



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# **INTERMEDIATE SMALL BANK**

## **PUBLIC DISCLOSURE**

August 11, 2025

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Newfield National Bank  
Charter Number: 14240

18-24 West Boulevard  
Newfield, NJ 08344

Office of the Comptroller of the Currency

1150 Northbrook Drive, Suite 303  
Trevose, PA 19053

**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 lending test is rated: Satisfactory**

**The community development test is rated: Satisfactory**

The major factors that support this rating include:

- The quarterly loan-to-deposit (LTD) ratio is reasonable.
- A majority of loans are inside its assessment area (AA).
- The bank exhibits a reasonable distribution of loans in its AA.
- The bank's distribution of loans among borrowers of different income levels is reasonable.
- The bank demonstrates adequate responsiveness to the community development (CD) needs of its AAs through CD lending, qualified investments, and CD services.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is reasonable. The bank's quarterly average net loan-to-deposit (LTD) ratio over the 12 quarters captured in the evaluation period is 53.11 percent. During this period, the ratio ranged from a quarterly low of 49.17 percent to a quarterly high of 55.43 percent. Examiners compared the bank's LTD to six similarly situated banks in Cumberland, Camden, Cape May, and Salem Counties, ranging in asset sizes from \$385 million to \$1.13 billion. The quarterly average net LTD ratio for these institutions over the same 12 quarter period was 71.38 percent. The ratios range from a quarterly low of 52.03 percent to a quarterly high of 90.40 percent. The bank's quarterly average net LTD is reasonable when taking into consideration the bank's lending market share, its size, and the competition for loans.

### Lending in Assessment Area

A majority of the bank's loans were inside its AA.

The bank originated and purchased 56.18 percent of its total loans inside the bank's AA during the evaluation period. This percentage does not include extensions of credit to affiliates that may be considered under the other performance criteria.

Loan Category	2022 - 2024									
	Number of Loans				Dollar Amount of Loans \$(000s)				Total \$(000s)	
	Inside		Outside		Inside		Outside			
	#	%	#	%	\$	%	\$	%		
Home Mortgage	224	65.50	118	34.50	342	22,346	35.30	40,953	64.70	63,300
Small Business	126	44.84	155	55.16	281	32,604	22.09	115,008	77.91	147,612
<b>Total</b>	<b>350</b>	<b>56.18</b>	<b>273</b>	<b>43.82</b>	<b>623</b>	<b>54,950</b>	<b>26.05</b>	<b>155,961</b>	<b>73.95</b>	<b>210,911</b>

Source: 1/1/2022 - 12/31/2024 Bank Data.  
Due to rounding, totals may not equal 100.0%

## Description of Institution

The Newfield National Bank (NNB) is a single state, community bank founded in 1934, with its main office and headquarters located in Newfield, New Jersey. NNB is a wholly owned subsidiary of Newfield Bancorp; a one-bank holding company established in 1990. NNB has one subsidiary, FNBN Investment Corporation, which is a Delaware-based investment subsidiary established in 1998. As of December 31, 2024, NNB has total assets of \$893.7 million, and tier one capital totaling \$88.6 million.

NNB offers a full range of deposit and loan products and services. Small business loans and residential real estate loans are the bank's primary loan products. NNB offers traditional products & services for consumers & businesses including checking accounts, savings accounts, certificates of deposit, real estate loans, consumer loans, and commercial/business loans. Additionally, the bank offers internet banking, mobile banking, and bill pay services. The bank also offers several services that promote community reinvestment. These include a consumer checking accounts targeted to young individuals, low- to moderate-income individuals, and elderly individuals on fixed incomes. These products offering a no-service-charge option to enhance financial accessibility. The bank serves as a state-approved trust account depository for Interest on Lawyers Trust Accounts which supports legal representation and assistance for low- or moderate-income (LMI) individuals. The bank also extends micro-loans of \$1,000 or less to individuals and businesses, providing critical financial support for personal and entrepreneurial needs in underserved areas.

The main office is located in Newfield, NJ (Gloucester County). The bank operates a network of 11 branches and 10 automated teller machines (ATM's). All branches are equipped with drive-through facilities and are open from 9:00 AM (drive-through open at 8:00 AM) until 3:00 PM (drive-through until 6:00 PM) on weekdays. All branches offer extended hours on Friday and limited hours on Saturday. The branch network and bank operations are located throughout Gloucester and Cumberland Counties in New Jersey. During the evaluation period, the bank did not open any new branches, nor close any existing branches.

As of December 31, 2024, NNB reported total loans and leases of \$443.26 million, or 49.6 percent of total assets.

**Table 2: Loan Portfolio Summary, by Product as of December 31, 2024**

Loan Category	\$ Amount (Thousands)	% of Outstanding Loans
Non-Farm / Non-Residential	\$250,563	56.53%
Residential Real Estate	\$131,093	29.57%
Commercial & Industrial	\$25,197	5.68%
Construction	\$22,199	5.01%
Multifamily	\$9,421	2.13%
Government Loan	\$1,822	0.41%
Agricultural	\$1,422	0.32%
Consumer	\$990	0.22%
Other	\$555	0.13%
<b>Total</b>	<b>\$443,262</b>	<b>100.00%</b>

There are no financial or legal impediments affecting NNB's ability to help meet the community credit needs of its AA. The bank received a "Satisfactory" rating at the prior CRA performance evaluation dated August 28, 2022.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation is an assessment of NNB's ability to meet the credit needs of its assessment areas. The Office of the Comptroller of the Currency (OCC) evaluated NNB using the intermediate-small CRA evaluation procedures to assess the bank's performance under the lending and community development (CD) tests for the evaluation period, January 1, 2022, to December 31, 2024. For the lending test, the OCC evaluated all home mortgages reported under the Home Mortgage Disclosure Act (HMDA), as well as the bank's internal reporting of small business loans as these are the bank's primary products. Examiners verified the accuracy of HMDA and small business reporting data prior to conducting analysis and drawing conclusions.

The CD test evaluates the bank's responsiveness to CD needs in its AA through CD lending, qualified investments, and community development services. Examiners reviewed documentation supplied by bank management to determine if the bank's CD loans, investments, and services meet the regulatory definition for community development. Further discussion of the bank's CD activities is included in the 'Community Development Test' section of this performance evaluation.

The evaluation period included a single census period. For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2020 U.S. Census for the evaluation period. No affiliate activity was included in this analysis. Refer to the table in Appendix A, Scope of the Examination, for more information on the scope of the review.

### Selection of Areas for Full-Scope Review

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

### Ratings

The bank's overall CRA rating is based on its lending, investment, and service test performance within the state of New Jersey. The state of New Jersey rating is based on performance within the AA.

## Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and

regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of New Jersey

#### CRA rating for the State of New Jersey: Satisfactory

**The lending test is rated: Satisfactory**

**The community development test is rated: Satisfactory**

The major factors that support this rating include:

- The LTD ratio is reasonable.
- A majority of loans are inside the bank's AA.
- The bank exhibits a reasonable geographic distribution of loans in its AA.
- Distribution of loans among borrowers of different income levels is reasonable.
- The bank demonstrates adequate responsiveness to the CD needs of its AA through CD lending, qualified investments, and CD services.

### Description of Institution's Operations in New Jersey

NNB has one AA located in New Jersey and only maintains branches within this state. Therefore, there is no difference in the description of the institution's operations at the overall and state level. Please refer to the overall description of the institution's operations for additional information.

The economy of the Camden, NJ metro area is in a strong expansion, outpacing the state and nation on payroll growth thanks to healthcare gains, supported by expansions at Cooper Health and Virtua Health. Logistics and manufacturing are rebounding, with pharmaceuticals, food production, and defense providing a relatively recession-proof industrial base, though trade tensions and labor shortages pose risks. Housing is undersupplied, driving stronger home price growth than nationally. While Camden has attracted new residents from costlier areas like New York and Philadelphia, return-to-office mandates and limited high-wage opportunities beyond healthcare and life sciences could slow migration. Overall, the region benefits from sturdy healthcare and manufacturing sectors, but demographic and policy headwinds will constrain longer-term growth. Major employers in the area include Cooper Health System, Virtua Health, and Campbell Soup Company.

According to the Bureau of Labor Statistics, the 2024 annual unemployment rate for Gloucester County was 4.4 percent while unemployment for the Cumberland County was 7 percent. Gloucester County outperformed the New Jersey unemployment rate of 4.5 percent, while the Vineland, NJ MSA lagged the state. Both Gloucester and Cumberland Counties lagged the 2024 U.S. unemployment rate of 4.1 percent.

Per FDIC deposit market share data as of June 30, 2024, NNB ranked 6<sup>th</sup> in deposits within the Philadelphia-Reading-Camden CSA. Within the AA, NNB maintained depositing total \$817 million, representing a market share of 6.07 percent.

Per peer mortgage data for 2023, NNB ranked 32<sup>nd</sup> in the AA with a market share of 0.77 percent. NNB's top competitors in the AA are Pennymac Loan Services LLC which ranked 1<sup>st</sup> with a market share of 5.48 percent, Nation One Mortgage Corporation which ranked 2<sup>nd</sup> with a market share of 5.33 percent, and Police and Fire Credit Union which ranked 3<sup>rd</sup> with a market share of 4.52 percent.

## Philadelphia-Reading-Camden, PA-NJ-DE-MD

Table 3: Assessment Area - Philadelphia-Reading-Camden, PA-NJ-DE-MD Combined Statistical Area 2024						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
<b>Geographies (Census Tracts)</b>	93	5.38	13.98	47.31	29.03	4.30
<b>Population by Geography</b>	378,608	4.71	13.30	51.00	28.87	2.11
<b>Housing Units by Geography</b>	139,947	3.92	13.34	53.06	29.68	0.00
<b>Owner-Occupied Housing by Geography</b>	97,578	1.33	8.49	56.16	34.01	0.00
<b>Occupied Rental Units by Geography</b>	31,617	11.42	26.97	43.40	18.22	0.00
<b>Vacant Units by Geography</b>	10,752	5.40	17.28	53.28	24.03	0.00
<b>Businesses by Geography</b>	13,966	5.72	11.49	50.30	32.48	0.01
<b>Farms by Geography</b>	673	3.27	9.66	45.32	41.75	0.00
<b>Family Distribution by Income Level</b>	90,468	19.02	16.94	21.87	42.16	0.00
<b>Household Distribution by Income Level</b>	129,195	22.51	14.96	17.39	45.15	0.00
<b>Unemployment rate (%)</b>	6.34	10.56	9.61	6.23	4.78	0.00
<b>Households Below Poverty Level (%)</b>	10.59	41.28	21.67	8.04	6.41	0.00
<b>Median Family Income (15804 - Camden, NJ MD)</b>	\$100,987	<b>Median Housing Value</b>				\$189,200
<b>Median Family Income (47220 - Vineland, NJ MSA)</b>	\$67,467	<b>Median Gross Rent</b>				\$1,147
<b>Median Family Income (15804 - Camden, NJ MD) for 2024</b>	\$117,400	<b>Families Below Poverty Level</b>				6.95
<b>Median Family Income (47220 - Vineland, NJ MSA) for 2024</b>	\$75,800					
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

## Community Contact

As part of the review of community contacts, examiners reviewed the minutes from a recent community development-focused listening session. The session focused on the financial challenges and opportunities within the southern and central New Jersey communities, particularly for low- and moderate-income households. Attendees included representatives from financial institutions, community organizations, and local businesses. The economic conditions highlight a significant need for accessible financial services and products, such as low-fee banking options and micro-loans, to support the unbanked and underbanked populations. For example, many small businesses in the area require enhanced access to lines of credit to manage cash flow and invest in growth opportunities. Additionally, predevelopment loans are crucial for affordable housing projects, which face obstacles due to rising land and construction costs. Collaborative efforts between public and private sectors are crucial to address these needs, with a focus on infrastructure improvements and policy advocacy to stimulate economic development and improve community services.

## Scope of Evaluation in New Jersey

For the evaluation period 2022-2024, examiners completed a full-scope evaluation of the Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA. This represents the bank's sole assessment area. The bank

designated all census tracts of Cumberland County, NJ, which comprise the whole of the Vineland, NJ MSA. The bank also designated 51 tracts from Gloucester County, NJ which is part of the Camden, NJ MD. The Vineland, NJ MSA and Camden, NJ MD were combined, analyzed and presented as one AA under the Philadelphia-Reading-Camden, PA-NJ-DE-MD CSA for the purposes of the evaluation. This AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW JERSEY**

### **LENDING TEST**

The bank's performance under the lending test in New Jersey is Satisfactory.

#### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's lending performance in the state of New Jersey was reasonable.

#### **Distribution of Loans by Income Level of the Geography**

The bank exhibited reasonable geographic distribution of loans in the state.

##### ***Home Mortgage Loans***

Refer to Table 7 in the state of New Jersey section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The bank exhibits reasonable geographic distribution of loans in the AA. The percentage of loans in low-income census tracts exceeded the percentage of owner-occupied housing units and aggregate percentage of all reporting lenders. The percentage of loans made in moderate-income census tracts was below the percentage of owner-occupied housing units and aggregate loans.

##### ***Small Loans to Businesses***

Refer to Table 9 in the state of New Jersey section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's geographic distribution of loans to small businesses reflects reasonable distribution throughout low- and moderate-income geographies. The percentage of small business loans made in low-income census tracts is near to the percentage of small businesses in low-income tracts and near the percentage of aggregate reporting lenders. The percentage of small business loans made in moderate-income census tracts was below the percentage of small businesses and below the percentage of aggregate percentage of reporting lenders.

#### **Lending Gap Analysis**

The lending gap analysis is based on consideration of performance during the evaluation period, within the bank's AAs, and on the information available at the time of the evaluation. The lending gap analysis examines the bank's lending performance by income distribution, particularly in LMI tracts, but is not an assessment of the bank's lending performance in majority-minority areas. Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any unexplained, conspicuous gaps in the geographic distribution of loans. Examiners did not identify any unexplained conspicuous gaps in the areas reviewed.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table 8 in the state of New Jersey section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The percentage of home mortgage loans made to low-income borrowers exceeded the aggregate percentage of all reporting lenders but was well-below the percentage of low-income families in the AA. The percentage of home mortgage loans made to moderate-income borrowers exceeded the percentage of moderate-income families and was below the aggregate percentage of reporting lenders in the AA.

### ***Small Loans to Businesses***

Refer to Table 10 in the state of New Jersey section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The percentage of loans to businesses with gross annual revenues of \$1 million or less well exceeded the percentage of aggregate lenders in the AA and was below the percentage of small businesses in the AA.

### **Responses to Complaints**

The Newfield National Bank did not receive any CRA-related complaints during the evaluation period.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the community development test in the state of New Jersey is rated Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

#### Number and Amount of Community Development Loans

The community development loans table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 4: Community Development Loans					
Assessment Area	Total				
	#	% of Total #	\$(000's)	% of Total \$	
Philadelphia-Reading-Camden, PA-NJ-DE-MD	1	100	\$50		100

The bank originated one CD loan in its AA during the evaluation period. Lending activity supported community services targeted to low- and moderate-income individuals. The following are examples of CD loans the bank originated or purchased in this AA:

- The bank made one loan totaling \$50,000 to an organization providing youth services to at-risk children and families. The loan proceeds supported programs that foster guidance, support, and stability for low-income youth in the community.

#### Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Philadelphia-Reading-Camden, PA-NJ-DE-MD	1	545	1	1,000	2	100	1,545	100		
Total	1	545	1	1,000	2	100	1,545	100		

The bank had two qualifying investments totaling \$1,545,000 during the evaluation period. These investments supported essential services and revitalization projects within the assessment area.

The following are examples of qualified investments in the AA:

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

- The bank made a \$1,000,000 investment to fund the planning, design, and construction of a fire station and emergency medical services facility, serving LMI geographies and residents.
- The bank made a \$545,000 investment with a local borough to fund property purchases and related fees in connection with a redevelopment project, supporting the revitalization of an LMI area.

### **Extent to Which the Bank Provides Community Development Services**

The bank demonstrates adequate responsiveness to the needs of its assessment area through community development services. During the evaluation period, the bank's officers and employees provided several qualified community development services. Examples include the following:

- A board member serves the United Way of Gloucester County, which addresses critical community needs, funds local agencies, and supports programs benefiting moderate-income census tracts in Gloucester County, NJ.
- An employee volunteers with the Vineland Downtown Improvement District/Main Street, an initiative to revitalize Landis Avenue located in a low-income census tract.
- A director serves on the Vineland Development Corporation, a nonprofit that promotes redevelopment and economic development in a low-income census tract.
- An officer serves on the Board of Trustees and as a mentor for Big Brothers Big Sisters of Cumberland & Salem Counties, which provides guidance and support to children from single-parent homes, operating adjacent to a low-income census tract.
- An employee volunteers with Cumberland County Habitat for Humanity in Vineland, NJ, which constructs and improves affordable housing for working families throughout Cumberland County.
- Two employees are members of the Vineland Rotary Charities Foundation, which supports local charities addressing hunger, poverty, and housing needs in low- and moderate-income census tracts.
- An employee is a stakeholder in the Downtown Vineland Neighborhood Preservation Program District, a revitalization initiative serving a low-income census tract.
- The bank participants in the Young Savers Program which involves bank personnel educating students in local schools, including those in or adjacent to low- and moderate-income areas, on financial literacy

## Appendix A: Scope of Examination

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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 MSA(s) and non-MSA(s) 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”.

<b>Table 6: Time Period Reviewed</b>		
01/01/22 to 12/31/24		
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
New Jersey		
Philadelphia-Reading-Camden, PA-NJ-DE-MD	Full-scope	<i>Whole of Cumberland County, partial tracts of Gloucester County</i>

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS</b>			
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>CD Test Rating</b>	<b>Overall Bank/State/Multistate Rating</b>
Newfield National Bank	Satisfactory	Satisfactory	Satisfactory
<b>State:</b>			
New Jersey	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Low-Income:** Individual income that is at 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 state/assessment area.

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

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

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

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

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

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

**Multistate Metropolitan Statistical Area (MMSA):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

**Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.

**Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.

**Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Assessment Area:	2022 - 2024																		
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Philadelphia-Reading-Camden, PA-NJ-DE-MD Combined Statistical Area 2024	224	22,346	100.00	24,843	1.33	1.79	1.15	8.49	6.70	11.55	56.16	65.18	56.15	34.01	26.34	31.14	--	--	--
<b>Total</b>	<b>224</b>	<b>22,346</b>	<b>100.00</b>	<b>24,843</b>	<b>1.33</b>	<b>1.79</b>	<b>1.15</b>	<b>8.49</b>	<b>6.70</b>	<b>11.55</b>	<b>56.16</b>	<b>65.18</b>	<b>56.15</b>	<b>34.01</b>	<b>26.34</b>	<b>31.14</b>	<b>--</b>	<b>--</b>	<b>--</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, -- HMDA Aggregate Data, "-- data not available.  
Due to rounding, totals may not equal 100.0%

Assessment Area:	2022 - 2024																		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Philadelphia-Reading-Camden, PA-NJ-DE-MD Combined Statistical Area 2024	224	22,346	100.00	24,843	19.02	8.93	6.85	16.94	20.09	21.52	21.87	17.41	24.26	42.16	38.39	26.73	--	15.18	20.64
<b>Total</b>	<b>224</b>	<b>22,346</b>	<b>100.00</b>	<b>24,843</b>	<b>19.02</b>	<b>8.93</b>	<b>6.85</b>	<b>16.94</b>	<b>20.09</b>	<b>21.52</b>	<b>21.87</b>	<b>17.41</b>	<b>24.26</b>	<b>42.16</b>	<b>38.39</b>	<b>26.73</b>	<b>--</b>	<b>15.18</b>	<b>20.64</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, -- HMDA Aggregate Data, "-- data not available.  
Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2022 - 2024		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Philadelphia-Reading-Camden, PA-NJ-DE-MD Combined Statistical Area 2024	126	32,604	100.00	19,621	5.72	5.56	5.89	11.49	9.52	10.40	50.30	46.83	50.84	32.48	38.1	32.22	0.01	--	0.01
<b>Total</b>	<b>126</b>	<b>32,604</b>	<b>100.00</b>	<b>19,621</b>	<b>5.72</b>	<b>5.56</b>	<b>5.89</b>	<b>11.49</b>	<b>9.52</b>	<b>10.40</b>	<b>50.30</b>	<b>46.83</b>	<b>50.84</b>	<b>32.48</b>	<b>38.1</b>	<b>32.22</b>	<b>0.01</b>	<b>--</b>	<b>0.01</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues																	2022 - 2024		
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM				Businesses with Revenues > 1MM				Businesses with Revenues Not Available						
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Aggregate		
Philadelphia-Reading-Camden, PA-NJ-DE-MD Combined Statistical Area 2024	126	32,604	100.00	19,621	82.51	76.19	53.24	8.49	--	9.00	--	23.81							
<b>Total</b>	<b>126</b>	<b>32,604</b>	<b>100.00</b>	<b>19,621</b>	<b>82.51</b>	<b>76.19</b>	<b>53.24</b>	<b>8.49</b>	<b>--</b>	<b>9.00</b>	<b>--</b>	<b>23.81</b>							

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023, -- CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%