



PUBLIC DISCLOSURE

March 4, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Eastern Savings Bank
Charter Number 708183

11350 McCormick Rd., Suite 200
Hunt Valley, MD 21031-1026

Office of the Comptroller of the Currency

400 7th Street S.W.,
Washington, DC 20219

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

Overall CRA Rating.....	1
Description of Institution.....	2
Scope of the Evaluation.....	3
Discriminatory or Other Illegal Credit Practices Review.....	4
Lending Test	5
State Rating.....	5
State of Maryland	5
Community Development	10
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**.

The lending test is rated: Outstanding.

The major factors that support this rating include:

- The lending test rating is based on an excellent distribution of loans in low- and moderate- income geographies.
- The bank originated a majority of loans in the assessment areas (AA).
- The bank's loan-to-deposit (LTD) ratio is more than reasonable.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is more than reasonable.

The bank's LTD ratio is calculated on a bank-wide basis for the period of March 30, 2020, through December 31, 2022. The bank's quarterly average net LTD ratio over the 12-quarter review period was 103.4 percent. The ratio ranged from a quarterly low of 88.2 percent as of March 31, 2022, to a quarterly high of 117.7 percent as of March 30, 2020.

The bank's average LTD ratio is more than reasonable when compared to a custom peer group of three similarly situated institutions in Maryland. The average quarterly LTD ratio for the custom peer group is 82.6 percent over the same period. The peer group's ratio ranged from a quarterly low average of 70.6 percent to a quarterly high average of 93.3 percent over the same time period.

Lending in Assessment Area

A majority of the bank's loans are inside its assessment area (AA).

The bank originated and purchased 66.0 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This performance was factored positively into the overall analysis of the geographic distribution of lending by income level of geography.

The table below illustrates the number and dollar volume of home mortgage loans the bank originated inside and outside the AA.

Table D - Lending Inside and Outside of the Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2020	47	73.4	17	26.6	64	26,165	74.2	9,120	25.8	35,285
2021	23	71.9	9	28.1	32	5,508	63.6	3,153	36.4	8,661
2022	23	51.1	22	48.9	45	11,093	43.0	14,677	57.0	25,770
Total	93	66.0	48	34.0	141	42,766	61.3	26,950	38.7	69,716

Source: Bank Data
Due to rounding, totals may not equal 100.0%
Dollar amounts for Small Business, Small Farm and Consumer loans are multiplied by 1000.

Description of Institution

Eastern Savings Bank, FSB (Eastern, ESB, bank, or institution) is a federally chartered thrift savings bank headquartered in Hunt Valley, Maryland (MD). During the evaluation period, the bank operated a number of service corporations that manage and dispose of real estate owned. The bank's affiliate, The Goldsmith Family Foundation, provides funding through grants and donations to low-income school projects and neighborhood improvement initiatives in the AA, which are being considered in this evaluation.

As of the evaluation date, ESB operates a main office in Hunt Valley, MD and four full-service branches. ESB's branches are located in the communities of Pikesville, Lutherville, Fullerton, and Ellicott City, MD. The Pikesville branch is located in a moderate-income geography, Lutherville is located in a middle-income geography, and both Fullerton and Ellicott City are located in upper-income geographies. There are no ESB branches located in low-income geographies. ESB operates a limited service teller window at its corporate headquarters in Hunt Valley, MD, which is open a few times a month for employees only. The bank did not open or close any branches during the evaluation period, nor were there any mergers or acquisitions. Branch hours of operations are comparable to other local financial institutions. None of the branch locations provide automated teller machines (ATMs). The bank is a member of two ATM networks that offer customers surcharge-free ATM transactions at participating ATM locations worldwide.

The bank's AA is located within the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA Combined Statistical Area (CSA) #548. The AA is based on the location of the bank's offices and includes:

- Baltimore-Columbia-Towson, MD Metropolitan Statistical Area (MSA) #12580:
 - Baltimore, Anne Arundel, Carroll, Harford, and Howard Counties, Maryland
 - Baltimore City, Maryland
- Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate MSA #47900:
 - Frederick-Gaithersburg-Rockville, MD Metropolitan Division #23224:
 - Montgomery County, Maryland;

- Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Division #47894:
 - Prince George’s County, Maryland

The OCC combined all the AA geographies into a single delineated rating area for this evaluation, which will be referred to as the Washington-Baltimore-Arlington CSA AA. The AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income geographies. The bank has not made any changes to its AA since the previous evaluation.

As of December 31, 2022, the bank had total assets of \$347.3 million. The loans and leases portfolio totaled \$218.8 million and represented 63.0 percent of total assets. Real estate loans accounted for \$216.9 million and represented 99 percent of total loans and leases. The bank’s tier 1 capital was \$88.2 million, and deposits totaled \$229.6 million as of December 31, 2022.

ESB’s principal business is retail banking, with a focus on one- to four-family lending as evidenced by the composition of its total assets. During the evaluation period, ESB offered a variety of credit and deposit services to businesses and consumers. The bank’s lending products included home mortgages, home equity, multifamily, and commercial real estate loans secured by properties in the designated lending area. Deposit products included certificates of deposit, individual retirement accounts, money market, checking, and savings accounts. Alternative banking services included remote deposit capture, electronic statements, telephone banking, and online and mobile banking. The bank also offered safe deposit boxes, debit cards, and night depository services.

There were no financial or legal impediments to hinder the bank’s ability to help meet the credit needs of the communities it services. The bank’s CRA performance was rated Satisfactory during its last Small Bank CRA evaluation dated January 04, 2021.

COVID-19 Pandemic Activities

This evaluation also considered the bank’s response to the COVID-19 pandemic that impacted the United States during the evaluation period. ESB participated in the federal Paycheck Protection Program (PPP) by originating loans to qualified business customers. The PPP was introduced in response to the economic impact of the COVID-19 pandemic as part of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) to aid small businesses in remaining operational and avoiding layoffs. During the review period, the bank originated 191 loans in the amount of \$25.2 million through this SBA program.

The bank also introduced a short-term modification program that provided temporary payment relief to borrowers directly impacted by COVID-19. During the pandemic, the bank granted modifications for 167 loans.

Scope of the Evaluation

Evaluation Period/Products Evaluated

ESB was evaluated under the Small Bank CRA examination procedures, which included a Lending Test. The Lending Test considered the bank’s performance pursuant to the following criteria; Loan-to-Deposit Ratio Analysis, AA Concentration, Geographic Distribution, and Response to CRA Complaints. At the option of bank management and in accordance with the Interagency Small Bank Procedures, ESB

submitted community development loans, investments, donations, and services completed during the review period.

The bank's primary lending product during the evaluation period was home mortgage loans. To evaluate performance under the Lending Test, the OCC reviewed home mortgage loans originated between January 1, 2020 and December 31, 2022. The bank was not required to report home mortgage loans under the Home Mortgage Disclosure Act (HMDA); however, it collected the relevant home mortgage data for CRA purposes. Examiners evaluated the bank's loans, investments, donations, and services that satisfied the definition of community development made between January 1, 2020 and December 31, 2022.

New census data was released midway through the evaluation period, and as a result the OCC conducted two analyses. For home mortgage loans originated from January 1, 2020 to December 31, 2021, the bank's data was compared to the U.S. Bureau's 2015 American Community Survey (ACS). For the home mortgage loans originated from January 1, 2022 to December 31, 2022, the bank's data was compared to the 2020 U.S. Census.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based solely on its performance in the State of Maryland.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next

performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Maryland

CRA rating for the State of Maryland¹: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The bank's LTD ratio is more than reasonable.
- A majority of the bank's home mortgage loans are within its AA.
- The geographic distribution of home mortgage loans is excellent.
- The bank did not receive any CRA related complaints during the evaluation period.

Description of Institution's Operations in Maryland

The bank provides products and services in the state of Maryland through its main office and four full-service branches. The bank accepts deposits from anywhere in the United States, although it is primarily focused on deposit gathering in the state of Maryland.

Competition

The AA is in a highly competitive market for financial services. According to the June 30, 2022, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, there were 51 financial institutions within the bank's AA. ESB ranked 32nd with a deposit market share of 0.12 percent. The largest competitors within the AA were Bank of America, N.A. with 24.5 percent market share, Manufacturers and Traders Trust Company with 13.6 percent market share, Truist Bank with 11.9 percent market share, Capital One with 8.4 percent market share, and PNC Bank with 7.9 percent market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders in the bank's AA. According to the most recent 2022 Peer Mortgage Data, there were 724 HMDA reporters who originated or purchased \$53.5 billion home mortgage loans within the bank's AA. The top five lenders were Truist Bank, Rocket Mortgage, PennyMac Loan Services LLC, United Wholesale Mortgage, and US Bank, N.A, who held a combined market share of 18.8 percent in the AA.

Demographics

The following tables present certain demographic characteristics of the bank's AA.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

2015 ACS

Table A – Demographic Information of the Assessment Area Assessment Area: Wash Balt Arlngtn DC MD VA WV PA CSA 548 Assessment Area: Eastern FSB AA CSA 548 (2020-2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,102	12.1	26.2	33.1	27.3	1.3
Population by Geography	4,631,893	9.4	25.0	35.1	29.8	0.6
Housing Units by Geography	1,837,745	10.4	25.7	35.4	28.2	0.2
Owner-Occupied Units by Geography	1,103,989	4.6	19.6	38.7	37.0	0.1
Occupied Rental Units by Geography	585,646	17.8	36.1	31.1	14.5	0.5
Vacant Units by Geography	148,110	24.4	30.0	28.1	16.9	0.6
Businesses by Geography	551,189	6.3	21.6	37.2	34.5	0.4
Farms by Geography	9,438	3.3	16.8	39.0	40.8	0.1
Family Distribution by Income Level	1,117,880	23.1	17.7	20.2	39.0	0.0
Household Distribution by Income Level	1,689,635	25.0	16.7	18.1	40.2	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$87,788	Median Housing Value			\$309,729
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		\$112,655	Median Gross Rent			\$1,316
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV		\$106,105	Families Below Poverty Level			6.8%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(* The NA category consists of geographies that have not been assigned an income classification.</i>						

2020 U.S. Census

Table A – Demographic Information of the Assessment Area Assessment Area: Wash Balt Arlngtn DC MD VA WV PA CSA Assessment Area: Eastern FSB AA CSA 548 (2022)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,149	10.6	26.9	34.0	27.0	1.5
Population by Geography	4,823,898	8.1	26.3	35.9	28.9	0.8
Housing Units by Geography	1,868,281	9.5	26.3	36.2	27.5	0.5
Owner-Occupied Units by Geography	1,133,357	4.3	20.6	39.6	35.3	0.2
Occupied Rental Units by Geography	598,882	16.5	36.3	31.5	14.8	0.9
Vacant Units by Geography	136,042	21.8	30.2	28.3	18.3	1.5
Businesses by Geography	652,687	6.1	23.2	38.2	32.0	0.5
Farms by Geography	10,606	3.6	17.9	38.9	39.3	0.4
Family Distribution by Income Level	1,135,081	22.7	17.8	21.1	38.4	0.0
Household Distribution by Income Level	1,732,239	25.0	16.7	18.7	39.7	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$104,637	Median Housing Value			\$347,928
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		\$129,092	Median Gross Rent			\$1,466
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV		\$126,224	Families Below Poverty Level			5.8%
<i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Employment and Economic Factors

According to US Bureau of Labor Statistics, the average unemployment rates across the AA experienced a notable increase in September 2020 attributed to the impact of the COVID-19 pandemic. As of December 2022, the unemployment rate in the Baltimore-Columbia-Towson, MD stood at 2.5 percent,

marking a significant decrease from 9.2 percent in September 2020. Similarly, in the Washington-Arlington-Alexandria, DC-VA-MD-WV MSA, the unemployment rate was 5.5 percent, down from 9.4 percent over the same period. As of December 2022, the unemployment rate for the State of Maryland was 2.5 percent, and the national unemployment rate was 3.5 percent, indicating a favorable employment situation within the state during that time.

SILVER SPRING-FREDERICK-ROCKVILLE MD:

According to the September 2022 Moody's Analytics report, the economy in Silver Spring-Frederick-Rockville was slowly progressing, with job growth below regional and national levels. Gains in certain sectors were offsetting losses in others, with the technology and federal government sectors showing limited growth. The labor force was gradually recovering, impacting the unemployment rate, while the housing market was experiencing a cooling trend.

BALTIMORE-COLUMBIA-TOWSON MD:

According to the September 2022 Moody's Analytics report, Baltimore-Columbia-Towson made steady progress, with job recovery ahead of other areas. Leisure and hospitality sectors led the gains, while house price appreciation slowed but remained more stable than in other regions.

WASHINGTON-ARLINGTON-ALEXANDRIA DC-VA-MD-WV:

According to the November 2022 Moody's Analytics report, Washington-Arlington-Alexandria's economy was stagnant, with slow progress in the labor market. Private service industries performed better than the public sector, which was inconsistent. However, the unemployment rate remained low, and long-term prospects were favorable due to demographic trends and the emergence of the area as a technology hub.

Community Contacts

As part of the evaluation, the OCC reviewed information from a CRA Listening session sponsored by several regulatory agencies and leveraged data obtained from one existing community contact conducted with the state of Maryland. Among the identified needs were affordable housing, small business loans under \$250,000, rehabilitation of older homes for LMI individuals, job training for low-income people, and childcare.

In addition, the COVID-19 pandemic also created a need to lend to small business to help maintain operations during a period of cash flow disruptions. Considering the ongoing COVID-19 pandemic, demographic, and economic data, the OCC determined that small business lending was also a significant credit need.

Scope of Evaluation in Maryland

ESB has one AA in the state of Maryland, the Washington-Baltimore-Arlington CSA AA. A full-scope review was performed for that AA. As previously noted, the bank's primary loan product was home mortgage loans which was reflective of the bank's business strategy during the evaluation period.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Washington-Baltimore-Arlington CSA AA is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the State.

Home Mortgage Loans

Refer to Table O in the state of Maryland section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

For the years 2020-2021, the percentage of loans in low-income geographies exceeded both the percentage of owner-occupied units as well as the aggregate distribution of home mortgage loans. The percentage of loans in moderate-income geographies exceeded both the percentage of owner-occupied units and the aggregate distribution of home mortgage loans.

For the year 2022, the percentage of loans in low-income geographies exceeded both the percentage of owner-occupied units as well as the aggregate distribution of home mortgage loans. The percentage of loans in moderate-income geographies exceeded the percentage of owner-occupied units as well as the aggregate distribution of home mortgage loans.

Distribution of Loans by Income Level of the Borrower

The bank did not originate a sufficient volume of loans that contained borrower income information to conduct a meaningful analysis.

Home Mortgage Loans

Refer to Table P in the state of Maryland section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In 2020-2021, the bank originated a total of 70 home mortgage loans, with 75.7 percent of these loans extended to commercial entities rather than natural persons. Income information on these loans was reported as Not Applicable in accordance with HMDA guidelines. There was not a sufficient volume of loans to conduct a meaningful analysis. Only 25.3 percent, or 17 loans, had borrower income available.

In 2022, the bank originated 23 home mortgage loans, with 78.3 percent of these loans extended to non-natural persons. Accordingly, income information was not collected on these loans. There was not a sufficient volume of loans to conduct a meaningful analysis. Only 22.7 percent, or five loans, had borrower income available.

Responses to Complaints

There were no consumer complaints regarding the bank's CRA performance or complaints indicating illegal or discriminatory lending practices during the evaluation period.

COMMUNITY DEVELOPMENT

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA. Performance related to community development activities had a positive effect on the bank's rating in the state.

Number and Amount of Community Development Loans

Refer to the Community Development Loans table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Washington-Baltimore-Arlington CSA AA	100	100	18,084	100

During the evaluation period, the bank originated a total of 100 CD loans amounting to \$18.1 million, representing 20.5 percent of tier one capital during the evaluation period. The majority of CD loans consisted of SBA Paycheck Protection Program (PPP) loans that supported economic development and job retention. The PPP loans totaled \$11.3 million and contributed to the preservation of 972 jobs. The remaining CD loans supported organizations that provided affordable housing to low- and moderate-income individuals.

Number and Amount of Qualified Investments

The Qualified Investments Table, shown below, sets forth the information and data used to evaluate the bank's level of qualified community development investments. This table includes all community development investments, including prior period investments that remain outstanding as of the examination date.

Assessment Area	Prior Period *		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Washington-Baltimore-Arlington CSA AA	3	330	51	766	54	100	1,096	100

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

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

During the evaluation period, the bank executed 54 qualified investments totaling approximately \$1.1 million to various charitable and nonprofit organizations. This total includes contributions amounting to \$766,000 along with three prior period investments with a current book value of \$330,000 in certificate of deposits at community development financial institutions (CDFIs). A substantial majority of contributions supported organizations focused on community services for low- and moderate-income individuals and geographies.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, ESB employees provided their expertise to eleven qualified CD organizations for a total of 591 hours. These organizations supported community services and revitalization or stabilization.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2020 to 12/31/2022	
Bank Products Reviewed:	Home mortgage loans Community development loans, qualified investments, community development services	
Affiliate(s):	Affiliate Relationship	Products Reviewed
The Goldsmith Family Foundation	Affiliate	Qualified Investments (Grants)
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State(s):		
State of Maryland	Full-Scope	Baltimore-Columbia-Towson, MD MSA Baltimore, Anne Arundel, Carroll, Harford, and Howard Counties, and Baltimore City, Maryland Frederick-Gaithersburg-Rockville, MD -Montgomery County, Maryland Washington-Arlington-Alexandria, DC-VA-MD-WV MD - Prince George’s County, Maryland

Appendix B: Summary of MMSA and State Ratings

RATINGS	Eastern Savings Bank
Overall Bank:	Lending Test Rating
Eastern Saving Bank, FSB	Outstanding
State:	
State of Maryland	Outstanding

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) loans purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Wash Balt Arlngtn DC MD VA WV PA CSA	70	31,673	100.0	302,260	4.6	30.0	3.3	19.6	32.9	17.2	38.7	21.4	39.4	37.0	12.9	40.0	0.1	2.9	0.1
Total	70	31,673	100.0	302,260	4.6	30.0	3.3	19.6	32.9	17.2	38.7	21.4	39.4	37.0	12.9	40.0	0.1	2.9	0.1

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Wash Balt Arlngtn DC MD VA WV PA CSA	23	11,093	100.0	144,270	4.3	21.7	4.5	20.6	34.8	20.6	39.6	17.4	40.4	35.3	21.7	34.1	0.2	4.3	0.3
Total	23	11,093	100.0	144,270	4.3	21.7	4.5	20.6	34.8	20.6	39.6	17.4	40.4	35.3	21.7	34.1	0.2	4.3	0.3

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2020-21
		Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Wash Balt Arlngtn DC MD VA WV PA CSA	70	31,673	100.0	302,260	23.1	0.0	8.2	17.7	5.7	19.2	20.2	5.7	20.1	39.0	12.9	29.3	0.0	75.7	23.2	
Total	70	31,673	100.0	302,260	23.1	0.0	8.2	17.7	5.7	19.2	20.2	5.7	20.1	39.0	12.9	29.3	0.0	75.7	23.2	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2022
		Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Wash Balt Arlngtn DC MD VA WV PA CSA	23	11,093	100.0	144,270	22.7	4.3	11.0	17.8	4.3	22.2	21.1	8.7	21.1	38.4	4.3	27.6	0.0	78.3	18.2	
Total	23	11,093	100.0	144,270	22.7	4.3	11.0	17.8	4.3	22.2	21.1	8.7	21.1	38.4	4.3	27.6	0.0	78.3	18.2	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.