



## **PUBLIC DISCLOSURE**

June 23, 2025

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

Hana Bank USA, National Association  
Charter Number: 20622

201 Main Street  
Fort Lee, NJ 07024

Office of the Comptroller of the Currency

91 Fieldcrest Avenue,  
Suite A-30  
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 lending test is rated: Satisfactory.**

The major factors that support this rating include:

- Hana Bank USA, NA's (Hana Bank) average loan-to-deposit (LTD) ratio was reasonable, based on the bank's size, financial condition, and credit needs of the assessment area (AA).
- The bank exhibited reasonable geographic distribution of loans originated in the AA.
- The bank exhibited a reasonable distribution of loans to borrowers of different income levels in the AA.
- The bank did not have any consumer complaints related to its community reinvestment performance during the evaluation period.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio was reasonable.

The average quarterly LTD ratio for 12 quarters in the evaluation period was 79.4 percent. The ratio ranged from a quarterly low of 59.6 percent to a quarterly high of 98.9 percent. Hana Bank's average LTD ratio was compared to the average LTD ratio of its peer group, which includes 14 banks of similar asset size, location, and product offerings. The average LTD ratio for the peer group over the evaluation period was 85.7 percent, ranging from a quarterly low of 43.5 percent and a quarterly high of 130.8 percent.

### Lending in Assessment Area

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

The bank originated and purchased 35.6 percent of its total loans inside the bank's AA during the evaluation period. However, the majority of loans originated and purchased outside of the bank's AA occurred during the first year of the evaluation period (2022). The majority of the bank's loans were inside its AA during 2023 and 2024. This analysis is performed at the bank, rather than the AA, level.

| Table 1: Lending Inside and Outside of the Assessment Area |                 |      |         |      |         |                                 |      |         |      | 2022-2024      |
|--|-----------------|------|---------|------|---------|---------------------------------|------|---------|------|----------------|
| Loan Category  | Number of Loans |      |         |      | Total # | Dollar Amount of Loans \$(000s) |      |         |      | Total \$(000s) |
|  | Inside          |      | Outside |      |         | Inside                          |      | Outside |      |                |
|  | #               | %    | #       | %    |         | \$                              | %    | \$      | %    |                |
| Small Business   |                 |      |         |      |         |                                 |      |         |      |                |
| 2022   | 11              | 21.6 | 40      | 78.4 | 51      | 6,537                           | 38.1 | 10,605  | 61.9 | 17,142         |
| 2023   | 10              | 62.5 | 6       | 37.5 | 16      | 4,724                           | 71.4 | 1,895   | 28.6 | 6,619          |
| 2024   | 5               | 83.3 | 1       | 16.7 | 6       | 2,030                           | 67.0 | 1,000   | 33.0 | 3,030          |
| Total  | 26              | 35.6 | 47      | 64.4 | 73      | 13,291                          | 49.6 | 13,500  | 50.4 | 26,791         |
| Source: 1/1/2022 - 12/31/2024 Bank Data.                   |                 |      |         |      |         |                                 |      |         |      |                |
| Due to rounding, totals may not equal 100.0%               |                 |      |         |      |         |                                 |      |         |      |                |

## Description of Institution

Hana Bank, a wholly owned subsidiary of Hana Bancorp Incorporated, was established on September 16, 1986. Hana Bancorp Incorporated is majority owned by KEB Hana Bank in Seoul, South Korea, which is a member of the Hana Financial Group, a large financial conglomerate also headquartered in Seoul, South Korea. Hana Bank is headquartered in Fort Lee, New Jersey (NJ) and does not have any subsidiaries.

Hana Bank operates three branch offices, located in the New York/New Jersey area. The bank operates a full-service branch in Fort Lee, NJ, a full-service branch in New York City, NY, and a full-service branch in Flushing, NY. All branches have reasonable hours and provide an automatic teller machine (ATM). Hana Bank has one AA, located within the multistate metropolitan statistical area (MMSA) of New York-Newark-Jersey City, NY-NJ, MMSA 35620. The AA includes Bergen, Essex, Hudson, Passaic, and Union counties in NJ, as well as Bronx, Kings, New York, Queens, Westchester, and Nassau counties in NY. During the review period, Hana Bank did not open or close any branch offices.

The bank primarily offers small business loans and commercial real estate loans. Deposit products include traditional checking accounts, savings accounts, and certificates of deposits. As of December 31, 2024, Hana Bank reported total assets of \$578.8 million. Net loans and leases totaled \$397.4 million, representing 68.7 percent of total assets. The loan portfolio primarily consists of real estate and commercial loans. Real estate loans totaled \$326.5 million, representing 82.2 percent of net loans. Commercial loans totaled \$76.7 million, representing 19.3 percent of net loans. Deposits totaled \$458.6 million. Tier 1 capital totaled \$103.2 million.

There were no financial or legal impediments that would hinder Hana Bank's ability to meet the credit needs of the communities it serves in the AA. Hana Bank's prior CRA performance evaluation was dated May 31, 2022, and was rated Satisfactory.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The OCC evaluated Hana Bank's CRA performance using small bank performance standards, which primarily consist of a lending test. The lending test evaluates the bank's record of meeting the credit needs in its AA through its lending activities. To evaluate performance under the lending test, examiners reviewed small business loan originations and purchases, the bank's primary loan product during the evaluation period. The evaluation period was January 1, 2022, through December 31, 2024.

### **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), 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 rating is based solely on its performance in the New York-Newark-Jersey City, NY-NJ MMSA.

## **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.

## **Multistate Metropolitan Statistical Area Rating**

### **New York-Newark-Jersey City, NY-NJ MMSA**

**CRA rating for the New York-Newark-Jersey City, NY-NJ MMSA: Satisfactory.**

**The Lending Test is rated: Satisfactory.**

The major factors that support this rating include:

- There was reasonable distribution of small business loans across geographies of different income levels.
- There was a reasonable distribution of small business loans across borrowers of different income levels.

### **Description of Institution's Operations in New York-Newark-Jersey City, NY-NJ MMSA**

Hana Bank provides commercial banking services with a concentration in small business lending and retail banking, primarily to Korean American and broader Asian American communities in the New York and New Jersey metropolitan areas. Hana Bank has designated its AA as Bergen, Essex, Hudson, Passaic, and Union counties in NJ and Bronx, Kings, Nassau, New York, Queens, and Westchester counties in NY. All 11 counties are part of the New York-Newark-Jersey City, NY-NJ MMSA. Eight of the designated counties are located within the New York-Jersey City-White Plains, NY-NJ metropolitan division (MD) 35614; two in the Newark, NJ MD #35084; and one in the Nassau County-Suffolk County, NY MD 35004. The AA consists of 3,565 census tracts surrounding the bank's three full-service branches located in Fort Lee, NJ, New York, NY, and Flushing, NY. Of the 3,565 census tracts, 12.3 percent are low-income geographies, 22.6 percent are moderate-income geographies, 29.6 percent are middle income geographies, 30.7 percent are upper-income tracts, and 4.8 percent have not been assigned an income classification. The AA meets the requirements of the CRA and does not arbitrarily exclude low and moderate-income geographies.

Hana Bank operates in a highly competitive financial services market, competing for both deposits and loans. According to the June 30, 2024 Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, Hana Bank ranked 92nd out of 138 banks in deposit market share inside of the AA at 0.02 percent. Significant competitors for deposits include large banks and multinational institutions such as JPMorgan Chase Bank, N.A., Goldman Sachs Bank USA, The Bank of New York Mellon, Morgan Stanley Private Bank, N.A., and Bank of America, N.A. These major competitors have an established presence in the AA and provide strong competition with a combined deposit market share of 68.0 percent. With respect to small business loans, there were 277 reporting lenders in the New York-Newark-Jersey City, NY-NJ MSA based on 2023 CRA Aggregate Market Share Data. The top two lenders in the MSA were American Express National Bank and JPMorgan Chase Bank, N.A. with a combined market share of 66.2 percent by number of loans. The average loan sizes for these lenders were \$16 thousand and \$17 thousand, respectively, as the majority of their small business loans are made through credit cards. Hana Bank did not originate enough small business loans to demonstrate any market share in the MSA. However, during 2023, Hana Bank's average small business loan in the AA

was \$472 thousand. Additionally, Hana Bank competes with other Korean American community banks within its AA, notably Woori America Bank and New Millennium Bank.

The New York-Jersey City-White Plains, NY-NJ MD, which makes up a majority of the AA, is experiencing a mild economic expansion. The annual unemployment rate in this MD remained stable during the evaluation period, ranging from 4.7 to 4.8 percent. As of December 2024, the unemployment rate in the MD was 4.9 percent, which was above the national unemployment rate of 4.1 percent. Significant industries in the area providing employment include education and health services, professional and business services, government, and financial activities. Of the top 13 employers in the MD, four are financial institutions, six are hospitals or health systems, two are universities, and one is a retail department store. Major employers in the area include JPMorgan Chase & Co., New York-Presbyterian Healthcare System, Mount Sinai Health System, NYC Health + Hospitals, and Montefiore Health System.

To determine local economic conditions and community needs, the OCC reviewed information from three community development organizations serving the bank's AA: one which supports affordable housing for low- and moderate-income individuals and two that provide community services to low- and moderate-income individuals. These contacts identified affordable housing, financial literacy initiatives, and more flexible financing programs as the greatest community needs.

The following table provides a summary of the demographics for the New York-Newark-Jersey City, NY-NJ AA:

| Assessment Area(s) - New York-Newark-Jersey City, NY-NJ MSA                                      |            |                              |                 |               |              |             |
|--|------------|------------------------------|-----------------|---------------|--------------|-------------|
|  |            |                              |                 |               |              | 2022 - 2024 |
| Demographic Characteristics  | #          | Low % of #                   | Moderate % of # | Middle % of # | Upper % of # | NA* % of #  |
| Geographies (Census Tracts)  | 3,565      | 12.29                        | 22.61           | 29.62         | 30.69        | 4.80        |
| Population by Geography  | 14,352,451 | 13.82                        | 23.66           | 28.88         | 32.52        | 1.12        |
| Housing Units by Geography   | 5,530,347  | 13.18                        | 22.09           | 27.98         | 35.71        | 1.04        |
| Owner-Occupied Housing by Geography  | 2,151,752  | 3.60                         | 13.96           | 33.64         | 48.29        | 0.50        |
| Occupied Rental Units by Geography   | 2,930,802  | 20.53                        | 28.29           | 24.48         | 25.30        | 1.39        |
| Vacant Units by Geography  | 447,793    | 11.08                        | 20.58           | 23.69         | 43.31        | 1.34        |
| Businesses by Geography  | 754,058    | 9.35                         | 17.61           | 26.03         | 43.89        | 3.13        |
| Farms by Geography   | 8,361      | 6.05                         | 15.51           | 28.14         | 48.93        | 1.36        |
| Family Distribution by Income Level  | 3,225,493  | 26.54                        | 15.47           | 16.60         | 41.39        | 0.00        |
| Household Distribution by Income Level   | 5,082,554  | 28.64                        | 14.02           | 15.02         | 42.32        | 0.00        |
| Unemployment rate (%)  | 6.20       | 10.78                        | 7.28            | 5.65          | 4.43         | 8.84        |
| Households Below Poverty Level (%)   | 14.51      | 34.03                        | 19.60           | 10.69         | 6.62         | 25.40       |
| Median Family Income (35004 - Nassau County-Suffolk County, NY MD)                               | \$130,301  | Median Housing Value         |                 |               |              | \$505,300   |
| Median Family Income (35084 - Newark, NJ MD)   | \$107,827  | Median Gross Rent            |                 |               |              | \$1,515     |
| Median Family Income (35614 - New York-Jersey City-White Plains, NY-NJ MD)                       | \$85,483   | Families Below Poverty Level |                 |               |              | 11.09       |
| Median Family Income (35004 - Nassau County-Suffolk County, NY MD) for 2024                      | \$156,200  |                              |                 |               |              |             |
| Median Family Income (35084 - Newark, NJ MD) for 2024  | \$133,300  |                              |                 |               |              |             |
| Median Family Income (35614 - New York-Jersey City-White Plains, NY-NJ MD) for 2024              | \$101,900  |                              |                 |               |              |             |
| 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 |            |                              |                 |               |              |             |

## LENDING TEST

The bank's performance under the Lending Test in the New York-Newark-Jersey City, NY-NJ MMSA is rated Satisfactory.

Based on a full-scope review, the bank's performance in the New York-Newark-Jersey City, NY-NJ MMSA was reasonable.

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

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

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

Refer to Table 9 in 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 distribution of the bank's small loans to businesses in low- and moderate-income geographies was reasonable. The proportion of loans originated in low-income geographies was below the proportion of businesses in low-income geographies and below the aggregate distribution of loans in low-income geographies. The proportion of loans originated in moderate-income geographies was well below the proportion of businesses in moderate-income geographies and well below the aggregate distribution of loans in moderate-income geographies. Hana Bank's performance was considered reasonable as the bank had a very limited presence in the market relative to the largest depository and lending institutions. The highly competitive market constrained Hana Bank's ability to lend in low- and moderate-income geographies where fewer businesses were located.

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

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

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

Refer to Table 10 in 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 distribution of the bank's small loans to businesses was reasonable. The proportion of loans to businesses with revenues of \$1 million or less was below the proportion of those businesses in the AA but near to the aggregate distribution of loans to those businesses. Although Hana Bank's performance was below aggregate industry performance, this was largely due to significant competition from American Express National Association and JPMorgan Chase Bank, N.A. in the small business lending market. The majority of these lenders' small business loans were small dollar and made through credit cards. As a result, the aggregate distribution does not reflect the performance of more traditional small business loan products offered by the bank. Hana Bank originated small business loans in much larger amounts, reflecting more permanent investment in its AA.



## **Responses to Complaints**

The bank did not receive any complaints regarding its CRA performance during the evaluation period.

## 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 MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

|   |                               |   |
|---|-------------------------------|---|
| <b>Time Period Reviewed:</b>                            | 01/01/2022 to 12/31/2024      |   |
| <b>Bank Products Reviewed:</b>                          | Small business loans          |   |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b> | <b>Products Reviewed</b>  |
| None  | Not applicable                | Not applicable  |
| <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>  |
| <b>MMSA(s)</b>  |                               |   |
| New York-Newark-Jersey City, NY-NJ MMSA                 | Full-scope                    | Counties of Bergen, Essex, Hudson, Passaic, and Union in NJ; and counties of Bronx, Kings, Nassau, New York, Queens, and Westchester in NY. |

## Appendix B: Summary of MMSA Ratings

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| RATINGS                             |                     |
|-------------------------------------|---------------------|
| Overall Bank:                       | Lending Test Rating |
| Hana Bank USA, National Association | Satisfactory        |
| MMSA or State:                      |                     |
| New York-Newark-Jersey City, NY-NJ  | Satisfactory        |

## 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/AA.

**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/AA.

**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 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.



| 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 |
| New York-Newark-Jersey City, NY-NJ MMSA  | 26                              | 13,291        | 100.0             | 1,033,627        | 9.35              | 3.80         | 8.34        | 17.61                  | 0.0          | 17.49        | 26.03                | 50.00        | 27.40        | 43.89               | 46.20        | 43.84        | 3.13                        | 0.0          | 2.93        |
| <b>Total</b>   | <b>26</b>                       | <b>13,291</b> | <b>100.0</b>      | <b>1,033,627</b> | <b>9.35</b>       | <b>3.80</b>  | <b>8.34</b> | <b>17.61</b>           | <b>0.0</b>   | <b>17.49</b> | <b>26.03</b>         | <b>50.00</b> | <b>27.40</b> | <b>43.89</b>        | <b>46.20</b> | <b>43.84</b> | <b>3.13</b>                 | <b>0.0</b>   | <b>2.93</b> |

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data.

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 |             |
| New York-Newark-Jersey City, NY-NJ MMSA   | 26                              | 13,291 | 100.00            | 1,033,627      | 85.15                           | 46.15        | 51.54       | 9.09                           | 26.92        | 5.77                                   | 26.92        |             |
| Total   | 26                              | 13,291 | 100.00            | 1,033,627      | 85.15                           | 46.15        | 51.54       | 9.09                           | 26.92        | 5.77                                   | 26.92        |             |
| Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data. |                                 |        |                   |                |                                 |              |             |                                |              |  |              |             |
| Due to rounding, totals may not equal 100.0%  |                                 |        |                   |                |                                 |              |             |                                |              |  |              |             |