanding humanitarian crisis after Hurricane Maria. Moreover, community service loans were a need for the assessment area that has 49.7% of families that live below the poverty level.

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>MSA 38660 (Ponce, PR)</b>		
<b>PURPOSE</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	4	7,853
Economic Development	10	85,190
Community Services	56	21,468
Revitalization and Stabilization	4	29,900
<b>TOTAL</b>	<b>74</b>	<b>144,411</b>

Examples of community development lending include the following:

- Four loans to organizations that provide affordable housing to eligible low-income senior citizens under the section 8 housing choice voucher program. The combined loans supported 269 affordable apartments.
- Four economic development loans totaling \$73.9 million, which provided working capital to a renewable energy organization that provided new and retained existing jobs to LMI individuals.
- A combined total of \$11.9 million of community service loans was provided to an organization that offered social programs directed to LMI including the following: young people who had dropped out of school; shelter for homeless; alcohol and drug recovery; women and child victims of domestic violence; and technical career classes. In addition, this organization received 74% of its funding from federal and state funds.
- A \$21.1 million line of credit that stabilized a renewable energy organization. Post Hurricane Maria, several areas were without power and this organization was providing clean, renewable locally produced electricity to LMI individuals residing in LMI geographies.

## INVESTMENT TEST

BPPR’s performance on the Investment Test in MSA 38660 (Ponce, PR) was adequate. The bank made an adequate level of qualified CD investments and grants, rarely in a leadership position, made occasional use of innovative and complex investments to support CD initiatives, and exhibited adequate responsiveness to credit and CD needs.

The bank made no investments that specifically targeted MSA 38660 (Ponce, PR), which is significantly less than the \$9.3 million in qualified investments during the previous evaluation. However, the assessment area benefitted from the \$103.0 million of Island-wide mortgage backed securities and also benefitted from investment in the innovative Popular Mezzanine Fund and the complex Popular Community Capital during the review period. In addition, BPPR provided grants worth \$623,000 to organizations serving low- and moderate-income individuals and communities and small businesses. During the previous review period, the bank’s assessment area grants totaled \$324,000. On an annualized basis, the bank’s performance was generally consistent between exams.

<b>QUALIFIED INVESTMENTS</b>		
<b>MSA 38660 (Ponce, PR)</b>		
<b>PURPOSE</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	0	\$0
Economic Development	3	\$17
Community Services	79	\$606
Revitalization and Stabilization	0	\$0
<b>TOTAL</b>	<b>82</b>	<b>\$623</b>

The bank made a reasonable level of grants in MSA 38660 (Ponce, PR), primarily addressing community service needs. This activity was responsive to assessment area needs identified by community contacts, particularly in response to Hurricane Maria. Examples of grants made in MSA 38660 (Ponce, PR) included:

- The bank made four grants totaling \$100,000 to Centros Sor Isolina Ferré. The grants supported the organization’s work to serve at risk youth and LMI communities with education, economic self-sufficiency, preventing violence and community action.
- BPPR granted \$220,000 to Museo de Arte de Ponce, supporting projects that bring arts to LMI children.
- The bank granted \$118,600 in scholarships to LMI students from the assessment area, and sponsorships funding organizations that serve LMI individuals and communities in the assessment area.

## SERVICE TEST

BPPR provided a relatively high level of community development services in MSA 38660 (Ponce, PR). Delivery systems were accessible to the bank's geographies and individuals of different income levels in its assessment area, changes in branch locations did not adversely impact the accessibility of delivery systems, and hours and services were tailored to the convenience and needs of the assessment area.

### Retail Services

BPPR's delivery systems in MSA 38660 (Ponce, PR) were accessible to essentially all portions of the bank's assessment area, when compared with the percentage of population residing in LMI geographies. BPPR operated 13 branches in this assessment area, of which three or 23.1% were located in moderate-income areas, compared to 24.2% of the MSA's population residing in LMI areas.

Alternative delivery systems somewhat enhanced the bank's performance in this assessment area. BPPR used multiple alternative delivery systems not specifically targeted to LMI individuals, such as bank-by-mail, internet banking, mobile banking, Interactive Kiosks, and 24-hour automated services. BPPR maintained 23 off-site ATMs in MSA 38660 (Ponce, PR), of which three (13.0%) were located in LMI tracts.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, one branch was acquired and one existing branch was consolidated into the acquired branch, each of which were located in an upper-income census tract.

BPPR's hours and services are tailored to the convenience and needs of the assessment area, particularly LMI geographies and LMI individuals. Extended morning, late afternoon, and weekend and holiday hours were available at branches in this assessment area. Of the 13 branches in the assessment area, seven branches (53.8%) had Saturday, Sunday or holiday hours. Of the three branches in LMI census tracts, two branches had weekend or holiday hours.

### Community Development Services

BPPR provided a relatively high level of community development services in MSA 38660 (Ponce, PR), conducting 299 financial services-related activities primarily consisting of financial education seminars.

The bank sponsored 196 community development services during the previous review period. The table to the right shows the number and type of services provided. In addition, BPPR’s management and staff engaged in community service provided community service to 25 non-profit and community based organizations in MSA 38660.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>MSA 38660 (Ponce, PR)</b>	
Financial Education	253
Mortgage Education Seminars	27
Technical Assistance	19
Small Business Seminars	0
Board Participation	0
<b>TOTAL</b>	<b>299</b>

Examples of community development services include:

- Technical assistance was provided to community members affected by Hurricane Maria, which included help in filling out claims with FEMA and other government agencies.
- Fund raising efforts were directed to providing material support to LMI families and individuals within the assessment area after the hurricanes.
- Employees organized a health fair for the community and financial awareness counseling to LMI residents.
- Bank employees delivered first aid supplies to clients of a women’s rehabilitation services provider.

## METROPOLITAN AREA (LIMITED REVIEW)

### MSA 11640 (Arecibo, PR)

#### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of BPPR's performance in MSA 11640 (Arecibo, PR) was conducted. According to the 2015 ACS, MSA 11640 (Arecibo, PR) had 5.4% of the total population of Puerto Rico, and according to 2018 Dun and Bradstreet information, 2.9% of all business establishments. The assessment area had an unemployment rate of 11.3% for 2018, and 45.7% of its families were below the poverty rate.

During the evaluation period BPPR had 4.4% of its Puerto Rico lending activity in this assessment area and maintained six branches. Three of the branches were in LMI census tracts. The six branches operating in MSA 11640 (Arecibo, PR) generated 1.9% of the bank's deposits in Puerto Rico as of June 30, 2018. BPPR was the leading bank in the assessment area (1 of 4) with 65.2% of all deposits.

Key demographic highlights are listed below:

<b>Assessment Area Demographics – MSA 11640 (Arecibo, PR)</b>				
<i><b>Income Category</b></i>	<i><b>Tract Distribution</b></i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	1	2.2	0.5	26.2
Moderate Income	9	20.0	13.2	14.5
Middle Income	22	48.9	59.4	17.0
Upper Income	9	20.0	27.0	42.2
Unknown	4	8.9	0.0	0.0
<b>Total</b>	<b>45</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

BPPR's performance in MSA 11640 (Arecibo, PR) was consistent with its overall performance in Puerto Rico, which was based on performance in the full-scope assessment areas. Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix A.

Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 11640 (Arecibo, PR)	Below	Consistent	Consistent

In 2018, BPPR's lending test performance in MSA 11640 was below the overall performance but was good as BPPR was second in the market for HMDA lending and the leader in small business lending with 24.9% and 60.2% of the market, respectively. Geographic and borrower distribution performance was good and community development lending performance was excellent as the bank was a leader in making community development loans with \$16.6 million in community development lending or 0.8% of all BPPR's community development lending in Puerto Rico.

Performance under both the investment and service test was consistent with overall performance as BPPR reported \$141,000 in qualified investments in the assessment area or 0.1% of qualified investments in Puerto Rico and was a leader in providing community development services in the assessment area.

## METROPOLITAN AREA (LIMITED REVIEW) MSA 25020 (Guayama, PR)

### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of BPPR's performance in MSA 25020 (Guayama, PR) was conducted. Located on the Caribbean coast of Puerto Rico, the assessment area has a population of 81,159 or 2.3% of the total population of Puerto Rico and 0.8% of its business establishments according to 2018 Dun and Bradstreet information. Unemployment in the MSA 25020 (Guayama, PR) assessment area was high with an unemployment rate of 14.3% in 2018. The assessment area also has high poverty rates with 51.4% of all families with incomes below the poverty rate.

Key demographic highlights are listed on the chart below:

<b>Assessment Area Demographics – MSA 25020 (Guayama, PR)</b>				
<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	1	5.0	1.5	24.9
Moderate Income	1	5.0	3.5	14.4
Middle Income	13	65.0	78.5	17.3
Upper Income	2	10.0	16.5	43.5
Unknown	3	15.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

During the evaluation period BPPR had 1.8% of its Puerto Rico lending activity in this assessment area and maintained three branches. None of the branches were in LMI census tracts. The three branches operating in MSA 25020 (Guayama, PR) generated 0.8% of BPPR's deposits in Puerto Rico as of June 30, 2018. BPPR is the leading bank in the assessment area (1 of 3) with 70.3% of all deposits.



## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

BPPR's performance in MSA 25020 (Guayama, PR) was consistent with its overall performance in Puerto Rico, which was based on performance in the full-scope assessment areas. Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix A. Conclusions regarding performance, which did not impact the overall rating, are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
MSA 25020 (Guayama, PR)	Consistent	Below	Below

In 2018, BPPR's lending test performance was excellent as BPPR was the market leader for both HMDA and small business lending with 29.8% and 74.3% of the market, respectively. Geographic and borrower distribution performance was good. Community development lending performance was excellent with \$78.7 million in community development lending or 3.7% of all BPPR's community development lending in Puerto Rico.

Performance under both the investment and service test were below the overall performance as BPPR reported \$13,300 in qualified investments in the assessment area or <0.1% of qualified investments in Puerto Rico, and there were no branches in LMI geographies. The bank provided a relatively high level of community development services in the assessment area.

## METROPOLITAN AREA (LIMITED REVIEW)

### MSA 32420 (Mayaguez, P.R.)

#### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of Banco Popular de Puerto Rico's performance in MSA 32420 (Mayaguez, P.R.) was conducted. According to the 2015 ACS, Mayaguez has 2.8 of the total population of Puerto Rico and according to 2018 Dun and Bradstreet information 3.2% of all business establishments. The assessment area suffers from high unemployment with an unemployment rate of 11.1% for 2018 and 42.9% of its families below the poverty rate.

Key demographic highlights are listed below:

<b>Assessment Area Demographics – MSA 32420 (Mayaguez, PR)</b>				
<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	1	3.2	1.7	28.1
Moderate Income	11	35.5	21.4	13.3
Middle Income	9	29.0	46.3	16.6
Upper Income	7	22.6	29.3	42.0
Unknown	3	9.7	1.3	0.0
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

During the evaluation period BPPR had 3.0% of its Puerto Rico lending activity in the MSA 32420 (Mayaguez, PR) assessment area and maintained seven branches. Four of the branches were in LMI census tracts. The seven branches operating in MSA 32420 (Mayaguez) generated 2.2% of deposits in Puerto Rico as of June 30, 2018. BPPR is the leading bank in the assessment area (1 of 5) with 53.1% of all deposits.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

BPPR's performance in MSA 32420 (Mayaguez, PR) was consistent with its overall performance in Puerto Rico, which was based on performance in the full-scope assessment areas. Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix A.

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 32420 (Mayaguez, PR)	Consistent	Consistent	Consistent

In 2018, BPPR's lending test performance was good as BPPR was the market leader in both HMDA and small business lending with 26.2% and 66.2% of the market, respectively. Geographic and borrower distribution performance was good. Community development lending performance was excellent with \$46.3 million in community development lending or 2.2% of all BPPR's community development lending in Puerto Rico.

Performance under both the investment and service test was also consistent with overall performance as BPPR reported \$696,500 in qualified investments in the assessment area or 0.4% of qualified investments in Puerto Rico and was a leader in providing community development services in the assessment area.

## METROPOLITAN AREA (LIMITED REVIEW)

### MSA 41900 (San German-Cabo Rojo, PR)

#### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of BPPR's performance in MSA 41900 (San German-Cabo Rojo, PR) was conducted. According to the 2015 ACS, the MSA 41900 (San German-Cabo Rojo, PR) assessment area has 3.7% of the total population of Puerto Rico and according to 2018 Dun and Bradstreet information 1.8% of all business establishments. The assessment area suffers from high unemployment with an unemployment rate of 12.3% for 2018 and 48.1% of its families below the poverty rate.

Key demographic highlights are listed below:

<b>Assessment Area Demographics – MSA 41900 (San German-Cabo Rojo, PR)</b>				
<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	27.5
Moderate Income	4	12.9	9.1	14.2
Middle Income	18	58.1	66.8	16.6
Upper Income	6	19.4	24.2	41.7
Unknown	3	9.7	0.0	0.0
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

During the evaluation period BPPR had 4.4% of its Puerto Rico lending activity in the MSA 32420 (San German-Cabo Rojo, PR) assessment area and maintained four branches. None of the branches were in LMI census tracts. The four branches operating in MSA 41900 (San German-Cabo Rojo, PR) generated 1.8% of BPPR's deposits in Puerto Rico as of June 30, 2018. BPPR is the leading bank in the assessment area (1 of 2) with 91.0% of all deposits.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

BPPR's performance in MSA 41900 (San German-Cabo Rojo, PR) was consistent with its overall performance in Puerto Rico, which was based on performance in the full-scope assessment areas. Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix A. Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 41900 (San German-Cabo Rojo, PR)	Consistent	Below	Below

In 2018, BPPR's lending test performance was good as BPPR was the market leader for HMDA and small business lending with 35.0% and 72.6% of the market, respectively. Geographic and borrower distribution performance was good. Community development lending performance was excellent with \$20.3 million in community development lending or 0.9% of all BPPR's community development lending in Puerto Rico.

Performance under both the investment and service test was below overall performance as BPPR reported \$23,000 in qualified investments in the assessment area or <0.1% of qualified investments in Puerto Rico and none of the branches were in LMI geographies. The bank was a leader in providing community development services in the assessment area.

## NON-METROPOLITAN AREA (LIMITED REVIEW)

### Non-Metropolitan Puerto Rico Assessment Area

#### DESCRIPTION OF INSTITUTION'S OPERATIONS

A limited evaluation of BPPR's performance in the Puerto Rico Non-Metropolitan assessment area was conducted. According to the 2015 ACS, the Puerto Rico Non-Metropolitan assessment area has 4.3% of the total population of Puerto Rico and according to 2018 Dun and Bradstreet information 2.1% of all business establishments. The assessment area suffers from high unemployment with an unemployment rate of 13.7% for 2018 and 49.9% of its families below the poverty rate.

Key demographic highlights are listed below:

<b>Assessment Area Demographics – Puerto Rico Non-Metropolitan Assessment Area</b>				
<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	28.2
Moderate Income	9	21.4	15.8	13.7
Middle Income	23	54.8	64.5	15.0
Upper Income	6	14.3	19.7	43.1
Unknown	4	9.5	0.0	0.0
<b>Total</b>	<b>42</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

During the evaluation period BPPR had 3.0% of its Puerto Rico lending activity in the Puerto Rico non-MSA assessment area and maintained ten branches. One of the branches was in an LMI census tract. The ten branches operating in the Puerto Rico non-MSA assessment area generated 1.4% of BPPR's deposits in Puerto Rico as of June 30, 2018. BPPR was the leading bank in the assessment area (1 of 2) with 92.0% of all deposits.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

BPPR's performance in the Puerto Rico Non-MSA assessment area was consistent with its overall performance in Puerto Rico, which was based on performance in the full-scope assessment areas. Facts and data reviewed, including performance, can be found in the tables accompanying this report in Appendix A.

Conclusions regarding performance, which did not impact the overall rating, are as follows:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Puerto Rico Non-MSA	Consistent	Consistent	Consistent

In 2018, BPPR's lending test performance was good as BPPR was the leader in the market for both HMDA and small business lending with 36.6% and 69.8% of the market, respectively. Geographic and borrower distribution performance was good. Community development lending performance was excellent as BPPR was a leader in making community development loans in the non-MSA assessment area with \$24.7 million in community development lending or 1.2% of all BPPR's community development lending in Puerto Rico.

Performance under both the investment and service test was also consistent with overall performance as BPPR reported \$148,000 in qualified investments in the assessment area or 0.1% of qualified investments in Puerto Rico and was a leader in providing community development services in the assessment area.

## U.S. VIRGIN ISLANDS

**CRA RATING FOR U.S. VIRGIN ISLANDS:** Satisfactory

*The Lending Test is rated: High Satisfactory.*

*The Investment Test is rated: Low Satisfactory.*

*The Service Test is rated: Outstanding.*

The major factors supporting the rating include:

Lending Test:

- Lending levels reflect good responsiveness to AA credit needs.
- A high percentage of loans are made in the bank's AA.
- The geographic distribution of loans reflects good penetration throughout the AA.
- The distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and businesses of different sizes.
- Exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses.
- Makes a relatively high level of CD loans.
- Makes use of innovative and/or flexible lending practices in serving AA credit needs.

Investment Test:

- An adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position.
- Makes occasional use of innovative and/or complex investments to support CD initiatives.
- Exhibits adequate responsiveness to credit and CD needs.

Service Test:

- Delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its AA.
- Records of opening and closing of branches has not adversely affected the accessibility of its delivery system, particularly to LMI geographies and/or LMI individuals.
- Reasonableness of business hours and services are tailored to the convenience and needs of its AA, particularly LMI geographies and/or LMI individuals.
- Provides a relatively high level of CD services.



## DESCRIPTION OF INSTITUTION'S OPERATIONS

BPPR operated eight retail branches in the USVI, representing 4.7% of BPPR's total branch network. Four of the branches in the USVI are located in moderate-income geographies. BPPR is one of only four banks in the USVI Non-Metropolitan assessment area. As of June 30, 2018, BPPR's USVI branches held \$1.1 billion in deposits. BPPR ranks first in deposit market share (44.1%) ahead of its principal competitor on the Islands, Firstbank of Puerto Rico (39.9%). Other banks include United Fidelity Bank, FSB, and Merchants Commercial Bank. The USVI contains approximately 1.0% of the total loans originated by BPPR during the review period.

## PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include the U.S. Department of Commerce's Bureau of the Census and the U.S. Department of Labor, 2010 Census, 2015 ACS, FFIEC, D&B, and Housing and Department of Housing and Urban Development (HUD).

### *Demographic Characteristics*

According to the ACS, demographic data reflected that the population of the assessment area was 106,405. The population of the assessment area decreased by 5.3% between 2010 and 2015. The assessment area consisted of 32 census tracts, of which 3.1% were low-income and 21.9% were moderate-income census tracts.

### *Income Characteristics*

There were 26,237 families in the USVI assessment area, of which approximately 2.2% resided in low-income geographies and 25.3% resided in moderate-income geographies. According to the 2010 census data, approximately 27.0% of families residing in the USVI assessment area were considered low-income and 12.0% were moderate-income. Of the total families residing in the assessment area, 18.0% lived below the poverty level. Income levels in the USVI were generally higher than in Puerto Rico. The 2014 HUD-adjusted MFI for the USVI was \$41,800 on the Island of St Thomas, \$31,200 for the island of St. Croix, and \$50,573 for the island of St. John. For the USVI, the ACS-estimated MFI was \$45,058 in 2015, which was an increase of 3.3% from the 2010 MFI. In the USVI assessment area, 37.8% of families lived below the poverty level.

### *Housing Characteristics*

According to the 2010 census, the USVI assessment area had 55,901 housing units, of which 37.0% (20,700) were owner-occupied, 40.3% (22,514) were rentals, and 22.7% (12,687) were vacant. Vacant housing units in non-LMI census tracts were generally vacation homes that were not occupied year-

round. Many rental units were apartments that were part of private homes. About 3,500 rental units were public housing. A breakdown of housing types by census tract income levels was not available.

As reported by the USVI Bureau of Economic Research, the housing and real estate market continued to be depressed. Comparison of the MFI to the average home price illustrated the challenges LMI individuals face in obtaining affordable housing. The average sales price of a home in the USVI was estimated to be about 22 times the income of a low-income family and 14 times the income of a moderate-income family.

### *Labor, Employment and Economic Characteristics*

According to the USVI Bureau of Economic Research, unemployment in the USVI was decreasing, from 12.0% in 2017 to 8.4% in 2018 as the Islands continued to recover from recession and the 2017 Hurricanes. A number of factors continued to restrain economic conditions, including uncertainty associated with anticipated growth of the U.S. economy, the major partner for tourism, trade and investment, and the need for policies and programs to encourage economic growth and development.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **Lending Test**

BPPR's overall lending performance in the Non-Metropolitan assessment area of St. Thomas, St. Croix, and St. John was rated *high satisfactory*. HMDA and small business loan data is not reported for activity in the USVI; as a result, there is no aggregate data to compare the bank's activity. BPPR collected and provided data for the CRA evaluation.

### **Lending Activity**

Lending activity reflected good responsiveness to assessment area credit needs in relation to the bank's capacity and performance context issues. During the evaluation period, 457 HMDA-related and small business loans totaling approximately \$47.4 million were originated in the USVI assessment area. Lending activity in the USVI represents approximately 1.0% of the bank's total lending activity evaluated during this evaluation period.

### **Geographic Distribution of Loans**

As BPPR's overall lending in the USVI is limited, HMDA lending volumes are insufficient to analyze on an individual product basis; therefore, HMDA lending was analyzed as a group. The geographic distribution of HMDA-related and small business loans in the USVI reflected good performance in LMI geographies. As complete demographic data from the 2010 census is not available at the census tract level, the level of HMDA-related and small business lending in LMI census tracts was compared to the percentage of LMI census tracts. Aggregate lending data was also not available for the USVI. Approximately 13.6% of all HMDA-related loans and no small business loans in 2018 were made in the assessment area's one

low-income census tract, which represented 3.1% of all census tracts. HMDA-related lending performance in moderate-income tracts was adequate as 9.1% of HMDA-related loans were in moderate-income tracts while 21.9% of census tracts were moderate-income. Small business lending performance was excellent as 46.2% of all small business loans were in moderate-income tracts.

In 2017, 2.4% (one loan) of HMDA-related lending was made in the low-income census tract, while 21.4% of HMDA-related loans were in moderate-income tracts. While no small business lending occurred in the low-income tract, 48.6% of small business loans were made in moderate-income tracts. HMDA performance in 2016 (no loans) and 2015 (2.4%) was similar in the low-income tract and lower in the moderate-income tract at 8.5% and 5.0%, respectively. Small business lending was similar in the low-income tract in 2016 and 2015 as only one loan was made; small business lending in the moderate-income tract was similar in 2016 (43.4%) but lower in 2015 (33.7%).

### **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

BPPR's distribution of borrowers in the USVI assessment area reflects, given the product lines offered, overall good penetration among customers of different income levels and businesses of different sizes. Lending to small businesses was good, while overall lending to low- and moderate-income borrowers was adequate. It should be noted that the ACS only supplied family income data for ranges of income and the distribution of family income was estimated based on these ranges. Aggregate lending data was not available for the USVI.

BPPR's HMDA lending performance in lending to low-income borrowers was adequate overall when compared to the 27.0% of families in the USVI who are low-income, and considering the performance context issues noted earlier for the USVI. In 2018, the bank made no HMDA-related loans to low-income borrowers, while in 2017, the bank made one home purchase loan, no refinance loans, and no home improvement loans to low-income borrowers. However, as previously noted, the average home sales price for the USVI was 22 times the income of a low-income family, making it difficult for lenders to extend home purchase, refinance, and home improvement loans to low-income borrowers in this assessment area. HMDA lending performance in 2016 was above and in 2015 was similar to 2017 HMDA lending to low-income borrowers.

BPPR's HMDA lending performance to moderate-income borrowers was adequate overall when compared to the 12.0% of families in the USVI that are of moderate-income, and considering the performance context issues for the USVI. In 2018, the bank made no home purchase loans, three refinance loans and no home improvement loans to moderate-income borrowers. In 2017, the bank made five home purchase loans, no refinance loans and no home improvement loans to moderate-income borrowers. However, as noted previously, the average sales price for the USVI was 14 times the income of a moderate-income family, making it difficult for lenders to extend home purchase and home improvement loans to moderate-income borrowers. Performance in 2016 was comparable to the performance in 2017, while performance in 2015 was below 2017.

BPPR provided a good level of lending to small business borrowers with GAR of \$1 million or less in 2018. Overall, the bank made 63.1% of its small business loans to these businesses, compared to the 78.3% of business establishments in the MSA with GAR of \$1 million or less. The bank made 75.4% of its small business loans in amounts of \$100,000 or less with an overall average loan size of \$114,000. Performance from 2015 through 2017 was similar in number but demographic data from D&B was not available for comparative purposes.

**Community Development Lending**

Banco Popular made a relatively high level of community development loans and was highly responsive to the credit needs of the USVI. This conclusion was supported by a favorable comparison to similarly-situated large retail banks in the assessment area.

During the evaluation period, community development lending in the USVI totaled 25 loans for \$107.8 million. At the previous evaluation, the bank originated a total of 36 qualified loans for approximately \$124.4 million. The bank decreased the number of loans by 30.6% and the dollar amount decreased by 13.3%. However, the bank’s lending was responsive to the community development needs within the USVI. The majority of the loans were for community services. Within the assessment area, efforts were distributed among the applicable categories of community development lending, with the exception of affordable housing. As reported by the USVI Bureau of Economic Research, the housing and real estate market continue to be depressed, making it difficult for the bank to originate these type of loans. The average sale price of a home in the USVI was estimated to be about 22 times the income of low-income family and 14 times the income of moderate-income families. In addition, the population in the USVI decreased by approximately 2.0% from 2000-2015.

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>U.S. VIRGIN ISLANDS</b>		
<b>PURPOSE</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	0	0
Economic Development	3	23,400
Community Services	14	18,670
Revitalization and Stabilization	8	65,750
<b>TOTAL</b>	<b>25</b>	<b>107,820</b>

Examples of community development lending include the following:

- Eight of the community service loans, totaling \$3.4 million, were to organizations that provide medical services targeted to LMI individuals.
- All three loans for economic development were to an organization that works with the government in distressed census tracts to raise capital and create and retain jobs for LMI residents of Saint Thomas.
- All eight revitalization and stabilization loans were made to the Virgin Islands Water and Power Authority to assist improving the water supply and help maintain a vital service to community residents. This includes renewals and one new loan in the amount of \$40.0 million.

## INVESTMENT TEST

The bank’s performance relative to the Investment Test in the USVI was rated *low satisfactory* based on an adequate level of qualified investments and grants, and occasional use of innovative and complex investments to support community development needs.

During the review period, the bank made no investments, but donated \$250,000 to local organizations, which were deemed responsive to the assessment area. This represented an annualized 40.0% increase in donation activity between the previous and current examinations, when controlling for the difference in review period length.

Examples of grant activity in the USVI included:

- BPPR made seven grants to the Virgin Islands Department of Education, totaling \$11,200. The grants supported LMI residents through literacy, music education, and the “STEAM” fair, which promotes careers in science, technology, engineering, arts, and mathematics.
- Seven grants totaling \$18,900 to Junior Achievement of the Virgin Islands, providing financial education to LMI youth.
- The bank granted \$10,100 to the Allen D. Burke Foundation, which promotes nonviolence through focusing youth attention on sports. The grant supports LMI youth athletics.

QUALIFIED INVESTMENTS		
U.S. VIRGIN ISLANDS		
PURPOSE	#	\$(000s)
Affordable Housing	0	\$0
Economic Development	8	\$31
Community Services	139	\$219
Revitalization and Stabilization	0	\$0
<b>TOTAL</b>	<b>147</b>	<b>\$250</b>

## SERVICE TEST

BPPR’s performance under the service test in the USVI was rated *outstanding* based on delivery systems that were readily accessible to the bank’s assessment area, changes in branch locations that did not adversely impact the accessibility of delivery systems, hours and services that were tailored to the convenience and needs of the assessment area, and by providing a relatively high level of community development services.

### Retail Services

BPPR’s delivery systems in the USVI were readily accessible to all portions of the assessment area, when compared with the percentage of the assessment area’s population residing in LMI geographies. BPPR operated eight branches in this assessment area, of which four branches (50.0%) were located in moderate-income areas, compared to 28.8% of the assessment area’s population residing in LMI areas.

Alternative delivery systems somewhat enhanced the bank’s performance in this assessment area. BPPR used multiple alternative delivery systems, including bank-by-mail, internet banking, mobile banking, and 24/7/365 live customer service.

During the evaluation period, no branches were opened, closed or relocated. BPPR’s hours and services were tailored to the convenience and needs of its assessment area. During the review period, the number of branches with extended hours on Friday increased from zero to seven branches, and Saturday and holiday hours were available at three branches in this assessment area, one of which was in a moderate-income geography.

### Community Development Services

BPPR provided a relatively high level of community development services in the USVI by providing 90 qualified activities, which primarily consisted of financial education seminars. In addition, BPPR officers served as directors, advisors, or committee members, providing financial management expertise and technical assistance to twelve non-profit and community based organizations.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>U.S. VIRGIN ISLANDS</b>	
Financial Education	52
Mortgage Education Seminars	2
Technical Assistance	4
Small Business Seminars	0
Board Participation	32
<b>TOTAL</b>	<b>90</b>

**CRA APPENDIX A**

**Aggregate Comparison Loan Distribution Tables 2018-2015**

**2018 Aggregate Comparison Loan Distribution Table**

Assessment Area/Group: MSA 41980

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	24	0.8%	0.5%	1.6%	1.1%	8	0.3%	0.1%	0.5%	0.2%
Moderate	404	13.2%	9.1%	15.1%	11.7%	81	2.6%	1.4%	6.4%	3.4%
Middle	1,154	37.7%	32.3%	38.1%	32.5%	173	5.6%	3.6%	13.8%	9.2%
Upper	1,479	48.3%	57.9%	45.0%	54.5%	1,191	38.9%	48.1%	58.2%	67.2%
Unknown	4	0.1%	0.1%	0.2%	0.3%	1,612	52.6%	46.9%	21.1%	20.0%
<b>Total</b>	<b>3,065</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,065</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	5	0.8%	0.4%	1.2%	0.9%	7	1.2%	0.4%	2.5%	1.0%
Moderate	89	15.0%	9.3%	16.2%	11.5%	34	5.7%	2.7%	8.6%	4.5%
Middle	209	35.2%	23.0%	36.7%	26.6%	79	13.3%	7.2%	15.9%	9.8%
Upper	290	48.8%	67.3%	45.8%	60.9%	380	64.0%	77.7%	59.9%	71.5%
Unknown	1	0.2%	0.1%	0.1%	0.0%	94	15.8%	12.1%	13.1%	13.2%
<b>Total</b>	<b>594</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>594</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	3.1%	0.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	21.9%	14.6%	0	0.0%	0.0%	9.4%	3.4%
Middle	0	0.0%	0.0%	25.0%	12.6%	0	0.0%	0.0%	18.8%	9.5%
Upper	2	100.0%	100.0%	50.0%	72.0%	1	50.0%	13.2%	62.5%	68.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	50.0%	86.8%	9.4%	18.3%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	42.9%	88.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	14.3%	1.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	100.0%	100.0%	42.9%	9.8%	0	0.0%	0.0%	42.9%	6.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	57.1%	93.4%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	29	0.8%	0.5%	1.5%	1.0%	15	0.4%	0.1%	0.8%	0.3%
Moderate	493	13.5%	9.2%	15.3%	12.2%	115	3.1%	1.6%	6.8%	3.5%
Middle	1,363	37.2%	30.7%	37.9%	31.4%	252	6.9%	4.2%	14.1%	9.2%
Upper	1,772	48.4%	59.5%	45.2%	55.1%	1,572	42.9%	52.9%	58.5%	67.4%
Unknown	5	0.1%	0.1%	0.2%	0.2%	1,708	46.6%	41.2%	19.9%	19.5%
<b>Total</b>	<b>3,662</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,662</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)					
Low	298	4.6%	4.6%	3.4%	3.9%					
Moderate	1,358	21.0%	18.7%	17.5%	17.7%					
Middle	1,901	29.3%	27.2%	25.4%	26.3%					
Upper	2,868	44.3%	48.3%	45.6%	49.7%					
Unknown	56	0.9%	1.2%	0.8%	1.3%					
Tract Unknown	0	0.0%	0.0%	7.3%	1.2%					
<b>Total</b>	<b>6,481</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	4,724	72.9%	47.7%	60.7%	43.1%					
<b>By Loan Size</b>										
\$100,000 or less	5,376	83.0%	35.7%	85.9%	31.7%					
\$100,001-\$250,000	720	11.1%	25.8%	8.4%	23.3%					
\$250,001-\$1 Million	385	5.9%	38.6%	5.7%	45.1%					
<b>Total</b>	<b>6,481</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2017 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41980

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	20	0.7%	0.4%	1.8%	1.4%	1	0.0%	0.0%	0.4%	0.2%
Moderate	391	14.4%	10.3%	16.2%	12.8%	50	1.8%	0.9%	7.3%	4.0%
Middle	1,055	38.7%	31.0%	39.2%	33.3%	164	6.0%	3.8%	17.5%	12.3%
Upper	1,253	46.0%	58.1%	42.4%	52.0%	884	32.5%	43.7%	55.0%	64.9%
Unknown	5	0.2%	0.2%	0.4%	0.4%	1,625	59.7%	51.6%	19.8%	18.6%
<b>Total</b>	<b>2,724</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,724</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	6	0.7%	0.3%	1.6%	1.1%	9	1.0%	0.5%	1.5%	0.7%
Moderate	128	14.5%	12.1%	15.3%	12.8%	30	3.4%	1.8%	5.9%	3.3%
Middle	299	33.8%	24.8%	37.1%	29.6%	77	8.7%	5.0%	15.6%	10.5%
Upper	452	51.1%	62.8%	45.7%	56.1%	555	62.7%	73.3%	60.1%	68.2%
Unknown	0	0.0%	0.0%	0.3%	0.4%	214	24.2%	19.3%	16.9%	17.3%
<b>Total</b>	<b>885</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>885</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	24	1.2%	1.2%	1.1%	0.9%	169	8.7%	2.6%	7.9%	2.6%
Moderate	589	30.4%	19.8%	26.8%	19.6%	413	21.3%	9.3%	22.5%	11.0%
Middle	828	42.7%	33.6%	43.3%	35.1%	480	24.8%	15.6%	25.6%	17.6%
Upper	495	25.6%	45.3%	28.6%	44.3%	841	43.4%	53.3%	42.9%	58.1%
Unknown	1	0.1%	0.0%	0.1%	0.2%	34	1.8%	19.2%	1.0%	10.6%
<b>Total</b>	<b>1,937</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,937</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	50.0%	5.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	50.0%	95.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	50	0.9%	0.5%	1.6%	1.3%	179	3.2%	0.3%	2.5%	0.4%
Moderate	1,108	20.0%	11.4%	18.7%	13.1%	493	8.9%	1.8%	11.0%	4.2%
Middle	2,182	39.3%	29.8%	39.9%	32.5%	721	13.0%	5.0%	19.2%	12.1%
Upper	2,200	39.7%	58.2%	39.5%	52.7%	2,280	41.1%	51.3%	52.8%	65.2%
Unknown	6	0.1%	0.1%	0.3%	0.4%	1,873	33.8%	41.6%	14.5%	18.1%
<b>Total</b>	<b>5,546</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,546</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)					
Low	298	4.7%	5.1%	3.7%	4.6%					
Moderate	1,350	21.2%	18.8%	18.1%	17.7%					
Middle	1,799	28.3%	26.3%	25.0%	25.6%					
Upper	2,858	44.9%	48.6%	44.9%	49.9%					
Unknown	63	1.0%	1.2%	1.0%	1.2%					
Tract Unknown	0	0.0%	0.0%	7.5%	1.0%					
<b>Total</b>	<b>6,368</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	4,608	72.4%	45.7%	66.4%	42.2%					
<b>By Loan Size</b>										
\$100,000 or less	5,316	83.5%	36.5%	85.9%	33.9%					
\$100,001-\$250,000	686	10.8%	25.5%	9.0%	24.9%					
\$250,001-\$1 Million	366	5.7%	37.9%	5.2%	41.2%					
<b>Total</b>	<b>6,368</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					



**2016 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41980

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	93	2.6%	1.5%	3.1%	2.1%	8	0.2%	0.1%	0.8%	0.3%
Moderate	697	19.2%	15.3%	18.8%	15.0%	74	2.0%	1.1%	6.3%	3.4%
Middle	1,334	36.7%	31.0%	36.8%	31.4%	261	7.2%	5.3%	16.3%	11.7%
Upper	1,515	41.6%	52.2%	41.0%	51.3%	1,195	32.8%	43.9%	52.3%	64.6%
Unknown	0	0.0%	0.0%	0.2%	0.2%	2,101	57.7%	49.6%	24.3%	19.9%
<b>Total</b>	<b>3,639</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,639</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	25	1.4%	1.0%	2.5%	1.8%	13	0.7%	0.4%	1.4%	0.8%
Moderate	227	12.9%	11.2%	16.3%	12.9%	58	3.3%	2.0%	5.6%	3.2%
Middle	585	33.3%	25.7%	34.2%	29.4%	168	9.6%	6.3%	14.1%	9.7%
Upper	921	52.4%	62.2%	46.7%	55.7%	888	50.5%	59.5%	52.8%	60.6%
Unknown	0	0.0%	0.0%	0.2%	0.2%	631	35.9%	31.9%	26.1%	25.7%
<b>Total</b>	<b>1,758</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,758</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	105	3.3%	2.2%	3.1%	2.1%	346	11.0%	3.9%	10.7%	4.0%
Moderate	977	31.1%	22.9%	29.1%	22.2%	656	20.9%	10.7%	20.9%	11.2%
Middle	1,217	38.8%	37.2%	39.5%	37.1%	807	25.7%	19.2%	25.4%	18.6%
Upper	838	26.7%	37.7%	28.3%	38.5%	1,280	40.8%	58.0%	42.0%	60.9%
Unknown	1	0.0%	0.0%	0.0%	0.0%	49	1.6%	8.2%	1.0%	5.2%
<b>Total</b>	<b>3,138</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,138</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	2	8.7%	5.9%	9.1%	34.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	26.1%	13.9%	21.2%	9.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	8	34.8%	23.6%	30.3%	16.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	7	30.4%	56.6%	39.4%	39.9%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	23	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	225	2.6%	1.6%	3.0%	2.7%	367	4.3%	0.4%	3.3%	0.6%
Moderate	1,907	22.3%	14.5%	20.5%	14.5%	788	9.2%	2.0%	9.5%	3.6%
Middle	3,144	36.7%	29.5%	36.7%	30.6%	1,236	14.4%	6.4%	17.8%	11.1%
Upper	3,281	38.3%	54.4%	39.6%	52.0%	3,363	39.3%	47.7%	50.0%	61.7%
Unknown	1	0.0%	0.0%	0.2%	0.2%	2,804	32.8%	43.4%	19.4%	23.0%
<b>Total</b>	<b>8,558</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8,558</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)					
Low	300	4.5%	4.4%	4.3%	5.1%					
Moderate	1,328	19.9%	17.1%	18.1%	16.4%					
Middle	1,772	26.5%	24.4%	25.6%	23.6%					
Upper	3,210	48.1%	52.9%	50.3%	53.7%					
Unknown	69	1.0%	1.2%	1.0%	1.2%					
Tract Unknown	0	0.0%	0.0%	0.6%	0.0%					
<b>Total</b>	<b>6,679</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	4,818	72.1%	46.9%	66.2%	42.9%					
<b>By Loan Size</b>										
\$100,000 or less	5,555	83.2%	35.7%	83.9%	31.0%					
\$100,001-\$250,000	707	10.6%	24.2%	9.5%	23.0%					
\$250,001-\$1 Million	417	6.2%	40.0%	6.6%	45.9%					
<b>Total</b>	<b>6,679</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

**2015 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41980

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	79	1.9%	1.2%	2.7%	1.9%	10	0.2%	0.1%	0.8%	0.3%
Moderate	727	17.2%	13.5%	18.2%	14.4%	129	3.1%	1.6%	8.0%	4.4%
Middle	1,489	35.3%	29.1%	36.4%	30.7%	388	9.2%	6.5%	16.9%	11.9%
Upper	1,925	45.6%	56.2%	42.6%	53.0%	1,558	36.9%	48.1%	51.6%	63.6%
Unknown	1	0.0%	0.0%	0.1%	0.1%	2,136	50.6%	43.7%	22.6%	19.8%
<b>Total</b>	<b>4,221</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,221</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	52	1.8%	1.3%	2.3%	1.7%	13	0.5%	0.3%	1.6%	0.9%
Moderate	431	15.2%	12.0%	15.9%	12.8%	86	3.0%	1.8%	5.8%	3.4%
Middle	984	34.8%	28.5%	36.5%	31.3%	183	6.5%	4.3%	11.3%	7.9%
Upper	1,361	48.1%	58.2%	45.2%	54.1%	944	33.4%	41.7%	43.1%	50.9%
Unknown	1	0.0%	0.0%	0.1%	0.1%	1,603	56.7%	51.9%	38.2%	36.9%
<b>Total</b>	<b>2,829</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,829</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	95	2.7%	1.7%	2.8%	2.2%	391	11.1%	3.8%	10.8%	4.0%
Moderate	1,129	32.0%	24.4%	28.7%	23.6%	866	24.5%	12.1%	23.6%	12.1%
Middle	1,353	38.4%	33.0%	39.0%	34.1%	843	23.9%	16.9%	24.1%	18.6%
Upper	951	27.0%	40.9%	29.5%	40.0%	1,356	38.4%	55.6%	40.1%	57.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	72	2.0%	11.6%	1.4%	7.7%
<b>Total</b>	<b>3,528</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,528</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	6.3%	1.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	18.8%	9.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	6.3%	2.1%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	100.0%	100.0%	68.8%	86.3%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	226	2.1%	1.2%	2.6%	1.8%	414	3.9%	0.4%	3.4%	0.7%
Moderate	2,287	21.6%	13.7%	20.0%	14.2%	1,081	10.2%	2.4%	11.0%	4.3%
Middle	3,826	36.2%	29.1%	37.0%	31.0%	1,414	13.4%	6.4%	16.9%	10.6%
Upper	4,238	40.1%	55.9%	40.4%	52.9%	3,858	36.5%	46.3%	46.2%	58.4%
Unknown	2	0.0%	0.0%	0.1%	0.1%	3,812	36.0%	44.5%	22.6%	26.0%
<b>Total</b>	<b>10,579</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10,579</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)					
Low	324	4.6%	4.5%	4.0%	4.6%					
Moderate	1,438	20.4%	17.5%	16.5%	16.5%					
Middle	1,882	26.7%	24.1%	23.6%	23.8%					
Upper	3,343	47.4%	52.9%	47.7%	53.5%					
Unknown	61	0.9%	1.0%	0.9%	0.9%					
Tract Unknown	0	0.0%	0.0%	7.2%	0.7%					
<b>Total</b>	<b>7,048</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	4,892	69.4%	44.7%	66.5%	45.4%					
<b>By Loan Size</b>										
\$100,000 or less	5,709	81.0%	34.4%	83.3%	30.3%					
\$100,001-\$250,000	873	12.4%	26.4%	10.5%	25.9%					
\$250,001-\$1 Million	466	6.6%	39.2%	6.2%	43.8%					
<b>Total</b>	<b>7,048</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2018 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 10380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	1	0.6%	0.2%	1.5%	0.6%	0	0.0%	0.0%	0.0%	0.0%
Moderate	19	12.3%	8.3%	13.9%	12.3%	4	2.6%	0.9%	2.9%	1.3%
Middle	78	50.3%	63.5%	57.7%	61.3%	15	9.7%	4.2%	8.2%	4.5%
Upper	57	36.8%	28.0%	26.8%	25.6%	104	67.1%	53.7%	81.3%	79.1%
Unknown	0	0.0%	0.0%	0.2%	0.1%	32	20.6%	41.2%	7.6%	15.2%
<b>Total</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	1.5%	1.2%	0	0.0%	0.0%	0.5%	0.2%
Moderate	5	9.3%	6.2%	12.0%	11.6%	1	1.9%	0.5%	4.5%	2.5%
Middle	32	59.3%	61.7%	60.5%	64.5%	3	5.6%	4.0%	10.0%	5.8%
Upper	17	31.5%	32.1%	26.0%	22.7%	43	79.6%	82.6%	78.5%	85.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	13.0%	12.8%	6.5%	5.7%
<b>Total</b>	<b>54</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>54</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	33.3%	19.4%	0	0.0%	0.0%	33.3%	19.4%
Upper	0	0.0%	0.0%	66.7%	80.6%	0	0.0%	0.0%	66.7%	80.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	1	0.5%	0.1%	1.5%	0.8%	0	0.0%	0.0%	0.1%	0.0%
Moderate	24	11.5%	7.9%	13.4%	12.1%	5	2.4%	0.9%	3.3%	1.5%
Middle	110	52.6%	63.2%	58.3%	62.0%	18	8.6%	4.2%	8.7%	4.8%
Upper	74	35.4%	28.8%	26.7%	25.1%	147	70.3%	58.7%	80.6%	80.6%
Unknown	0	0.0%	0.0%	0.1%	0.1%	39	18.7%	36.3%	7.3%	13.1%
<b>Total</b>	<b>209</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>209</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	24	2.6%	1.6%		3.1%	1.5%				
Moderate	168	18.5%	19.9%		18.4%	23.8%				
Middle	487	53.7%	53.1%		50.4%	51.2%				
Upper	228	25.1%	25.4%		22.6%	21.8%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		5.5%	1.6%				
<b>Total</b>	<b>907</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	728	80.3%	61.0%		72.9%	54.7%				
<b>By Loan Size</b>										
\$100,000 or less	803	88.5%	45.9%		87.8%	41.0%				
\$100,001-\$250,000	70	7.7%	25.2%		8.1%	26.1%				
\$250,001-\$1 Million	34	3.7%	28.9%		4.1%	32.9%				
<b>Total</b>	<b>907</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2017 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 10380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.2%	0.1%	0	0.0%	0.0%	0.2%	0.1%
Moderate	23	13.5%	12.3%	11.6%	10.7%	3	1.8%	0.9%	2.0%	1.1%
Middle	85	50.0%	50.8%	54.1%	53.8%	8	4.7%	3.0%	9.3%	6.0%
Upper	62	36.5%	37.0%	34.1%	35.4%	114	67.1%	69.6%	79.6%	84.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	45	26.5%	26.4%	8.9%	8.8%
<b>Total</b>	<b>170</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>170</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.7%	0.4%	0	0.0%	0.0%	2.0%	0.8%
Moderate	12	19.7%	14.8%	14.5%	12.1%	1	1.6%	1.4%	5.6%	2.9%
Middle	33	54.1%	59.3%	56.4%	59.1%	4	6.6%	3.5%	11.6%	7.7%
Upper	16	26.2%	25.9%	28.4%	28.3%	45	73.8%	79.3%	72.9%	81.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	18.0%	15.8%	7.9%	7.5%
<b>Total</b>	<b>61</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>61</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	1	0.4%	0.2%	0.8%	0.4%	3	1.2%	0.2%	1.7%	0.4%
Moderate	48	19.6%	15.8%	17.8%	17.6%	47	19.2%	7.1%	16.9%	6.6%
Middle	118	48.2%	39.7%	51.3%	46.5%	46	18.8%	10.3%	19.2%	10.5%
Upper	78	31.8%	44.3%	30.1%	35.5%	148	60.4%	80.2%	61.9%	81.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.4%	2.2%	0.2%	1.1%
<b>Total</b>	<b>245</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>245</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	1	0.2%	0.0%	0.5%	0.2%	3	0.6%	0.0%	1.1%	0.3%
Moderate	83	17.4%	13.3%	14.4%	11.7%	51	10.7%	1.9%	8.0%	2.1%
Middle	236	49.6%	51.0%	53.6%	54.7%	58	12.2%	4.2%	13.2%	6.9%
Upper	156	32.8%	35.6%	31.4%	33.4%	307	64.5%	73.2%	72.0%	83.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	57	12.0%	20.7%	5.7%	7.8%
<b>Total</b>	<b>476</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>476</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)					
Low	25	2.9%	2.8%	3.0%	4.3%					
Moderate	163	19.2%	19.5%	17.6%	19.4%					
Middle	463	54.5%	53.6%	50.5%	51.3%					
Upper	199	23.4%	24.1%	22.5%	24.0%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	6.4%	1.1%					
<b>Total</b>	<b>850</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	679	79.9%	54.8%	75.5%	54.3%					
<b>By Loan Size</b>										
\$100,000 or less	749	88.1%	41.5%	88.8%	39.6%					
\$100,001-\$250,000	61	7.2%	21.7%	6.7%	22.3%					
\$250,001-\$1 Million	40	4.7%	36.8%	4.5%	38.0%					
<b>Total</b>	<b>850</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2016 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 10380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	3	1.0%	0.7%	1.4%	1.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	30	10.4%	8.1%	8.8%	7.2%	2	0.7%	0.3%	2.2%	1.0%
Middle	157	54.5%	54.2%	59.7%	59.5%	24	8.3%	5.5%	9.0%	5.7%
Upper	98	34.0%	37.0%	30.1%	32.1%	188	65.3%	74.2%	76.8%	84.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	74	25.7%	20.0%	12.0%	8.8%
<b>Total</b>	<b>288</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>288</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.6%	0.5%	0	0.0%	0.0%	0.8%	0.3%
Moderate	10	6.3%	5.5%	7.0%	6.1%	6	3.8%	1.9%	2.9%	1.5%
Middle	100	62.9%	66.4%	61.7%	61.0%	18	11.3%	8.1%	10.6%	7.2%
Upper	49	30.8%	28.1%	30.6%	32.4%	102	64.2%	71.6%	74.3%	79.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	33	20.8%	18.4%	11.4%	12.0%
<b>Total</b>	<b>159</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>159</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	4	1.0%	0.6%	1.1%	0.6%	6	1.5%	0.4%	1.8%	0.4%
Moderate	43	11.1%	11.7%	10.6%	11.1%	71	18.3%	7.4%	17.0%	6.2%
Middle	254	65.5%	70.1%	63.8%	69.0%	96	24.7%	15.7%	24.3%	15.0%
Upper	87	22.4%	17.6%	24.4%	19.4%	214	55.2%	73.9%	56.8%	76.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.3%	2.6%	0.2%	1.5%
<b>Total</b>	<b>388</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>388</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	7	0.8%	0.5%	1.1%	0.9%	6	0.7%	0.0%	0.8%	0.1%
Moderate	83	9.9%	7.7%	8.8%	7.0%	79	9.4%	1.5%	6.7%	1.5%
Middle	511	61.1%	59.4%	61.5%	60.6%	138	16.5%	7.4%	14.0%	6.8%
Upper	235	28.1%	32.4%	28.6%	31.5%	504	60.3%	73.3%	70.1%	81.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	109	13.0%	17.8%	8.4%	9.6%
<b>Total</b>	<b>836</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>836</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>			
Low	44	5.0%	5.5%	5.0%	6.8%					
Moderate	150	17.2%	17.5%	14.8%	15.2%					
Middle	478	54.8%	51.8%	55.0%	53.4%					
Upper	201	23.0%	25.2%	24.5%	24.5%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	0.7%	0.1%					
<b>Total</b>	<b>873</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	690	79.0%	54.0%	72.6%	52.8%					
<b>By Loan Size</b>										
\$100,000 or less	773	88.5%	44.4%	88.3%	42.0%					
\$100,001-\$250,000	64	7.3%	22.9%	7.9%	25.3%					
\$250,001-\$1 Million	36	4.1%	32.7%	3.8%	32.6%					
<b>Total</b>	<b>873</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2015 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 10380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	2	0.6%	0.3%	1.8%	1.4%	1	0.3%	0.1%	0.1%	0.1%
Moderate	31	9.5%	8.2%	9.3%	9.0%	6	1.8%	0.9%	1.7%	0.7%
Middle	199	60.7%	62.4%	62.0%	60.5%	29	8.8%	6.1%	11.5%	7.3%
Upper	96	29.3%	29.0%	26.9%	29.1%	220	67.1%	72.4%	76.9%	83.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	72	22.0%	20.4%	9.8%	8.8%
<b>Total</b>	<b>328</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>328</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.7%	0.8%	1	0.4%	0.2%	0.6%	0.2%
Moderate	9	3.9%	3.8%	6.0%	5.3%	3	1.3%	0.8%	2.8%	1.4%
Middle	136	59.6%	58.2%	62.1%	61.0%	18	7.9%	4.6%	9.8%	5.8%
Upper	83	36.4%	38.0%	31.2%	32.9%	146	64.0%	69.4%	71.0%	77.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	60	26.3%	25.0%	15.9%	15.4%
<b>Total</b>	<b>228</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>228</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	6	1.2%	1.8%	1.8%	1.7%	12	2.5%	0.6%	2.9%	0.7%
Moderate	64	13.2%	11.2%	11.7%	9.8%	80	16.5%	8.3%	16.2%	8.2%
Middle	317	65.4%	61.5%	65.3%	62.6%	134	27.6%	18.3%	25.9%	18.0%
Upper	98	20.2%	25.5%	21.2%	25.9%	255	52.6%	67.9%	54.4%	69.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	0.8%	4.9%	0.6%	3.4%
<b>Total</b>	<b>485</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>485</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	8	0.8%	0.4%	1.5%	1.1%	14	1.3%	0.2%	1.2%	0.2%
Moderate	104	10.0%	7.0%	9.0%	7.4%	89	8.5%	1.7%	6.8%	1.5%
Middle	652	62.6%	60.8%	63.1%	60.1%	181	17.4%	7.0%	15.7%	7.3%
Upper	277	26.6%	31.9%	26.4%	31.5%	621	59.7%	70.8%	67.6%	78.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	136	13.1%	20.3%	8.7%	12.5%
<b>Total</b>	<b>1,041</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,041</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	37	4.2%	4.4%		4.2%	4.8%				
Moderate	153	17.5%	16.4%		15.1%	15.7%				
Middle	484	55.3%	58.2%		53.8%	57.2%				
Upper	202	23.1%	21.1%		22.6%	21.9%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		4.4%	0.4%				
<b>Total</b>	<b>876</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	691	78.9%	63.4%		74.9%	64.5%				
<b>By Loan Size</b>										
\$100,000 or less	782	89.3%	45.2%		89.0%	43.0%				
\$100,001-\$250,000	58	6.6%	20.5%		7.2%	23.5%				
\$250,001-\$1 Million	36	4.1%	34.3%		3.9%	33.6%				
<b>Total</b>	<b>876</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

**2018 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 38660

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)
<b>Home Purchase</b>										
Low	2	0.9%	0.8%	2.4%	1.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	18	8.3%	6.5%	9.5%	7.9%	2	0.9%	0.6%	3.3%	1.9%
Middle	90	41.5%	35.5%	41.3%	39.1%	23	10.6%	7.4%	12.3%	8.9%
Upper	107	49.3%	57.1%	46.6%	51.3%	111	51.2%	58.2%	68.1%	73.0%
Unknown	0	0.0%	0.0%	0.1%	0.0%	81	37.3%	33.9%	16.3%	16.2%
<b>Total</b>	<b>217</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>217</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	1	2.1%	0.8%	1.8%	1.3%	0	0.0%	0.0%	0.6%	0.6%
Moderate	2	4.3%	4.3%	9.1%	6.9%	1	2.1%	1.0%	4.3%	2.7%
Middle	21	44.7%	40.7%	35.4%	30.4%	3	6.4%	3.1%	10.4%	6.7%
Upper	23	48.9%	54.1%	53.7%	61.4%	37	78.7%	78.8%	70.1%	72.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	12.8%	17.1%	14.6%	17.3%
<b>Total</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	100.0%	100.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	3	1.1%	0.8%	2.3%	1.6%	0	0.0%	0.0%	0.1%	0.1%
Moderate	20	7.6%	6.2%	9.5%	9.6%	3	1.1%	0.6%	3.5%	2.0%
Middle	111	42.0%	36.3%	40.2%	37.0%	26	9.8%	6.7%	11.9%	8.4%
Upper	130	49.2%	56.7%	47.9%	51.7%	148	56.1%	61.2%	68.4%	71.5%
Unknown	0	0.0%	0.0%	0.1%	0.0%	87	33.0%	31.4%	16.1%	18.0%
<b>Total</b>	<b>264</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>264</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)					
Low	31	4.0%	6.4%	4.5%	5.2%					
Moderate	122	15.9%	18.5%	15.9%	17.5%					
Middle	302	39.4%	36.5%	33.3%	30.7%					
Upper	294	38.4%	37.1%	39.5%	44.6%					
Unknown	17	2.2%	1.6%	1.8%	1.0%					
Tract Unknown	0	0.0%	0.0%	5.0%	1.0%					
<b>Total</b>	<b>766</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	577	75.3%	51.1%	63.5%	44.3%					
<b>By Loan Size</b>										
\$100,000 or less	687	89.7%	47.0%	89.3%	40.7%					
\$100,001-\$250,000	46	6.0%	17.7%	6.0%	18.0%					
\$250,001-\$1 Million	33	4.3%	35.3%	4.6%	41.4%					
<b>Total</b>	<b>766</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2017 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 38660

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	2	0.9%	0.4%	1.3%	0.8%	1	0.5%	0.2%	0.5%	0.2%
Moderate	16	7.4%	6.9%	14.0%	14.1%	12	5.5%	3.0%	6.0%	3.5%
Middle	91	41.9%	38.1%	43.0%	40.1%	24	11.1%	9.1%	15.5%	12.4%
Upper	103	47.5%	53.6%	40.8%	44.7%	95	43.8%	51.3%	64.8%	71.3%
Unknown	5	2.3%	0.9%	0.8%	0.3%	85	39.2%	36.5%	13.1%	12.7%
<b>Total</b>	<b>217</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>217</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	1	2.3%	1.7%	1.6%	1.3%	0	0.0%	0.0%	0.4%	0.2%
Moderate	5	11.4%	11.1%	11.6%	9.7%	1	2.3%	1.6%	4.8%	3.3%
Middle	15	34.1%	33.3%	38.6%	39.7%	2	4.5%	4.0%	10.0%	8.0%
Upper	23	52.3%	53.9%	47.4%	48.3%	29	65.9%	64.1%	74.1%	76.8%
Unknown	0	0.0%	0.0%	0.8%	1.0%	12	27.3%	30.3%	10.8%	11.7%
<b>Total</b>	<b>44</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>44</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	3	1.3%	0.9%	1.7%	1.3%	7	3.0%	0.9%	4.2%	1.3%
Moderate	46	19.8%	13.7%	21.0%	15.0%	51	22.0%	10.4%	19.5%	8.8%
Middle	112	48.3%	43.6%	44.0%	39.4%	55	23.7%	17.0%	23.4%	15.5%
Upper	68	29.3%	41.2%	32.3%	43.8%	116	50.0%	66.1%	52.3%	72.2%
Unknown	3	1.3%	0.6%	1.0%	0.4%	3	1.3%	5.6%	0.7%	2.2%
<b>Total</b>	<b>232</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>232</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	6	1.2%	0.7%	1.5%	0.8%	8	1.6%	0.2%	1.9%	0.3%
Moderate	67	13.6%	8.4%	16.2%	12.1%	64	13.0%	3.8%	10.8%	3.6%
Middle	218	44.2%	38.1%	42.7%	36.4%	81	16.4%	9.4%	17.5%	10.7%
Upper	194	39.4%	52.0%	38.8%	50.2%	240	48.7%	55.0%	61.6%	66.1%
Unknown	8	1.6%	0.8%	0.9%	0.4%	100	20.3%	31.6%	8.3%	19.4%
<b>Total</b>	<b>493</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>493</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	20	2.7%	2.5%	3.0%	3.1%					
Moderate	112	15.1%	16.0%	16.3%	16.3%					
Middle	292	39.5%	39.6%	34.9%	37.2%					
Upper	299	40.4%	40.2%	38.8%	41.3%					
Unknown	17	2.3%	1.7%	2.7%	1.8%					
Tract Unknown	0	0.0%	0.0%	4.2%	0.4%					
<b>Total</b>	<b>740</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	558	75.4%	52.6%	69.4%	49.8%					
<b>By Loan Size</b>										
\$100,000 or less	663	89.6%	46.9%	89.8%	42.6%					
\$100,001-\$250,000	46	6.2%	18.2%	5.8%	18.0%					
\$250,001-\$1 Million	31	4.2%	34.8%	4.4%	39.4%					
<b>Total</b>	<b>740</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases



**2016 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 38660

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	4	1.2%	0.6%	1.5%	1.1%	0	0.0%	0.0%	0.1%	0.1%
Moderate	20	6.2%	4.4%	13.4%	9.1%	5	1.5%	0.9%	3.7%	2.2%
Middle	132	40.7%	38.3%	41.4%	41.9%	36	11.1%	8.9%	11.4%	8.8%
Upper	168	51.9%	56.7%	43.6%	47.8%	135	41.7%	52.4%	59.4%	69.5%
Unknown	0	0.0%	0.0%	0.1%	0.1%	148	45.7%	37.8%	25.4%	19.4%
<b>Total</b>	<b>324</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>324</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	1	0.6%	1.0%	1.0%	1.1%	0	0.0%	0.0%	0.3%	0.1%
Moderate	11	6.5%	7.2%	16.3%	14.2%	4	2.4%	1.6%	3.1%	1.9%
Middle	78	45.9%	41.2%	38.4%	37.7%	11	6.5%	4.6%	10.4%	7.4%
Upper	80	47.1%	50.6%	43.9%	46.8%	96	56.5%	58.3%	62.5%	67.0%
Unknown	0	0.0%	0.0%	0.3%	0.3%	59	34.7%	35.4%	23.6%	23.6%
<b>Total</b>	<b>170</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>170</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	3	0.9%	0.2%	0.9%	0.2%	5	1.5%	0.3%	1.5%	0.4%
Moderate	67	19.9%	15.8%	20.5%	14.7%	64	19.0%	6.6%	17.0%	6.5%
Middle	144	42.9%	36.7%	39.5%	39.7%	82	24.4%	14.3%	23.9%	13.2%
Upper	122	36.3%	47.4%	39.1%	45.4%	182	54.2%	76.8%	57.2%	78.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	0.9%	2.1%	0.4%	1.0%
<b>Total</b>	<b>336</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>336</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	25.0%	22.2%	22.2%	22.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	50.0%	43.2%	44.4%	42.9%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	25.0%	34.6%	33.3%	35.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	8	1.0%	0.6%	1.2%	1.0%	5	0.6%	0.0%	0.6%	0.1%
Moderate	100	11.9%	8.2%	16.5%	11.8%	73	8.7%	1.5%	7.7%	2.4%
Middle	358	42.7%	39.4%	40.0%	40.4%	129	15.4%	7.3%	15.0%	8.3%
Upper	372	44.4%	51.8%	42.2%	46.7%	413	49.3%	50.3%	59.3%	66.3%
Unknown	0	0.0%	0.0%	0.1%	0.2%	218	26.0%	40.8%	17.3%	22.9%
<b>Total</b>	<b>838</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>838</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	19	2.7%	3.4%		2.3%	2.5%				
Moderate	112	15.8%	14.6%		15.7%	14.1%				
Middle	244	34.5%	34.0%		32.3%	30.5%				
Upper	333	47.0%	48.1%		48.4%	52.7%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		1.2%	0.2%				
<b>Total</b>	<b>708</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	552	78.0%	53.1%		67.5%	46.3%				
<b>By Loan Size</b>										
\$100,000 or less	647	91.4%	53.2%		89.0%	42.2%				
\$100,001-\$250,000	36	5.1%	17.6%		6.7%	21.4%				
\$250,001-\$1 Million	25	3.5%	29.2%		4.2%	36.4%				
<b>Total</b>	<b>708</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2015 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 38660

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	3	0.7%	0.4%	1.2%	0.9%	1	0.2%	0.1%	0.4%	0.2%
Moderate	24	5.8%	4.6%	9.0%	7.5%	6	1.4%	1.0%	3.0%	1.7%
Middle	142	34.2%	34.7%	40.0%	39.6%	35	8.4%	6.2%	17.1%	12.6%
Upper	246	59.3%	60.3%	49.8%	52.0%	189	45.5%	51.9%	58.6%	66.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	184	44.3%	40.8%	21.0%	19.4%
<b>Total</b>	<b>415</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>415</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	3	1.0%	0.7%	2.3%	2.1%	0	0.0%	0.0%	0.8%	0.3%
Moderate	18	6.2%	5.4%	12.2%	10.9%	9	3.1%	1.9%	4.9%	2.9%
Middle	101	34.9%	34.4%	35.3%	35.7%	10	3.5%	2.4%	9.4%	6.5%
Upper	166	57.4%	59.1%	50.1%	51.2%	110	38.1%	40.8%	48.1%	53.6%
Unknown	1	0.3%	0.3%	0.1%	0.1%	160	55.4%	54.9%	36.9%	36.6%
<b>Total</b>	<b>289</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>289</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	5	1.2%	0.7%	1.4%	0.9%	15	3.6%	0.8%	3.3%	1.8%
Moderate	86	20.4%	15.4%	19.2%	15.6%	101	24.0%	12.0%	21.6%	10.8%
Middle	206	48.9%	48.9%	47.5%	46.9%	98	23.3%	13.9%	23.4%	14.3%
Upper	124	29.5%	35.0%	31.9%	36.6%	204	48.5%	67.9%	51.2%	69.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	0.7%	5.4%	0.5%	3.6%
<b>Total</b>	<b>421</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>421</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	11	1.0%	0.5%	1.6%	1.3%	16	1.4%	0.1%	1.4%	0.3%
Moderate	128	11.4%	5.4%	13.0%	9.1%	116	10.3%	2.2%	9.1%	2.7%
Middle	450	40.0%	41.0%	40.8%	40.7%	143	12.7%	5.2%	16.5%	9.9%
Upper	536	47.6%	52.9%	44.6%	48.9%	503	44.7%	45.6%	53.1%	59.2%
Unknown	1	0.1%	0.1%	0.0%	0.0%	348	30.9%	46.9%	20.0%	27.9%
<b>Total</b>	<b>1,126</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,126</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)					
Low	21	2.9%	3.7%	2.5%	3.0%					
Moderate	121	16.9%	16.2%	16.8%	15.7%					
Middle	245	34.3%	29.7%	31.6%	31.8%					
Upper	328	45.9%	50.4%	44.8%	49.1%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	4.3%	0.4%					
<b>Total</b>	<b>715</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	524	73.3%	51.2%	68.7%	48.7%					
<b>By Loan Size</b>										
\$100,000 or less	644	90.1%	49.2%	89.0%	43.8%					
\$100,001-\$250,000	44	6.2%	18.4%	7.2%	22.9%					
\$250,001-\$1 Million	27	3.8%	32.4%	3.8%	33.3%					
<b>Total</b>	<b>715</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2018 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 11640

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.8%	0.5%	0	0.0%	0.0%	0.2%	0.1%
Moderate	17	12.1%	12.1%	16.8%	15.5%	5	3.6%	2.0%	3.8%	2.2%
Middle	81	57.9%	56.2%	53.2%	54.2%	10	7.1%	5.4%	13.4%	10.1%
Upper	42	30.0%	31.7%	29.2%	29.8%	46	32.9%	34.9%	64.0%	68.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	79	56.4%	57.7%	18.7%	19.1%
<b>Total</b>	<b>140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	2.3%	2.0%	0	0.0%	0.0%	3.0%	1.7%
Moderate	3	9.7%	12.2%	13.5%	12.2%	2	6.5%	3.8%	6.8%	3.7%
Middle	15	48.4%	51.3%	53.4%	56.5%	6	19.4%	16.5%	16.5%	12.1%
Upper	13	41.9%	36.4%	30.8%	29.3%	18	58.1%	65.3%	63.9%	71.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	16.1%	14.4%	9.8%	11.1%
<b>Total</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	33.3%	39.7%	0	0.0%	0.0%	33.3%	21.7%
Middle	0	0.0%	0.0%	33.3%	21.7%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	33.3%	38.6%	0	0.0%	0.0%	33.3%	39.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	33.3%	38.6%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	1.1%	0.8%	0	0.0%	0.0%	0.8%	0.4%
Moderate	20	11.7%	12.1%	16.2%	15.0%	7	4.1%	2.2%	4.5%	2.5%
Middle	96	56.1%	55.5%	53.2%	54.5%	16	9.4%	7.0%	14.0%	10.5%
Upper	55	32.2%	32.4%	29.6%	29.8%	64	37.4%	39.4%	63.8%	68.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	84	49.1%	51.3%	17.0%	17.7%
<b>Total</b>	<b>171</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>171</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	20	4.1%	6.7%		3.5%	5.6%				
Moderate	91	18.6%	14.3%		19.3%	15.0%				
Middle	270	55.1%	55.5%		51.7%	58.3%				
Upper	109	22.2%	23.5%		18.0%	20.3%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		7.4%	0.9%				
<b>Total</b>	<b>490</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	339	69.2%	39.4%		63.2%	35.5%				
<b>By Loan Size</b>										
\$100,000 or less	410	83.7%	34.9%		86.3%	32.4%				
\$100,001-\$250,000	54	11.0%	26.9%		8.8%	26.3%				
\$250,001-\$1 Million	26	5.3%	38.2%		4.9%	41.4%				
<b>Total</b>	<b>490</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

**2017 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 11640

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	2.6%	2.5%	0	0.0%	0.0%	0.0%	0.0%
Moderate	9	9.6%	9.9%	16.0%	15.1%	0	0.0%	0.0%	5.8%	3.7%
Middle	54	57.4%	55.0%	52.1%	51.9%	7	7.4%	5.9%	17.0%	12.6%
Upper	31	33.0%	35.1%	29.3%	30.6%	27	28.7%	31.2%	61.9%	69.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	60	63.8%	62.9%	15.3%	14.6%
<b>Total</b>	<b>94</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>94</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.5%	0.7%	1	2.0%	0.6%	0.5%	0.2%
Moderate	4	7.8%	8.4%	18.3%	18.4%	2	3.9%	2.5%	4.6%	3.1%
Middle	24	47.1%	51.1%	50.3%	51.0%	5	9.8%	9.4%	13.2%	11.8%
Upper	23	45.1%	40.5%	31.0%	29.8%	30	58.8%	63.2%	69.5%	71.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	13	25.5%	24.2%	12.2%	13.2%
<b>Total</b>	<b>51</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>51</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.7%	1.2%	4	2.9%	0.5%	3.7%	1.0%
Moderate	8	5.9%	7.8%	11.7%	8.8%	23	16.9%	5.1%	19.0%	7.9%
Middle	94	69.1%	66.5%	64.3%	67.2%	37	27.2%	18.7%	24.0%	14.6%
Upper	34	25.0%	25.8%	23.3%	22.7%	70	51.5%	65.6%	52.7%	71.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.5%	10.2%	0.7%	5.1%
<b>Total</b>	<b>136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	1.5%	1.9%	5	1.8%	0.3%	1.3%	0.1%
Moderate	21	7.5%	9.1%	15.1%	15.0%	25	8.9%	1.6%	9.8%	3.7%
Middle	172	61.2%	55.8%	55.6%	51.4%	49	17.4%	9.0%	18.4%	12.2%
Upper	88	31.3%	35.1%	27.8%	31.7%	127	45.2%	46.2%	60.5%	68.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	75	26.7%	43.0%	10.0%	15.8%
<b>Total</b>	<b>281</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>281</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)					
Low	23	5.0%	10.6%	3.9%	8.4%					
Moderate	89	19.3%	13.7%	17.0%	12.0%					
Middle	239	51.8%	50.0%	48.9%	55.6%					
Upper	110	23.9%	25.7%	20.8%	22.9%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	9.4%	1.1%					
<b>Total</b>	<b>461</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	322	69.8%	46.2%	65.4%	44.8%					
<b>By Loan Size</b>										
\$100,000 or less	397	86.1%	41.6%	87.0%	38.0%					
\$100,001-\$250,000	44	9.5%	27.0%	8.7%	27.2%					
\$250,001-\$1 Million	20	4.3%	31.4%	4.3%	34.8%					
<b>Total</b>	<b>461</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

**2016 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 11640

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
	<b>Home Purchase</b>									
Low	6	3.1%	2.7%	5.0%	4.0%	0	0.0%	0.0%	0.7%	0.1%
Moderate	6	3.1%	2.5%	3.8%	3.3%	7	3.6%	2.4%	7.4%	4.7%
Middle	140	71.8%	70.4%	69.1%	70.5%	19	9.7%	7.2%	14.5%	11.4%
Upper	43	22.1%	24.4%	22.1%	22.2%	67	34.4%	41.8%	56.7%	64.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	102	52.3%	48.7%	20.7%	18.8%
<b>Total</b>	<b>195</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>195</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	5	5.2%	3.9%	3.6%	3.5%	1	1.0%	0.4%	1.4%	0.6%
Moderate	5	5.2%	4.2%	5.0%	4.6%	4	4.2%	2.1%	5.3%	3.1%
Middle	68	70.8%	70.6%	68.5%	69.2%	4	4.2%	3.5%	12.3%	9.6%
Upper	18	18.8%	21.4%	22.8%	22.7%	52	54.2%	55.9%	60.3%	61.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	35	36.5%	38.2%	20.7%	24.9%
<b>Total</b>	<b>96</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>96</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	4	1.8%	0.9%	1.9%	2.4%	8	3.6%	0.9%	3.8%	1.1%
Moderate	14	6.2%	3.8%	4.7%	3.6%	59	26.2%	14.3%	22.7%	11.1%
Middle	160	71.1%	75.9%	72.1%	73.9%	55	24.4%	13.0%	24.9%	13.8%
Upper	47	20.9%	19.4%	21.4%	20.1%	101	44.9%	66.8%	47.9%	70.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	0.9%	5.1%	0.5%	3.1%
<b>Total</b>	<b>225</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>225</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
	<b>HMDA Totals</b>									
Low	15	2.9%	2.9%	3.8%	3.7%	9	1.7%	0.2%	1.7%	0.4%
Moderate	25	4.8%	3.2%	4.4%	3.8%	70	13.6%	3.6%	10.8%	4.4%
Middle	368	71.3%	71.1%	69.7%	70.2%	78	15.1%	6.7%	16.6%	10.8%
Upper	108	20.9%	22.9%	22.1%	22.3%	220	42.6%	48.9%	55.5%	63.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	139	26.9%	40.6%	15.4%	20.4%
<b>Total</b>	<b>516</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>516</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
		<b>Bank</b>			<b>Aggregate</b>					
	<b>#</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>% \$(000s)</b>
Low	35	7.6%	8.7%	7.8%	7.0%					
Moderate	63	13.6%	9.7%	13.8%	8.0%					
Middle	274	59.3%	56.0%	58.1%	60.7%					
Upper	90	19.5%	25.6%	18.8%	23.9%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	1.5%	0.3%					
<b>Total</b>	<b>462</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
	<b>By Revenue</b>									
\$1 Million or Less	323	69.9%	43.7%	66.1%	44.5%					
	<b>By Loan Size</b>									
\$100,000 or less	388	84.0%	37.5%	82.1%	32.4%					
\$100,001-\$250,000	55	11.9%	30.6%	12.8%	31.6%					
\$250,001-\$1 Million	19	4.1%	31.9%	5.0%	36.0%					
<b>Total</b>	<b>462</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2015 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 11640

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	15	7.9%	6.4%	5.7%	4.8%	1	0.5%	0.3%	0.2%	0.1%
Moderate	6	3.2%	3.9%	4.1%	4.3%	7	3.7%	2.5%	4.8%	2.8%
Middle	140	73.7%	73.1%	70.4%	69.6%	18	9.5%	7.4%	15.8%	11.8%
Upper	29	15.3%	16.7%	19.7%	21.3%	77	40.5%	43.2%	61.5%	68.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	87	45.8%	46.6%	17.7%	17.2%
<b>Total</b>	<b>190</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>190</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	3	1.9%	1.7%	3.4%	3.4%	1	0.6%	0.2%	1.5%	0.6%
Moderate	4	2.6%	3.2%	4.7%	5.5%	1	0.6%	0.5%	6.0%	3.5%
Middle	119	76.8%	74.0%	73.3%	71.9%	13	8.4%	6.2%	12.3%	9.1%
Upper	29	18.7%	21.0%	18.5%	19.1%	75	48.4%	47.0%	55.1%	58.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	65	41.9%	46.1%	25.2%	28.2%
<b>Total</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	8	2.8%	2.1%	3.0%	1.9%	4	1.4%	0.4%	2.2%	0.7%
Moderate	15	5.3%	4.1%	5.4%	4.4%	61	21.6%	11.5%	17.8%	8.8%
Middle	204	72.3%	73.3%	71.3%	75.3%	71	25.2%	19.8%	23.8%	18.7%
Upper	55	19.5%	20.5%	20.3%	18.5%	143	50.7%	63.6%	55.4%	68.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	1.1%	4.7%	0.7%	3.3%
<b>Total</b>	<b>282</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>282</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	26	4.1%	3.9%	4.2%	4.0%	6	1.0%	0.3%	1.2%	0.3%
Moderate	25	4.0%	3.6%	4.7%	4.8%	69	11.0%	2.8%	8.9%	3.5%
Middle	463	73.8%	73.5%	71.6%	70.9%	102	16.3%	8.6%	16.9%	11.2%
Upper	113	18.0%	18.9%	19.5%	20.2%	295	47.0%	47.4%	57.7%	64.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	155	24.7%	41.0%	15.3%	20.8%
<b>Total</b>	<b>627</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>627</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	41	8.6%	6.5%		6.7%	4.8%				
Moderate	63	13.2%	14.0%		10.4%	11.1%				
Middle	271	56.9%	50.2%		56.5%	59.5%				
Upper	101	21.2%	29.3%		18.7%	24.1%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		7.8%	0.5%				
<b>Total</b>	<b>476</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	336	70.6%	52.6%		68.5%	55.2%				
<b>By Loan Size</b>										
\$100,000 or less	400	84.0%	35.5%		85.1%	32.6%				
\$100,001-\$250,000	53	11.1%	26.6%		9.5%	24.7%				
\$250,001-\$1 Million	23	4.8%	37.8%		5.3%	42.7%				
<b>Total</b>	<b>476</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2018 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 25020

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	1	1.6%	1.5%	1.0%	1.7%	0	0.0%	0.0%	0.5%	0.2%
Moderate	0	0.0%	0.0%	2.5%	2.4%	1	1.6%	1.5%	6.9%	5.5%
Middle	50	79.4%	79.6%	78.3%	75.8%	3	4.8%	4.6%	17.7%	15.4%
Upper	12	19.0%	18.9%	18.2%	20.1%	16	25.4%	32.0%	50.2%	56.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	43	68.3%	61.9%	24.6%	22.4%
<b>Total</b>	<b>63</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>63</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	2.3%	5.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	4.5%	4.4%	2	16.7%	10.4%	4.5%	2.9%
Middle	9	75.0%	83.6%	65.9%	65.3%	1	8.3%	11.1%	18.2%	19.6%
Upper	3	25.0%	16.4%	27.3%	24.6%	7	58.3%	64.1%	65.9%	64.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	16.7%	14.5%	11.4%	13.0%
<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	1	1.3%	1.2%	1.2%	2.3%	0	0.0%	0.0%	0.4%	0.2%
Moderate	0	0.0%	0.0%	2.8%	2.7%	3	4.0%	2.8%	6.5%	5.1%
Middle	59	78.7%	80.2%	76.2%	74.2%	4	5.3%	5.6%	17.7%	16.0%
Upper	15	20.0%	18.6%	19.8%	20.8%	23	30.7%	36.7%	53.2%	57.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	45	60.0%	54.9%	22.2%	20.8%
<b>Total</b>	<b>75</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>75</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>		<b>Aggregate</b>						
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>		
Low	23	14.8%	7.5%	15.8%	9.4%					
Moderate	15	9.7%	3.7%	7.7%	3.7%					
Middle	89	57.4%	73.8%	55.5%	70.7%					
Upper	28	18.1%	15.1%	18.2%	16.1%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	2.9%	0.1%					
<b>Total</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	128	82.6%	55.7%	75.6%	53.8%					
<b>By Loan Size</b>										
\$100,000 or less	141	91.0%	49.7%	90.0%	48.5%					
\$100,001-\$250,000	9	5.8%	17.6%	7.7%	25.4%					
\$250,001-\$1 Million	5	3.2%	32.7%	2.4%	26.1%					
<b>Total</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

**2017 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 25020

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	1	2.0%	1.5%	2.1%	1.8%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	2.0%	2.1%	5.1%	4.9%	2	3.9%	2.3%	2.1%	1.4%
Middle	43	84.3%	85.1%	76.9%	76.3%	2	3.9%	2.6%	17.9%	14.5%
Upper	6	11.8%	11.4%	15.9%	17.0%	16	31.4%	35.3%	63.1%	67.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	31	60.8%	59.8%	16.9%	16.7%
<b>Total</b>	<b>51</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>51</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	1.9%	2.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	1.9%	1.2%	0	0.0%	0.0%	1.9%	1.2%
Middle	15	88.2%	87.8%	79.2%	76.2%	2	11.8%	12.3%	17.0%	15.8%
Upper	2	11.8%	12.2%	17.0%	20.5%	9	52.9%	48.4%	67.9%	69.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	35.3%	39.4%	13.2%	13.4%
<b>Total</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	3.0%	2.2%	1	1.2%	1.1%	1.8%	0.8%
Moderate	5	6.1%	4.5%	4.2%	2.4%	14	17.1%	6.1%	13.9%	5.3%
Middle	64	78.0%	79.0%	74.7%	73.9%	26	31.7%	22.5%	30.7%	21.1%
Upper	13	15.9%	16.5%	18.1%	21.5%	41	50.0%	70.3%	53.0%	70.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.6%	2.4%
<b>Total</b>	<b>82</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>82</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	1	0.7%	0.9%	2.4%	1.9%	1	0.7%	0.2%	0.7%	0.1%
Moderate	6	4.0%	2.2%	4.3%	4.0%	16	10.7%	2.6%	6.8%	1.9%
Middle	122	81.3%	84.4%	76.3%	76.0%	30	20.0%	8.2%	22.9%	15.6%
Upper	21	14.0%	12.5%	16.9%	18.2%	66	44.0%	44.4%	59.7%	68.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	37	24.7%	44.6%	9.9%	14.3%
<b>Total</b>	<b>150</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>150</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	28	17.2%	10.6%		18.2%	11.0%				
Moderate	16	9.8%	6.0%		9.1%	6.8%				
Middle	83	50.9%	52.7%		50.7%	56.7%				
Upper	36	22.1%	30.7%		17.7%	25.1%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		4.3%	0.3%				
<b>Total</b>	<b>163</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	137	84.0%	67.6%		78.0%	59.0%				
<b>By Loan Size</b>										
\$100,000 or less	145	89.0%	48.7%		89.0%	47.1%				
\$100,001-\$250,000	12	7.4%	22.0%		7.7%	22.7%				
\$250,001-\$1 Million	6	3.7%	29.2%		3.3%	30.2%				
<b>Total</b>	<b>163</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases



**2016 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 25020

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	3.5%	4.9%	4.4%	5.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	63	74.1%	67.1%	82.5%	80.3%	1	1.2%	0.5%	6.8%	4.9%
Upper	19	22.4%	28.0%	12.7%	14.2%	34	40.0%	46.9%	62.5%	69.9%
Unknown	0	0.0%	0.0%	0.4%	0.5%	50	58.8%	52.7%	30.7%	25.1%
<b>Total</b>	<b>85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	5.3%	4.8%	6.4%	7.2%	0	0.0%	0.0%	1.4%	0.5%
Middle	28	73.7%	72.3%	75.0%	72.5%	0	0.0%	0.0%	8.6%	5.9%
Upper	8	21.1%	22.9%	17.1%	18.8%	27	71.1%	70.5%	72.1%	76.2%
Unknown	0	0.0%	0.0%	1.4%	1.5%	11	28.9%	29.5%	17.9%	17.4%
<b>Total</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	11	6.9%	6.9%	6.1%	8.9%	8	5.0%	2.7%	3.9%	1.9%
Middle	125	78.1%	78.8%	78.8%	74.8%	39	24.4%	16.5%	23.8%	13.6%
Upper	24	15.0%	14.3%	15.2%	16.3%	113	70.6%	80.7%	72.3%	84.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	16	5.7%	5.2%	5.5%	6.1%	8	2.8%	0.4%	1.8%	0.3%
Middle	216	76.3%	70.4%	79.4%	77.2%	40	14.1%	3.0%	13.5%	6.1%
Upper	51	18.0%	24.4%	14.6%	15.9%	174	61.5%	58.7%	68.3%	73.4%
Unknown	0	0.0%	0.0%	0.5%	0.8%	61	21.6%	37.9%	16.4%	20.2%
<b>Total</b>	<b>283</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>283</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		0.0%	0.0%				
Moderate	2	1.3%	0.7%		1.6%	0.9%				
Middle	118	75.6%	75.2%		72.0%	73.9%				
Upper	36	23.1%	24.1%		24.9%	25.0%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		1.6%	0.2%				
<b>Total</b>	<b>156</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	125	80.1%	52.2%		75.6%	49.5%				
<b>By Loan Size</b>										
\$100,000 or less	138	88.5%	48.1%		89.6%	48.4%				
\$100,001-\$250,000	14	9.0%	28.4%		7.8%	26.0%				
\$250,001-\$1 Million	4	2.6%	23.5%		2.6%	25.7%				
<b>Total</b>	<b>156</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2015 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 25020

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	7	11.5%	13.6%	6.4%	6.6%	0	0.0%	0.0%	3.5%	2.7%
Middle	45	73.8%	73.1%	79.7%	78.7%	7	11.5%	9.2%	21.3%	18.1%
Upper	9	14.8%	13.3%	13.9%	14.7%	12	19.7%	24.6%	51.5%	56.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	42	68.9%	66.2%	23.8%	23.0%
<b>Total</b>	<b>61</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>61</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.5%	0.8%
Moderate	4	6.3%	8.7%	4.4%	4.6%	2	3.2%	2.3%	2.7%	2.6%
Middle	46	73.0%	73.4%	79.2%	80.0%	7	11.1%	9.1%	10.4%	9.0%
Upper	13	20.6%	17.9%	16.4%	15.5%	29	46.0%	47.4%	55.7%	57.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	25	39.7%	41.2%	30.6%	30.1%
<b>Total</b>	<b>63</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>63</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	3	1.7%	0.7%	2.5%	0.8%
Moderate	12	6.7%	4.7%	5.0%	3.3%	22	12.3%	5.6%	13.2%	6.6%
Middle	147	82.1%	81.3%	82.2%	78.8%	55	30.7%	20.6%	29.3%	18.7%
Upper	20	11.2%	14.0%	12.8%	17.9%	97	54.2%	69.1%	53.7%	71.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.1%	4.1%	1.2%	3.0%
<b>Total</b>	<b>179</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>179</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	3	1.0%	0.2%	1.1%	0.4%
Moderate	23	7.6%	9.7%	5.3%	5.4%	24	7.9%	2.1%	7.0%	3.1%
Middle	238	78.5%	75.1%	80.5%	79.2%	69	22.8%	11.8%	21.2%	14.5%
Upper	42	13.9%	15.2%	14.2%	15.4%	138	45.5%	43.5%	53.6%	58.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	69	22.8%	42.4%	17.1%	23.5%
<b>Total</b>	<b>303</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>303</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)					
Low	0	0.0%	0.0%	0.0%	0.0%					
Moderate	3	1.8%	0.8%	2.9%	7.7%					
Middle	128	78.0%	84.8%	77.6%	80.1%					
Upper	33	20.1%	14.4%	17.6%	12.2%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	1.9%	0.1%					
<b>Total</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	133	81.1%	57.4%	80.5%	56.6%					
<b>By Loan Size</b>										
\$100,000 or less	145	88.4%	37.7%	88.6%	36.6%					
\$100,001-\$250,000	10	6.1%	16.6%	6.2%	16.9%					
\$250,001-\$1 Million	9	5.5%	45.8%	5.2%	46.5%					
<b>Total</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2018 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 32420

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	1	2.1%	0.8%	3.7%	2.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	8.5%	4.6%	14.0%	14.3%	1	2.1%	0.8%	3.7%	1.6%
Middle	17	36.2%	29.6%	36.0%	33.0%	3	6.4%	3.6%	7.9%	5.0%
Upper	22	46.8%	59.2%	40.2%	44.7%	31	66.0%	74.4%	77.4%	83.2%
Unknown	3	6.4%	5.9%	6.1%	5.3%	12	25.5%	21.3%	11.0%	10.2%
<b>Total</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	1.8%	1.2%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	8.3%	4.5%	18.2%	17.8%	0	0.0%	0.0%	7.3%	4.4%
Middle	4	33.3%	39.3%	34.5%	36.3%	1	8.3%	2.4%	7.3%	4.0%
Upper	3	25.0%	22.4%	34.5%	34.9%	11	91.7%	97.6%	80.0%	84.8%
Unknown	4	33.3%	33.8%	10.9%	9.9%	0	0.0%	0.0%	5.5%	6.7%
<b>Total</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	1	1.7%	0.6%	3.2%	2.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	5	8.5%	4.6%	15.1%	15.1%	1	1.7%	0.6%	4.6%	2.3%
Middle	21	35.6%	31.2%	35.6%	33.7%	4	6.8%	3.4%	7.8%	4.8%
Upper	25	42.4%	53.1%	38.8%	42.4%	42	71.2%	78.2%	78.1%	83.6%
Unknown	7	11.9%	10.5%	7.1%	6.2%	12	20.3%	17.8%	9.6%	9.4%
<b>Total</b>	<b>59</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>59</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>			
Low	2	0.5%	0.0%	0.6%	0.0%	0.6%	0.0%			
Moderate	116	26.4%	23.8%	23.5%	24.9%					
Middle	121	27.6%	28.3%	25.3%	24.8%					
Upper	97	22.1%	26.6%	22.6%	25.8%					
Unknown	103	23.5%	21.2%	20.2%	22.8%					
Tract Unknown	0	0.0%	0.0%	7.8%	1.7%					
<b>Total</b>	<b>439</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	338	77.0%	52.4%	65.8%	47.7%					
<b>By Loan Size</b>										
\$100,000 or less	384	87.5%	46.3%	88.9%	42.9%					
\$100,001-\$250,000	37	8.4%	21.7%	7.1%	21.0%					
\$250,001-\$1 Million	18	4.1%	32.0%	4.1%	36.1%					
<b>Total</b>	<b>439</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2017 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 32420

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
	<b>Home Purchase</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	1	2.2%	0.6%	1.5%	0.5%
Moderate	3	6.7%	3.6%	9.5%	10.7%	3	6.7%	4.2%	8.8%	5.4%
Middle	20	44.4%	41.1%	38.7%	38.1%	6	13.3%	11.4%	16.1%	11.9%
Upper	21	46.7%	52.5%	44.5%	45.5%	28	62.2%	68.7%	68.6%	77.0%
Unknown	1	2.2%	2.8%	7.3%	5.7%	7	15.6%	15.2%	5.1%	5.3%
<b>Total</b>	<b>45</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>45</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.6%	1.3%
Moderate	5	29.4%	16.5%	22.9%	17.2%	1	5.9%	2.9%	13.3%	7.0%
Middle	8	47.1%	45.5%	44.6%	43.1%	1	5.9%	4.5%	12.0%	9.9%
Upper	4	23.5%	38.1%	31.3%	38.9%	10	58.8%	70.8%	61.4%	74.7%
Unknown	0	0.0%	0.0%	1.2%	0.8%	5	29.4%	21.7%	9.6%	7.1%
<b>Total</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	1	1.8%	1.2%	1.4%	0.9%	3	5.5%	1.2%	9.2%	2.3%
Moderate	7	12.7%	16.5%	16.2%	24.8%	16	29.1%	29.7%	23.2%	13.5%
Middle	33	60.0%	58.3%	50.7%	48.0%	12	21.8%	23.2%	23.9%	19.0%
Upper	13	23.6%	21.9%	31.0%	25.7%	24	43.6%	45.9%	43.7%	65.2%
Unknown	1	1.8%	2.0%	0.7%	0.6%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>55</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>55</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
	<b>HMDA Totals</b>									
Low	1	0.9%	0.1%	0.6%	0.1%	4	3.4%	0.5%	5.0%	0.9%
Moderate	15	12.8%	7.8%	15.2%	14.2%	20	17.1%	6.5%	15.5%	6.7%
Middle	61	52.1%	43.8%	44.8%	40.7%	19	16.2%	11.0%	18.2%	12.0%
Upper	38	32.5%	46.2%	36.2%	41.4%	62	53.0%	66.8%	57.2%	75.1%
Unknown	2	1.7%	2.1%	3.3%	3.6%	12	10.3%	15.1%	4.1%	5.3%
<b>Total</b>	<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank %	% \$(000s)	%	% \$(000s)	#	Bank %	% \$(000s)	%	% \$(000s)
Low	4	0.9%	0.7%	1.0%	1.3%					
Moderate	138	31.5%	30.9%	28.3%	29.6%					
Middle	109	24.9%	28.7%	23.5%	28.6%					
Upper	94	21.5%	26.1%	23.8%	24.8%					
Unknown	93	21.2%	13.5%	19.9%	14.7%					
Tract Unknown	0	0.0%	0.0%	3.5%	1.0%					
<b>Total</b>	<b>438</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
	<b>By Revenue</b>									
\$1 Million or Less	324	74.0%	52.7%	68.7%	51.4%					
	<b>By Loan Size</b>									
\$100,000 or less	383	87.4%	44.3%	88.7%	43.9%					
\$100,001-\$250,000	33	7.5%	19.2%	7.0%	20.9%					
\$250,001-\$1 Million	22	5.0%	36.5%	4.3%	35.2%					
<b>Total</b>	<b>438</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2016 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 32420

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
	<b>Home Purchase</b>									
Low	5	6.3%	6.1%	5.4%	4.6%	1	1.3%	0.4%	0.5%	0.2%
Moderate	0	0.0%	0.0%	8.4%	4.8%	6	7.5%	4.1%	6.9%	3.3%
Middle	41	51.3%	46.6%	46.3%	44.6%	17	21.3%	14.8%	17.7%	13.7%
Upper	34	42.5%	47.3%	39.9%	46.0%	40	50.0%	62.5%	60.1%	71.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	20.0%	18.2%	14.8%	11.2%
<b>Total</b>	<b>80</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>80</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	1	2.2%	1.3%	4.7%	3.2%	0	0.0%	0.0%	1.8%	1.0%
Moderate	0	0.0%	0.0%	4.7%	3.1%	4	8.9%	3.9%	5.9%	4.1%
Middle	24	53.3%	56.2%	39.1%	41.4%	7	15.6%	7.2%	11.8%	6.8%
Upper	20	44.4%	42.5%	51.5%	52.3%	23	51.1%	64.0%	58.6%	66.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	24.4%	24.9%	21.9%	21.7%
<b>Total</b>	<b>45</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>45</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	3	2.6%	2.3%	2.1%	1.6%	1	0.9%	0.3%	4.1%	0.9%
Moderate	8	6.9%	8.8%	9.3%	9.7%	30	25.9%	10.7%	24.9%	11.0%
Middle	78	67.2%	56.1%	64.8%	55.6%	29	25.0%	11.4%	28.5%	16.5%
Upper	27	23.3%	32.9%	23.8%	33.1%	56	48.3%	77.7%	42.5%	71.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>116</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>116</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>HMDA Totals</b>									
Low	9	3.7%	4.0%	4.2%	4.8%	2	0.8%	0.2%	2.1%	0.6%
Moderate	8	3.3%	1.2%	7.6%	4.4%	40	16.6%	4.9%	12.7%	4.2%
Middle	143	59.3%	51.1%	50.4%	43.6%	53	22.0%	11.8%	19.6%	10.8%
Upper	81	33.6%	43.7%	37.8%	47.2%	119	49.4%	65.1%	53.5%	68.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	27	11.2%	18.0%	12.0%	15.8%
<b>Total</b>	<b>241</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>241</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Low	119	28.3%	18.5%	27.3%	20.5%					
Moderate	57	13.5%	16.6%	13.1%	16.4%					
Middle	156	37.1%	42.6%	37.5%	41.5%					
Upper	89	21.1%	22.3%	21.5%	21.6%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	0.5%	0.0%					
<b>Total</b>	<b>421</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
	<b>By Revenue</b>									
\$1 Million or Less	318	75.5%	48.7%	70.0%	47.8%					
	<b>By Loan Size</b>									
\$100,000 or less	374	88.8%	43.7%	89.4%	42.6%					
\$100,001-\$250,000	24	5.7%	14.1%	5.4%	14.8%					
\$250,001-\$1 Million	23	5.5%	42.2%	5.2%	42.6%					
<b>Total</b>	<b>421</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2015 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 32420

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	3	4.8%	2.7%	6.4%	5.1%	4	6.5%	2.9%	3.2%	1.6%
Moderate	4	6.5%	7.8%	5.3%	5.2%	2	3.2%	1.1%	9.6%	6.6%
Middle	27	43.5%	37.5%	54.8%	53.8%	6	9.7%	9.5%	10.6%	9.4%
Upper	28	45.2%	51.9%	33.5%	35.9%	41	66.1%	74.0%	71.3%	77.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	14.5%	12.5%	5.3%	4.8%
<b>Total</b>	<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	2	2.5%	1.6%	4.6%	4.2%	0	0.0%	0.0%	1.5%	0.8%
Moderate	1	1.3%	1.4%	3.6%	3.5%	3	3.8%	2.4%	10.2%	5.9%
Middle	40	50.0%	47.9%	49.5%	48.2%	11	13.8%	12.3%	12.8%	10.4%
Upper	37	46.3%	49.1%	42.3%	44.1%	34	42.5%	47.7%	51.0%	56.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	32	40.0%	37.7%	24.5%	26.6%
<b>Total</b>	<b>80</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>80</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	4	3.8%	2.5%	3.8%	4.2%	13	12.3%	3.7%	15.8%	5.2%
Moderate	7	6.6%	4.9%	7.6%	8.9%	37	34.9%	21.1%	28.3%	19.5%
Middle	55	51.9%	54.5%	52.2%	44.7%	21	19.8%	12.2%	21.7%	13.3%
Upper	40	37.7%	38.1%	36.4%	42.2%	34	32.1%	56.3%	33.7%	58.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.9%	6.7%	0.5%	3.8%
<b>Total</b>	<b>106</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>106</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	33.3%	70.8%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	100.0%	100.0%	66.7%	29.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	9	3.6%	2.1%	4.9%	4.5%	17	6.8%	1.5%	6.7%	1.4%
Moderate	12	4.8%	4.3%	5.6%	5.2%	42	16.9%	3.8%	15.8%	7.0%
Middle	122	49.0%	44.5%	51.8%	49.9%	38	15.3%	11.1%	14.9%	10.1%
Upper	106	42.6%	49.1%	37.7%	40.3%	109	43.8%	58.8%	51.8%	65.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	43	17.3%	24.8%	10.9%	16.4%
<b>Total</b>	<b>249</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>249</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)					
Low	117	27.1%	18.0%	26.3%	20.9%					
Moderate	67	15.5%	15.5%	15.1%	12.9%					
Middle	159	36.9%	40.2%	35.6%	41.2%					
Upper	88	20.4%	26.3%	19.3%	24.5%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	3.7%	0.4%					
<b>Total</b>	<b>431</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	331	76.8%	52.9%	72.0%	55.0%					
<b>By Loan Size</b>										
\$100,000 or less	381	88.4%	43.4%	88.2%	38.2%					
\$100,001-\$250,000	28	6.5%	15.3%	6.2%	15.5%					
\$250,001-\$1 Million	22	5.1%	41.3%	5.6%	46.3%					
<b>Total</b>	<b>431</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2018 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41900

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.2%	0.1%
Moderate	6	4.1%	3.8%	5.6%	5.1%	0	0.0%	0.0%	1.0%	0.3%
Middle	53	36.6%	34.9%	42.4%	39.1%	9	6.2%	5.3%	10.0%	7.0%
Upper	86	59.3%	61.3%	52.0%	55.8%	100	69.0%	69.2%	75.4%	78.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	36	24.8%	25.5%	13.4%	13.7%
<b>Total</b>	<b>145</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>145</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.0%	0.6%
Moderate	2	6.1%	6.4%	6.3%	6.1%	2	6.1%	4.0%	6.3%	4.2%
Middle	19	57.6%	64.0%	51.0%	51.4%	3	9.1%	7.4%	10.4%	7.8%
Upper	12	36.4%	29.6%	42.7%	42.5%	26	78.8%	79.6%	75.0%	76.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	6.1%	8.9%	7.3%	10.6%
<b>Total</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	1	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.4%	0.1%
Moderate	8	4.5%	3.9%	5.7%	5.1%	2	1.1%	0.6%	2.0%	0.9%
Middle	72	40.2%	36.4%	44.0%	40.0%	12	6.7%	5.2%	10.1%	6.9%
Upper	99	55.3%	59.7%	50.3%	54.8%	126	70.4%	65.7%	75.1%	76.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	39	21.8%	28.5%	12.4%	15.5%
<b>Total</b>	<b>179</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>179</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		0.0%	0.0%				
Moderate	77	20.1%	36.0%		19.0%	32.2%				
Middle	186	48.4%	41.7%		44.2%	44.7%				
Upper	121	31.5%	22.3%		30.6%	22.4%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		6.2%	0.7%				
<b>Total</b>	<b>384</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	291	75.8%	43.3%		67.9%	44.5%				
<b>By Loan Size</b>										
\$100,000 or less	331	86.2%	35.8%		86.8%	35.7%				
\$100,001-\$250,000	35	9.1%	25.4%		8.8%	26.6%				
\$250,001-\$1 Million	18	4.7%	38.8%		4.3%	37.7%				
<b>Total</b>	<b>384</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

**2017 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41900 - 2017

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	0.7%	0.2%	0.5%	0.2%
Moderate	4	2.9%	2.2%	5.0%	4.4%	1	0.7%	0.3%	2.1%	1.1%
Middle	49	36.0%	31.7%	38.0%	35.9%	14	10.3%	7.3%	9.5%	6.5%
Upper	83	61.0%	66.1%	56.7%	59.3%	94	69.1%	75.1%	80.5%	85.6%
Unknown	0	0.0%	0.0%	0.3%	0.3%	26	19.1%	17.1%	7.4%	6.7%
<b>Total</b>	<b>136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.6%	0.2%
Moderate	2	3.8%	1.9%	5.7%	4.2%	1	1.9%	0.9%	1.9%	1.0%
Middle	23	43.4%	42.7%	49.1%	46.8%	5	9.4%	5.9%	10.1%	5.8%
Upper	28	52.8%	55.4%	45.3%	48.9%	36	67.9%	77.9%	76.1%	83.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	11	20.8%	15.3%	11.3%	9.3%
<b>Total</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	3	1.9%	0.5%	2.4%	0.7%
Moderate	17	11.0%	6.0%	10.8%	6.4%	30	19.4%	10.0%	18.9%	8.9%
Middle	97	62.6%	69.0%	57.4%	58.6%	35	22.6%	16.3%	22.9%	15.4%
Upper	41	26.5%	24.9%	31.7%	35.0%	87	56.1%	73.2%	55.8%	75.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	4	1.2%	0.2%	1.1%	0.2%
Moderate	23	6.7%	2.5%	7.0%	4.2%	32	9.3%	1.5%	7.4%	1.5%
Middle	169	49.1%	38.4%	46.3%	38.2%	54	15.7%	7.8%	13.8%	6.4%
Upper	152	44.2%	59.2%	46.6%	57.4%	217	63.1%	75.7%	71.7%	79.8%
Unknown	0	0.0%	0.0%	0.1%	0.2%	37	10.8%	14.9%	6.0%	12.1%
<b>Total</b>	<b>344</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>344</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		0.0%	0.0%				
Moderate	76	20.1%	27.9%		18.5%	24.7%				
Middle	182	48.0%	45.0%		44.2%	44.4%				
Upper	121	31.9%	27.1%		32.3%	30.4%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		5.0%	0.5%				
<b>Total</b>	<b>379</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	288	76.0%	40.5%		71.0%	41.8%				
<b>By Loan Size</b>										
\$100,000 or less	330	87.1%	37.2%		88.1%	36.9%				
\$100,001-\$250,000	29	7.7%	21.0%		7.1%	20.8%				
\$250,001-\$1 Million	20	5.3%	41.8%		4.8%	42.3%				
<b>Total</b>	<b>379</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases



**2016 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41900

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	0.7%	0.2%	0.2%	0.1%
Moderate	9	6.1%	6.1%	7.2%	7.5%	4	2.7%	1.7%	4.2%	2.6%
Middle	103	69.6%	70.8%	65.8%	66.8%	15	10.1%	7.6%	12.5%	9.6%
Upper	36	24.3%	23.1%	27.0%	25.6%	92	62.2%	69.9%	72.3%	79.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	36	24.3%	20.6%	10.9%	8.5%
<b>Total</b>	<b>148</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>148</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.4%	0.5%
Moderate	7	7.1%	7.1%	9.8%	8.5%	8	8.1%	5.1%	7.1%	4.3%
Middle	63	63.6%	66.5%	61.4%	64.2%	12	12.1%	9.1%	15.6%	11.2%
Upper	29	29.3%	26.4%	28.8%	27.3%	55	55.6%	65.3%	56.9%	65.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	24	24.2%	20.5%	19.0%	18.6%
<b>Total</b>	<b>99</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>99</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	28	11.3%	3.9%	10.6%	4.4%
Moderate	31	12.5%	13.6%	11.8%	12.4%	49	19.8%	8.3%	19.8%	8.7%
Middle	177	71.4%	73.3%	69.3%	70.6%	61	24.6%	18.0%	24.7%	19.1%
Upper	40	16.1%	13.0%	19.0%	17.0%	109	44.0%	67.9%	44.5%	66.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.4%	1.8%	0.3%	1.2%
<b>Total</b>	<b>248</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>248</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	29	5.9%	0.6%	3.9%	0.5%
Moderate	47	9.5%	7.4%	9.4%	8.2%	61	12.3%	3.7%	10.0%	3.7%
Middle	343	69.3%	69.6%	65.7%	66.1%	88	17.8%	9.4%	17.3%	10.9%
Upper	105	21.2%	23.0%	24.9%	25.7%	256	51.7%	68.1%	59.1%	73.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	61	12.3%	18.3%	9.7%	11.9%
<b>Total</b>	<b>495</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>495</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)					
Low	0	0.0%	0.0%	0.0%	0.0%					
Moderate	16	4.7%	5.9%	4.4%	5.6%					
Middle	219	64.0%	66.4%	63.4%	70.0%					
Upper	107	31.3%	27.7%	30.2%	24.1%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	2.0%	0.3%					
<b>Total</b>	<b>342</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	254	74.3%	43.3%	69.6%	42.8%					
<b>By Loan Size</b>										
\$100,000 or less	309	90.4%	47.3%	89.0%	42.1%					
\$100,001-\$250,000	20	5.8%	19.6%	7.3%	23.9%					
\$250,001-\$1 Million	13	3.8%	33.1%	3.7%	34.0%					
<b>Total</b>	<b>342</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2015 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41900

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	11	6.1%	5.3%	9.7%	9.1%	3	1.7%	1.3%	3.7%	2.2%
Middle	117	65.4%	60.6%	66.4%	64.0%	23	12.8%	11.2%	14.8%	11.9%
Upper	51	28.5%	34.1%	23.9%	26.9%	119	66.5%	71.0%	73.1%	78.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	34	19.0%	16.5%	8.4%	7.3%
<b>Total</b>	<b>179</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>179</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	9	5.4%	6.5%	7.6%	8.2%	3	1.8%	1.1%	4.3%	2.5%
Middle	105	62.5%	63.6%	58.7%	58.8%	15	8.9%	6.0%	9.7%	7.6%
Upper	54	32.1%	29.9%	33.7%	33.0%	94	56.0%	62.4%	60.5%	65.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	56	33.3%	30.5%	25.5%	24.5%
<b>Total</b>	<b>168</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>168</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	13	4.6%	1.0%	3.5%	0.7%
Moderate	35	12.3%	11.5%	11.9%	10.4%	65	22.8%	9.1%	20.0%	7.4%
Middle	182	63.9%	62.0%	63.2%	61.2%	81	28.4%	19.2%	26.5%	17.2%
Upper	68	23.9%	26.5%	24.9%	28.3%	122	42.8%	62.7%	48.9%	68.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	1.4%	8.1%	1.1%	5.9%
<b>Total</b>	<b>285</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>285</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	13	2.1%	0.1%	1.1%	0.1%
Moderate	55	8.7%	6.5%	9.8%	8.8%	71	11.2%	2.1%	9.2%	2.7%
Middle	404	63.9%	62.0%	63.1%	61.9%	119	18.8%	9.9%	17.2%	10.6%
Upper	173	27.4%	31.5%	27.1%	29.3%	335	53.0%	66.5%	61.5%	72.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	94	14.9%	21.5%	11.1%	14.0%
<b>Total</b>	<b>632</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>632</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$ (000s)	Bank %	Aggregate % \$ (000s)					
Low	0	0.0%	0.0%	0.0%	0.0%					
Moderate	21	5.9%	6.0%	7.0%	8.1%					
Middle	223	62.3%	68.4%	58.0%	64.0%					
Upper	114	31.8%	25.6%	30.9%	27.6%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	4.1%	0.3%					
<b>Total</b>	<b>358</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	278	77.7%	56.3%	71.6%	58.9%					
<b>By Loan Size</b>										
\$100,000 or less	310	86.6%	36.9%	87.7%	39.2%					
\$100,001-\$250,000	30	8.4%	22.3%	8.4%	25.4%					
\$250,001-\$1 Million	18	5.0%	40.7%	3.9%	35.4%					
<b>Total</b>	<b>358</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2018 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Puerto Rico Non-Metropolitan Area

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
	<b>Home Purchase</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.6%	0.1%
Moderate	9	7.5%	5.9%	16.4%	11.0%	0	0.0%	0.0%	4.7%	2.4%
Middle	64	53.3%	49.4%	53.3%	50.7%	8	6.7%	4.7%	17.0%	12.5%
Upper	47	39.2%	44.7%	30.3%	38.3%	48	40.0%	43.2%	56.5%	63.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	64	53.3%	52.1%	21.1%	21.4%
<b>Total</b>	<b>120</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>120</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	5.3%	2.7%	7.4%	6.5%	0	0.0%	0.0%	11.1%	7.3%
Middle	7	36.8%	31.8%	46.3%	40.7%	0	0.0%	0.0%	9.3%	7.0%
Upper	11	57.9%	65.5%	44.4%	51.5%	15	78.9%	72.7%	68.5%	68.4%
Unknown	0	0.0%	0.0%	1.9%	1.3%	4	21.1%	27.3%	11.1%	17.3%
<b>Total</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
	<b>HMDA Totals</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.5%	0.1%
Moderate	10	7.2%	5.4%	15.1%	10.4%	0	0.0%	0.0%	5.7%	3.1%
Middle	71	51.1%	46.7%	52.3%	49.4%	8	5.8%	4.0%	15.9%	11.8%
Upper	58	41.7%	47.9%	32.3%	40.0%	63	45.3%	47.7%	58.2%	64.2%
Unknown	0	0.0%	0.0%	0.3%	0.2%	68	48.9%	48.3%	19.7%	20.8%
<b>Total</b>	<b>139</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>139</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	51	16.6%	15.8%	15.8%	16.0%	0	0.0%	0.0%	18.3%	18.3%
Middle	181	59.0%	46.6%	50.8%	50.8%	0	0.0%	0.0%	44.5%	44.5%
Upper	75	24.4%	37.5%	26.2%	26.2%	0	0.0%	0.0%	36.1%	36.1%
Unknown	0	0.0%	0.0%	0.5%	0.1%	0	0.0%	0.0%	0.1%	0.1%
Tract Unknown	0	0.0%	0.0%	6.5%	1.0%	0	0.0%	0.0%	1.0%	1.0%
<b>Total</b>	<b>307</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>307</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>By Revenue</b>									
\$1 Million or Less	247	80.5%	51.3%	73.6%	50.5%	0	0.0%	0.0%	0.0%	0.0%
	<b>By Loan Size</b>									
\$100,000 or less	283	92.2%	57.8%	92.3%	54.2%	0	0.0%	0.0%	0.0%	0.0%
\$100,001-\$250,000	17	5.5%	18.8%	5.6%	22.0%	0	0.0%	0.0%	0.0%	0.0%
\$250,001-\$1 Million	7	2.3%	23.3%	2.0%	23.7%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>307</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>307</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2017 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Puerto Rico Non-Metropolitan Area

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	8	8.0%	5.2%	15.9%	13.3%	0	0.0%	0.0%	1.2%	0.6%
Middle	57	57.0%	51.9%	57.3%	54.1%	2	2.0%	1.4%	6.9%	4.2%
Upper	35	35.0%	42.9%	25.9%	30.5%	43	43.0%	43.3%	71.7%	73.8%
Unknown	0	0.0%	0.0%	0.9%	2.1%	55	55.0%	55.2%	20.2%	21.3%
<b>Total</b>	<b>100</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	7.4%	5.3%	15.7%	14.0%	1	3.7%	3.6%	2.6%	1.8%
Middle	14	51.9%	54.8%	61.7%	62.0%	0	0.0%	0.0%	10.4%	8.4%
Upper	11	40.7%	39.8%	22.6%	24.0%	19	70.4%	71.3%	76.5%	78.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	25.9%	25.0%	10.4%	11.5%
<b>Total</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	22	14.7%	11.9%	15.5%	14.0%	16	10.7%	3.9%	8.4%	3.6%
Middle	87	58.0%	55.0%	58.2%	52.8%	34	22.7%	9.6%	24.7%	14.3%
Upper	41	27.3%	33.1%	26.3%	33.2%	99	66.0%	83.9%	66.5%	80.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.7%	2.6%	0.4%	1.6%
<b>Total</b>	<b>150</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>150</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	32	11.6%	6.3%	15.7%	13.5%	17	6.1%	1.2%	4.1%	1.2%
Middle	158	57.0%	52.9%	58.4%	55.8%	36	13.0%	2.5%	14.0%	6.1%
Upper	87	31.4%	40.8%	25.5%	29.2%	161	58.1%	54.4%	70.6%	75.4%
Unknown	0	0.0%	0.0%	0.4%	1.4%	63	22.7%	41.8%	11.4%	17.3%
<b>Total</b>	<b>277</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>277</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>			
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%			
Moderate	50	17.3%	12.9%	15.3%	15.6%					
Middle	174	60.2%	50.0%	50.4%	47.7%					
Upper	65	22.5%	37.2%	25.3%	35.7%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	9.1%	1.0%					
<b>Total</b>	<b>289</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	231	79.9%	45.2%	75.2%	47.6%					
<b>By Loan Size</b>										
\$100,000 or less	265	91.7%	50.4%	92.1%	48.7%					
\$100,001-\$250,000	15	5.2%	16.0%	5.3%	18.6%					
\$250,001-\$1 Million	9	3.1%	33.7%	2.6%	32.7%					
<b>Total</b>	<b>289</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2016 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Puerto Rico Non-Metropolitan Area

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	2.6%	1.3%	5.9%	5.4%	0	0.0%	0.0%	4.8%	2.2%
Middle	72	47.4%	38.3%	53.2%	44.9%	9	5.9%	5.1%	12.5%	9.7%
Upper	76	50.0%	60.4%	40.4%	48.6%	53	34.9%	42.1%	54.1%	66.0%
Unknown	0	0.0%	0.0%	0.4%	1.1%	90	59.2%	52.8%	28.6%	22.1%
<b>Total</b>	<b>152</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>152</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	1.6%	0.5%	1.3%	0.7%
Moderate	2	3.1%	2.1%	5.6%	5.0%	3	4.7%	2.9%	6.4%	3.8%
Middle	29	45.3%	46.6%	49.4%	46.5%	3	4.7%	3.5%	9.9%	7.7%
Upper	33	51.6%	51.3%	45.1%	48.5%	41	64.1%	66.0%	63.9%	66.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	25.0%	27.1%	18.5%	21.5%
<b>Total</b>	<b>64</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>64</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	0.9%	0.2%	1.2%	0.2%
Moderate	21	9.1%	4.6%	9.3%	5.5%	47	20.3%	7.6%	18.1%	6.7%
Middle	133	57.3%	47.3%	55.1%	49.4%	55	23.7%	14.2%	20.7%	12.7%
Upper	78	33.6%	48.1%	35.6%	45.0%	125	53.9%	67.8%	59.2%	73.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	1.3%	10.2%	0.9%	6.7%
<b>Total</b>	<b>232</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>232</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	3	0.7%	0.1%	0.7%	0.2%
Moderate	27	6.0%	2.1%	7.0%	5.3%	50	11.2%	2.0%	9.6%	3.1%
Middle	234	52.2%	41.8%	53.0%	45.7%	67	15.0%	6.4%	14.6%	9.4%
Upper	187	41.7%	56.1%	39.9%	48.3%	219	48.9%	52.2%	58.0%	66.8%
Unknown	0	0.0%	0.0%	0.2%	0.7%	109	24.3%	39.3%	17.1%	20.5%
<b>Total</b>	<b>448</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>448</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)					
Low	0	0.0%	0.0%	0.0%	0.0%					
Moderate	36	13.2%	8.3%	13.0%	12.2%					
Middle	144	52.7%	52.2%	45.3%	48.5%					
Upper	93	34.1%	39.5%	35.0%	38.6%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	6.7%	0.7%					
<b>Total</b>	<b>273</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	226	82.8%	58.3%	75.1%	58.2%					
<b>By Loan Size</b>										
\$100,000 or less	260	95.2%	65.8%	93.3%	52.4%					
\$100,001-\$250,000	9	3.3%	13.4%	4.1%	15.3%					
\$250,001-\$1 Million	4	1.5%	20.8%	2.6%	32.4%					
<b>Total</b>	<b>273</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2015 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Puerto Rico Non-Metropolitan Area

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)	#	Bank %	% \$(000s)	Aggregate %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	3.5%	4.0%	5.0%	4.7%	2	1.2%	0.6%	2.4%	1.3%
Middle	78	45.1%	37.1%	53.3%	47.5%	18	10.4%	7.1%	15.1%	10.8%
Upper	89	51.4%	58.8%	41.5%	46.9%	61	35.3%	44.5%	58.3%	64.5%
Unknown	0	0.0%	0.0%	0.2%	0.9%	92	53.2%	47.8%	24.3%	23.4%
<b>Total</b>	<b>173</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>173</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	3.8%	4.5%	8.2%	7.2%	0	0.0%	0.0%	4.3%	2.5%
Middle	45	43.3%	39.7%	44.7%	39.9%	3	2.9%	1.9%	7.6%	4.9%
Upper	55	52.9%	55.8%	45.9%	51.1%	49	47.1%	49.1%	60.2%	64.3%
Unknown	0	0.0%	0.0%	1.2%	1.8%	52	50.0%	49.0%	28.0%	28.3%
<b>Total</b>	<b>104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	3	1.3%	1.2%	1.1%	0.8%
Moderate	24	10.3%	7.3%	9.4%	7.3%	41	17.5%	6.3%	15.1%	6.9%
Middle	122	52.1%	52.5%	51.3%	47.5%	68	29.1%	17.7%	28.2%	17.3%
Upper	88	37.6%	40.2%	39.3%	45.2%	118	50.4%	68.4%	54.4%	71.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	1.7%	6.5%	1.1%	3.7%
<b>Total</b>	<b>234</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>234</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	3	0.6%	0.1%	0.4%	0.1%
Moderate	34	6.7%	4.5%	7.3%	5.8%	43	8.4%	1.0%	7.0%	2.1%
Middle	245	47.9%	39.4%	50.1%	44.6%	89	17.4%	6.4%	17.0%	9.0%
Upper	232	45.4%	56.1%	42.1%	48.4%	228	44.6%	48.3%	57.6%	64.9%
Unknown	0	0.0%	0.0%	0.5%	1.2%	148	29.0%	44.3%	18.0%	23.9%
<b>Total</b>	<b>511</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>511</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		0.0%	0.0%				
Moderate	37	13.7%	9.8%		14.0%	19.9%				
Middle	140	51.9%	47.3%		45.4%	39.4%				
Upper	93	34.4%	42.9%		34.6%	39.8%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		6.1%	0.8%				
<b>Total</b>	<b>270</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	211	78.1%	53.1%		72.6%	45.1%				
<b>By Loan Size</b>										
\$100,000 or less	244	90.4%	49.5%		87.3%	36.6%				
\$100,001-\$250,000	15	5.6%	17.6%		7.4%	21.1%				
\$250,001-\$1 Million	11	4.1%	32.9%		5.3%	42.3%				
<b>Total</b>	<b>270</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2018 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: U.S. Virgin Islands

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
	<b>Home Purchase</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	7.7%	4.9%	46.9%	37.9%	0	0.0%	0.0%	9.4%	5.1%
Middle	5	38.5%	47.2%	34.4%	32.8%	2	15.4%	7.6%	15.6%	10.8%
Upper	7	53.8%	48.0%	15.6%	25.9%	11	84.6%	92.4%	71.9%	74.4%
Unknown	0	0.0%	0.0%	3.1%	3.5%	0	0.0%	0.0%	3.1%	9.7%
<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	3	37.5%	20.1%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	12.5%	5.4%	20.0%	16.9%	3	37.5%	22.2%	20.0%	16.9%
Middle	4	50.0%	74.4%	60.0%	62.1%	1	12.5%	7.7%	40.0%	37.9%
Upper	0	0.0%	0.0%	0.0%	0.0%	4	50.0%	70.1%	40.0%	45.2%
Unknown	0	0.0%	0.0%	20.0%	21.1%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
	<b>HMDA Totals</b>									
Low	3	13.6%	6.5%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	9.1%	4.7%	43.2%	36.0%	3	13.6%	7.1%	10.8%	6.2%
Middle	10	45.5%	59.4%	37.8%	35.4%	3	13.6%	7.2%	18.9%	13.3%
Upper	7	31.8%	29.5%	13.5%	23.5%	16	72.7%	85.7%	67.6%	71.8%
Unknown	0	0.0%	0.0%	5.1%	5.1%	0	0.0%	0.0%	2.7%	8.8%
<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)					
Low	0	0.0%	0.0%	0.1%	0.0%					
Moderate	30	46.2%	50.9%	22.4%	32.5%					
Middle	30	46.2%	45.9%	16.2%	35.2%					
Upper	5	7.7%	3.2%	3.7%	4.5%					
Unknown	0	0.0%	0.0%	0.3%	0.1%					
Tract Unknown	0	0.0%	0.0%	57.2%	27.7%					
<b>Total</b>	<b>65</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
	<b>By Revenue</b>									
\$1 Million or Less	41	63.1%	51.4%	41.0%	32.5%					
	<b>By Loan Size</b>									
\$100,000 or less	49	75.4%	31.9%	95.1%	49.4%					
\$100,001-\$250,000	6	9.2%	14.0%	2.9%	16.7%					
\$250,001-\$1 Million	10	15.4%	54.2%	2.1%	33.9%					
<b>Total</b>	<b>65</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2017 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: U.S. Virgin Islands

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	1	3.7%	5.5%	0.0%	0.0%	1	3.7%	1.6%	0.0%	0.0%
Moderate	5	18.5%	22.2%	50.0%	48.6%	5	18.5%	9.2%	0.0%	0.0%
Middle	9	33.3%	27.5%	16.7%	12.1%	3	11.1%	7.9%	16.7%	9.1%
Upper	12	44.4%	44.8%	33.3%	39.3%	18	66.7%	81.3%	72.2%	89.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	11.1%	1.5%
<b>Total</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	26.7%	23.8%	80.0%	93.4%	0	0.0%	0.0%	0.0%	0.0%
Middle	7	46.7%	62.6%	20.0%	6.6%	0	0.0%	0.0%	40.0%	20.4%
Upper	4	26.7%	13.6%	0.0%	0.0%	15	100.0%	100.0%	40.0%	57.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	20.0%	21.8%
<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	1	2.4%	3.3%	0.0%	0.0%	1	2.4%	1.0%	0.0%	0.0%
Moderate	9	21.4%	22.9%	56.5%	60.3%	5	11.9%	5.5%	0.0%	0.0%
Middle	16	38.1%	41.8%	17.4%	10.7%	3	7.1%	4.7%	21.7%	12.0%
Upper	16	38.1%	32.1%	26.1%	29.0%	33	78.6%	88.9%	65.2%	81.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	13.0%	6.8%
<b>Total</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		<b>Bank</b>			<b>Aggregate</b>					
	<b>#</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	
Low	0	0.0%	0.0%	0.3%	0.1%					
Moderate	36	48.6%	43.1%	50.4%	33.7%					
Middle	32	43.2%	50.7%	38.3%	58.2%					
Upper	6	8.1%	6.3%	8.9%	7.9%					
Unknown	0	0.0%	0.0%	2.1%	0.2%					
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%					
<b>Total</b>	<b>74</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	40	54.1%	49.9%	57.3%	40.0%					
<b>By Loan Size</b>										
\$100,000 or less	54	73.0%	31.7%	89.0%	29.2%					
\$100,001-\$250,000	12	16.2%	25.2%	5.0%	16.1%					
\$250,001-\$1 Million	8	10.8%	43.2%	5.9%	54.7%					
<b>Total</b>	<b>74</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases



**2016 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: U.S. Virgin Islands

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	7.7%	3.6%	0.0%	0.0%	2	7.7%	2.5%	0.0%	0.0%
Middle	20	76.9%	82.2%	0.0%	0.0%	6	23.1%	10.9%	0.0%	0.0%
Upper	4	15.4%	14.1%	0.0%	0.0%	18	69.2%	86.6%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	12.5%	9.5%	0.0%	0.0%	2	12.5%	5.5%	0.0%	0.0%
Middle	7	43.8%	31.9%	0.0%	0.0%	2	12.5%	4.4%	0.0%	0.0%
Upper	7	43.8%	58.7%	0.0%	0.0%	12	75.0%	90.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	1	20.0%	11.4%	0.0%	0.0%
Middle	3	60.0%	52.5%	0.0%	0.0%	1	20.0%	22.4%	0.0%	0.0%
Upper	2	40.0%	47.5%	0.0%	0.0%	3	60.0%	66.2%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	8.5%	5.3%	0.0%	0.0%	5	10.6%	4.4%	0.0%	0.0%
Middle	30	63.8%	61.8%	0.0%	0.0%	9	19.1%	9.7%	0.0%	0.0%
Upper	13	27.7%	32.9%	0.0%	0.0%	33	70.2%	85.9%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)		Bank %	% \$(000s)	Aggregate %	% \$(000s)
Low	0	0.0%	0.0%	0.4%	0.2%		0.4%	0.2%		
Moderate	33	43.4%	38.9%	55.8%	49.9%		55.8%	49.9%		
Middle	36	47.4%	56.3%	37.5%	47.1%		37.5%	47.1%		
Upper	7	9.2%	4.8%	6.1%	2.8%		6.1%	2.8%		
Unknown	0	0.0%	0.0%	0.2%	0.0%		0.2%	0.0%		
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%		
<b>Total</b>	<b>76</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	45	59.2%	40.8%	53.1%	22.8%					
<b>By Loan Size</b>										
\$100,000 or less	62	81.6%	37.5%	92.4%	33.2%					
\$100,001-\$250,000	9	11.8%	23.3%	3.8%	16.9%					
\$250,001-\$1 Million	5	6.6%	39.2%	3.8%	49.9%					
<b>Total</b>	<b>76</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>

Originations and Purchases

**2015 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: U.S. Virgin Islands

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	5.9%	2.1%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	10	58.8%	66.9%	0.0%	0.0%	3	17.6%	7.7%	0.0%	0.0%
Upper	6	35.3%	31.0%	0.0%	0.0%	14	82.4%	92.3%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	5.6%	1.6%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	7	38.9%	34.5%	0.0%	0.0%	3	16.7%	8.1%	0.0%	0.0%
Upper	10	55.6%	63.8%	0.0%	0.0%	15	83.3%	91.9%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	5	100.0%	100.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	5	100.0%	100.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	5.0%	1.6%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	22	55.0%	59.8%	0.0%	0.0%	6	15.0%	6.7%	0.0%	0.0%
Upper	16	40.0%	38.6%	0.0%	0.0%	34	85.0%	93.3%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>			
Low	1	1.1%	2.6%	0.7%	1.3%					
Moderate	30	33.7%	26.9%	42.7%	35.9%					
Middle	47	52.8%	61.7%	28.1%	47.4%					
Upper	11	12.4%	8.9%	6.4%	10.1%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	22.2%	5.2%					
<b>Total</b>	<b>89</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	57	64.0%	49.6%	55.9%	31.7%					
<b>By Loan Size</b>										
\$100,000 or less	72	80.9%	40.1%	95.0%	42.4%					
\$100,001-\$250,000	13	14.6%	31.3%	3.1%	21.3%					
\$250,001-\$1 Million	4	4.5%	28.6%	1.9%	36.3%					
<b>Total</b>	<b>89</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

## CRA APPENDIX B

### Summary of Ratings

STATE OR MSA	LENDING TEST RATING	INVESTMENT TEST RATING	SERVICE TEST RATING	OVERALL RATING
Puerto Rico	Outstanding	Low Satisfactory	Outstanding	Outstanding
United States Virgin Islands	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory

**CRA APPENDIX C**

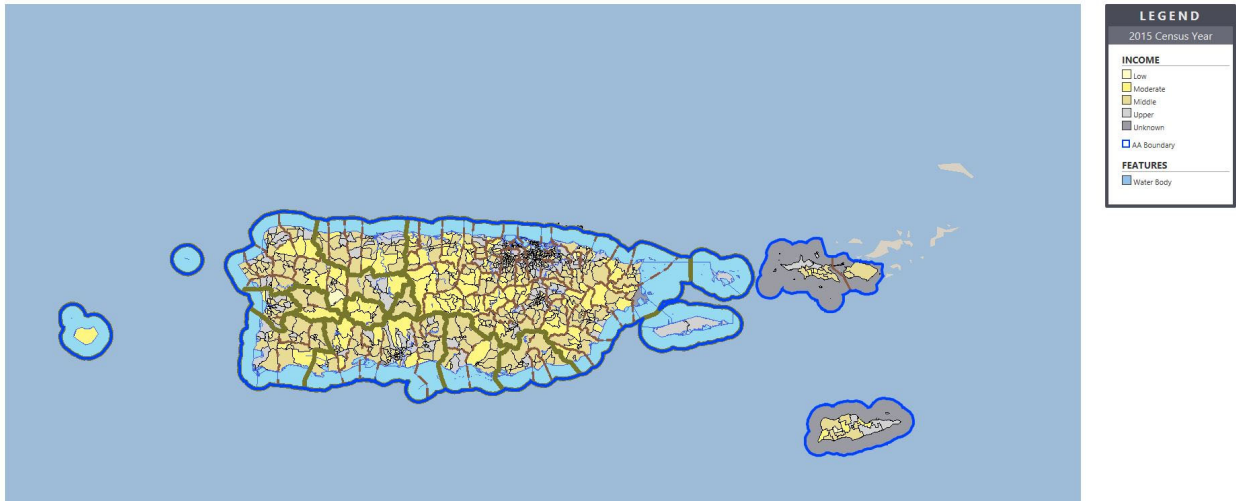
SCOPE OF EXAMINATION			
<b>TIME PERIOD REVIEWED</b>	<b>Lending Test: January 1, 2015 – December 31, 2018</b>  <b>CD Loans/Investments: April 1, 2015 – June 30, 2019</b>		
<b>FINANCIAL INSTITUTION</b>		<b>PRODUCTS REVIEWED</b>	
Banco Popular de Puerto Rico, 209 Munoz Rivera Avenue San Juan, PR		<ul style="list-style-type: none"> <li>• Home purchase</li> <li>• Refinancings</li> <li>• Home improvement</li> <li>• Small business</li> <li>• Community development loans</li> </ul>	
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>		<b>PRODUCTS REVIEWED</b>
Popular Mortgage Inc.	Bank Subsidiary		<ul style="list-style-type: none"> <li>• Mortgage Originations</li> </ul>
Popular Auto, Inc.	Bank Subsidiary		<ul style="list-style-type: none"> <li>• Home Improvement</li> </ul>
<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>			
<b>ASSESSMENT AREA</b>	<b>TYPE OF EXAMINATION</b>	<b>BRANCHES VISITED</b>	<b>OTHER INFORMATION</b>

<p style="text-align: center;"><b><u>Puerto Rico</u></b></p> <p><b>MSA 41980 (San Juan-Carolina-Caguas, PR)</b>  <b>MSA 10380 (Aguadilla-Isabela-San Sebastian, PR)</b>  <b>MSA 38660 (Ponce, PR)</b></p> <p>MSA 32420 (Mayaguez, PR)  MSA 41900 (San German-Cabo Rojo, PR)  MSA 25020 (Guayama, PR)  MSA 11640 (Arecibo, PR)  Non-Metropolitan Area</p>	<p style="text-align: center;"><b>Full Scope</b></p> <p style="text-align: center;"><b>Full Scope</b></p> <p style="text-align: center;"><b>Full Scope</b></p> <p style="text-align: center;"><b>Limited Scope</b></p> <p style="text-align: center;"><b>Limited Scope</b></p> <p style="text-align: center;"><b>Limited Scope</b></p> <p style="text-align: center;"><b>Limited Scope</b></p> <p style="text-align: center;"><b>Limited Scope</b></p>	<p style="text-align: center;"><b>None</b></p> <p style="text-align: center;"><b>None</b></p> <p style="text-align: center;"><b>None</b></p> <p style="text-align: center;"><b>None</b></p> <p style="text-align: center;"><b>None</b></p> <p style="text-align: center;"><b>None</b></p> <p style="text-align: center;"><b>None</b></p>	
<p style="text-align: center;"><b>U.S. Virgin Islands</b></p> <p style="text-align: center;"><b>Non-MSA Islands of St. Thomas, St. Croix, and St. John</b></p>	<p style="text-align: center;"><b>Full Scope</b></p>	<p style="text-align: center;"><b>None</b></p>	

## CRA APPENDIX D

### MAP OF ASSESSMENT AREAS

**Banco Popular De Puerto Rico**  
Assessment Area Map



## CRA APPENDIX E

### 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/assessment area.

**Census tract:** A small, relatively permanent statistical subdivision of a county or statistically equivalent entity delineated for data presentation purposes by a local group of census data users or the geographic staff of a regional census center in accordance with Census Bureau guidelines. Designed to be relatively homogeneous units with respect to population characteristics, economic status, and living conditions at the time they are established, census tracts generally contain between 1,000 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries are delineated with the intention of being stable over many decades, so they generally follow relatively permanent visible features. However, they may follow governmental unit boundaries and other invisible features in some instances; the boundary of a state or county (or statistically equivalent entity) is always a census tract boundary.

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

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

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

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

**Distressed or Underserved Non-Metropolitan Middle Income Area:** A middle-income, nonmetropolitan geography that is distressed due to economic factors, such as unemployment levels, poverty, or population loss, or is underserved based on population size, density and dispersion.

**Family:** A family is a group of two or more people related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

**Full 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 income of applicants, the amount of loan requested, and the disposition of the application (e.g., 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:** A household consists of all the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household. The count of households excludes group quarters.

**Limited-scope review:** Performance is analyzed using only quantitative factors.

**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 the 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 'loan 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.