# **PUBLIC DISCLOSURE**

November 28, 2022

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Pennsville National Bank Charter Number: 15733

> 170 South Broadway Pennsville, NJ 08070

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 major factors supporting this rating include:

- The quarterly loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's lending is inside its assessment area (AA) by number of loans originated or purchased.
- The overall geographic distribution of loans reflects reasonable dispersion in low- and moderateincome (LMI) census tracts.
- The bank's distribution of loans by income level of the borrower represents excellent distribution to individuals of different income levels.
- The bank did not receive any CRA-related complaints during the evaluation period.

#### Loan-to-Deposit Ratio

The Pennsville National Bank's (PNB) quarterly average net loan-to-deposit ratio is reasonable given the bank's size, financial condition, and the competition within the assessment area (AA). The bank's quarterly average net loan-to-deposit ratio over the 12 quarters captured in our evaluation period is 30.43 percent. During this period, the ratio ranged from a quarterly low of 26.69 percent to a quarterly high of 36.00 percent. At the last CRA evaluation, the average loan-to-deposit ratio was 37.84 percent. We compared the bank's LTD to six similarly situated banks ranging in asset sizes from \$184 million to \$618 million. The quarterly average net loan-to-deposit ratio for these institutions over the same 12 quarters was 60.62 percent. The ratios range from a quarterly low of 30.43 percent to a quarterly high of 97.29 percent. While the bank's quarterly average net loan-to-deposit ratio is lower than the peer group, it is reasonable when taking into consideration the bank's lending market share, its size, the competition for loans, and the consequences of the pandemic during the review period. Additionally, during the review period, the bank sold mortgage loans in the secondary market to manage interest rate risk and credit risk. Concurrently, the bank experienced a large inflow of deposits stemming from pandemicrelated stimulus programs which culminated in a reduced loan-to-deposit ratio for the period.

#### Lending in Assessment Area

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

The bank originated and purchased 89.7 percent of its total loans, by number, inside the bank's AAs during the evaluation period. The bank originated and purchased 86.3 percent of its loans, by dollar amount, inside the bank's AA during the evaluation period. This analysis is performed at the bank level, rather than at the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

	I	Number o	f Loans			Dollar A	mount o	of Loans \$(	000s)	
Loan Category	Insi	de	Outs	side	Total	Insid	le	Outsi	ide	Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage										
2019	63	91.3	6	8.7	69	5,322	86.3	847	13.7	6,169
2020	39	86.7	6	13.3	45	3,658	79.5	944	20.5	4,602
2021	20	90.9	2	9.1	22	2,484	99.1	23	0.9	2,507
Subtotal	122	89.7	14	10.3	136	11,465	86.3	1,813	13.7	13,277
Total	122	89.7	14	10.3	136	11,465	86.3	1,813	13.7	13,277

### **Description of Institution**

Pennsville National Bank (PNB) is a \$262 million single-state community bank, headquartered in Pennsville, New Jersey. The bank is a full service, intrastate institution offering a standard array of traditional loans, deposit products, investment products, as well as trust services. The bank's website provides a listing and description of all deposit, loan, investment, and trust services. PNB is a wholly owned subsidiary of Penn Bancshares, Inc., a single bank holding company. Both the bank and the holding company are located at the same location in Pennsville, Salem County, New Jersey. The bank has one subsidiary, Denn and Company, which is a Delaware chartered company that holds the bank's investment securities. The bank has not opened or closed any branches since the last CRA performance evaluation.

The bank operates five retail branches within Salem County and the southern portion of Gloucester County, NJ. The main office and administrative office are located in Pennsville, NJ (Salem County). While branch hours vary slightly, the branches offer extended hours on Friday as well as Saturday hours, with the exception of Pedricktown, which is closed on Saturday. All of the branches offer drive thru deposit taking services during business hours and ATMs are available 24 hours a day.

PNB is a full-service community bank offering a range of retail banking, commercial banking, retirement accounts, and trust services. Its retail services include checking accounts, savings programs, money-market accounts, certificates of deposit, consumer loan programs, and residential mortgages. Its commercial services include business checking accounts, money-market accounts, and commercial mortgages. In addition, PNB offers trust and investment services.

As of December 31, 2021, PNB reported net loans and leases of \$71.4 million or 27.4 percent of average assets; total deposits were \$241.2 million.

The bank's loan portfolio consisted of 52.6 percent 1-4 family residential real estate loans, 8.1 percent commercial and industrial loans, 23.0 percent municipal loans, and 16.3 percent in other types of loans. Table 1 identifies the loan portfolio composition.

Loan Portfol	lio Summary by Loan Product	
I	December 31, 2021	
Loan Category	<b>\$</b> Amount (thousands)	% Of Outstanding Loans
Residential Real Estate	38,196	52.60%
Obligations of States and Political Subdivisions	16,701	23.00%
Non-Farm/Non-Residential	8,674	11.94%
Commercial & Industrial	5,908	8.14%
Consumer Loans	1,683	2.32%
Construction and Development	1,453	2.00%
TOTAL	72,615	100.00%

There are no financial or legal impediments to hinder the bank's ability to help meet the credit needs of the communities it serves. The bank received a "Satisfactory" rating on its prior CRA Performance Evaluation dated November 28, 2018.

### Scope of the Evaluation

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

The evaluation period under the Lending Test is representative of the bank's lending strategy since the last CRA evaluation. The evaluation covers the bank's performance from January 1, 2019, through December 31, 2021. The evaluation under the lending test considered home mortgage loans, as these are the bank's primary loan product.

#### Selection of Areas for Full-Scope Review

A Metropolitan Statistical Area (MSA) was used for this review. PNB has defined the entire county of Salem and the southern portion of Gloucester County as its AA. These counties are located in the southwest region of New Jersey, anchored by the cities of Salem and Woodbury, respectively. Salem County is part of the Wilmington, DE-MD-NJ Metropolitan Division (MD) #48864 and consists of 25 census tracts. All 25 census tracts are part of the bank's AA. Two are low-income census tracts and four are moderate-income census tracts. Gloucester County is part of the Camden, NJ MD #15804 and consists of 63 census tracts. Seven of the 59 census tracts are part of the bank's AA. There is one moderate income census tract in this portion of the bank's AA. These two MDs both fall within the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA#37980, and therefore maybe be evaluated as a single AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any low-or moderate-income areas.

#### Ratings

PNB's overall rating is based on the review of the bank's full-scope AA, the Philadelphia- Camden-Wilmington AA, comprised of 25 contiguous tracts in Salem County, New Jersey and seven tracts in Gloucester County, New Jersey. The vast majority of the bank's loans, deposits, and branches are located in this AA during the evaluation period.

### **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, 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 major factors supporting this rating include:

- Pennsville National Bank's (PNB or bank) quarterly loan-to-deposit (LTD) ratio is reasonable.
- A majority of the bank's lending is inside its assessment area (AA) by number of loans originated or purchased.
- The overall geographic distribution of loans reflects reasonable dispersion in low- and moderateincome (LMI) census tracts.
- The bank's distribution of loans by income level of the borrower represents excellent distribution to individuals of different income levels.
- The bank did not receive any CRA-related complaints during the evaluation period.

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

The Philadelphia-Camden-Wilmington AA consists of the Wilmington, DE-NJ MD (48864) and is comprised of 24 contiguous tracts in Salem County, New Jersey and the Camden, NJ MD (15804) which includes seven tracts in Gloucester County, New Jersey.

Of the 32 tracts, 6.3 percent are low-income geographies, 12.5 percent are moderate-income geographies, 59.4 percent are middle-income geographies, and 18.8 percent are upper income geographies.

Per 2015 ACS and 2020 D&B data, the total population of the AA is105,369. Within the AA, there are 27,261 families and 37,563 households. There are 41,538 housing units in the AA, and the median housing cost is \$217,701. Of the total housing units, 70.3 percent are owner occupied, 20.0 percent are renter occupied, and 9.6 percent are vacant housing units. Approximately 1.2 percent of the owneroccupied housing is located within a low-income geography, 4.8 percent is located in moderate-income geographies; 60.2 percent is located in middle-income geographies, and 33.8 percent is located in upperincome geographies.

The median family incomes for the Camden MD and the Wilmington MSA are \$87,133 and \$80,707, respectively. Approximately 18.3 percent of families within the AA are low-income, 15.2 percent are moderate-income, 19.9 percent are middle-income, and 46.6 percent are upper income. Approximately 6.8 percent of households are below the poverty level. Please refer to Table A for Demographic information.

Table A – Dem	ographic I	nformation	of the Assessm	nent Area		
Assessment A	Area: Philac	lelphia-Car	nden-Wilming	ton AA		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	6.3	12.5	59.4	18.8	3.1
Population by Geography	105,369	4.9	7.4	54.4	33.3	0.0
Housing Units by Geography	41,538	5.1	8.8	56.1	30.0	0.0
Owner-Occupied Units by Geography	29,224	1.2	4.8	60.2	33.8	0.0
Occupied Rental Units by Geography	8,339	16.0	18.5	43.4	22.1	0.0
Vacant Units by Geography	3,975	10.5	18.0	53.0	18.5	0.0
Businesses by Geography	6,256	2.4	5.5	53.8	38.3	0.0
Farms by Geography	445	0.2	1.1	65.2	33.5	0.0
Family Distribution by Income Level	27,261	18.3	15.2	19.9	46.6	0.0
Household Distribution by Income Level	37,563	22.3	13.6	16.5	47.6	0.0
Median Family Income MSA - 15804 Camden, NJ		\$87,133	Median Housi	ng Value		\$217,701
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ		\$80,707	Median Gross	Rent		\$1,035
			Families Belov	w Poverty Lev	vel	6.8%

#### Philadelphia-Camden-Wilmington AA

Due to rounding, totals may not equal 100.0%

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

The economy is stable. The major employment sectors in Salem County are energy, chemicals, manufacturing, and health services. The major employers are PSE&G, E.I. DuPont, and Mannington Mills. The major employment sectors in Gloucester County are health care, education, hospitality, and food wholesale distribution. The major employers are Rowan University, Inspire Health Center, Walmart Super Center and Jefferson Health. According to Moody's Analytics, the economy will grow, but the pace will slacken. Healthcare will be a key source of payroll growth while logistics and professional services take a less active role. According to the U.S Bureau of Labor Statistics, the unemployment rate in Gloucester County, NJ in January 2019 was 4.2 percent and increased to 15.4 percent in May 2020. As of December 31, 2021, the unemployment rate was 4.1 percent. Salem County unemployment rate was 5.80 percent in January 2019 with a high of 14.00 percent in May of 2020. As of December 31, 2021, the unemployment rate was 5.80 percent. U.S. unemployment during this period was 6.7 percent.

Competition in the AA is high and includes local community banks and larger regional and national banks. Per the 2020 Peer Mortgage Data, there are 195 lenders within NNB's AA. NNB's largest competitors are Quicken Loans which originated 247 loans or 9.54 percent of the market share, Susquehanna Community Bank which originated 214 loans or 8.27 percent of the market share, and Mifflinburg Bank and Trust Company which originated 212 loans or 8.19 percent of the market share.

According to 2021 Peer Deposit Data, PNB's deposit market share within this AA is 10.13 percent which ranks PNB tied for 4th out of 12 institutions in AA. PNB's primary competitors are Fulton Bank, N.A. (nine offices, 32.78 percent market share), TD Bank, N.A. (three offices, 16.14 percent market share), First National Bank of Elmer (five offices, 13.56 percent market share), and Franklin Bank (four offices, 10.13 percent).

PNB only maintains branches within the state of New Jersey, therefore, there is no difference in the description of the institution's operations at the overall and state level. The Bank has not made any changes to the AA since its last CRA evaluation. Please refer to the overall description of institution's operations for additional information.

#### **Community Contact**

We reviewed the OCC Community Contact Database during this examination to determine the credit needs of the local community. The report involved a local economic development authority conducted in 2022. The organization's mission is to promote adequate and affordable housing, economic opportunity, and suitable living environments within the AA. The contact stated that the lack of available housing and lengthy wait lists is a common problem. Financial institutions have generally been responsive to the authority. The contact stated there are opportunities for local bank involvement.

#### Scope of Evaluation in New Jersey

We completed a full-scope reviews of the bank's AAs located within the Wilmington, DE-NJ MD (48864), which is comprised of 25 contiguous tracts in Salem County, New Jersey and 7 tracts in Gloucester County, 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**

The state rating is based on performance in the AA receiving a full scope review. Based on a full-scope review, the bank's lending performance in the state of New Jersey is reasonable.

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

The bank exhibits reasonable geographic distribution of loans in the State.

#### Home Mortgage Loans:

Refer to Table O in 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's distribution of home mortgage loans by geographic distribution reflects reasonable distribution throughout the AA. The percentage of loans in low-income census tracts is below the percentage of owner-occupied housing units in the AA but slight above the aggregate percentage of home mortgage loans made within the AA. The percentage of loans in moderate income census tracts is slightly below the percentage of owner-occupied housing units but is above the percentage of aggregate loans.

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

The distribution of home mortgage loans among individuals of different income levels was excellent.

#### Home Mortgage Loans

Refer to Table P in 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 to individuals of different income levels is excellent. The borrower distribution of home mortgage loans to both low- and moderate-income borrowers in the AA exceed the aggregate lending in the AA.

#### **Responses to Complaints:**

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

### **Appendix A: Scope of Examination**

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

Time Period Reviewed:	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of	f Examination	
Rating and Assessment Areas	Type of Exam	Other Information
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA 37980 AA	Full Scope	Whole of Salem County, NJ; portion of Gloucester County, NJ

# **Appendix B: Summary of MMSA and State Ratings**

	RATINGS
Overall Bank:	Lending Test Rating
Pennsville National Bank	Satisfactory
MMSA or State	
New Jersey	Satisfactory

### **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 investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 Appendix-C2

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.

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

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

**Rating Area:** A rated area is a state or multi-state 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

### **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/assessment area. 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 O.Assessment Area Distribution of Home Mortgage Loans by Income Category of the<br/>Geography Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of owner-occupied housing units throughout those geographies. The<br/>table also presents aggregate peer data for the years the data is available.
- Table P.Assessment Area Distribution of Home Mortgage Loans by Income Category of the<br/>Borrower Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the<br/>percentage distribution of families by income level in each MMSA/assessment area. The<br/>table also presents aggregate peer data for the years the data is available.

	Total	l Home M	lortgage	e Loans	Low-	Income	Tracts	Modera	te-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not	Available-	Income T	racts
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units		Aggregate	% of Owner- e Occupied Housing Units		Aggregate	-	% Bank A Loans	Aggregate		% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggre	gate
Philadelphia- Camden- Wilmington AA	122	11,465	100.0	5,420	1.2	0.8	0.6	4.8	4.1	2.5	60.2	86.1	47.3	33.8	9.0	49.7	0.0	0.0	0.0	C
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<b>Total</b> Source: 2015 AC Due to rounding,	S; 01/0 totals	may not e	12/31/2 equal 10	2021 Bank 20.0%							60.2	86.1 Borrov	47.3 ver	33.8	9.0	49.7	0.0	0.0	0.0	0 2019
Total Source: 2015 ACC Due to rounding, Table P: Ass	S; 01/0 totals	01/2019 - may not e	12/31/2 equal 10 ea Dist	021 Bank 00.0% tributio	k Data, 202	eo HMDA me Mo	Aggregate	e Data, "" a	data not c Income	available.	ry of the	Borrov			1		0.0 Borrowers		0.0 Available- Borrowe	2019 -Income
<b>Total</b> Source: 2015 AC Due to rounding,	S; 01/0 totals	01/2019 - may not e	12/31/2 equal 10 ea Dist	2021 Bank 20.0% tributio	k Data, 202	eo HMDA me Mo	4 Aggregate ortgage L come Borro	e Data, "" o Loans by I owers N	data not c Income	available. e Catego Income B	ry of the	Borrov	ver -Income B % Bank		Upp	per-Income	Borrowers k Aggrega	Not	Available- Borrowe	2019 -Incom
Total Source: 2015 AC. Due to rounding, Table P: Ass	S; 01/( totals sessm	o1/2019 - may not e nent Arc	12/31/2 equal 10 ea Dist ne Mort 9%	21 Bank 00.0% tributio gage Loa 6 of Or otal M	ans verall larket	me Mo Low-Inc	4 Aggregate ortgage L come Borro % Bank Ag	e Data, "" o Loans by I owers N	data not d Income Moderate	e Catego -Income B Bank	ry of the Borrowers	Borrov Middle %	ver Income B & Bank	Borrowers	Upp %	per-Income , Banl Loan	Borrowers k Aggrega	Not	Available- Borrowe % Bank	2019 -Incom ers