PLEDGE TO STRENGTHEN MINORITY DEPOSITORY INSTITUTIONS

The Project REACh¹ Pledge to Strengthen Minority Depository Institutions promotes the viability and preservation of minority depository institutions (MDI). We recognize the importance of MDIs within their communities. Consistent with the purpose of Project REACh, we commit to help reduce specific barriers that prevent full, equal, and fair participation in the nation’s economy by traditionally disadvantaged communities, including those served by MDIs.

As a Project REACh participant, we pledge to sponsor one or more MDIs to help them remain vibrant parts of the economic landscape and important resources to their communities.² We will engage in open discussion with MDI senior leaders to identify areas in which our institution is well positioned to provide support. We recognize that each MDI faces a different set of challenges and opportunities, so each MDI’s priorities for sponsor support will also differ.

INVESTMENT. We will invest in our sponsored MDI to expand its capacity to provide the products and services needed within its communities. For example, we will acquire the MDI’s capital stock in an amount no less than 1 percent of its equity; place and maintain deposits in the MDI for the duration of our partnership at or below prevailing market rates; or invest in funds targeted for the benefit of MDIs such as the MDI Keeper’s Fund or the Black Economic Development Fund.

TECHNICAL ASSISTANCE. We will provide technical assistance to help expand the MDI’s revenues and/or improve operational efficiency. For example, we will assist the MDI in the design and implementation of new products, services, delivery channels, or advanced technology; or provide technical assistance focused on remediation strategies for problem loans.

BUSINESS OPPORTUNITIES. We will provide opportunities targeted to expand the MDI’s reach and impact within its communities. For example, we will leverage our established relationships with community business leaders to help connect the MDI and its customers to new business and growth opportunities.

¹ The Office of the Comptroller of the Currency launched Project REACh (Roundtable for Economic Access and Change) in July 2020 to create economic opportunities for minority communities by bringing together leaders from banking, business, technology, and national civil rights organizations to reduce specific barriers that prevent full, equal, and fair participation in the nation's economy.

² Participants should consult with their supervisory office to ensure that all actions taken pursuant to this pledge are consistent with safety and soundness, compliant with applicable laws and regulations, and protective of consumers’ rights. For example, participants may wish to discuss the authority under which they would make relevant investments and the applicability of the prohibitions on management official interlocks under 12 CFR 26.
**EXECUTIVE TRAINING.** We will sponsor a talent development program providing opportunities for the MDI’s executives to broaden and deepen their experience and skill sets. For example, we will establish a mentorship program for key executive management roles; provide opportunities for the MDI’s employees to spend time working at our institution; provide a senior bank executive to serve as a director on the board of the MDI (in conformance with all applicable legal requirements); or explore longer-term secondment opportunities with the MDI.

**COMMITMENT OF RESOURCES.** We will commit resources to support the MDI’s operations and customers through lending, investment, and service activities, for example, through loan participation programs, providing branch office space to the MDI rent-free, or sponsoring financial literacy programs targeted to the MDI’s communities.

---

**MDI PLEDGE SIGNATORIES**

- Bank of Oklahoma
- Cadence Bank
- First National Bank of Omaha
- Flagstar Bank
- Huntington National Bank
- South State Bank
- TCF Bank
- The First, A National Banking Association
- Valley National Bank
- Webster Bank
- WSFS Bank
- BMO Harris Bank
- Citibank
- First National Bank of Pennsylvania
- Fulton Bank
- Investar Bank
- Stearns Bank
- Texas Capital Bank
- Trustmark
- WaFd Bank
- Wells Fargo
- Zions Bancorporation