INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

November 6, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Rosedale FS & LA Charter Number: 703758

9616 Belair Rd., Baltimore, MD 21236-1104

Office of the Comptroller of the Currency

400 7th Street S.W., Washington, DC 20219

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.

Table of Contents

Overall CRA Rating	2
Description of Institution	3
Scope of the Evaluation	5
Discriminatory or Other Illegal Credit Practices Review	6
State Rating	7
State of Maryland	7
Community Development Test	12
Appendix A: Scope of Examination	A-1
Appendix B: Summary of MMSA and State Ratings	B-1
Appendix C: Definitions and Common Abbreviations	
Appendix D: Tables of Performance Data	D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated Outstanding.

The Lending Test is rated: Outstanding.
The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on an excellent distribution of home mortgage loans among borrowers of different incomes, a reasonable distribution of loans in low- and moderate-income geographies, a substantial majority of loans originated within the assessment area (AA); and a more than reasonable loan-to-deposit (LTD) ratio.
- The Community Development (CD) Test rating is based on an adequate responsiveness to community needs through qualified CD loans, investments, and services given the bank's capacity and the need and availability of such opportunities in the bank's AA.

Loan-to-Deposit Ratio

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

Rosedale's quarterly average net LTD ratio over the 12-quarter review period was 89.9 percent. The ratio ranged from a quarterly low of 81.1 percent as of March 31, 2021, to a quarterly high of 99.7 percent as of June 30, 2020. The ratio is calculated on a bank-wide basis. The quarterly average net LTD ratio for a custom peer group of five similarly situated institutions with assets ranging from \$362.6 million to \$836 million and located in the same MSA was 80 percent over the same period. The peer group's ratio ranged from a quarterly low average of 63.9 percent to a quarterly high average of 93.3 percent during that time period.

Lending in Assessment Area

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

The bank originated and purchased 91.4 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. The findings from this analysis had a positive effect on the overall analysis of the geographic distribution of lending by income level of geography.

	Nu	ımber o	f Loans	5		Dolla				
Loan Category	Inside		Outside		Total	Inside	;	Outsid	le	Total
	#	%	#	%	#	\$	%	\$	%	\$
Home Mortgage										
2020	235	92.2	20	7.8	255	64,566,089	92.9	4,919,819	7.1	69,485,908
2021	307	91.1	30	8.9	337	98,146,797	83.5	19,452,714	16.5	117,599,51
2022	363	91.2	35	8.8	398	129,433,709	88.4	16,925,554	11.6	146,359,263
Subtotal	905	91.4	85	8.6	990	292,146,595	87.6	41,298,087	12.4	333,444,682
Total	905	91.4	85	8.6	990	291,146,595	87.6	77,676,355	12.4	597,403,450

Description of Institution

Rosedale Federal Savings & Loan Association (Rosedale, bank, or institution) is a federally chartered mutual savings bank headquartered in Baltimore County, Maryland (MD). Since the previous evaluation, the bank acquired and merged Chesapeake Bank of Maryland, Parkville, MD into its operations. This merger was completed on July 7, 2022.

As of the evaluation date, Rosedale operates its business through a network of 13 full-time branches, with nine branches in Baltimore County, three branches in Harford County and one branch in Anne Arundel County. The bank offers a variety of credit and deposit services to businesses and consumers. Lending products include home mortgages, home equity loans and lines of credit, commercial real estate, and consumer loans. Deposit products include certificates of deposit, individual retirement accounts, money market, and various checking and savings accounts for individuals and businesses. Alternative banking services include night depository services, direct deposit, automated teller machines (ATMs), electronic statements, internet banking and mobile banking. The bank's website, www.rosedalefederal.com, provides additional information on its services.

The bank's CRA performance was assessed within the bank's delineated AA: Baltimore-Columbia-Towson, MD Metropolitan Statistical Area (MSA) 12580. The AA included the counties of Anne Arundel, Baltimore, Carroll, Harford, Howard, Queen Anne's, and Baltimore City. As of September 19, 2022, the bank removed the Queen Anne's County. The AA is contiguous, meets the requirements of the CRA regulation, and does not arbitrarily exclude the low- and moderate-income census tracts.

The bank concentrates on the origination and purchase of residential mortgage loans to hold in the loan portfolio. As of December 31, 2022, Rosedale reported total assets of \$1.2 billion, total deposits of 945.7 million, tier 1 capital of \$242.5 million, and net loans and leases of \$898.2 million. The loan portfolio consisted of approximately 99 percent real estate mortgages and less than one percent commercial loans.

There are no financial or legal impediments to hinder the bank's ability to help meet the credit needs of the communities it services. The bank received an overall rating of "Outstanding" at the previous Intermediate Small Bank (ISB) CRA Performance Evaluation dated August 31, 2020.

Innovative and/or Flexible Lending Products

During the evaluation period, the bank offered several flexible affordable mortgage products to assist low- and moderate-income individuals in obtaining homeownership. Many of these loan programs are available through partnerships with local and state government agencies. The bank originated forty-seven (47) loans totaling \$8.6 million under these programs resulting in \$284,885 in grants to the borrowers. Loans originated under these programs are included in the bank's home mortgage loans. Following is a list of loan programs that were available during the evaluation period:

			Total \$ Volume	Total \$ Volume
Loan Program	No. of Loans	No. of Grants	Loans	Grants
Habitat for Humanity Susquehanna				
Homeownership Program	7	0	1,372,850	-
Habitat for Humanity Chesapeake				
Homeownership Program	7	6	1,070,000	59,885
Rosedale First Time Homebuyers				
Program	33	0	6,194,481	-
Baltimore County Settlement				
Expense Loan Program (SELP)	0	2	-	20,000
FHLB of Atlanta Affordable Housing				
Program	0	25	=	182,500
HOME Funds (Harford County				
Home Investment Partnership				
Program)	0	7	=	17,500
Community Development Block				
Grant (CDBG)	0	1	-	5,000
Total	47	41	8,637,331	284,885
Source: Bank Data	·	·	·	<u> </u>

COVID-19 Pandemic Activities

This evaluation also considered the bank's response to the COVID-19 pandemic that impacted the United States during the evaluation period. Rosedale participated in the federal Paycheck Protection Program (PPP) by originating loans to qualified business customers. The PPP was introduced in response to the economic impact of the COVID-19 pandemic as part of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) to aid small businesses in remaining operational and avoiding layoffs. During the review period, the bank originated 747 loans in the amount of \$66.9 million through this SBA program during the pandemic.

The bank also introduced a short-term modification program that provided temporary payment relief to borrowers directly impacted by COVID-19. At the height of the pandemic, 280 loans were restructured under the adjusted terms, with 124 of them already paid off. As of December 31, 2022, the remaining balance comprised 51 commercial loans totaling \$50.4 million, and 107 residential loans totaling \$19 million.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Rosedale was evaluated under the ISB examination procedures. These procedures evaluate the bank's performance based on a Lending Test and a CD Test. The Lending Test considers the bank's performance pursuant to the following criteria: Loan-to-Deposit Ratio Analysis; AA Concentration; Geographic Distribution; Borrower Distribution; and Response to CRA Complaints. The CD Test evaluates the bank's responsiveness to CD needs in its AA through CD lending, qualified investments, and CD services.

The evaluation period used for both the Lending Test and the CD Test includes Rosedale's performance from January 1, 2020, through December 31, 2022, and encompasses two census periods. Analysis of bank's performance data for years 2020 and 2021 utilized the 2015 American Community Survey (ACS), whereas the analysis of performance data for year 2022 utilized the 2020 U.S. Census. The bank's primary loan product during the evaluation period was home mortgage loans.

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 assessment areas 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. 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 State of Maryland.

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 (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 Maryland

CRA rating for the State of Maryland¹: Outstanding.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The geographic distribution of loans across geographies of different income levels is reasonable.
- The borrower distribution of loans to borrowers of different income levels is excellent.
- CD activities reflect adequate responsiveness to community development needs.

Description of Institution's Operations in Maryland

The bank operates only in the state of Maryland. The bank provides products and services in the state of Maryland through its 13 full-service branches and five deposit-taking ATMs. During the evaluation period, home mortgage lending was the bank's primary lending focus in the AA.

Competition

The AA is in a highly competitive market for financial services. According to the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, there were 40 financial institutions within the bank's AA that operated 510 full-service branches with aggregate deposits of \$91.4 billion. Rosedale ranked 12th with a deposit market share of 1.04 percent. The largest competitors within the AA were Bank of America, N.A. with 30.2 percent market share, Manufacturers and Traders Trust Company with 18.8 percent market share, PNC Bank N.A. with 9.4 percent market share, Truist Bank with 9.2 percent market share and Wells Fargo Bank N.A. with 8.4 percent market share.

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders in the bank's AA. According to the most recent 2022 Peer Mortgage Data, there were 660 HMDA reporters who originated or purchased \$29.8 billion home mortgage loans within the bank's AA. Rosedale ranked 56th with a market share of less than one percent. The top five lenders were Truist Bank, Rocket Mortgage, PennyMac Loan Services LLC, First Home Mortgage and State Employee Credit Union of MD, who held a combined market share of 19.9 percent in the AA.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Demographics

The following tables present certain demographic characteristics of the bank's AA.

2015 ACS

Table A – Dei	mographic Iı	nformation	of the Assessn	nent Area		
	Assessment	Area: Rose	edale AA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	683	13.0	22.5	33.4	28.7	2.3
Population by Geography	2,769,818	9.0	22.0	35.3	32.8	0.8
Housing Units by Geography	1,145,512	10.7	22.9	35.5	30.6	0.3
Owner-Occupied Units by Geography	687,555	4.9	17.3	38.2	39.5	0.1
Occupied Rental Units by Geography	348,757	16.6	32.8	32.9	17.1	0.5
Vacant Units by Geography	109,200	28.2	26.7	26.7	17.6	0.8
Businesses by Geography	308,819	6.2	17.7	37.3	38.3	0.6
Farms by Geography	6,379	1.9	12.3	39.7	46.0	0.1
Family Distribution by Income Level	675,620	22.3	17.0	19.8	40.8	0.0
Household Distribution by Income Level	1,036,312	25.1	15.4	17.4	42.2	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$87,788	Median Housi	ng Value		\$272,723
			Median Gross	Rent		\$1,181
			Families Belo	w Poverty Le	vel	7.6%

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

2020 U.S. Census

Table A – De	mographic I	nformation	of the Assessn	ient Area		
	Assessment	Area: Rose	edale AA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	717	11.2	22.5	34.4	29.1	2.8
Population by Geography	2,844,510	7.1	21.7	37.0	32.9	1.3
Housing Units by Geography	1,164,762	9.3	22.8	36.7	30.4	0.9
Owner-Occupied Units by Geography	707,862	4.2	17.7	39.7	38.1	0.3
Occupied Rental Units by Geography	354,918	14.8	31.5	33.6	18.5	1.6
Vacant Units by Geography	101,982	25.5	27.3	26.6	18.6	2.0
Businesses by Geography	366,361	5.6	19.8	37.6	36.0	0.9
Farms by Geography	7,135	2.2	13.3	40.3	43.7	0.6
Family Distribution by Income Level	684,359	21.7	17.0	21.1	40.2	0.0
Household Distribution by Income Level	1,062,780	24.8	15.7	17.8	41.7	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$104,637	Median Housi	ng Value		\$300,765
			Median Gross	Rent		\$1,323
			Families Belo	w Poverty Le	vel	6.4%

Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0%

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

Housing Affordability

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$58,050 per year (or less than 50 percent of the 2022 FFIEC adjusted median family income in the AA) could afford a \$270,341 mortgage with a payment of \$1,451 per month. A moderate-income borrower making \$92,880 per year (or less than 80 percent of the 2022 FFIEC adjusted median family income in the AA) could afford a \$432,546 mortgage with a payment of \$2,322 per month. This illustrates that low-income borrowers would be challenged to afford the median home price, but moderate-income borrowers would be able to afford with an estimated payment of \$1,771.

Furthermore, there was a limited number of owner-occupied-units available in the bank's the low- and moderate-income geographies. According to 2015 ACS, there were over 1.1 million housing units in the AA with 33.6 percent located in low- and moderate-income geographies. The population within the low-income census tracts was 248,579 with 122,695 owner-occupied-units. The population within the moderate-income census tracts was 610,002 with 118,674 owner-occupied-units. The number of owner-occupied-units in the low- and moderate-income geographies was 22.2 percent, significantly lower than middle- and upper-income geographies with 77.7 percent, indicating a limited proportion of owner-occupied-units were affordable to low- and moderate-income people.

According to 2020 US census, there were over 1.2 million housing units in the AA with 32.1 percent located in low- and moderate-income geographies. The population within the low-income census tracts was 202,921 with 29, 551 owner-occupied-units. The population within the moderate-income census tracts was 617, 091 with 125, 274 owner-occupied-units. The number of owner-occupied-units in the

low- and moderate-income geographies was 21.9 percent, significantly lower than middle- and upper-income geographies with 77.8 percent, indicating a limited proportion of owner-occupied-units were affordable to low- and moderate-income people.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate for the Baltimore-Columbia-Towson, MSA experienced a notable increase to 9.2 percent in May 2020, attributed to the impact of the COVID-19 pandemic. Since then, there has been a consistent decline in the unemployment rate. As of December 2022, the unemployment rate for the MSA was 2.5 percent compared to 3 percent in the state of Maryland and 3.5 percent in the United States.

According to September 2022 Moody's Analytics report, Baltimore-Columbia-Towson is progressing steadily. Job recovery outpaces that of Maryland and the Northeast, with leisure/hospitality taking the leads in gains, while most private services providing support. Although housing price appreciation has slowed, it remains less pronounced than in many other metro areas.

Moody's predicts a return to pre-pandemic levels for the MSA in 2023, with consumer services spearheading the final stages. Nevertheless, labor shortages are expected to pose a challenge. In the long term, sluggish population gains may constraint job growth, but incomes are forecasted to fare comparatively better.

Moody highlights several strengths of the MSA, such as being a hub for the growing cybersecurity sector, hosting established and well-funded medical research centers and having robust transportation and distribution industries. Conversely, the MSA faces weaknesses, including limited public transportation links with Washington DC, and below average population growth.

Community Contact

OCC leveraged data obtained from two existing community contacts conducted within the state of Maryland to determine and obtain a better understanding of the local economic conditions and community development needs. The contacts highlighted several critical needs, including a need for affordable housing programs, support for revitalization and stabilization activities, investment in underserved neighborhoods, improved access to traditional banking services, support for small businesses, financial assistance for local nonprofits and community development organizations, and a focus on job training and workforce development for area residents.

In addition, the COVID-19 pandemic also created a need to lend to small business to help maintain operations during a period of cash flow disruptions. Considering the ongoing COVID-19 pandemic, demographic and economic data, the OCC determined that small business lending was also a significant credit need.

Scope of Evaluation in Maryland

Examiners completed a full-scope review of the bank's only AA located within the Baltimore-Columbia-Towson, MD MSA 12580. All of the bank's branches are located in the state of Maryland. The bank's primary loan product was home mortgage loans which is reflective of the bank's business strategy during the evaluation period.

Refer to the table in appendix A, Scope of Examination, for a list of this full-scope AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MARYLAND

LENDING TEST

The bank's performance under the Lending Test in Maryland 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 Maryland is excellent. The geographic distribution of mortgage loans in the AA is reasonable. The distribution of mortgage loans by income level of the borrower is excellent.

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 the state of Maryland 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.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans is reasonable.

For the years 2020-2021, the percentage of loans in low-income geographies was below both the percentage of owner-occupied units as well as the aggregate distribution of home mortgage loans. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units and was slightly above the aggregate distribution of home mortgage loans.

For the year 2022, the percentage of loans in low-income geographies was below both the percentage of owner-occupied units as well as the aggregate distribution of home mortgage loans. The percentage of loans in moderate-income geographies was also below both the percentage of owner-occupied units as well as the aggregate distribution of home mortgage loans.

Lending Gap Analysis

The OCC reviewed summary reports and maps and analyzed the bank's home mortgage lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. The OCC did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Maryland 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.

Based on the data in the tables and considering the performance context factors discussed above the overall borrower distribution of home mortgage loans is excellent. Greater emphasis was placed on years 2020-2021 due to the longer timeframe and larger volume of loans.

For the years 2020-2021, the percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but exceeded the aggregate industry distribution of home mortgage loans to those families. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to those families.

For the year 2022, the percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but exceeded the aggregate industry distribution of home mortgage loans to those families. The percentage of home mortgage loans to moderate-income borrowers was below both the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to those families. The lending performance in 2022 was affected by a notable number of loans. purchased by the bank. As per the HMDA guidelines, the bank was not required to report income for approximately 45 percent of the purchased loans.

Responses to Complaints

There were no consumer complaints regarding the bank's CRA performance or complaints indicating illegal or discriminatory lending practices during the evaluation period.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

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

Community Dev	Community Development Loans													
	Total													
Assessment														
Area	#	% of Total #	\$(000's)	% of Total \$										
Rosedale AA	270	100	15,919	100										

Rosedale originated a total of 270 CD loans totaling \$15.9 million or 6.6 percent of tier one capital during the evaluation period. The vast majority of CD loans were PPP loans that supported job retention and economic development within the bank's AA. The PPP lending contributed to the retention of approximately 1,685 jobs. The remaining CD loans supported organizations that provided affordable housing to low- and moderate-income individuals.

Number and Amount of Qualified Investments

Qualified Investi	nents									
Assessment	Prio	or Period*	Curr	ent Period		7		Unfunded Commitments*		
Area	#	\$(000's)	#	\$(000's)	#	% of	\$(000's)	% of	#	\$(000's)
						Total #		Total \$		
Rosedale AA	2	733	170	11,883	172	100	12,616	100	0	0

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

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

Total qualified investments amounted to \$12.6 million. This included 10 current period investments of \$11.4 million, two prior period investments of \$732,566, and 160 qualified grants of \$507,230. Together, the current and prior period investments represented 5.2 percent of tier one capital.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, bank employees provided 88.5 community service hours to four entities by participating in various community development services.

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:	01/01/2020 to 12/31/2021	
Bank Products Reviewed:	Home mortgage loans	
	Community development loa	ns, qualified investments, community development
	services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
		Home mortgage loans
		Community development loans, qualified
		investments, community development services
List of Assessment Areas and Type	of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
State		
		Anne Arundel, Baltimore, Carroll, Harford,
State of Maryland	Full-scope	Howard, Queen Anne's counties, and Baltimore
		City.

Appendix B: Summary of MMSA and State Ratings

	RATINGS	Rosedale FS & LA	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
Rosedale FS & LA	Outstanding	Satisfactory	Outstanding
MMSA or State:			
State of Maryland	Outstanding	Satisfactory	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 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 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.

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/assessment area. 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 O.** 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 P.** 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/assessment area. 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.

T	able O: As	ble O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2020-2															2020-21				
		Total Home Mortgage Loans			oans	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-	-Income	Tracts	Not Available-Income Tracts			
	ssessment rea:	#	\$	% of Total	Overall Market			Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate	
R A	osedale A	542	162,712,886	100.0	182,252	4.9	0.6	3.0	17.3	14.6	14.2	38.2	41.7	39.3	39.5	43.2	43.4	0.1	0.0	0.1	

14.6

14.2

38.2

39.3

39.5

43.2

43.4

0.1

0.0

0.1

41.7

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0%

0.6

3.0

17.3

542 162,712,886 100.0 182,252

Total

Table O: As	able O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2022															2022				
	Т	otal Home Mort	tgage Lo	ans	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-	Income	Tracts	Not Available-Income Tracts			
Assessment Area:	#	\$		Overall Market	Ciccinnied	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans		% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	
Rosedale AA	363	129,433,709	100.0	90,314	4.2	2.8	4.5	17.7	12.9	17.6	39.7	41.6	39.8	38.1	42.4	37.6	0.3	0.3	0.5	
Total	363	129,433,709	100.0	90,314	4.2	2.8	4.5	17.7	12.9	17.6	39.7	41.6	39.8	38.1	42.4	37.6	0.3	0.3	0.5	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data.

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.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2020-21

	Т	otal Home Mort	oans	Low-Inc	ome Bo	rrow ers	Moderate	Income	Borrowers	Middle-Income Borrowers			Upper-In	come Be	orrow ers	Not Available-Income Borrowers			
Assessment Area:	#	s	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggr egate	% Families	% Bank Loans	Aggr egate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Rosedale AA	542	162,712,886	100.0	182,252	22.3	13.1	7.6	17.0	20.7	18.5	19.8	21.0	19.4	40.8	37.8	30.7	0.0	7.4	23.8
Total	542	162,712,886	100.0	182,252	22.3	13.1	7.6	17.0	20.7	18.5	19.8	21.0	19.4	40.8	37.8	30.7	0.0	7.4	23.8

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2022

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market		% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Rosedale AA	363	129,433,709	100.0	90,314	21.7	11.6	10.3	17.0	12.1	20.8	21.1	13.2	21.0	40.2	18.5	29.1	0.0	44.6	18.8
Total	363	129,433,709	100.0	90,314	21.7	11.6	10.3	17.0	12.1	20.8	21.1	13.2	21.0	40.2	18.5	29.1	0.0	44.6	18.8

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data.

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.