



PUBLIC DISCLOSURE

April 24, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Columbia Bank
Charter Number 702454

19-01 Route 208 North
Fair Lawn, NJ 07410

Office of the Comptroller of the Currency

343 Thornall Street
Suite 610
Edison, NJ 08837

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.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of **Columbia Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory			X
Low Satisfactory	X		
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:

- A majority of home mortgages and small business loans were made within the assessment area;
- The geographic distribution of home mortgage loans is adequate and small loans to businesses by income level of the geography is adequate;
- The borrower distribution of home mortgage loans by income level is adequate and the borrower distribution of small loans to businesses is poor;
- The institution has made a high level of community development loans;
- The institution has an excellent level of qualified community development investments and grants, and
- The branch distribution is reasonably accessible to essentially all portions of low-to moderate-income individuals and geographies; and
- The institution provides an outstanding level of community development services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

Full 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

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

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 One 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.

Description of Institution

Columbia Bank (Columbia) is an intrastate bank headquartered in Fair Lawn, New Jersey (NJ), and is a wholly owned subsidiary of Columbia Bank MHC, a mutual holding company. The bank's primary market consists of Essex, Union, Morris, Bergen, Monmouth, Middlesex, Passaic, Burlington, Camden, and Gloucester Counties in NJ.

Columbia offers a full range of deposit and credit products through 47 branches distributed throughout its assessment areas (AAs). Columbia's website offers information on Bank products as well as branch hours and locations. Additional information on products and services can be found in the bank's Public File, which is available by request at any branch location. Columbia has 33 branches located within Bergen, Middlesex, Monmouth, and Passaic counties, 8 branches located within Burlington, Gloucester, and Camden counties, and 6 branches located within Essex, Morris, and Union counties. Of the 47 branches, 36 are located within upper-income geographies, 10 are located in middle-income geographies, and 1 is located in a moderate-income geography. During the evaluation period, the bank opened three branches, none of which were located in low- or moderate-income geographies. Two branches were relocated during the evaluation period, but stayed within the same geographies.

As of December 31, 2016, Columbia had total assets of \$5.1 billion and Tier One Capital was \$536.3 million. Total outstanding net loans and leases were \$4.1 billion and represented 78.8 percent of assets. Total deposits were \$3.9 billion and represented 76 percent of assets. The bank's loan portfolio mix consisted of 1-4 family residential mortgages (52.1 percent), non-farm non-residential (27.3 percent), multifamily (11.6 percent), commercial and industrial (4.7 percent), and construction and development (4.2 percent).

There were no legal or financial factors impeding the bank's ability during the evaluation period to help meet credit needs in its assessment areas. Columbia's CRA performance was rated "Satisfactory" in the last public evaluation dated September 23, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation (PE) assesses Columbia's performance under the Lending, Investment, and Service Tests. The evaluation period for the Lending Test is January 1, 2014 to December 31, 2016, with the exception of Community Development (CD) loans. For the Investment Test, Service Test, and CD loans, the evaluation period is September 23, 2013 to April 24, 2017.

We evaluated the bank's lending performance, using home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA), loans to small businesses reported under the Community Reinvestment Act (CRA), multifamily loans, and CD loans. Loans to small farms reported under the CRA were not evaluated as the bank does not originate a sufficient volume to provide a meaningful analysis.

We evaluated the bank's investment performance by reviewing all qualified investments made during the evaluation period as well as outstanding prior period investments. We based our conclusions on the number and dollar amount of investments as well as the level of innovation, complexity, and responsiveness to the credit needs of the community.

We compared the bank's loan data to area demographic data using the 2010 U.S. Census American Community Survey, 2016 Dun and Bradstreet small business demographic data, 2015 HMDA peer mortgage data, 2015 CRA peer small business data, and 2016 FFIEC median family incomes. Deposit and branch data was obtained from the Federal Deposit Insurance Corporation (FDIC).

Data Integrity

Prior to this evaluation, we conducted a data integrity review in July of 2016. We reviewed HMDA data and small business loan data to determine the accuracy of lending related data supplied by the bank. CD loans, investments, and services were also reviewed to ensure that they meet the regulatory definition and standards of CD activities. We determined that recorded data for HMDA and loans to small business reported under the HMDA was considered accurate and were used in this evaluation.

Selection of Areas for Full-Scope Review

Columbia has delineated three AAs in New Jersey that meet the technical and regulatory requirements as defined by the regulation. We selected all three AAs for full scope reviews. The AAs are consistent with the requirements of the regulation, and do not arbitrarily exclude low- or moderate-income geographies. For additional information, refer to Appendix A.

Ratings

The bank's overall rating is based on the Lending Test, Investment Test, and Services Test, with the Lending Test receiving more weight than the Investment or Service Tests. The bank's performance in the Bergen, Middlesex, Monmouth, and Passaic AA is weighted more heavily than the other two AAs as 70.6 percent of total bank deposits and 62.2 percent of all lending activity during the evaluation period occurred in this AA.

Performance related to home mortgage lending is also more heavily weighted than performance related to small business loans. The volume of home mortgage originations was significantly larger than the volume of small business loans in all markets and represented 79.8 percent of all loans originated during the evaluation period. We placed more weight on performance against aggregate peer performance than on performance based on market share among specific loan types. Market share data is based on the bank's performance within a single year while performance compared to aggregate peer data considers all loans originated during the evaluation period.

Other

The credit and community development needs of the assessment areas were determined by reviewing recent housing and demographic information and by community contacts conducted by the OCC in conjunction with CRA evaluations for banks operating within the same AAs. We utilized information recorded from earlier interviews with community groups within the bank's AAs in identifying local community needs.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c) and 195.28(c), in determining a national bank's (bank) or federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA'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 (HUD), and the Consumer Financial Protection Bureau (CFPB).

The OCC did not identify evidence of discriminatory or other illegal credit practices with respect to this institution.

The OCC will consider any evidence of discriminatory or other illegal credit practices relative to this institution that other regulators may provide to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information provided concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Bergen-Middlesex-Monmouth-Passaic, Essex-Union-Morris, and Burlington-Camden-Gloucester MDs is adequate.

Lending Activity

Columbia's lending levels reflect adequate responsiveness to overall AA credit needs. Based on full-scope reviews, the bank's performance is adequate in the Bergen-Middlesex-Monmouth-Passaic MD, adequate in the Essex-Union-Morris MD, and poor in the Burlington-Camden-Gloucester MD. The institution exhibits an adequate record of serving the credit needs of the most economically disadvantaged area(s) of its assessment area(s), low-income individuals, and/or very small businesses.

Refer to Table 1 Lending Volume of Appendix C for the facts and data used to evaluate the bank's lending activity.

Bergen-Middlesex-Monmouth-Passaic, NJ MD (MD 35614)

Lending levels reflect an adequate responsiveness to the credit needs of the AA. Columbia has 33 branches and 70.64 percent of the bank's total deposits in the AA. Competition is high for both loans and deposits in the AA as the bank competes with nationwide, large regional and local financial institutions. The bank has exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas in MD 35614. The borrower distribution of loans indicates Columbia exhibits an adequate record of serving low-income individuals and very small businesses.

Columbia's equivalent market rank in home mortgage lending relative to the number of reporting lenders in the AA is favorable to bank's market rank in deposits. As of June 30, 2016, the bank held 2.20 percent market share of deposits and was ranked 12 out of 82 depository financial institutions in the MD 35614. Columbia held a 1.06 percent market share for home mortgage loans overall and was ranked 17 out of 595 total reporting lenders. Columbia's market share for small business loans is 0.24 percent and they are ranked 22 out of 154 reporting lenders.

Essex-Union-Morris, NJ MD (MD 35084)

Lending levels reflect a good responsiveness to the credit needs of the AA. Columbia has 6 branches and 14.61 percent of the bank's total deposits in the AA. The bank has exhibited a poor record of serving the credit needs of the most economically disadvantaged areas in MD 35084. The borrower distribution of loans indicates Columbia exhibits an adequate record of serving the low-income individuals and very small businesses.

Columbia's market share rank in home mortgage lending relative to the number of reporting lenders in the AA is near to the bank's market rank in deposits. As of June 30, 2016, the bank held 0.75 percent market share of deposits and was ranked 19 out of 52 depository financial institutions in MD 35084. Columbia held a 0.50 percent market share for home mortgage loans overall and was ranked 50 out of 515 total reporting lenders. Columbia's market share for small business loans is 0.12 percent and they are ranked 36 out of 132 reporting lenders.

Burlington-Camden-Gloucester, NJ MD (MD 15804)

Lending levels reflect an adequate responsiveness to the credit needs of the AA. Columbia had 8 branches and 14.75 percent of the bank's total deposits in the AA. The bank has exhibited an adequate record of serving the credit needs of the most economically disadvantaged areas in MD 15804. The borrower distribution of loans indicates Columbia exhibits a poor record of serving low-income individuals and small businesses in the AA consistent.

Columbia's market rank in home mortgage lending relative to the number of reporting lenders in the AA is comparable to the bank's market rank in deposits. As of June 30, 2016, the bank held 2.14 percent market share of deposits and was ranked 13 out of 32 depository financial institutions in MD 15804. Columbia held a 0.62 percent market share for home mortgage loans overall and was ranked 40 out of 484 total reporting lenders. Columbia's market share for small business loans is 0.35 percent and they are ranked 23 out of 101 reporting lenders.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans reflects adequate penetration throughout the full-scope AAs. The geographic distribution of home mortgage loans is adequate. The distribution of loans to small businesses is adequate.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 of Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage lending.

Small Loans to Businesses

Refer to Table 6 of Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

Bergen-Middlesex-Monmouth-Passaic, NJ MD (MD 35614)

The geographic distribution of loans in MD 35614 reflects adequate penetration throughout the AA, particularly to low- and moderate-income geographies. Overall, this performance is considered adequate when considering that the Adjusted Median Family Income for 2016 in this AA is \$72,600, which means a low-income individual earns less than \$36,300 while a moderate-income individual earns less than \$58,080 and the median cost of housing is \$427,649. These demographics make home ownership difficult for low- or moderate-income individuals. In addition, 8% of the population of this AA is below the poverty level.

Home Purchase Lending

The geographic distribution of home purchase loans reflects excellent penetration throughout the AA. The percentage of home purchase loans in low- and moderate-income geographies exceeds the percentage of aggregate peer lending levels in low- and moderate-income geographies. The percentage of loans in low- and moderate-income geographies also exceeds the percentage of owner-occupied units in low- and moderate-income geographies in the AA.

Home Improvement Lending

The geographic distribution of home improvement loans reflects poor penetration throughout the AA. The bank's level of home improvement lending in low- and moderate-income geographies is less than the percentage of aggregate peer lending levels in those geographies. The percentage of home refinance loans in low- and moderate-income geographies is also less than the percentage of owner-occupied units in those geographies.

Home Refinance Lending

The geographic distribution of home refinance loans reflects poor penetration throughout the AA. The bank's level of home refinance lending in low- and moderate-income geographies is less than the percentage of aggregate peer lending levels in those geographies. The percentage of loans in low- and moderate-income geographies is also less than the percentage of owner-occupied units in those geographies.

Multifamily Lending

The geographic distribution of multifamily loans reflects poor penetration throughout the AA. The bank did not originate any multifamily loans in low-income geographies. The bank's level of multifamily lending in moderate-income geographies is also less than the percentage of aggregate peer lending levels in moderate-income geographies. The percentage of loans in moderate-income geographies exceeds the percentage of multifamily units in those geographies.

Small Loans to Businesses

The geographic distribution of small loans to businesses reflects adequate penetration throughout the AA. The percentage of small loans to businesses in low-income geographies is less than the percentage of aggregate peer lending levels in those geographies. The percentage of small loans to businesses in moderate-income geographies exceeds the percentage of aggregate peer lending levels in those geographies. This performance is considered adequate as Columbia operates in a highly competitive market for commercial lending.

Essex-Union-Morris, NJ MD (MD 35084)

The overall geographic distribution of loans in MD 35084 reflects poor penetration throughout the AA, to low- and moderate-income geographies.

Home Purchase Lending

The geographic distribution of home purchase loans reflects good penetration throughout the AA. The percentage of home purchase loans in low-income geographies exceeds the percentage of aggregate peer lending levels in those geographies. The percentage of loans in moderate-income geographies is less than the percentage of aggregate peer lending levels in those geographies. The percentage of loans in low-income geographies exceeds the percentage of owner-occupied units in those geographies. The percentage of loans in moderate-income geographies is less than the percentage of owner-occupied units in those geographies.

Home Improvement Lending

The geographic distribution of home improvement loans reflects very poor penetration throughout the AA. The percentage of home improvement loans in low-income geographies is less than the percentage of aggregate peer levels in low-income geographies. The percentage of loans in moderate-income geographies is significantly less than the percentage of aggregate peer levels in moderate-income geographies. The percentage of loans in low-income geographies is less than the percentage of owner-occupied units in those geographies. The percentage of loans in moderate-income geographies is significantly less than the percentage of owner-occupied units in those geographies.

Home Refinance Lending

The geographic distribution of home refinance loans reflects very poor penetration throughout the AA. The percentage of home refinance loans in low-income geographies is less than the percentage of aggregate peer lending levels in low-income geographies. The percentage of loans in moderate-income geographies is significantly less than the percentage of aggregate peer lending levels in moderate-income geographies. The percentage of loans in low-income geographies is also less than the percentage of owner-occupied units in those geographies. The percentage of loans in moderate-income geographies is significantly less than the percentage of owner-occupied units in those geographies.

Multifamily Lending

The geographic distribution of multifamily loans reflects good penetration throughout the AA. The percentage of multifamily loans in low-income geographies is slightly less than the percentage of aggregate peer levels in low-income geographies. The bank's level of multifamily lending in moderate-income geographies exceeds the percentage of aggregate peer lending levels in moderate-income geographies. The percentage of loans in low-income geographies is also slightly less than the percentage of multifamily units in those geographies. The percentage of loans in moderate-income geographies exceeds the percentage of multifamily units in those geographies.

Small Loans to Businesses

The geographic distribution of small loans to businesses reflects adequate distribution throughout the AA. The percentage of small loans to businesses in low- and moderate-income geographies is slightly less than the percentage of aggregate peer lender levels in low- and moderate-income geographies. The percentage of loans in low-income geographies is less than the percentage of businesses located in low-income geographies. The percentage of loans in moderate-income geographies is significantly less than the percentage of businesses in moderate-income geographies.

Burlington-Camden-Gloucester, NJ MD (MD 15804)

The overall geographic distribution of loans in this AA reflects adequate penetration throughout the AA, to low- and moderate-income geographies. Overall, this performance is considered adequate when considering that the Adjusted Median Family Income for 2016 in this AA is \$84,200, which means a low-income individual earns less than \$42,100 while a moderate-income individual earns less than \$67,360, and the median cost of housing is \$243,798. These demographics make home ownership difficult for low- or moderate-income individuals. In addition, 8% of the population of this AA is below the poverty level.

Home Purchase Lending

The geographic distribution of home purchase loans reflects good penetration throughout the AA. The percentage of home purchase loans in low-income geographies exceeds the percentage of aggregate peer lending levels in low-income geographies. The percentage of loans in moderate-income geographies is near to the percentage of aggregate peer lending levels in moderate-income geographies. The percentage of loans in low-income geographies is near to the percentage of owner-occupied units in those geographies. The percentage of loans in moderate-income geographies is less than the percentage of owner-occupied units in those geographies.

Home Improvement Lending

The geographic distribution of home improvement loans reflects adequate penetration throughout the AA. The bank did not originate any home improvement loans in low-income geographies during the evaluation period in MD 15804. The percentage of loans in moderate-income geographies is near to the percentage of aggregate peer lending levels in moderate-income geographies. The percentage of loans in moderate-income geographies is less than the percentage of owner-occupied units in those geographies.

Home Refinance Lending

The geographic distribution of home refinance loans reflects poor penetration throughout the AA. The bank did not originate any home refinance loans in low-income geographies during the evaluation period in MD 15804. The percentage of loans in moderate-income geographies is less than the percentage of aggregate lender levels in moderate-income geographies. The percentage of loans in moderate-income geographies is significantly less than the percentage of owner-occupied units in those geographies.

Multifamily Lending

The geographic distribution of multifamily loans reflects excellent penetration throughout the AA. The bank did not originate any multifamily loans in low-income geographies. The performance in low-income geographies does not have an impact given the low levels of available multifamily units in low-income geographies and the absence of peer lending in those geographies. The bank's level of multifamily lending in moderate-income geographies exceeds the percentage of aggregate peer lending levels in moderate-income geographies. The percentage of loans in moderate-income geographies exceeds the percentage of multifamily units in those geographies.

Small Loans to Businesses

The geographic distribution of small loans to businesses reflects good penetration throughout the AA. The bank did not originate any small loans to businesses in low-income geographies during the evaluation period in MD 15804. The percentage of loans in moderate-income geographies exceeds the percentage of aggregate peer lending levels and the percentage of businesses located in moderate-income geographies.

Lending Gap Analysis

We evaluated the bank's geographic lending distribution in the bank's AAs to determine if any unexplained, conspicuous gaps existed. We used HMDA and CRA data reports to compare the geographies where loans were made to the geographies in the AAs. We also considered competition, market conditions, and demographic information. No unexplained, conspicuous gaps were identified.

Inside/Outside Ratio

A majority of loans are made inside Columbia's AAs. Overall, 85.7 percent of the bank's loan originations fell within the AAs. For home mortgage loans, 84.3 percent of loan originations fell within the bank's AAs and for loans to small businesses, 92.0 percent fell within the bank's AAs.

Distribution of Loans by Income Level of the Borrower

Overall, the distribution of loans to borrowers in full-scope AAs reflects adequate penetration among customers of different income levels and poor penetration among businesses of different sizes.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 of Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage lending.

Small Loans to Businesses

Refer to Table 11 of Appendix C for the facts and data used to evaluate the bank's distribution of loans to businesses of different sizes.

Bergen-Middlesex-Monmouth-Passaic, NJ MD (MD 35614)

The overall distribution of loans to borrowers of different income levels and businesses of different sizes in this AA is adequate. The overall borrower distribution is adequate considering that for 2016 the Adjusted Median Family Income for 2016 in this AA is \$72,600, which means a low-income individual earns less than \$36,300, while a moderate-income person earns less than \$58,800 and the Median Housing Value is \$401,639, these demographics make home ownership for low and moderate income individuals extremely difficult. In addition, 8% of the population of this AA is below the poverty level.

Home Purchase Lending

The borrower distribution of home purchase loans is good. The percentage of home purchase loans to low- and moderate-income borrowers is near to the percentage of aggregate peer lending levels to low- and moderate-income borrowers. The percentage of loans to low-income borrowers is significantly less than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is less than the percentage of moderate-income families in the AA.

Home Improvement Lending

The borrower distribution of home improvement loans is adequate. The percentage of home improvement loans to low-income borrowers is near to the percentage of aggregate peer lending levels to low-income borrowers. The percentage of loans to moderate-income borrowers is somewhat less than the percentage of aggregate peer lending levels to moderate-income borrowers. The percentage of loans to low-income borrowers is significantly less than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is less than the percentage of moderate-income families in the AA.

Home Refinance Lending

The borrower distribution of home refinance loans is good. The percentage of loans to low-income borrowers is somewhat less than the percentage of aggregate peer lending levels to low-income borrowers. The percentage of loans to moderate-income borrowers exceeds the percentage of aggregate peer lending levels to moderate-income borrowers. The percentage of loans to low-income borrowers is significantly less than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is less than the percentage of moderate-income families in the AA.

Small Loans to Businesses

The distribution of loans to businesses of different sizes is poor. The percentage of small loans to businesses is less than the percentage of small businesses throughout the AA.

Essex-Union-Morris, NJ MD (MD 35084)

The overall distribution of loans to borrowers of different income levels and businesses of different sizes is adequate. This performance is adequate when considering that the 2016 Adjusted Median Family Income for this AA is \$95,100, which means that a low-income borrower earns less than \$47,750 and a moderate-income borrower makes less than \$76,080. The average cost of housing in the AA is \$401,639, which makes home mortgage lending extremely difficult for a low- or moderate-income individuals considering these demographics. In addition, 11 percent of the population of this AA is below the poverty level.

Home Purchase Lending

The borrower distribution of home purchase loans is adequate. The percentage of home purchase loans to low-income borrowers is somewhat less than the percentage of aggregate peer lending levels to low-income borrowers. The percentage of loans to moderate-income borrowers is less than the percentage of aggregate peer lending levels to moderate-income borrowers. The percentage of loans to low-income borrowers is significantly less than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is somewhat less than the percentage of moderate-income families in the AA.

Home Improvement Lending

The borrower distribution of home improvement loans is adequate. The percentage of home improvement loans to low- and moderate-income borrowers is somewhat less than the percentage of aggregate peer lending levels to low- and moderate-income borrowers. The percentage of loans to low-income borrowers is significantly less than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is less than the percentage of moderate-income families in the AA.

Home Refinance Lending

The borrower distribution of home refinance loans is adequate. The percentage of home refinance loans to low- and moderate-income borrowers is somewhat less than the percentage of aggregate peer lending levels to low- and moderate-income borrowers. The percentage of loans to low-income borrowers is significantly less than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is somewhat less than the percentage of moderate-income families in the AA.

Small Loans to Businesses

The distribution of loans to businesses of different sizes is poor. The percentage of small loans to businesses is less than the percentage of small businesses throughout the AA.

Burlington-Camden-Gloucester, NJ MD (MD 15804)

The overall distribution of loans to borrowers of different income levels and businesses of different sizes is poor.

Home Purchase Lending

The borrower distribution of home purchase loans is poor. The percentage of home purchase loans to low- and moderate-income borrowers is less than the percentage of aggregate peer lending levels to low- and moderate-income borrowers. The percentage of loans to low-income borrowers is less than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

Home Improvement Lending

The borrower distribution of home improvement loans is poor. The percentage of home improvement loans to low- and moderate-income borrowers is less than the percentage of aggregate peer lending to low- and moderate-income borrowers. The percentage of loans to low-income borrowers is less than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA.

Home Refinance Lending

The borrower distribution of home refinance loans is poor. The percentage of home refinance loans to low- and moderate-income borrowers is less than the percentage of aggregate peer lending levels to low- and moderate-income borrowers. The percentage of loans to low-income borrowers is significantly less than the percentage of low-income families in the AA. The percentage of loans to moderate-income borrowers is similar to the percentage of moderate-income families in the AA.

Small Loans to Businesses

The distribution of loans to businesses of different sizes is poor. The percentage of small loans to businesses is less than to the percentage of small businesses throughout the AA.

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

Columbia has made a high level of community development loans in the Bergen-Middlesex-Monmouth-Passaic MD, Essex-Union-Morris MD, and the Burlington-Camden-Gloucester MD, which had a positive impact on the Lending Test. The bank originated 76 community development loans during the review period totaling approximately \$204 million, which represented 4.96 percent of total loans as of December 31, 2016. The majority of loans originated supported the revitalization and stabilization of low- and moderate-income geographies, specifically in zones designated by the New Jersey's Urban Enterprise Zone (UEZ) Program.

Highlights of CD lending activities include:

- A \$19.4 million loan to finance a 106 unit multi-family housing project in a LMI geography located in the Essex-Union-Morris MD
- A \$1.3 million loan to finance a 63 unit multi-family housing project for low-income senior citizens in an LMI geography in the Bergen-Middlesex-Monmouth-Passaic MD
- The annual renewal of a \$300 thousand line of credit to a non-profit which provides support to LMI children with emotional issues in the Bergen-Middlesex-Monmouth-Passaic MD
- Renewal of a \$350 thousand line of credit to a non-profit which provides legal support to disabled low-income individuals in the Essex-Union-Morris MD
- Renewal of a \$525 thousand line of credit to a non-profit which provides support to LMI students with physical and mental disabilities in the Essex-Union-Morris MD
- A \$1.76 million construction loan for a 23 unit affordable housing project in Patterson NJ

Product Innovation and Flexibility

Columbia offers a variety of flexible lending products that provide additional opportunities for LMI families and first time home buyers to purchase or refinance their homes. The bank is an approved FHA loan applications processor. Columbia bank also offers an affordable housing program for purchases and refinances of owner-occupied properties in the bank's AA's. The program offers customers a half to one percent rate discount on the base rate of the loan with terms of up to 30 years, as well as 5/1 and 7/1 ARMs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated Outstanding. Based on full-scope reviews, the bank's performance in the Bergen-Middlesex-Monmouth-Passaic MD, the Essex-Union-Morris MD, and the Burlington-Camden-Gloucester MD is excellent. The bank made 13 investments in Mortgage-Backed Securities during the evaluation period totaling \$31.4 million and held an additional \$26.7 million in prior period Mortgage-Backed Securities. Columbia made 111 donations within the AAs and the Columbia Foundation made 26 qualified grants totaling \$532 thousand in the AAs which met the regulatory definition of Community Development.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Bergen-Middlesex-Monmouth-Passaic, NJ MD (MD 35614)

Columbia has an outstanding level of qualified investments and grants and exhibits excellent responsiveness to meeting the identified needs of the AA. Columbia made 82 qualified donations and 17 qualified grants totaling \$498 thousand in the AA. The bank held 36 mortgages in the Mortgage-Backed Securities that were located in the AA totaling \$9.4 million.

Highlights of investment activities in MD 35614 include:

- \$5,000 fundraiser for an organization that provides a haven for abused women and children
- \$6,000 donation to an organization that provides mental health services to LMI individuals
- \$2,000 donation to an organization that provides affordable housing to low-income home buyers
- \$30,000 grant to purchase a van for an organization that supports low-income disabled students
- \$20,000 grant to purchase an emergency generator for an organization that houses low-income seniors

Essex-Union-Morris, NJ MD (MD 35084)

Columbia has an outstanding level of qualified investments and grants and exhibits excellent responsiveness to meeting the identified needs of the AA. Columbia made 19 qualified donations and 3 qualified grants totaling \$77 thousand in the AA. The bank held 56 mortgages in the Mortgage-Backed Securities that were located in the AA totaling \$10.6 million.

Highlights of investment activities in MD 35084 include:

- \$9,000 in total donations to an organization that provides legal services to disabled and low-income individuals
- \$7,650 in total donations to organizations that provides affordable housing throughout the AA
- \$25,000 grant to an organization that provides services to mentally and physically disabled students

Burlington-Camden-Gloucester, NJ MD (15804)

Columbia has an outstanding level of qualified investments and grants and exhibits excellent responsiveness to meeting the identified needs of the AA. Columbia made 10 qualified donations and 6 qualified grants totaling \$128 thousand in the AA. The bank held 99 mortgages in the Mortgage-Backed Securities that were located in the AA totaling \$11.3 million.

Highlights of investment activities in MD 15804 include:

- \$1,000 donation to an organization that provides services to developmentally challenged LMI adults
- \$7,000 grant to an organization that supports affordable housing in Burlington County
- \$20,000 grant to purchase a van for an organization that helps transport low-income and homeless individuals

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Bergen-Middlesex-Monmouth-Passaic MD AA, the Essex-Union-Monmouth MD AA and the Burlington-Camden-Gloucester MD AA are adequate.

Retail Banking Services

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Bergen-Middlesex-Monmouth-Passaic, NJ MD (MD 35614)

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area. The bank operates 33 full services branches in this AA, which include Automated Teller Machines. The distribution of branches in low- and moderate-income geographies is less than the percentage of the population in those geographies and is lower than the percentage of geographies that are low- or moderate-income. Of the 33 branches, none are located in low-income tracts with one branch located within a moderate-income tract. The Sayreville branch is directly adjacent to a moderate-income geography and provides reasonable access to moderate-income individuals. The bank has several branches that serve some of the low and moderate-income tracts in the City of Paterson area. One branch is located within the Passaic County Technical Institute (PCTI) High School in an upper-income census tract in Wayne, NJ. The PCTI branch provides services to the students of the high school such as financial literacy initiatives. The branch is staffed by a bank employee and students from PCTI. The school has about 69% of students enrolled that are eligible for free or reduced lunches based on income.

The institution's opening and closing of branches has not affected the accessibility of delivery systems. Columbia opened two branches in 2016 located in Oradell, NJ and Wayne, NJ and one branch in 2017 in Franklin Lakes, NJ. All branches are located in upper-income tracts. The bank relocated two branches in Paramus, NJ and Englishtown, NJ with both the new locations remaining within the same census tract as the prior locations.

Services do not vary in a way that inconveniences low- and moderate-income individuals. The bank offers a full range of credit and deposit services throughout its AA's. Lending products include real estate loans, commercial loans as well as consumer loans. Deposit services provided by the bank include Savings, Checking and Money Market accounts. The bank also provides internet, mobile, and telephone banking services which help improve accessibility to all geographies within its AA.

Essex-Union-Morris, NJ MD (MD 35084)

Delivery systems are reasonably accessible to all portions of the institution's assessment area. The bank operates 6 full service branches which include Automated Teller Machines in this AA. The distribution of branches in low- and moderate-income geographies is lower than the percentage of the population in those geographies and is lower than the percentage of geographies that are low- or moderate-income. The bank does not operate any branches in low- or moderate-income geographies in the AA. However, the Linden branch in this AA is directly adjacent to a moderate-income tract and provides reasonable access to moderate-income individuals.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or to low- or moderate-income individuals. During the evaluation period, Columbia did not open, close, or relocate any branches within the AA.

Services do not vary in a way that inconveniences low- and moderate-income individuals. The bank offers a full range of credit and deposit services throughout its AA's. Lending products include real estate loans, commercial loans as well as consumer loans. Deposit services provided by the bank include Savings, Checking and Money Market accounts. The bank also provides internet, mobile, and telephone banking services which help improve accessibility to all geographies within its AA.

Burlington-Camden-Gloucester, NJ MD (MD 15804)

Delivery systems are accessible to essentially all portions of the institution's assessment area. The bank operates 8 full service branches which include Automated Teller Machines in the AA. The distribution of branches in low- and moderate-income geographies is less than the percentage of the population in those geographies and is less than the percentage of geographies that are low- or moderate-income. The bank does not operate any branches in low- or moderate-income geographies in the AA. However, the Deptford, West Deptford, Maple Shade, and Voorhees branches all provide reasonable access to moderate-income individuals within the AA as they are all directly adjacent to moderate-income geographies.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or to low- or moderate-income individuals. During the evaluation period, Columbia did not open, close, or relocate any branches within the AA.

Services do not vary in a way that inconveniences low- and moderate-income individuals. The bank offers a full range of credit and deposit services throughout its AA's. Lending products include real estate loans, commercial loans as well as consumer loans. Deposit services provided by the bank include Savings, Checking and Money Market accounts. The bank also provides internet, mobile, and telephone banking services which help improve accessibility to all geographies within its AA.

Community Development Services

The institution is a leader in providing community development services. Bank officers have participated in workshops, financial literacy courses, and have provided financial and technical expertise to a large number of organizations that provide services to low- and moderate-income individuals both within the Assessment Areas and the broader Statewide Region. The bank provided over 3000 hours of community development services throughout the evaluation period.

Highlights of Community Development Services provided include:

Bergen-Middlesex-Monmouth-Passaic, NJ MD (MD 35614)

- The CRA Officer coordinates the completion of Federal Home Loan Bank grant applications
- The bank's CRA Officer serves on the Board of an organization that provides affordable housing in the Patterson area. The officer has also served on a sub-committee that has developed business training for prospective low-income individuals under the HUD Hope VI Section 3 program
- A bank officer served as a mentor and assisted low-income students with the Free Application for Federal Student Aid and college financial packages
- Four bank officers provided financial literacy education to low-income students in Patterson, NJ
- The bank's Assistant Controller served on the Finance Committee and the Board of an organization that provides affordable housing in Bergen County
- A Vice President of Business Development served on the Board of an organization that supports affordable housing initiatives for low-income disabled adults who live independently

Essex-Union-Morris, NJ MD (MD 35084)

- Bank officers serve on the Board of Directors for three separate organizations who provide affordable housing within the AA
- The CRA Officer serves on the Board of a non-profit service organization that supports quality affordable, permanent housing that fosters freedom, independence and community integration to low income individuals
- A Financial Advisor in Wealth Management sits on the Board of an organization whose mission is to promote social independence and job skill training for low-income disabled individuals

- A bank officer serves on the Board of Directors of an organization that provides legal services to disabled low-income individuals

Burlington-Camden-Gloucester, NJ MD (MD 15804)

- A Financial Service Officer served on the Board of an organization that provides housing, jobs, and training to developmentally challenged low-income individuals
- A bank officer gave a financial wellness seminar to moderate-income individuals utilizing the FDIC's Money Smart curriculum
- The Chief Information Officer provided a cyber security seminar to small businesses in South Jersey

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 metropolitan and nonmetropolitan areas 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): January 1, 2014 to December 31, 2016 Investment and Service Tests and CD Loans: September 23, 2013 to April 24, 2016	
Financial Institution	Products Reviewed	
Columbia Bank (Columbia) Fair Lawn, New Jersey	Home Mortgage Loans (includes home purchase, home improvement, home mortgage refinance, and multifamily loans) as reported on the HMDA Loan Application Register, as well as small loans to businesses as reported on the CRA Loan Register. Community development loans, investments, and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
First Jersey Title Services, Inc.		N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
New York-Jersey City-White Plains, NY-NJ MD #35614	Full Scope	Bergen, Middlesex, Monmouth, Passaic Counties
Camden, NJ MD #15084	Full Scope	Burlington, Camden, Gloucester Counties
Newark, NJ MD #35084	Full Scope	Essex, Morris, Union Counties

Appendix B: Market Profiles for Full-Scope Areas

Columbia Bank 35614 New York-Jersey City-White Plains, NY-NJ MD

Demographic Information for Full Scope Area: 35614 New York-Jersey City-White Plains, NY-NJ MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts BNAs)	597	4.69	9.88	20.44	64.66	0.34
Population by Geography	2,846,580	3.70	10.20	19.85	66.23	0.02
Owner-Occupied Housing by Geography	676,632	0.70	4.69	16.64	77.96	0.00
Business by Geography	197,512	2.59	8.76	18.04	70.60	0.01
Farms by Geography	3,819	0.81	4.35	13.90	80.94	0.00
Family Distribution by Income Level	712,303	14.30	12.25	16.54	56.90	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	189,150	8.56	19.27	26.24	45.94	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		68,006 72,600 8%	Median Housing Value Unemployment Rate (Dec 2016 BLS)	427,649 4.20%		

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census, 2016 FFIEC updated MFI, and 2016 BLS

Columbia's AA includes Bergen, Middlesex, Monmouth, and Passaic counties in north New Jersey, which is part of the greater New York-Jersey City-White Plains, NY-NJ MD 35614. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies.

The Bergen-Middlesex-Monmouth-Passaic AA consists of 597 geographies. Of the 597 geographies by number, 28, 59, 122, and 386 are classified as low-, moderate-, middle-, and upper-income, respectively. Two geographies are not classified. As a percentage of Columbia's AA geographies, 5 percent, 10 percent, 20 percent, and 65 percent are located within low-, moderate-, middle-, and upper-income AA geographies, respectively. Within the Bergen-Middlesex-Monmouth-Passaic AA, Columbia operates 33 branches and ATMs. Of Columbia's 33 branches within the AA, none are located within low-income geographies, one is located in a moderate-income geography, 2 are located in middle-income geographies, and 30 are located in upper-income geographies.

As of June 30, 2016, of Columbia Bank's total deposits, 71 percent are generated in the Bergen-Middlesex-Monmouth-Passaic AA. Also as of June 30, 2016, Columbia ranked 12th out of 82 depository financial institutions with a market share of 2.20 percent. Major competitors for deposits in MD 35614 include Clifton Savings Bank, The Provident Bank, Spencer Savings Bank, TD Bank, Valley National Bank, Wells Fargo, Bank of America, and PNC Bank. Of loans originated by Columbia Bank, over the evaluation period, 62.25 percent were originated within MD 35614.

The 2010 U.S. Census, for the Bergen-Middlesex-Monmouth-Passaic AA, reports a total population of 2,846,580. Business demographic information for 2016 reports that 201,331 businesses operate within the AA, of which 3,819 or 3.44 percent are farms. Of these businesses, approximately 83.63 percent reported revenues of less than \$1,000,000 and approximately 85.80 percent have fewer than 10 employees. As of December 31, 2016, the unemployment rate for the AA was 4.20 percent, which compares favorably with the NJ unemployment rate of 4.70 percent and the national unemployment rate of 4.60 percent. Top employers in the AA include the Hackensack University Medical Center, St. Joseph's Hospital, Meridian Health Systems, and Robert Wood Johnson University Hospital.

Contact was made with a non-profit organization that is involved primarily with providing affordable housing opportunities within the AA. The contact stated that there exists a need for additional affordable housing units within the AA as low- and moderate-income families would not be able to qualify for homes due to the high cost of housing. The contact stated that local banks have been helpful by participating in home-buyer fairs and other outreach programs within the AA.

Columbia Bank 35084 Newark-Union, NJ-PA MD

Demographic Information for Full Scope Area: Columbia EMU						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	395	23.04	25.82	23.29	27.34	0.51
Population by Geography	1,697,964	18.18	24.76	24.66	32.12	0.28
Owner-Occupied Housing by Geography	350,622	5.96	16.52	31.27	46.24	0.00
Business by Geography	113,129	13.57	17.95	26.50	41.67	0.30
Farms by Geography	1,853	5.07	10.09	33.14	51.70	0.00
Family Distribution by Income Level	413,257	26.44	17.45	18.83	37.28	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	181,381	29.12	34.16	21.46	15.24	0.01
Median Family Income		90,123	Median Housing Value		401,639	
FFIEC Adjusted Median Family Income for 2016		95,100	Unemployment Rate (Dec 2016 BLS)		4.90%	
Households Below Poverty Level		11%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census, 2016 FFIEC updated MFI, and 2016 BLS

Columbia's AA includes Essex, Union, and Morris counties in New Jersey, which is part of the greater Newark-Union, NJ-PA MD 35804. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies.

The Essex-Union-Morris AA consists of 395 geographies. Of the 395 geographies by number, 91, 102, 92, and 108 are classified as low-, moderate-, middle-, and upper-income, respectively. Two geographies are not classified. As a percentage of Columbia's AA geographies, 23 percent, 26 percent, 23 percent, and 27 percent are located within low-, moderate-, middle-, and upper-income AA geographies, respectively. Within the Essex-Union-Morris AA, Columbia operates 6 branches and ATMs. Of Columbia's six branches within the AA, none are located within low-income geographies, none are located in a moderate-income geography, three are located in middle-income geographies, and three are located in upper-income geographies.

As of June 30, 2016, of Columbia Bank's total deposits, 14.61 percent are generated in the Essex-Union-Morris AA. Also as of June 30, 2016, Columbia ranked 19th out of 52 depository financial institutions with a market share of 0.75 percent. Major competitors for deposits in MD 35084 include Clifton Savings Bank, The Provident Bank, Spencer Savings Bank, TD Bank, Valley National Bank, Wells Fargo, Bank of America, and PNC Bank. Of loans originated by Columbia Bank, over the evaluation period, 18.99 percent were originated within MD 35084.

The 2010 U.S. Census, for the Essex-Union-Morris AA, reports a total population of 1,697,964. Business demographic information for 2016 reports that 114,982 businesses operate within the AA, of which 1,853 or 1.61 percent are farms. Of these businesses, approximately 83.88 percent reported revenues of less than \$1,000,000 and approximately 85.88 percent have fewer than 10 employees. As of December 31, 2016, the unemployment rate for the AA was 4.90 percent, which is similar to the NJ unemployment rate of 4.70 percent and the national unemployment

rate of 4.60 percent. Top employers in Essex County include St. Barnabas Health Care System and New Jersey Transit. The top employer in Union County is the Merck & Company. The top employer in Morris County is Novartis Life Sciences.

Contact was made with a non-profit organization that is involved primarily with providing affordable housing opportunities within the AA. The contact stated that affordable housing as the most pressing need in the AA, especially within Elizabeth, NJ; landlords require that rent payments do not exceed 30 percent of total income which equates to \$50,000, while the median income of Union county is far less. The contact stated that there is a lack of rental assistance programs within the AA. Banks have been helpful in volunteering both time and donations to assist local community development groups within the AA. Opportunities exist for banks to help support general operating expenses of the non-profits, offer matching deposit products to help low- income residents, as well as donating/renting abandoned and foreclosed buildings to community development organizations at favorable terms in order to meet affordable housing needs.

Columbia Bank 15804 Camden, NJ MD

Demographic Information for Full Scope Area: Columbia Burlington-Camden-Gloucester AA 15804						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	304	4.93	19.74	50.00	25.00	0.33
Population by Geography	1,250,679	5.18	17.13	48.03	29.41	0.25
Owner-Occupied Housing by Geography	346,532	2.50	14.41	51.18	31.91	0.00
Business by Geography	67,543	2.79	13.64	46.55	37.01	0.00
Farms by Geography	1,830	0.49	8.91	51.48	39.13	0.00
Family Distribution by Income Level	320,697	19.91	17.96	23.10	39.02	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	121,472	10.59	25.00	47.55	16.87	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		83,092 84,200 8%	Median Housing Value Unemployment Rate (2010 US Census)	243,798 4.40%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census, 2016 FFIEC updated MFI, and 2016 BLS

Columbia’s AA includes Burlington, Camden, and Gloucester counties in New Jersey, which is part of the greater Camden, NJ MD 15804. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies.

The Burlington-Camden-Gloucester AA consists of 304 geographies. Of the 304 geographies by number, 15, 60, 152, and 76 are classified as low-, moderate-, middle-, and upper-income, respectively. One geography is not classified. As a percentage of Columbia’s AA geographies, 5 percent, 20 percent, 50 percent, and 25 percent are located within low-, moderate-, middle-, and upper-income AA geographies, respectively. Within the Burlington-Camden-Gloucester AA, Columbia operates eight branches and ATMs. Of Columbia’s eight branches within the AA, none are located within low-income geographies, none are located in a moderate-income geography, five are located in middle-income geographies, and three are located in upper-income geographies.

As of June 30, 2016, of Columbia Bank’s total deposits, 14.75 percent are generated in the Burlington-Camden-Gloucester AA. Also as of June 30, 2016, Columbia ranked 13th out of 32 depository financial institutions with a market share of 2.14 percent. Major competitors for deposits in MD 15804 include Beneficial Savings Bank, TD Bank, Wells Fargo, PNC, and Bank of America. Of loans originated by Columbia Bank, over the evaluation period, 18.76 percent were originated within MD 35084.

The 2010 U.S. Census, for the Burlington-Camden-Gloucester AA, reports a total population of 1,250,679. Business demographic information for 2016 reports that 69,373 businesses operate within the AA, of which 1,830 or 2.64 percent are farms. Of these businesses, approximately 83.19 percent reported revenues of less than \$1,000,000 and approximately 84.53 percent have fewer than 10 employees. As of December 31, 2016, the unemployment rate for the AA was

5.00 percent, which is similar to the NJ unemployment rate of 4.70 percent and the national unemployment rate of 4.60 percent. Top employers in Burlington County include Virtua Memorial Hospital, Lockheed Martin, and Burlington Coat Factory. The top employer in Camden County is the Kings Bay Naval Submarine Base. The top employers in Gloucester County include Underwood Memorial Hospital, Kennedy Memorial Hospital and Rowan University.

Appendix C: Tables of Performance Data

Content of Standardized 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 as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms** - 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. The table also presents market share information based on the most recent aggregate market data available. Because 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 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Institution ID: Columbia Bank
Table 1. Lending Volume**

LENDING VOLUME												
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016												
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Columbia EMU	19.28	737	345,072	153	48,353	0	0	28	93,290	918	486,715	14.61
Columbia BMMP	61.97	2,327	914,742	590	173,702	0	0	34	80,438	2,951	1,168,882	70.64
Columbia BCG	18.75	678	145,120	201	61,080	0	0	14	30,432	893	236,632	14.75

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from September 23, 2013 to April 24, 2017.

*** Deposit Data as of June 05, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: Columbia Bank
Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE														
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income [†]			
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Columbia BMMP	557	60.48	0.70	4.67	4.69	7.36	16.64	10.41	77.96	77.56	1.12	5.33	15.98	77.57
Columbia EMU	235	25.52	5.96	7.23	16.52	11.06	31.27	21.70	46.24	60.00	6.48	15.66	31.20	46.65
Columbia BCG	129	14.01	2.50	2.33	14.42	10.85	51.18	39.53	31.91	47.29	0.86	12.00	52.20	34.94

[†] Based on 2015 Peer Mortgage Data -- US and PR

^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

^{****} Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Columbia Bank

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT														
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Columbia BMMP	403	60.33	0.70	0.25	4.69	1.99	16.64	9.68	77.96	88.09	0.55	3.81	13.62	82.02
Columbia EMU	87	13.02	5.96	1.15	16.52	3.45	31.27	35.63	46.24	59.77	3.93	12.13	30.40	53.53
Columbia BCG	178	26.65	2.50	0.00	14.42	11.24	51.18	44.94	31.91	43.82	1.75	11.80	52.79	33.66

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Columbia Bank
Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE														
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Columbia BMMP	1,323	63.79	0.70	0.30	4.69	2.12	16.64	9.52	77.96	88.06	0.73	4.01	14.18	81.08
Columbia EMU	393	18.95	5.96	3.05	16.52	4.83	31.27	27.74	46.24	64.38	4.73	12.39	30.82	52.06
Columbia BCG	358	17.26	2.50	0.00	14.42	7.82	51.18	47.49	31.91	44.69	0.67	11.00	52.10	36.22

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Columbia Bank
Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY														
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Columbia BMMP	44	55.70	7.55	0.00	14.20	15.91	27.66	36.36	50.59	47.73	16.10	24.86	28.25	30.79
Columbia EMU	22	27.85	34.34	31.82	30.13	36.36	21.04	27.27	14.49	4.55	41.11	33.33	16.94	8.61
Columbia BCG	13	16.46	6.02	0.00	31.61	46.15	45.07	46.15	17.30	7.69	0.00	32.63	49.47	17.89

* Based on 2015 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: Columbia Bank
Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income [†]			
	#	% of Total*	% of Businesses***	% BAN K Loans	% of Businesses**	% BAN K Loans	% of Businesses**	% BAN K Loans	% of Businesses***	% BAN K Loans	Low	Mod	Mid	Upp
Full Review:														
Columbia BMMP	590	62.50	2.59	0.51	8.76	11.36	18.04	22.03	70.60	66.10	1.90	8.45	18.38	71.27
Columbia EMU	153	16.21	13.57	7.84	17.95	9.15	26.50	37.25	41.67	45.75	10.02	13.67	25.44	50.87
Columbia BCG	201	21.29	2.79	0.00	13.64	18.41	46.55	30.35	37.01	51.24	1.51	12.15	46.55	39.79

[†] Based on 2015 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

^{***} Source Data - Dun and Bradstreet (2016).

Institution ID: Columbia Bank
Table 7a. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS														
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Columbia BMMP	0	0.00	0.81	0.00	4.35	0.00	13.90	0.00	80.94	0.00	1.96	2.94	14.71	80.39
Columbia EMU	0	0.00	5.07	0.00	10.09	0.00	33.14	0.00	51.70	0.00	4.76	4.76	7.14	83.33
Columbia BCG	0	0.00	0.49	0.00	8.91	0.00	51.48	0.00	39.13	0.00	0.00	0.00	44.16	55.84

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Institution ID: Columbia Bank
Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE														
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total*	% Families***	% BANK Loans**	% Families ¹	% BANK Loans**	% Families**	% BANK Loans**	% Families****	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Columbia BMMP	557	60.48	14.30	1.42	12.25	9.35	16.54	11.79	56.90	77.44	1.32	9.38	21.60	67.70
Columbia EMU	235	25.52	26.44	5.02	17.45	15.98	18.83	13.70	37.28	65.30	5.81	22.91	24.66	46.62
Columbia BCG	129	14.01	19.91	8.66	17.96	22.83	23.10	20.47	39.02	48.03	11.13	30.37	26.10	32.40

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 9.0% of loans originated and purchased by BANK.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Columbia Bank
Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT														
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans**	% Families ²	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Low	Mod	Mid	Upp
Full Review:														
Columbia BMMP	403	60.33	14.30	2.30	12.25	6.65	16.54	10.23	56.90	80.82	2.48	7.99	16.39	73.14
Columbia EMU	87	13.02	26.44	5.81	17.45	12.79	18.83	22.09	37.28	59.30	7.08	14.89	23.14	54.89
Columbia BCG	178	26.65	19.91	6.36	17.96	17.92	23.10	25.43	39.02	50.29	11.32	21.15	25.94	41.59

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by BANK.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Columbia Bank
Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE														
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total*	% Families***	% BANK Loans****	% Families ³	% BANK Loans**	% Families**	% BANK Loans**	% Families***	% BANK Loans**	Low	Mod	Mid	Upp
Full Review:														
Columbia BMMP	1,323	63.79	14.30	1.24	12.25	6.58	16.54	13.47	56.90	78.72	2.18	6.36	16.52	74.94
Columbia EMU	393	18.95	26.44	3.25	17.45	11.38	18.83	17.62	37.28	67.75	5.41	14.18	23.73	56.68
Columbia BCG	358	17.26	19.91	3.40	17.96	15.86	23.10	30.03	39.02	50.71	8.74	19.49	28.23	43.54

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchased by BANK.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Columbia Bank
Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Columbia BMMP	590	62.50	83.41	35.42	37.46	18.98	43.56	84,837	41,506
Columbia EMU	153	16.21	83.69	39.22	26.80	31.37	41.83	44,885	21,612
Columbia BCG	201	21.29	81.84	41.79	36.32	22.89	40.80	21,397	10,503

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.59% of small loans to businesses originated and purchased by the bank.

Institution ID: Columbia Bank
Table 12a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016									
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Columbia BMMP	0	0.00	95.26	0.00	0.00	0.00	0.00	103	49
Columbia EMU	0	0.00	94.98	0.00	0.00	0.00	0.00	43	18
Columbia BCG	0	0.00	95.03	0.00	0.00	0.00	0.00	80	39

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2016).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Institution ID: Columbia Bank
Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO APRIL 24, 2017									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Columbia EMU	0	10,622	22	10,724	22	21,346	38.16	0	0
Columbia BMMP	0	13,151	99	9,974	99	23,125	41.34	0	0
Columbia BCG	0	0	16	11,466	16	11,466	20.50	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Institution ID: Columbia Bank
Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO APRIL 24, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Columbia EMU	14.61	6	12.77	0.00	0.00	50.00	50.00	0	0	0	0	0	0	18.18	24.76	24.66	32.12
Columbia BMMP	70.64	33	70.21	0.00	3.03	6.06	90.91	3	0	0	0	0	3	3.70	10.20	19.85	66.23
Columbia BCG	14.75	8	17.02	0.00	0.00	62.50	37.50	0	0	0	0	0	0	5.18	17.13	48.03	29.41

**Institution ID: Columbia Bank
Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM																	
Geography: COLUMBIA AA Evaluation Period: JANUARY 1, 2014 TO APRIL 24, 2017																	
Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Columbia EMU	14.61	6	12.77	0	0	50	50	6	12.77	0	0	3	3	18.18	24.76	24.66	32.12
Columbia BMMP	70.64	33	70.21	0	3	6	91	33	70.21	0	1	2	30	3.70	10.20	19.85	66.23
Columbia BCG	14.75	8	17.02	0	0	63	38	8	17.02	0	0	5	3	5.18	17.13	48.03	29.41