



PUBLIC DISCLOSURE

October 4, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

BankUnited, N.A.
Charter Number: 25028

14817 Oak Lane
Miami Lakes, FL 33016

Office of the Comptroller of the Currency

Midsized Bank Supervision
425 S Financial Place, Suite 1700
Chicago, IL 60605

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.....	3
Description of Institution.....	4
Scope of the Evaluation	5
Discriminatory or Other Illegal Credit Practices Review.....	7
State Rating.....	8
State of Florida.....	8
State of New York.....	22
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of 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 Satisfactory.

The following table indicates the performance level of BankUnited, N.A. (the bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Bank) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based primarily on the outstanding performance in the state of Florida. The performance of the bank's community development (CD) loans had a significantly positive impact in the rating areas.
- The Investment Test rating is based on the outstanding performance in the states of Florida and New York. The bank exhibits good responsiveness to credit and economic development needs.
- The Service Test rating is based primarily on the high satisfactory performance in the state of Florida. Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's assessment areas (AA).

Lending in Assessment Area

An adequate percentage of the bank's loans are in its AAs.

The bank originated and purchased 25.7 percent of its total loans inside the bank's AAs during the evaluation period. The bank originated or purchased a small percentage of home mortgages in its AAs. This performance is adequate considering the bank's business strategy of purchasing home mortgages on a nationwide basis. 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.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,453	8.2	16,216	91.8	17,669	1,177,426	18.8	5,088,253	81.2	6,265,679
Small Business	4,450	84.2	835	15.8	5,285	882,351	80.4	214,635	19.6	1,096,986
Total	5,903	25.7	17,051	74.3	22,954	2,059,777	28.0	5,302,888	72.0	7,362,665

Description of Institution

The bank is an interstate bank headquartered in Miami Lakes, Florida, and is a wholly owned subsidiary of BankUnited Inc. The bank's two rating areas are the states of Florida and New York. Since the previous CRA evaluation, dated September 17, 2018, the bank grew from \$30.3 billion to \$34.8 billion in assets as of December 31, 2020. The growth was accomplished without merger or acquisition activity.

As of December 31, 2020, total loans of \$23.8 billion represented 68.4 percent of total assets which were \$34.8 billion. Loan portfolio composition was 61.7 percent real estate, 19.8 percent commercial and industrial, and 18.5 percent all other loans. The bank also held total deposits of \$27.8 billion and tier 1 capital of \$3.3 billion.

The bank operates 74 full-service branches and 50 deposit-taking automated teller machines (ATMs) located in six AAs throughout Florida and New York. The bank has 70 branches in Florida and four in New York. The bank opened two branches and closed 20 during the evaluation period. One of the two branches opened during the evaluation period was opened in a moderate-income census tract (CT). Three of the branches closed during the evaluation period were located in moderate-income CTs and no branches were closed in low-income CTs.

The bank's business strategy focuses on commercial banking with an emphasis on small- and middle-market businesses. Loan origination during the evaluation period, centered on the commercial portfolio, consisted of small business loans, commercial real estate loans, equipment loans and leases, term loans, formula-based loans, commercial lines of credit, letters of credit, and consumer loans. The bank formally ceased originating residential mortgages on January 13, 2016 and continues to purchase Home Mortgage Disclosure Act (HMDA) loans through correspondent channels, nationally. The bank offers traditional deposit products ranging from checking accounts, money market accounts, savings accounts, and certificates of deposit.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The bank received a Satisfactory rating in its previous CRA evaluation dated September 17, 2018.

COVID-19 Pandemic

The COVID-19 health pandemic (COVID-19) impacted the Bank's operations and customers through 2020. In March of that year, COVID-19 lockdowns were imposed in many geographical locations. The lockdowns lead to many businesses and organizations being closed for varied periods of time, which limited the ability of bank personnel to provide in-person CD services. Additionally, opportunities to deliver virtual CD services were limited by the capacity and ability of community organizations, low- and moderate-income (LMI) families and small businesses to access necessary technology.

In response to COVID-19, the bank participated in the Paycheck Protection Program and the Main Street Lending Program in and outside of the bank's CRA AA. Additionally, the bank temporarily provided full benefit of stimulus payments for overdrawn customers, waived select deposit account and ATM fees, and granted loan forbearance or payment deferrals, and loan modifications to commercial and residential borrowers.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) assesses the bank's performance under the large institution Lending, Investment, and Service Tests. For this evaluation, we analyzed mortgage loans the bank reported under the HMDA and small business loans made to business the bank reported under the Community Reinvestment Act (CRA). The evaluation period for the Lending, Investment, and Service Tests, and CD loans, investments, and services is January 1, 2018 to December 31, 2020 for all AAs except for the Punta Gorda MSA. The bank exited the Punta Gorda MSA in the state of Florida during 2018 and the evaluation period for the Lending, Investment, and Service Tests and CD loans, investments, and services is January 1, 2018 to December 31, 2018.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs 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 section 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 a blend of state ratings. The rating for the state of Florida received the greatest weight in our analysis. Weight was determined considering the bank's deposit volume, branch presence, and loan value in each state relative to the bank as a whole. The state of Florida represented 63.8 percent of deposits, 82.2 percent of loans originated and purchased, and 94.6 percent of the bank's branch network. For the loan products considered under the Lending Test, loans to small businesses received greater weight than home mortgage loans in the state of Florida because they represented a higher percentage of the number and dollar amount of the bank's loans in the state during the evaluation period.

The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.17, 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 Florida

CRA rating for the State of Florida:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to credit needs in its AA;
- The bank exhibits an excellent geographic distribution of loans in its AAs, given the strong level of competition;
- The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank;
- The bank is a leader in originating CD loans and was responsive to community needs;
- The bank exhibits excellent responsiveness to credit and community economic development needs;
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AAs; and
- The bank provides an excellent level of CD services.

Description of Institution's Operations in Florida

The bank has six AAs within the state of Florida. These include the Cape Coral CSA, Miami CSA, North Port MSA, Orlando MSA, Punta Gorda MSA, and Tampa MSA. The bank chose full counties in all AAs. The bank offers a full range of loan and deposit products and services in its AA through its branches within Florida.

Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

Based on FDIC deposit market share data as of June 30, 2020, the bank had \$16.9 billion in deposits representing a 1.9 percent deposit market share in the state of Florida and is ranked 11th out of 191 financial banks doing business in the state. The deposits account for 93.8 percent of the total bank deposits. The largest depository institutions include Bank of America, NA, which

ranked first (20.4 percent) with 506 offices, Wells Fargo Bank, NA, which ranked second (12.9 percent) with 533 offices, and Truist Bank, which ranked third (10.4 percent) with 572 offices.

The bank originated and purchased 82.2 percent of total bank loans in Florida. Home mortgages represented 15.7 percent and loans to small businesses represented 84.3 percent of lending in Florida.

The following table provides information on the demographic composition of the Miami CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Miami CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,331	6.1	27.5	30.6	33.1	2.8
Population by Geography	6,443,458	5.6	28.1	33.3	32.6	0.4
Housing Units by Geography	2,777,572	5.3	26.7	32.9	34.8	0.3
Owner-Occupied Units by Geography	1,416,581	2.5	22.0	35.4	40.0	0.1
Occupied Rental Units by Geography	858,136	10.0	36.1	31.0	22.5	0.4
Vacant Units by Geography	502,855	5.3	24.1	29.2	40.9	0.5
Businesses by Geography	1,234,379	4.1	21.5	29.4	43.8	1.2
Farms by Geography	18,511	4.4	24.4	32.5	38.3	0.4
Family Distribution by Income Level	1,477,569	22.8	17.2	17.9	42.1	0.0
Household Distribution by Income Level	2,274,717	25.0	15.8	16.7	42.5	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach-Sunrise, FL		\$61,809	Median Housing Value			\$221,822
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL		\$49,264	Median Gross Rent			\$1,178
Median Family Income MSA - 38940 Port St. Lucie, FL MSA		\$56,570	Families Below Poverty Level			13.2%

Median Family Income MSA - 42680 Sebastian- Vero Beach, FL MSA	\$58,448		
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL	\$65,914		
<i>Source: 2015 ACS and 2020 D&B Data Due to rounding, totals may not equal 100.0% (* The NA category consists of geographies that have not been assigned an income classification.</i>			

Six community contacts and one OCC listening session conducted in the AA were reviewed as part of the performance evaluation. Community contacts included organizations focused on affordable housing, economic development, and community services. Community contacts identified the following credit and CD needs for the AA:

- Nonprofit organization grant funding
- Living wage jobs
- Improved public transportation
- Affordable housing
- Affordable home repair and rehab programs for ownership and rental properties
- Economic development
- Financial education

The following table provides information on the demographic composition of the Tampa MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Tampa MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	567	7.1	20.1	36.5	33.7	2.6
Population by Geography	2,234,361	5.8	20.0	38.2	35.6	0.5
Housing Units by Geography	1,052,682	5.6	19.9	39.6	34.7	0.2
Owner-Occupied Units by Geography	545,133	2.5	16.0	39.5	42.0	0.1
Occupied Rental Units by Geography	343,598	10.0	25.4	39.6	24.6	0.4
Vacant Units by Geography	163,951	6.4	21.4	40.2	31.9	0.2
Businesses by Geography	316,949	4.9	17.5	34.2	43.0	0.4
Farms by Geography	6,568	4.2	18.2	39.6	37.8	0.2

Family Distribution by Income Level	531,900	21.2	17.0	18.4	43.4	0.0
Household Distribution by Income Level	888,731	23.7	15.8	17.1	43.4	0.0
Median Family Income MSA - 45300 Tampa-St. Petersburg-Clearwater, FL MSA		\$58,916	Median Housing Value			\$166,481
			Median Gross Rent			\$988
			Families Below Poverty Level			11.5%
<i>Source: 2015 ACS and 2020 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>						

Four community contacts conducted in the AA were reviewed as part of the performance evaluation. Community contacts included organizations focused on economic development and affordable housing. Community contacts identified the following credit and CD needs for the AA:

- Affordable housing
- Financing for affordable multifamily units
- Living wage jobs
- Economic development
- Financial education

Opportunities for financial institutions to meet all of the above needs are available throughout the Miami and Tampa areas. Many well-established CD organizations operate in the region. In addition, financial institutions can provide staff support for small business development, financial education, civic leadership, and expertise.

Scope of Evaluation in Florida

The Miami CSA and Tampa MSA received a full-scope review. The two AAs account for 83.7 percent of loans, 84 percent of branches, and 92.1 percent of deposits in the state of Florida throughout the evaluation period. All remaining AAs received limited-scope reviews. Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Refer to Appendix A - Scope of Examination, for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Miami CSA and Tampa MSA is good.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	%State Loans	%State Deposits
Cape Coral CSA	63	246	6	315	6	3.1
Miami CSA	391	3,214	93	3,698	74	88.2
North Port MSA	45	118	7	170	3	2.7
Orlando MSA	111	206	23	340	7	2.1
Punta Gorda MSA	1	0	0	1	0	0.0
Tampa MSA	146	292	7	445	9	3.9

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (\$000)*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	%State* Loans	%State Deposits
Cape Coral CSA	18,121	35,862	11,622	65,605	4	3.1
Miami CSA	298,273	552,824	283,952	1,135,049	72	88.2
North Port MSA	24,461	26,299	13,323	64,083	4	2.7
Orlando MSA	31,102	56,478	84,838	172,418	11	2.1
Punta Gorda MSA	591	0	0	591	0	0.0
Tampa MSA	57,004	66,421	13,919	137,344	9	3.9

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Miami CSA

According to the FDIC Deposit Market Share data as of June 30, 2020, the bank ranked 6th among 84 deposit banks with a market share of 5.1 percent, placing it in the 7th percentile of deposits.

Based on 2019 Peer Mortgage Data, the bank ranked 164th out of 1,100 lenders with a market share of 0.1 percent, placing in the 16th percentile of all mortgage lenders in the AA. The bank's mortgage market share is weaker than the deposit market share. While the HMDA market share is lower than the bank's deposit market share, this remains a highly competitive market with competition consisting of local and national financial institutions of different sizes. The top five mortgage lenders have a combined market share of 25 percent.

According to the 2019 Peer Small Business data, the bank ranked 39th out of 240 small business lenders with 0.2 percent market share, placing in the 17th percentile of small business lenders in the AA. The bank's market share is weaker than the deposit market share. The market consists of local and national lenders including megabanks and issuers of small business credit cards. The top five small business lenders have a combined market share of 71.1 percent. The bank is not an issuer of small business credit cards.

Tampa MSA

According to the FDIC Deposit Market Share data as of June 30, 2020, the bank ranked 18th among 54 deposit banks with a market share of 0.7 percent, placing it in the 34th percentile of deposits.

Based on 2019 Peer Mortgage Data, the bank ranked 153rd out of 944 mortgage lenders with a market share of 0.1 percent, placing in the 17th percentile of all mortgage lenders in the AA. The bank's mortgage market share is near to the deposit market share. The mortgage market competition in the Tampa MSA consists of local and national financial institutions of different sizes. The top five mortgage lenders have a combined market share of 22.2 percent.

According to the 2019 Peer Small Business data, the bank ranked 54th out of 165 small business lenders with 0.1 percent market share, placing in the top 33rd percentile of small business lenders in the AA. The bank's market share is weaker than the deposit market share. The market consists of local and national lenders including megabanks and issuers of small business credit cards. The top five small business lenders have a combined market share of 65 percent. The bank is not an issuer of small business credit cards.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to table O in the state of Florida 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.

Miami CSA

The geographic distribution of the bank's home mortgage lending was excellent. The proportion of loans exceeded both the percentage of owner-occupied housing units in LMI CTs and the aggregate.

Tampa MSA

The geographic distribution of the bank's home mortgage lending was excellent. The proportion of loans exceeded both the percentage of owner-occupied housing units in LMI CTs and the aggregate.

Small Loans to Businesses

Refer to table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Miami CSA

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded both the percentage of businesses in LMI CTs and the aggregate.

Tampa MSA

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded both the percentage of businesses in LMI CTs and the aggregate.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AAs to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We identified no unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of Florida 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.

Miami CSA

During the 2018-2020 evaluation period, the borrower distribution of the bank's home mortgage lending was poor. The proportion of loans was significantly below the percentage of low-income families and below the aggregate. The proportion of loans was significantly below the percentage of moderate-income families and well below the aggregate.

Tampa MSA

During the 2018-2020 evaluation period, the borrower distribution of the bank's home mortgage lending was poor. The proportion of loans was significantly below the percentage of low-income families and exceeded the aggregate. The proportion of loans was significantly below the percentage of moderate-income families and significantly below the aggregate.

Small Loans to Businesses

Refer to table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Miami CSA

During the 2018-2020 evaluation period, the borrower distribution of the bank's loans to small businesses by revenue was adequate. The proportion of loans was significantly below the percentage of small businesses and near to the aggregate.

Tampa MSA

During the 2018-2020 evaluation period, the borrower distribution of the bank's loans to small businesses by revenue was adequate. The proportion of loans was significantly below the percentage of small businesses and near to the aggregate.

Community Development Lending

The institution is a leader in making CD loans which had a positive impact in the overall Lending Test rating in the state.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank utilized CD lending opportunities to meet identified credit needs. The bank's CD lending supported economic development, organizations providing community services to LMI individuals and families, revitalization and stabilization of LMI areas, and the development and retention of affordable housing.

Additionally, the bank made 17 loans benefiting the broader statewide area totaling \$102.3 million without a purpose, mandate, or function (P/M/F) to benefit the bank's AAs.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

The bank has made warehouse lines of credit to six affordable housing organizations in Florida to originate residential mortgages underwritten to the Community Housing Assistance Mortgage Program (CHAMP) guidelines. The partners source applicants while the bank underwrites and makes the credit decision on the loans. The community partners originate and fund the loans through the warehouse line of credit and the bank subsequently purchases the loans.

The CHAMP program was introduced to provide financing for LMI borrowers or to purchase or refinance properties located in low- or moderate-income geographies within the bank's AAs. The program allows for a maximum loan-to-value (LTV) of 80 percent and was designed to work with local municipal programs to provide additional financing. The program was redesigned in 2014 to offer a Fixed Rate CHAMP subordinate mortgage product; the revised program offers down payment assistance in the form of a subordinate mortgage provided concurrently with a CHAMP first lien mortgage. This allows for higher combined LTV ratios, no mortgage insurance, principal forgiveness for low-income borrowers, and terms up to 30 years.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Cape Coral CSA is good and thus weaker than the bank's overall performance under the Lending Test in the full-scope areas. Weaker performance in LMI geographies and to LMI borrowers were determinant in drawing a weaker conclusion and did not impact overall conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the North Port MSA and Orlando MSA is adequate and thus weaker than the bank's overall performance under the Lending Test in the full-scope areas. Weaker performance in LMI geographies and to LMI borrowers were determinant in drawing a weaker conclusion and did not impact overall conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Punta Gorda MSA is very poor and thus weaker than the bank's overall performance under the Lending Test in the full-scope areas. Weaker performance in lending activity was determinant in drawing a weaker conclusion but did not impact overall conclusions. The bank exited the market in 2018 and did not originate or purchase a sufficient volume of home mortgage or small business loans

during the evaluation period to perform a meaningful borrower and geographic distribution analysis.

Refer to tables O through V in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Florida is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami CSA and Tampa MSA is excellent.

The bank has an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives. The majority of investments support affordable housing and economic development.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cape Coral CSA	8	6,207	33	2,305	41	7.5	8,512	3.8	0	0
Miami CSA	43	116,260	304	56,779	347	63.2	173,040	77.5	2	3,500
North Port MSA	6	993	28	3,789	34	6.2	4,783	2.1	0	0
Orlando MSA	3	273	45	5,934	48	8.7	6,207	2.8	0	0
Punta Gorda MSA	4	296	4	6,750	8	1.5	303	0.1	0	0
Tampa MSA	6	1,082	65	29,214	71	12.9	30,296	13.6	0	0

* 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.

Miami CSA

Considering the large number of competitors in the market the bank's level of qualified CD investment relative to investment opportunities and capacity in the AA is excellent. During the evaluation period, the bank made 304 investments and grants totaling \$56.9 million. Including the prior period investments, the bank has \$173.0 million in total CD investments.

Additionally, the bank made an in-kind contribution to a nonprofit organization contributing 19 computers to assist the organization in achieving its mission in LMI communities.

Tampa MSA

The Tampa MSA has a number of nonprofit affordable housing developers of both rental and homeownership units and the bank's level of qualified CD investment relative to investment opportunities in the AA is excellent. During the evaluation period, the bank made 65 investments and grants totaling \$29.2 million. Including the prior period investments, the bank has \$30.2 million in total CD investments.

Additionally, the bank made nine statewide investments totaling \$41,000 without P/M/F to benefit the bank's AAs and two broader regional investments totaling \$7.2 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Cape Coral CSA, North Port MSA, and Orlando MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area(s). Based on limited-scope reviews, the bank's performance under the Investment Test in the Punta Gorda MSA is weaker than the bank's overall performance under the Investment Test in the full-scope area(s). The bank's weaker performance is based on a lower dollar amount than the bank's overall performance under the Investment Test in the full-scope area(s). The weaker performance did not impact the overall conclusions due to the bank's limited scope of operations in the AA.

SERVICE TEST

The bank's performance under the Service Test in Florida is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami CSA is good and in the Tampa MSA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cape Coral CSA	3.1	4	5.7	0.0	25.0	0.0	75.0	5.4	23.7	35.7	34.0
Miami CSA	88.2	51	72.9	5.9	29.4	31.4	33.3	6.1	27.5	30.6	33.1
North Port MSA	2.7	3	4.3	0.0	0.0	100.0	0.0	2.3	24.7	45.4	26.4
Orlando MSA	2.1	4	5.7	0.0	25.0	50.0	25.0	4.1	27.3	32.4	35.8
Punta Gorda MSA	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	15.4	59.0	23.1
Tampa MSA	3.9	8	11.4	0.0	12.5	25.0	62.5	7.1	20.1	36.5	33.7

Miami CSA

The percentage of branches located in low-income areas is near to the percentage of the population residing in these geographies. The percentage of branches located in moderate-income areas exceeded the percentage of the population residing in these geographies. However, 17 branches in middle- or upper-income geographies were within sufficient proximity to reasonably serve LMI areas. The bank had two branches in proximity to serve a low-income geography and 15 branches in proximity to serve moderate-income geographies. The bank provided data showing bank deposit customers being served in the LMI CTs. This contributed positively to conclusions.

The bank complements its traditional service delivery systems with alternative delivery systems, including debit cards, ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provide additional delivery availability and access to banking services to both retail and business customers. No significant weight was placed on these services, as no data was available to determine their impact on LMI individuals.

Tampa MSA

The percentage of branches located in low-income areas is significantly below the percentage of the population residing in these geographies. The percentage of branches located in moderate-income areas is below the percentage of the population residing in these geographies. However, five branches in middle- or upper-income geographies were within sufficient proximity to reasonably serve LMI areas. The bank had two branches in proximity to serve a low-income geography and three branches in proximity to serve moderate-income geographies. The bank provided data showing bank deposit customers being served in the LMI CTs. This contributed positively to conclusions.

The bank complements its traditional service delivery systems with alternative delivery systems, including debit cards, ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provide additional delivery availability and access to banking services to both retail and business customers. No consideration was given to these services, as no data was available to determine their impact on LMI individuals.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cape Coral CSA		1			-1	
Miami CSA	1	15		-1	-3	-10
North Port MSA		1		-1		
Orlando MSA	1	1				
Punta Gorda MSA		1			-1	
Tampa MSA		1				-1

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened two branches and closed 20 branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA(s), particularly LMI geographies and/or individuals.

Community Development Services

The bank is a leader in providing CD services.

Miami CSA

The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 157 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, or provided technical assistance to qualifying organizations commensurate with their bank job duties.

Bank employees conducted presentations, taught courses, and provided technical assistance on financial and banking related matters to community groups and LMI individuals and small business owners. These services exhibited good responsiveness to identified needs in the AA. During the evaluation period, bank employees volunteered 3,681 hours to 197 organizations

focused on affordable housing, financial literacy, revitalization activities, and small business development.

Examples of qualified CD services in the AA include:

- An employee served on the board of directors (board) and steering committee of an organization that provides assistance with affordable housing that serves LMI individuals and families. The organization has aided in the funding of gap financing that resulted in over 1,500 new affordable rental units for LMI individuals. The employee contributed 130 hours of service for the organization during the evaluation period.
- An employee served on the board of an affordable housing organization and contributed 155 hours to a CD corporation during the evaluation period. The organization's mission is to provide affordable housing, and educational and business enterprise programs that create sustainable economic advancement.

Tampa MSA

The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 13 bank employees either held board or committee positions, provided financial literacy training to LMI individuals or small business owners, or provided technical assistance to qualifying organizations commensurate with their bank job duties.

Bank employees conducted presentations, taught courses, and provided technical assistance on financial and banking related matters to community groups and LMI individuals and small business owners. These services exhibited adequate responsiveness to identified needs in the AA. During the evaluation period, bank employees volunteered 724 hours to 35 organizations focused on financial literacy, revitalization activities, small business development, and affordable housing.

Examples of qualified CD services in the AA include:

- An employee served on the board of a community service organization that served LMI individuals and families. The organization is located in a moderate-income geography and assists the homeless by providing food and clothing. The employee performed 78 hours of service for the organization during the evaluation period.
- An employee served on the board of a CD financial institution that provides flexible financing for affordable housing and CD. The employee performed approximately 78 hours of service for the organization during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Cape Coral CSA, North Port MSA, Orlando MSA, and Punta Gorda MSA is weaker than the bank's overall performance under the Service Test in the full-scope areas. Weaker performance is due to branch distribution in the AAs and did not impact the overall Service Test rating.

State Rating

State of New York

CRA rating for the State of New York: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to credit needs in its AA;
- The bank exhibits a good geographic distribution of loans in its AAs, given the strong level of competition;
- The bank exhibits a poor distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank;
- The bank has made a relatively high level of CD loans and was responsive to community needs;
- The bank exhibits excellent responsiveness to credit and community economic development needs;
- Service delivery systems are accessible to geographies and individuals of different income levels in the AAs; and
- The bank provides a good level of CD services.

Description of Institution's Operations in New York

The bank has one AA within the state of New York referred to as the New York MSA in which full counties were delineated. The bank offers a full range of loan and deposit products and services in its AA through its branches within New York.

Refer to Appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

Based on FDIC deposit market share data as of June 30, 2020, the bank had \$9.6 billion in deposits representing a 0.6 percent deposit market share in the state of New York and is ranked 21st out of 202 financial institutions doing business in the state. The deposits accounted for 6.2 percent of the total bank deposits. The largest depository institutions include JPMorgan Chase, NA, which ranked first (34.4 percent) with 638 offices, Goldman Sachs, which ranked second

(8.5 percent) with one office, and The Bank of New York Mellon, which ranked third (7.3 percent) with two offices.

The bank originated and purchased 17.8 percent of total bank loans in New York. Home mortgages represented 65.5 percent and loans to small businesses represented 34.5 percent of lending in the state of New York.

Four community contacts and one OCC listening session conducted in the AA were reviewed as part of the performance evaluation. Community contacts included nonprofit organizations focused on affordable housing, economic development, and community services. Community contacts identified the following credit and CD needs for the AA:

- Affordable housing and housing support services
- Nonprofit organization funding for operating support
- Small business loans for working capital
- Financial education
- Job training
- Affordable banking products
- Small dollar loans
- Homebuyer down payment assistance programs

The following table provides information on the demographic composition of the New York MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: New York MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,372	9.8	28.1	32.3	27.6	2.2
Population by Geography	5,726,139	11.8	30.2	29.6	28.1	0.3
Housing Units by Geography	2,449,765	10.0	27.0	27.7	35.0	0.4
Owner-Occupied Units by Geography	837,186	2.9	19.4	41.7	35.8	0.2
Occupied Rental Units by Geography	1,338,868	15.3	32.4	19.0	32.9	0.5
Vacant Units by Geography	273,711	5.8	24.0	27.1	42.7	0.4
Businesses by Geography	710,053	6.3	18.5	23.5	48.6	3.0
Farms by Geography	6,140	2.9	21.6	42.3	32.4	0.8

Family Distribution by Income Level	1,263,586	29.4	16.1	16.9	37.6	0.0
Household Distribution by Income Level	2,176,054	30.0	14.2	15.5	40.3	0.0
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY		\$108,193	Median Housing Value			\$607,762
Median Family Income MSA - 35614 New York- Jersey City-White Plains, NY-NJ		\$67,560	Median Gross Rent			\$1,442
			Families Below Poverty Level			14.0%
<i>Source: 2015 ACS and 2020 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in New York

A full-scope review of the New York MSA was performed as it was the only AA in the state. Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. Refer to Appendix A - Scope of Examination, for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

The bank's performance under the Lending Test in New York is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the New York MSA is adequate.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	%State Loans	%State Deposits
New York MSA	684	361	28	1,073	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*						
Assessment Area	Home Mortgage (\$000)	Small Business (\$000)	Community Development (\$000)	Total (\$000)	%State* Loans	%State Deposits
New York MSA	745,109	140,634	111,731	997,474	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the FDIC Deposit Market Share data as of June 30, 2020, the bank ranked fifteenth among 102 deposit banks with a market share of 0.6 percent, placing in the 15th percentile of deposits.

Based on 2019 Peer Mortgage Data, the bank ranked 57th out of 430 mortgage lenders with a market share of 0.3 percent, placing in the 14th percentile of all mortgage lenders in the AA. The bank's market share is near to the deposit market share. The mortgage market in the New York MSA remains highly competitive with competition consisting of local and national financial institutions of different sizes. The top five mortgage lenders have a combined market share of 34.8 percent.

According to the 2019 Peer Small Business data, the bank ranked 68th out of 240 small business lenders with 0.02 percent market share, placing it in the 29th percentile of small business lenders in the AA. The bank's market share is weaker than the deposit market share. The market consists of local and national lenders including megabanks and issuers of small business credit cards. The top five small business lenders have a combined market share of 77.5 percent. The bank is not an issuer of small business credit cards.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to table O in the state of New York 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.

The geographic distribution of the bank's home mortgage lending was good. The proportion of loans exceeded the percentage of owner-occupied housing units in low-income CTs and the aggregate. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income CTs and the aggregate.

Small Loans to Businesses

Refer to table Q in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of the bank's small loans to businesses was good. The proportion of loans was near to the percentage of businesses in low-income CTs and the aggregate. The proportion of loans exceeded the percentage of businesses in moderate-income CTs and the aggregate.

Lending Gap Analysis

The OCC reviewed the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed the bank's home mortgage and small business lending activity during the evaluation period to identify any gaps in the geographic distribution of loans. We identified no unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to table P in the state of New York 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.

During the 2018-2020 evaluation period, the borrower distribution of the bank's home mortgage lending was poor. The proportion of loans was well below both the percentage of LMI families and the aggregate.

Small Loans to Businesses

Refer to table R in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of the bank's loans to small businesses by revenue was poor. The proportion of loans was significantly below the percentage of small businesses and well below the aggregate.

Community Development Lending

The institution has made a relatively high level of CD loans which had a positive impact on overall lending performance in the state.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank utilized CD lending opportunities to meet identified credit needs. The bank's CD lending supported the development and retention of affordable housing, organizations providing community services to LMI individuals and families, revitalization and stabilization of LMI areas, and economic development.

Additionally, the bank made 15 loans benefiting the statewide area totaling \$44.3 million without a P/M/F to benefit the bank's AA and seven broader regional investments totaling \$21 million.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

The bank has made warehouse lines of credit to a local affordable housing organization in New York City to originate residential mortgages underwritten to CHAMP guidelines. The partners source applicants while the bank underwrites and makes the credit decision on the loans. The community partner originates and funds the loan through the warehouse line of credit and the bank subsequently purchases the loans.

INVESTMENT TEST

The bank's performance under the Investment Test in New York is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the New York MSA is excellent.

The bank has an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
New York MSA	14	49,334	174	25,715	188	100.0	75,049	100.0	0	0

* 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.

Considering the large number of competitors in the markets, including some of the largest banks in the country, the bank's level of qualified CD investment relative to investment opportunities and capacity in the AA is excellent. During the evaluation period, the bank made 174 investments and grants totaling \$25.7 million. Including the prior period investments, the bank has \$75.0 million in total CD investments.

Additionally, the bank made one broader regional investment without a P/M/F totaling \$1.3 million.

SERVICE TEST

The bank's performance under the Service Test in New York is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the New York MSA is adequate.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System			
	Deposits	Branches	Population

Assessment Area	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
New York MSA	100.0	4	100.0	25.0	0	0	75.0	9.8	28.1	32.3	27.6

The percentage of branches located in low-income areas exceeded the percentage of the population residing in these geographies. The percentage of branches located in moderate-income areas was significantly below the percentage of the population residing in these geographies.

The bank makes good use of alternative delivery systems through debit cards, ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provide additional delivery availability and access to banking services to both retail and business customers. No significant weight was placed on these services, as no data was available to determine their impact on LMI individuals.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
New York MSA	0	0	0	0	0	0

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA(s), particularly LMI geographies and/or individuals.

Community Development Services

The institution provides a relatively high level of CD services.

The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 18 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, or provided technical assistance to qualifying organizations commensurate with their bank job duties.

Bank employees conducted presentations, taught courses, and provided technical assistance on financial and banking related matters to community groups and LMI individuals and small business owners. These services exhibited adequate responsiveness to identified needs in the AA. During the evaluation period, bank employees volunteered 982 hours to 26 organizations focused on financial literacy, affordable housing, revitalization activities, and providing small business classes. Examples of qualified CD services in this AA include:

- An employee served as the executive director of a nonprofit organization dedicated to supporting the creative, educational, and professional development of LMI youth in Brooklyn. The organization has six programs focused on developing youth including a financial education institute that offers financial education for youth and adults. The training provides the skills to be financially independent and acquire assets for themselves and their communities by setting goals for their future; establishing regular saving habits and discipline; and invest in assets that will allow them to achieve their goals. The employee performed 640 hours of service for the organization during the evaluation period.
- An employee served on the board of an organization that annually serves more than 8,000 LMI New Yorkers through transitional housing and affordable housing. The organization's mission supports individuals, families, and communities by developing and sustaining supportive and affordable housing as well as programs for homeless and other vulnerable New Yorkers. The employee performed approximately 36 hours of service for the organization during the evaluation period.

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	Lending Test (excludes CD Loans): 01/01/18 to 12/31/20 Investment and Service Tests and CD Loans 01/01/18 to 12/31/20	
Financial Institution	Products Reviewed	
BankUnited, N.A.	Home Mortgage, Small Business, and CD Loans Qualified Investments and Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Counties
Florida Cape Coral CSA Miami CSA North Port MSA Orlando MSA Punta Gorda MSA Tampa MSA New York New York MSA	Limited-scope Full-scope Limited-scope Limited-scope Limited-scope Full-scope Full-scope	Collier and Lee Counties Broward, Indian River, Martin, Miami-Dade, Palm Beach, and St. Lucie Counties Manatee, and Sarasota Counties Orange and Seminole Counties Charlotte County (2018) Hillsborough and Pinellas Counties Kings, New York, Suffolk Counties

Appendix B: Summary of State Ratings

RATINGS BankUnited				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
BankUnited	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State:				
Florida	Outstanding	Outstanding	High Satisfactory	Outstanding
New York	Satisfactory	Outstanding	Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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) purchased loans are treated the same 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.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage

distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018	
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	
Punta Gorda MSA	1	591	100.0	8,339	0.0	0.0	0.0	10.7	0.0	12.0	70.6	0.0	70.2	18.6	100.0	17.7	0.0	0.0	0.0	
Total	1	591	100.0	8,339	0.0	0.0	0.0	10.7	0.0	12.0	70.6	0.0	70.2	18.6	100.0	17.7	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 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																			2018	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Punta Gorda MSA	1	591	100.0	8,339	17.3	--	4.7	20.7	--	16.3	21.8	--	21.7	40.2	--	43.1	0.0	100.0	14.2	
Total	1	591	100.0	8,339	17.3	--	4.7	20.7	--	16.3	21.8	--	21.7	40.2	--	43.1	0.0	100.0	14.2	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 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																			2018-20	
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	
Cape Coral CSA	63	18,121	8.3	70,571	2.1	0.0	1.4	17.8	25.4	16.5	43.2	47.6	43.4	36.9	27.0	38.6	0.0	0.0	0.1	
Miami CSA	391	298,273	51.7	271,927	2.5	6.4	1.7	22.0	27.9	16.9	35.4	27.4	36.2	40.0	38.4	45.0	0.1	0.0	0.2	
North Port MSA	45	24,461	6.0	52,023	1.0	2.2	0.3	18.3	22.2	11.8	50.7	42.2	43.9	29.9	33.3	44.0	0.0	0.0	0.0	
Orlando MSA	111	31,102	14.7	91,205	1.1	1.8	0.6	18.3	20.7	13.2	33.6	33.3	33.1	47.0	44.1	53.1	0.0	0.0	0.0	
Tampa MSA	146	57,004	19.3	128,176	2.5	4.1	2.1	16.0	20.5	12.7	39.5	33.6	35.7	42.0	41.8	49.4	0.1	0.0	0.1	
Total	756	428,960	100.0	613,902	2.2	4.5	1.5	19.7	24.9	15.0	38.0	32.0	37.1	40.1	38.6	46.3	0.1	0.0	0.1	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 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																				2018-20	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Cape Coral CSA	63	18,121	9.0	70,571	20.8	7.1	3.5	18.2	9.8	14.3	19.5	--	19.2	41.5	--	47.0	0.0	92.1	16.0		
Miami CSA	391	298,273	51.7	271,927	22.8	1.8	2.3	17.2	6.9	10.8	17.9	5.6	18.6	42.1	1.6	50.3	0.0	85.2	18.0		
North Port MSA	45	24,461	6.0	52,023	19.4	--	4.7	19.1	--	15.4	21.0	--	20.5	40.5	--	44.5	0.0	100.0	14.8		
Orlando MSA	111	31,102	15.9	91,205	21.1	--	2.7	17.0	2.2	11.6	18.6	--	18.8	43.3	--	49.5	0.0	99.1	17.4		
Tampa MSA	146	57,004	20.8	128,176	21.2	3.4	3.0	17.0	6.0	13.4	18.4	3.4	18.7	43.4	--	44.8	0.0	92.5	20.1		
Total	756	428,960	100.0	613,902	21.9	1.3	2.8	17.3	5.2	12.2	18.4	3.2	18.9	42.3	0.7	48.2	0.0	90.1	17.9		

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018-20

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cape Coral CSA	246	35,862	6.0	34,712	2.7	2.8	2.4	19.1	21.1	18.1	39.4	36.6	39.7	38.7	39.4	39.8	0.1	0.0	0.0
Miami CSA	3,214	552,824	78.9	299,792	4.1	7.2	4.4	21.5	26.1	22.0	29.4	26.1	28.3	43.8	38.7	44.1	1.2	1.9	1.2
North Port MSA	118	26,299	2.9	25,769	1.4	0.8	1.2	19.4	33.1	17.9	44.3	47.5	43.0	35.0	18.6	37.9	0.0	0.0	0.0
Orlando MSA	206	56,478	5.1	56,247	1.4	3.4	1.2	22.6	38.4	21.8	32.2	30.6	31.8	43.8	27.7	45.2	0.0	0.0	0.0
Tampa MSA	292	66,421	7.2	72,097	4.9	10.6	5.6	17.5	23.6	18.6	34.2	36.0	33.8	43.0	29.8	41.9	0.4	0.0	0.3
Total	4,076	737,884	100	488,617	3.6	6.8	3.9	20.7	26.4	21.0	32.1	28.3	31.1	42.8	37.0	43.3	0.8	1.5	0.8

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2018-20**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cape Coral CSA	246	35,862	6.0	34,712	92.0	44.3	46.2	2.7	45.9	5.3	9.8
Miami CSA	3,214	552,824	78.9	299,792	92.9	42.2	48.1	2.7	43.9	4.4	13.9
North Port MSA	118	26,299	2.9	25,769	91.7	44.1	50.8	2.8	46.6	5.4	9.3
Orlando MSA	206	56,478	5.1	56,247	91.3	39.3	49.0	2.8	49.5	5.9	11.2
Tampa MSA	292	66,421	7.2	72,097	90.8	41.1	48.7	3.1	54.1	6.0	4.8
Total	4,076	737,884	100.0	488,617	92.3	42.1	48.3	2.8	45.1	5.0	12.8

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA 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																			2018-20	
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	
New York MSA	684	745,109	100.0	108,246	2.9	6.3	3.2	19.4	15.4	18.6	41.7	27.3	45.1	35.8	50.9	32.9	0.2	0.1	0.2	
Total	684	745,109	100.0	108,246	2.9	6.3	3.2	19.4	15.4	18.6	41.7	27.3	45.1	35.8	50.9	32.9	0.2	0.1	0.2	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 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																			2018-20	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
New York MSA	684	745,109	100.0	108,246	29.4	1.7	3.3	16.1	1.3	13.7	16.9	1.3	19.1	37.6	1.1	48.9	0.0	96.9	15.0	
Total	684	745,109	100.0	108,246	29.4	1.7	3.3	16.1	1.3	13.7	16.9	1.3	19.1	37.6	1.1	48.9	0.0	96.9	15.0	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018-20	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
New York MSA	361	140,634	100.0	245,150	6.3	3.9	7.5	18.5	18.8	18.9	23.5	19.1	24.1	48.6	53.2	46.7	3.0	5.0	2.7	
Total	361	140,634	100.0	245,150	6.3	3.9	7.5	18.5	18.8	18.9	23.5	19.1	24.1	48.6	53.2	46.7	3.0	5.0	2.7	

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018-20
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
New York MSA	361	140,634	100.0	245,150	89.8	21.6	42.1	5.1	62.6	5.1	15.8	
Total	361	140,634	100.0	245,150	89.8	21.6	42.1	5.1	62.6	5.1	15.8	
<i>Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												