



PUBLIC DISCLOSURE

August 4, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Winter Hill Bank, FSB
Charter Number: 701149

342 Broadway
Somerville, MA 02145

Office of the Comptroller of the Currency

75 Federal Street
Suite 805
Boston, MA 02110

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 Outstanding.

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on Winter Hill Bank, FSB's ('WHB' or 'the bank') record of performance in meeting the credit needs of the bank's Massachusetts (MA) assessment area (AA) during the January 1, 2022, to December 31, 2024, evaluation period.
- Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit (LTD) ratio was more than reasonable.
- A majority of the bank's loans were inside its AA.
- The bank exhibited an excellent geographic distribution of loans in the state.
- The bank exhibited a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.
- The Community Development (CD) Test rating is based on the bank's responsiveness to the community credit needs of its AA through CD lending, investment, donations, and services. Based on a full-scope review, the bank exhibited excellent responsiveness to community development needs in the state.
- The bank was not subject to any CRA related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio was more than reasonable.

WHB's quarterly LTD ratio averaged 89.5 percent over the past 12 quarters, since the end of the previous evaluation's LTD analysis. Specifically, this analysis considered LTD data occurring from January 1, 2022, to December 31, 2024. During the 12 preceding quarters, the bank's quarterly LTD ratio ranged from a quarter low of 74.2 percent to a quarter high of 105.5 percent. The bank's LTD ratio was in line with other peer institutions of similar size, scope of operations, and geographic location. The peer group had a quarterly net LTD average of 88.2 percent over the same 12 quarters, ranging from a low quarterly average of 79.2 percent to a high quarterly average of 100.7 percent.

Lending in Assessment Area

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

The bank originated and/or purchased 65.9 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	180	65.93	93	34.07	273	100,223	62.20	60,903	37.80	161,125
Total	180	65.93	93	34.07	273	100,223	62.20	60,903	37.80	161,125

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

Description of Institution

Winter Hill Bank, FSB, is a single state, federal mutual institution, established in 1906 and headquartered in Somerville, MA. As of December 31, 2024, the institution reported total assets of \$431.6 million. The bank has two operating subsidiaries, Winter Hill Service Corporation and Winter Hill Securities Corporation; however, affiliate activities were not considered in this evaluation. As of this evaluation, the bank's AA consisted of a single state rating area in MA, the full-scope Cambridge MA metropolitan division (MD) AA. The AA contains all three of the bank's branch locations and encompasses the full counties of Essex and Middlesex, MA. There were no branch closures, mergers, or acquisitions during the evaluation period. The bank maintains three full-service branches, a loan center, and an operations center, all located in Somerville and North Reading. Bank branches are located within the bank's delineated AA. The bank's Corporate Office is in a middle-income census tract, the loan center is in a low-income census tract, the operation center is in a middle-income census tract, and the Davis Square and North Reading branches are in upper-income census tracts. Operating hours are reasonable and largely uniform amongst the three branch locations. The branches are open by 8:30am, and close by 4:00 pm, Monday through Thursday. On Fridays, the branch hours are 8:30am to 6:00pm. On Saturdays, the branch hours are 8:30am to 1:00pm. The bank is closed on Sundays. All branches have automated teller machines available for 24-hour banking access.

The bank is a residential and commercial real estate lender offering traditional products and services. The primary loan products of the bank are residential mortgages, including home purchase, home refinance, and home improvement loans. The bank also offers commercial loan mortgage products. Additionally, the bank offers an array of deposit products including, but not limited to, checking accounts, savings accounts, money market accounts, and certificates of deposits. The bank's website, www.winterhillbank.com, provides a listing and description of product offerings.

As of December 31, 2024, WHB reported total assets of \$431.6 million, total deposits of \$303.5 million, and tier 1 capital of \$40.6 million. The net loan portfolio totaled \$319.2 million or 73.9 percent of total assets.

The following table provides a summary of the loan mix as of December 31, 2024:

Loan Portfolio Summary by Loan Product	
December 31, 2024	
Loan Category	% of Gross Loans and Leases
1-4 Family Residential Mortgage – Closed End	65.4%
Multifamily	16.0%
Construction & Development	8.9%
Commercial Real Estate	8.0%
Home Equity	1.6%
Consumer Loans	0.1%
Total	100.0%

Source: Federal Deposit Insurance Corporation Call Report, December 31, 2024.

The bank has no financial or legal impediments in meeting the credit needs of its AA. The bank was rated ‘Outstanding’ during the previous CRA performance evaluation dated July 18, 2022.

Additionally, performance context considered housing affordability needs, leveraging the AA’s reported median family income (MFI) and assumed maximum monthly principal and interest mortgage payments of no more than 30 percent of an applicant’s income. This was compared to the monthly payment for a 30-year mortgage with a 5 percent interest rate, not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, using the AA’s reported median housing value (MHV) to assess the affordability for either low- and/or moderate-income (LMI) borrowers. To supplement this analysis, a review of recent real estate listing data as reported by Zillow.com and Realtor.com was completed to further understand homeownership challenges in the area.

Scope of the Evaluation

Evaluation Period/Products Evaluated

WHB was evaluated using Intermediate Small Bank procedures to assess the bank's CRA performance according to components of the Lending and Community Development tests. The Lending Test evaluated the bank's record of meeting the community credit needs of its AA through lending activities. The bank's lending performance was assessed using Home Mortgage Disclosure Act (HMDA) reportable home mortgage loans originated during the evaluation period from January 1, 2022, to December 31, 2024, as home mortgage loans accounted for the majority of all originated loans by number. The CD Test evaluated the bank's responsiveness to community credit needs of its AA through CD lending, investments, donations, and services. Examiners verified the accuracy of loan data and CD activities submitted by management as part of this evaluation prior to conducting analysis and drawing conclusions.

For the geographic and borrower distribution analyses, loan data was compared to 2020 and 2024 U.S. Census data, calendar year ending 2022-2023 Peer Mortgage data, and 2024 Dunn & Bradstreet Demographics data. For performance context, information from the Federal Deposit Insurance Corporation (FDIC), as of June 30, 2024, was used for support, as applicable.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more 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), 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. Furthermore, refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings.

The state rating in rating areas with a single AA are based on performance in that AA. Refer to the "Scope" section under the State Rating section for details regarding how the areas were weighted in arriving at the respective ratings, as applicable.

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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Massachusetts

CRA rating for the State of Massachusetts:	Outstanding
The Lending Test is rated:	Outstanding
The Community Development Test is rated:	Outstanding

The major factors that support this rating include:

- The bank exhibited an excellent geographic distribution of loans in the state.
- The bank exhibited a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.
- Based on a full-scope review, the bank exhibited excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services.
- The bank was not subject to any CRA related complaints during the evaluation period.

Description of Institution's Operations in Massachusetts

The state of Massachusetts represents WHB's primary area of operations and consists of a single rating area, the full-scope Cambridge MA MD AA. The rating area comprises of Essex and Middlesex counties. The AA consists of wholly contiguous political subdivisions in MA and does not arbitrarily exclude any LMI geographies, nor does the AA delineation contain any unexplained conspicuous gaps. In total, the AA contains 531 geographies: 53 low-income, 100 moderate-income, 188 middle-income, 180 upper-income, and 10 geographies that had not been assigned an income classification as of the 2024 Census.

WHB's primary business focus during the evaluation period was to originate loans funded by its core deposits and the bank faced strong competition in its AA. According to the FDIC Deposit Market Share report as of June 30, 2024, a total of 61 depository institutions maintain a branch presence in Essex and Middlesex counties. Among competitors, WHB ranked 41st with less than 1 percent market share, representing \$324.7 million in total deposits. Leading competitors for deposits in the AA included Bank of America, Citizens Bank, TD Bank, Eastern Bank, and Cambridge Savings Bank. These top five institutions accounted for 45.5 percent of the area's deposits. Outside of the top five deposit holders in the AA, the remaining institutions individually maintained less than 5 percent of market share.

Competition for home mortgage lending from national banks, mortgage lenders, and other community banks is strong in WHB's AA. In 2023, WHB ranked 108th among 507 competing lenders for home mortgage loans originated in the AA, with less than 1 percent market share. Other top lending competitors in the AA included JP Morgan Chase (8.7 percent), Citizens Bank (6.8 percent), Guaranteed Rate, Inc. (3.9 percent), TD Bank (3.5 percent), and Leader Bank (3.3 percent). Outside of the top 10 home mortgage lenders, the remaining institutions individually maintained less than 2 percent of market share.

Economic Data

According to September 2023 Moody's Analytics, the Cambridge Newton Framingham, MA MD unemployment rate is lower than before the pandemic, but the size of the labor force has yet to fully

recover. Employment gains were realized in the transportation/warehousing, construction, and healthcare sectors. Biotechnology is one of the metro division's largest sources of high wage jobs. While biotech employment was up by more than 10 percent since early 2020, mostly in research and development roles, hiring has largely tapered off. Similarly, the large information technology (IT) industry is not expected to generate high growth in the near term. Large firms have conducted layoffs in recent years and start-ups have slowed hiring as high interest rates pose a challenge to obtaining funds to invest in products that are not yet turning a profit. These factors are likely to continue to hinder growth in IT jobs.

The Cambridge Newton Framingham, MA MD population fell during the pandemic as the rise of remote work enabled technology workers to relocate to other metro areas. Population in the metro division is predicted to increase, despite population losses regionally, which will boost hiring in local services such as healthcare, leisure/hospitality, retail, and person services. Cambridge-Newton-Framingham is expected to maintain its lead in population growth over the Northeast, due to gains in local service industries, but is not expected to catch up to nationwide expansion due to weakness in the technology industry. Top-tier universities in the area are expected to support Cambridge-Newton-Framingham's population growth as well. Additionally, housing prices appreciated faster than state and nationwide performances this year but ultimately lagged pre-pandemic appreciation levels.

Community Contact

To better provide context of the bank's performance in the AA, the OCC referenced recent community contacts made within the bank's Cambridge MA MD AA during the evaluation period. Community contacts included four local organizations that operate within Essex and Middlesex counties. One of the organizations interviewed operates a local economic development and urban planning agency, helping to create jobs and affordable housing opportunities for LMI populations in the AA. Another organization contacted operates as a 501(c)(3) community housing development corporation whose mission is to promote the development, rehabilitation, and maintenance of affordable housing in the AA, focusing on LMI individuals and families. The contacts shared that rising housing prices in the region present significant hurdles for LMI families in an area that is still recovering from COVID-19 pandemic challenges.

Assessment Area – Cambridge MA MD AA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	531	9.98	18.83	35.40	33.90	1.88
Population by Geography	2,441,831	8.95	19.10	36.39	34.92	0.64
Housing Units by Geography	955,234	8.34	18.82	38.17	34.10	0.56
Owner-Occupied Housing by Geography	569,787	3.26	14.92	40.25	41.23	0.35
Occupied Rental Units by Geography	339,317	16.83	25.50	34.11	22.66	0.90
Vacant Units by Geography	46,130	8.78	17.81	42.39	30.28	0.74
Businesses by Geography	101,648	7.19	16.48	37.40	38.60	0.33
Farms by Geography	2,608	4.91	16.10	39.42	39.30	0.27
Family Distribution by Income Level	590,786	22.41	16.73	20.06	40.80	0.00
Household Distribution by Income Level	909,104	26.09	14.64	17.29	41.98	0.00
Unemployment rate (%)	4.50	9.06	5.24	3.95	3.70	3.26
Households Below Poverty Level (%)	8.96	25.80	12.30	7.07	5.10	11.51
Median Family Income (15764 - Cambridge-Newton-Framingham, MA MD)	\$121,481	Median Housing Value				\$486,900
Median Family Income (15764 - Cambridge-Newton-Framingham, MA MD) for 2024	\$146,600	Median Gross Rent				\$1,511
		Families Below Poverty Level				5.42
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						

Scope of Evaluation in Massachusetts

The rating for the state of MA is based on a full-scope review of the performance in the Cambridge MA MD AA. Refer to appendix A for additional information on the AA under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Massachusetts was excellent, given performance context.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in the state.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans in the Cambridge MA MD AA is excellent, given performance context.

The percentage of home mortgage loans in low-income geographies exceeded both the percentage of owner-occupied (OO) housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income geographies exceeded both the percentage of OO housing units located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed demographic summary data and mapping reports to identify any gaps in the geographic distribution of the bank's home mortgage loans in the Cambridge MA MD AA during the evaluation period. The analysis did not identify any unexplained or conspicuous gaps in the bank's lending patterns, given performance context.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table 8 in the state of Massachusetts 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 borrower distribution of home mortgage loans in the Cambridge MA MD AA is reasonable, given performance context.

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was near to both the percentage of moderate-income families and the aggregate percentage of all reporting lenders. During this period, 17.8 percent of the bank's home mortgage loans and 15.2 percent of aggregate lending were made to borrowers within the AA without a reportable income.

The assessment of performance also considered the affordability of home ownership for LMI borrowers in the AA relative to the MHV. For the Cambridge MA MD AA, with a reported 2024 MFI of \$146,600, low-income families in the AA with a maximum annual income of \$73,300, would find it challenging to qualify for a mortgage given the \$486,900 MHV in the MD. Additionally, 5.4 percent of the families in the AA were below the poverty level, and the median gross rent was \$1,511.

To further understand homeownership challenges in the Cambridge MA MD AA housing market for LMI borrowers, the analysis also considered the housing values reported by online real estate listing sites, namely Realtor.com and Zillow.com. Real estate listing data collected in June 2025 consistently identified housing values exceeding the 2024 Census MHV of \$486,900 by an estimated \$200,000. Specifically, real state listing data for geographies in the bank's AA ranged from a low of \$686,300 to a high of \$860,000, illustrating the challenges that LMI families experience when applying for home mortgage loans.

Responses to Complaints

The bank was not subject to any CRA related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Massachusetts is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

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 loans that qualified for community development.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Cambridge MA MD AA	15	100.0	3,887	100.0
Total	15	100.0	3,887	100.0

WHB provided an excellent level of CD lending within the AA. During the evaluation period, the bank made 15 qualified CD loans benefitting the full-scope Cambridge MA MD AA, totaling \$3.9 million, or 9.6 percent, of tier 1 capital as of December 31, 2024. Qualified CD loans were largely made through state sponsored affordable housing programs to borrowers within the Cambridge MA MD AA.

The highlights of the bank's CD loans are as follows:

- During 2022, the bank made a \$231,000 loan as part of the Massachusetts Housing Partnership's One Mortgage First Time Homebuyer Program.
- During 2023, the bank made a \$253,000 loan as part of the Massachusetts Housing Partnership's One Mortgage First Time Homebuyer Program.
- During 2024, the bank made a \$560,000 loan as part of the Federal Home Loan Bank of Boston's Affordable Homeownership Permanent Rate Buydown Program.

Number and Amount of Qualified Investments

WHB's investment and donation activity demonstrates adequate responsiveness to credit and community development needs of the Cambridge MA MD AA. As of this review, the bank did not have any prior period investments, nor did the bank make any new investments during the evaluation period. For qualified donations, the bank made 56 CD-eligible donations amongst 43 community organizations operating within the Cambridge MA MD AA, totaling approximately \$43,199, or less than 1 percent of tier 1 capital for the evaluation period. Donations were made to community organizations that support community services targeted towards LMI populations and affordable housing initiatives in the

Cambridge MA MD AA. While the bank's actual level of charitable giving in the AA was higher, these 56 instances of giving in the full-scope AA were verified as having a CD purpose.

The highlights of the bank's CD donations are as follows:

- A \$2,500 donation to Community Cooks in 2022 to help provide meals to the homeless.
- A \$1,500 donation to Somerville Education Foundation in 2023 to help provide school supplies to LMI populations within the AA.
- A \$1,000 donation to Respond Inc. in 2024 to help provide affordable housing needs for LMI populations within the AA.

Extent to Which the Bank Provides Community Development Services

The bank provides an adequate level of community development services in the full-scope AA. During the evaluation period, a senior bank employee provided approximately 425 hours of CD services as part of community outreach within the Cambridge MA MD AA. The former Vice President of Lending and current Vice President of Loan Origination provided financial expertise acting as an instructor for two First Time Homebuyer Seminars focused on assisting and educating potential LMI borrowers on homeownership and how to apply for a mortgage.

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 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”.

Time Period Reviewed:	(01/01/2022 to 12/31/2024)	
Bank Products Reviewed:	HMDA-reportable home mortgage loans Community Development-eligible loans, investments, services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None reviewed.		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Massachusetts		
Cambridge MA MD AA	Full-scope	Single State: Massachusetts – MA (#25) <ul style="list-style-type: none"> • Cambridge-Newton-Framingham, MA MD (#15764) <ul style="list-style-type: none"> ○ Essex (#009), Middlesex (#017)

Appendix B: Summary of State Ratings

RATINGS WINTER HILL BANK, FSB			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Rating
Winter Hill Bank, FSB	Outstanding	Outstanding	Outstanding
State:			
Massachusetts	Outstanding	Outstanding	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 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 (MD): 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 (MSA): 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 (OO) 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

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 30th of each year. Tables without data are not included in this PE.

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

Table 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.

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

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024	
Assessment Area:	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	
Cambridge MA MD AA	180	100,223	100.00	112,174	3.26	5.56	4.58	14.92	22.22	15.88	40.25	32.22	38.37	41.23	38.89	40.69	0.35	1.11	0.47	
Total	180	100,223	100.00	112,174	3.26	5.56	4.58	14.92	22.22	15.88	40.25	32.22	38.37	41.23	38.89	40.69	0.35	1.11	0.47	

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 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024	
Assessment Area:	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	
Cambridge MA MD AA	180	100,223	100.00	112,174	22.41	7.22	7.09	16.73	15.00	17.59	20.06	20.00	22.13	40.80	40.00	37.98	--	17.78	15.22	
Total	180	100,223	100.00	112,174	22.41	7.22	7.09	16.73	15.00	17.59	20.06	20.00	22.13	40.80	40.00	37.98	--	17.78	15.22	

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%

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