



PUBLIC DISCLOSURE

August 26, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

People's United Bank, National Association
Charter Number: 25103

850 Main Street
Bridgeport, CT 06604

Office of the Comptroller of the Currency
Midsize Bank Supervision
425 South Financial Plaza, Suite 2700
Chicago, IL 60605

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 following Table indicates the performance level of People's United Bank, N.A. ("PUB" or "bank") with respect to the Lending, Investment, and Service Tests:

Performance Levels	People's United Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based primarily on the Outstanding rating in the state of Vermont, High Satisfactory rating in the New York CSA, and Low Satisfactory rating in the Boston CSA.
- The Investment Test rating is based primarily on the Outstanding ratings in the states of Vermont and Connecticut, the High Satisfactory rating in the Boston CSA, and the Low Satisfactory rating in the New York CSA.
- The Service Test rating is based primarily on the Outstanding ratings in the Boston CSA and state of Vermont, the High Satisfactory rating in the state of Connecticut, and the Low Satisfactory rating in the New York CSA.

The bank offered several bank-wide flexible affordable mortgage and small business products during the evaluation period. Some of the major flexible products offered in all assessment areas (AA) include:

- U.S. Small Business Administration 7(a) Program – loan guaranty program available to assist qualified small businesses to obtain financing when they might not be eligible for business loans through normal lending channels.
- Federal Housing Administration (FHA) – mortgage insurance program helping homebuyers achieve sustainable, affordable homeownership.
- People's Affordable Mortgage – bank-specific program to encourage homeownership opportunities for low- and moderate-income (LMI) persons.

Lending in Assessment Area

A substantial majority of the bank's loans are in in its AAs.

The bank originated and purchased 93.5 percent of its total loans inside the bank's AAs 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.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	14,634	91.9	1,287	8.1	15,921	5,976,083	87.6	844,861	12.4	6,820,944
Small Business	9,052	96.2	362	3.8	9,414	1,341,913	93.7	90,151	6.3	1,432,064
Small Farm	35	100	0	0	35	4,942	100	0	0	4,942
Total	23,721	93.5	1,649	6.5	25,370	7,322,938	88.7	935,012	11.3	8,257,950

This performance was factored positively into the overall analysis of the geographic distribution of lending by income level of the geographies.

Description of Institution

People's United Financial, Inc. (PUFI) is a bank holding company and a financial holding company registered under the Bank Holding Company Act of 1956, as amended, and is incorporated under the state laws of Delaware. PUFI is the holding company for People's United Bank, National Association ("PUB" or "bank"), an interstate banking association headquartered in Bridgeport, Connecticut.

Effective April 1, 2017, the bank completed its acquisition of Suffolk Bancorp. Effective August 1, 2017, the bank completed its acquisition of LEAF Commercial Capital, Inc. Effective June 27, 2018, the bank completed its acquisition of Vend Lease Company. Effective October 1, 2018, the bank completed its acquisition of First Connecticut Bancorp Inc.

The bank's principal business is commercial banking, retail banking, and wealth management services to individual, corporate and municipal customers through the bank and its subsidiaries. Traditional banking activities are conducted primarily within New England and southeastern New York, and include extending secured and unsecured commercial and consumer loans, originating mortgage loans secured by residential and commercial properties, and accepting consumer, commercial and municipal deposits.

In addition to traditional banking activities, the bank provides specialized financial services tailored to specific markets including: personal, institutional, and employee benefit trust; cash management, and municipal banking. Through its non-banking subsidiaries, the bank offers: brokerage, financial advisory services, investment management services, and life insurance through People's Securities, Inc.; equipment financing through People's Capital and Leasing Corp., People's United Equipment Finance Corp., and LEAF Commercial Capital, Inc.; and commercial insurance services through People's United Insurance Agency, Inc.

The bank has seven rating areas and 10 assessment areas (AAs) across five states. A full range of financial services is delivered through a network of 422 branches and 532 deposit-taking automatic teller machines (ATM) located in Connecticut, southeastern New York, Massachusetts, Vermont, Maine, and New Hampshire. The branches include 85 full-service supermarket branches throughout Connecticut and 63 in southeastern New York that provide customers with seven-day-a-week banking. The bank's distribution network includes investment and brokerage offices, commercial banking offices, online banking, and investment trading, a 24-hour telephone banking service and participation in a worldwide ATM network.

As of December 31, 2018, the bank had tier 1 capital of \$4.1 billion, total assets of \$47.5 billion, and total loans of \$33.8 billion.

There were no legal or financial factors impeding the bank's ability to help meet credit needs in its AAs during the evaluation period. The bank's CRA performance was rated Satisfactory in the last public evaluation dated November 7, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the large bank Lending, Investment, and Service Tests. The evaluation period is January 1, 2016 through December 31, 2018.

In evaluating the bank's lending performance, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under the CRA. All home mortgage products were reviewed, and conclusions were reached in the aggregate. Small loans to farms were not considered a primary loan product and were not evaluated. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during an analysis period within the overall evaluation period.

Under the Lending Test, separate analysis of 2016 data and 2017 through 2018 data was performed. This is due to changes instituted by the U.S. Census 2015 American Community Survey (ACS), which updated income, population, and housing information. The ACS also resulted in changes to the income designations of some geographies. The changes became effective January 1, 2017.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were 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 and CSA Rating section 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 a blend of the state ratings, and where applicable, multistate ratings.

The bank's performance in each of the analysis periods was weighted equally. The New York CSA rating area carried the greatest emphasis in the OCC's conclusions as this area represented the bank's most significant market with 59 percent of the bank's total deposits, 41 percent of HMDA and small loans to businesses originated and purchased, and 48 percent of the total branch network.

For the loan products considered under the Lending Test, home mortgage loans received greater weight than small loans to businesses in developing conclusions due to a higher volume of home mortgage loans during the evaluation period. In rating areas where there was a significant difference in weighting, it is noted under the "Scope of the Evaluation" section.

Mortgage lending was analyzed based on aggregated mortgage loan data. Conclusions are based on the analysis of the aggregated data and performance context considerations that are discussed in each applicable rating area section within the Lending Test.

Throughout all rating areas equal emphasis was given to the geographic and borrower distribution components of the Lending Test.

In the analysis of the distribution of home mortgage loans to borrowers of different income levels, the impact that poverty levels had on the demand for mortgages from low-income individuals and the affordability or high cost of housing in many markets was considered. The costs associated with financing homeownership has a more significant impact on the opportunity to lend to low-income populations where a larger proportion of the individuals and families fall below the poverty line.

The volume of community development (CD) loans and the degree of responsiveness of those loans to the needs in the community were considered in the lending evaluation. CD lending in an AA influenced the Lending Test rating either positively, neutrally, or negatively, to the extent of opportunity, responsiveness, and performance context. The dollar amount of CD loans was compared to tier 1 capital allocated to the AAs to gain a common perspective regarding the volume of CD lending activity. Tier 1 capital was allocated to the rating areas and AAs based on the percentage of bank deposits in the AAs.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the institution, or in any assessment area 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 bank has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Multistate Metropolitan Statistical Area Rating

Boston CSA

CRA rating for the Boston CSA¹:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to credit needs in its AA;
- An adequate geographic distribution of both home mortgage loans and small loans to businesses;
- An adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- A very good level of qualified investments that provides good responsiveness to community needs in the rating area; and
- The bank provides an excellent level of CD services.

Description of Bank's Operations in the Boston CSA

The bank's operations in the AA include geographies in Connecticut, Massachusetts, and New Hampshire. The bank included Windham County in Connecticut; Essex, Middlesex, Norfolk, Suffolk, and Worcester Counties in Massachusetts; and Belknap, Hillsborough, Merrimack, Rockingham, and Stratford Counties in New Hampshire.

The bank operated 63 branches in the AA or 14.9 percent of its total branches as of December 31, 2018. Based on Federal Deposit Institution Corporation (FDIC) Deposit Market Share data as of June 30, 2018, the bank had \$4.8 billion in deposits in the AA representing 14.6 percent of its total deposits. The bank ranked eighth with 1.3 percent market share. The three largest banks by deposit market share are State Street Bank, Bank of America, and Citizens Bank. State Street Bank is the only bank of the three that does not have a substantially larger branch network.

The AA poses several challenges to home mortgage lenders in the AA, including PUB. The AA is a high-cost housing area, limiting access to affordable home ownership among LMI borrowers. The median housing value in the AA is \$372 thousand. A method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a 4.5 interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making approximately \$50 thousand per year (or less than 50 percent of the Federal Financial Institution Examination Council (FFIEC) adjusted MFI in the AA) could afford a \$228 thousand mortgage with a payment of \$1,300 per month; a moderate-income borrower earning approximately \$80 thousand per year (or less than 80 percent of the FFIEC adjusted MFI in the AA) could afford a \$364 thousand mortgage with a payment of \$2 thousand per month.

¹This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The top mortgage lender in this market was Wells Fargo Bank with a 5.6 percent market share followed by Quicken Loans with 4.1 percent, and JPMorgan Chase Bank with 3.4 percent. In small loans to businesses, the bank ranked 23rd with 0.5 percent market share. The top three small business lenders with a combined market share of 45.6 percent were American Express with 25.8 percent, Bank of America with 11.7 percent, and Citigroup with 8.1 percent. There are 199 small business lenders in the AA.

Fifteen community contacts conducted in the AA were reviewed as part of this performance evaluation. Community contacts included government planning agencies, a housing authority, and organizations focused on housing counseling, CD, asset wealth building, social services, community organizing, and small business and economic development. Needs identified in the AA included affordable housing and housing services for families, disabled people and seniors; affordable mortgages, small dollar loans, small business credit products; financial literacy, homebuyer counseling; and consumer credit and debt consolidation programs.

Boston CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Boston CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,239	10.0	19.6	41.2	27.7	1.5
Population by Geography	5,581,717	8.3	18.8	43.5	29.3	0.1
Housing Units by Geography	2,305,243	8.2	19.7	44.7	27.4	0.0
Owner-Occupied Units by Geography	1,355,126	2.8	13.9	48.6	34.7	0.0
Occupied Rental Units by Geography	778,559	16.7	29.0	37.8	16.6	0.0
Vacant Units by Geography	171,558	11.9	23.5	44.8	19.8	0.0
Businesses by Geography	400,887	6.8	14.3	41.6	37.1	0.2
Farms by Geography	8,588	1.9	9.6	50.3	38.2	0.0
Family Distribution by Income Level	1,362,653	21.8	16.8	21.1	40.4	0.0
Household Distribution by Income Level	2,133,685	25.6	15.0	17.6	41.8	0.0
Median Family Income MSA - 14454 Boston, MA MD		\$83,664	Median Housing Value			\$371,938
Median Family Income MSA - 15764 Cambridge-Newton-Framingham, MA MD		\$90,625	Median Gross Rent			\$1,094

Median Family Income MSA - 31700 Manchester-Nashua, NH MSA	\$81,794	Families Below Poverty Level	6.7%
Median Family Income MSA - 40484 Rockingham County- Strafford County, NH MD	\$85,547		
Median Family Income MSA - 49340 Worcester, MA-CT MSA	\$77,128		
Median Family Income Non- MSAs - NH	\$66,238		
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Scope of Evaluation in the Boston CSA

The AA received a full-scope review as it is the only AA in the rating area. This AA represents the bank's second largest market after the New York CSA with 15 percent of total deposits and 24 percent of HMDA and small loans to businesses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BOSTON CSA

LENDING TEST

The bank's performance under the Lending Test in the AA is rated Satisfactory.

Based on a full-scope review, the bank's performance in the AA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Boston CSA	3,641	1,930	0	22	5,593

Dollar Volume of Loans (000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Boston CSA	\$1,964,702	\$314,942	\$0	\$37,921	\$2,317,565

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank ranked eighth in deposits with 1.3 percent market share. According to 2018 peer mortgage data, the bank ranked 34th with a market share of 0.6 percent. While the HMDA lending market share is lower than the bank's deposit market share, this is a highly competitive market with 761 home mortgage lenders. The top lender in this market

was Wells Fargo Bank with a 5.6 percent market share followed by Quicken Loans with 4.1 percent, and JPMorgan Chase Bank with 3.4 percent. In small loans to businesses, Peoples ranked 23rd with 0.5 percent market share. The top three lenders with a combined market share of 45.6 percent were American Express with 25.8 percent, Bank of America with 11.7 percent, and Citigroup with 8.1 percent. There are 199 small business lenders in the AA

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the “MMSA” 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.

2017 to 2018

The proportion of loans in low-income geographies equaled the proportion of owner-occupied housing in those geographies and below the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below both the proportion of owner-occupied housing in those geographies and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies was near to the proportion of owner-occupied housing in those geographies and below the aggregate distribution of loans. The proportion of loans in moderate-income geographies was significantly below both the proportion of owner-occupied housing in those geographies and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the “MMSA” section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

2017 to 2018

The proportion of loans in low-income geographies was below the proportion of businesses in those geographies and near to the aggregate distribution of loans. The proportion of loans in moderate-income geographies was near to both the proportion of businesses in those geographies and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies was below the proportion of businesses in those geographies and near to the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses and the aggregate distribution of loans.

Lending Gap Analysis

The OCC reviewed summary reports and maps to analyze home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes when taking into account housing affordability and competition in the AA.

Home Mortgage Loans

Refer to Table P in the “MMSA” 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.

2017 to 2018

The proportion of loans to low-income borrowers was significantly below the proportion of low-income families and below the aggregate distribution of loans. The proportion of loans to moderate-income borrowers was well below both the proportion of moderate-income families and the aggregate distribution of loans.

2016

Performance in 2016 was weaker than 2017 to 2018 performance. The proportion of loans to LMI borrowers was significantly below the proportion of LMI families and well below the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the “MMSA” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

2017 to 2018

The proportion of loans to small businesses was well below the proportion of small businesses and below the aggregate distribution of loans.

2016

The proportion of loans to small businesses was well below the proportion of small businesses and below the aggregate distribution of loans.

Community Development Lending

The bank has made a relatively high level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank’s level of CD lending. These Tables include all CD loans, including multifamily loans that also qualify as CD loans.

CD loan originations represent 6.8 percent of allocated tier 1 capital. The loans were responsive to the identified needs in the AA, including affordable housing, economic development, community services, revitalization, and stabilization.

Product Innovation and Flexibility

The bank uses innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The bank's performance under the Investment Test in the Boston CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Boston CSA is good.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Boston CSA	7	18,978	490	26,912	497	100	46,890	100	2	274

* 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 bank's financial reporting system.

Boston CSA

Qualified investments totaled \$46.9 million with current period investments of \$26.9 million and prior period investments of \$19 million. Total qualified investments represented 7.7 percent of allocated tier 1 capital. At the end of the evaluation period, the bank had two unfunded commitments totaling \$274 thousand.

Examples of qualified investments include:

- \$3.8 million investment in equity funding for a project that provides affordable housing to LMI individuals in an area in need of affordable housing.
- \$1 million investment to support buildings to improve health and affordable housing in distressed communities in MA.

SERVICE TEST

The bank's performance under the Service Test in the Boston CSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Boston CSA is excellent.

Retail Banking Services

Services delivery systems are readily accessible to geographies and individuals of different income levels in the bank’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Boston CSA	100.0	63	100.0	11.1	25.4	39.2	22.2	8.3	18.8	43.5	29.3

Boston CSA

The bank has 63 branches in the AA with seven branches in low-income and 16 branches in moderate-income geographies. The percentages of the bank’s branches in LMI geographies exceeds the percentages of population living in those geographies.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. No significant weight was placed on these services, as no data was available to determine their impact on LMI individuals.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Boston CSA	1	1			-1	+1

To the extent changes have been made, the bank’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. The bank closed one branch in a middle-income geography and opened one branch in an upper-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

Boston CSA

The bank provides a relatively high level of CD services.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities. Bank employees from various lines of business provided technical assistance to 113 different CD organizations totaling 1,233 hours during the evaluation period. Included in these services are 599 hours where bank employees served in leadership roles.

Examples of some of these services:

- An employee provided 69 hours of service on the board of a nonprofit housing organization. The mission of the organization is to provide hunger relief, emergency shelter, affordable housing, and supportive services to individuals and families who are homeless, enabling them to gain self-sufficiency.
- An employee provided 120 hours of service on the board of a housing origination whose mission is to strengthen communities by creating opportunities quality affordable housing. The organization has a portfolio of 349 affordable apartments for LMI families in the communities it serves.

Multistate Metropolitan Statistical Area Rating

New York CSA

CRA rating for the New York CSA: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to credit needs in its AA;
- A good geographic distribution of both home mortgage loans and small loans to businesses;
- An adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- A good level of qualified investments that provides good responsiveness to community needs in the rating area; and
- The bank provides a good level of CD services.

Description of Bank's Operations in the New York CSA

The bank's operations in the AA include geographies in Connecticut and New York. The bank included Fairfield, Litchfield, and New Haven Counties in Connecticut; and Bronx, Dutchess, Kings, Nassau, New York, Orange, Putnam, Queens, Richmond, Rockland, Suffolk, and Westchester Counties in New York. The bank also included Ulster County in NY in 2016.

The bank operated 204 branches in the AA or 48.3 percent of its total branches as of December 31, 2018. Based on FDIC Deposit Market Share data as of June 30, 2018, the bank had \$19.4 billion in deposits in the AA representing 59.3 percent of its total deposits. The bank ranked 15th with 1.2 percent market share. The three largest financial institutions by deposit market share are Chase with 34.6 percent, Citibank with 6.9 percent, and Bank of New York Mellon with 6.5 percent.

The AA poses challenges to home mortgage lenders in the AA, including PUB. The AA is a very high-cost housing area, limiting access to affordable home ownership among LMI borrowers. The median housing value in the AA is \$483 thousand. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Assuming a 30-year mortgage with a 4.5 interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making approximately \$44 thousand per year (or less than 50 percent of the FFIEC adjusted MFI in the AA) could afford a \$201 thousand mortgage with a payment of \$1 thousand per month; a moderate-income borrower earning approximately \$70 thousand per year (or less than 80 percent of the FFIEC adjusted MFI in the AA) could afford a \$319 thousand mortgage with a payment of less than \$2 thousand per month.

The top mortgage lender in the market was Wells Fargo with 8.3 percent market share followed by Chase with 7 percent, and Citigroup with 5.4 percent. In small loans to businesses, the bank ranked 29th with 0.2 percent market share. The top three lenders with a combined market share of 59.6 percent were

American Express with 34.8 percent, Chase USA with 17.3 percent, and Capital One with 7.5 percent. There are 289 small business lenders in the AA.

Nineteen community contacts conducted in the AA were reviewed as part of the performance evaluation. Community contacts were made within the New York metropolitan area and Connecticut. Contacts included housing counseling providers, affordable housing developers, small business and economic development centers, a community development financial institution (CDFI), and social services providers. A number of needs were identified within the AA including affordable housing and housing support services; funding for nonprofit organizations for operating support; small business loans for working capital; financial education, job training, affordable banking products small dollar loans, and homebuyer down payment assistance programs.

New York CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: New York CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3,691	12.1	23.3	34.0	28.3	2.4
Population by Geography	15,331,042	13.8	24.3	32.4	29.2	0.3
Housing Units by Geography	6,043,891	12.7	23.1	31.9	32.0	0.2
Owner-Occupied Units by Geography	2,694,340	3.0	15.2	40.8	40.9	0.1
Occupied Rental Units by Geography	2,795,353	22.3	30.7	23.7	23.0	0.2
Vacant Units by Geography	554,198	11.5	23.7	30.2	34.4	0.2
Businesses by Geography	1,094,105	7.7	17.1	31.1	42.6	1.5
Farms by Geography	17,475	3.7	15.6	39.7	40.7	0.3
Family Distribution by Income Level	3,559,733	26.8	16.1	17.5	39.6	0.0
Household Distribution by Income Level	5,489,693	28.5	14.6	16.0	40.8	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		\$105,628	Median Housing Value			\$482,742
Median Family Income MSA - 20524 Dutchess County-Putnam County, NY MD		\$94,443	Median Gross Rent			\$1,343
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY MD		\$108,193	Families Below Poverty Level			12.1%

Median Family Income MSA - 35300 New Haven-Milford, CT MSA	\$80,739		
Median Family Income MSA - 35614 New York-Jersey City- White Plains, NY-NJ MD	\$72,047		
Median Family Income Non- MSAs - CT	\$89,735		
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Scope of Evaluation in the New York CSA

The AA received a full-scope review as it is the only AA in the rating area. The bank delineated AAs located in the Bridgeport, CT MSA, CT Non-MSA, Kingston, NY MSA, New Haven, CT MSA, and New York, NY MSA are combined, analyzed, and presented as the New York CSA. The AA represents the bank's most significant market with 59 percent of the bank's total deposits, 41 percent of total HMDA and small loans to businesses originated during the evaluation period. The very high cost of housing was considered in performance conclusions.

Refer to the Scope of Evaluation Table in Appendix A for AA delineations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NEW YORK CSA

LENDING TEST

The bank's performance under the Lending Test in the New York AA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the AA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NY CSA	6,386	3,279	1	52	9,718

Dollar Volume of Loans (000s)*					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NY CSA	\$2,908,547	\$460,196	\$490	\$125,658	\$3,494,891

*The Tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank ranked 15th in deposits with 1.2 percent market share. According to 2018 peer mortgage data, the bank ranked 24th with a market share of 0.8 percent. The top lender in this market was Wells Fargo Bank with 8.3 percent market share followed by JPMorgan Chase Bank with 7 percent, and Citigroup with 5.4 percent. In small loans to businesses, Peoples ranked 29th with 0.2 percent market share. The top three lenders with a combined market share of 59.6 percent were American Express with 34.8 percent, Chase USA with 17.3 percent, and Capital One with 7.5 percent. There are 289 small business lenders in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the “MMSA” 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.

2017 to 2018

The proportion of loans in low-income geographies was near to the proportion of owner-occupied housing in those geographies and below the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below both the proportion of owner-occupied housing and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies was below the proportion of owner-occupied housing in those geographies and below the aggregate distribution of loans. Performance in moderate-income geographies was consistent with 2017 to 2018 performance.

Small Loans to Businesses

Refer to Table Q in the “MMSA” section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

2017 to 2018

The proportion of loans in low-income geographies was near to the proportion of businesses located in those geographies and below the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies was near to the proportion of businesses located in those geographies and near to the aggregate distribution of loans. Performance in moderate-income geographies was consistent with 2017 to 2018 performance.

Lending Gap Analysis

The OCC reviewed summary reports and maps to analyze home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes. The very high cost of housing was considered in drawing conclusions.

Home Mortgage Loans

Refer to Table P in the “MMSA” 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.

2017 to 2018

The proportion of loans to low-income borrowers was well below the proportion of low-income families and exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans

2016

The proportion of loans to low-income borrowers was well below the proportion of low-income families and below the aggregate distribution of loans. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families and below the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the “MMSA” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

2017 to 2018

The proportion of loans to small businesses was well below the proportion of small businesses and exceeded the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018 performance.

Community Development Lending

The bank has made a relatively high level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank’s level of CD lending. These Tables include all CD loans, including multifamily loans that also qualify as CD loans.

CD loan originations represent 5.6 percent of allocated tier 1 capital. The loans were responsive to the identified needs in the AA, including affordable housing, economic development, community services, revitalization, and stabilization.

Product Innovation and Flexibility

The bank uses flexible lending practices in order to serve the AA credit needs. In addition to programs offered bank-wide, the bank originated loans through statewide programs offered in New York and Connecticut. They include the State of New York Mortgage Agency (SONYMA) and Connecticut Housing Finance Authority (CHFA). SONYMA partners with approved participating mortgage lenders across the state to offer 30-year, competitive, fixed-rate mortgages with features to help LMI New Yorkers become homeowners. A down payment assistance program product is also available.

INVESTMENT TEST

The bank’s performance under the Investment Test in the New York CSA is rated Low Satisfactory.

Based on a full-scope review, the bank’s performance in the New York CSA is adequate.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
New York CSA	11	34,297	535	82,792	546	100	117,089	100	3	586

* 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 bank's financial reporting system.

New York CSA

Qualified investments totaled \$117.1 million, with current period investments of \$82.8 million and prior period investments of \$34.3 million. Total qualified investments represented 4.8 percent of allocated tier 1 capital. At the end of the evaluation period, the bank had three unfunded commitments totaling \$586 thousand.

SERVICE TEST

The bank’s performance under the Service Test in New York CSA is rated Low Satisfactory.

Based on a full-scope review, the bank’s performance in the New York CSA is adequate

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
New York CSA	100.0	204	100.0	2.9	17.2	46.6	32.3	13.8	24.3	32.4	29.2

New York CSA

The bank has 204 branches in the AA with six branches in low-income and 35 branches in moderate-income geographies. The percentage of branches located in low-income areas was significantly below the percentage of the population residing in these geographies. However, the percentage of branches located in moderate-income geographies was below the percentage of the population residing in those geographies.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. No significant weight was placed on these services, as no data was available to determine their impact on LMI individuals.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
New York CSA	2	14	-2	-3	-5	-2

To the extent changes have been made, the bank's opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed two branches in low-income geographies and three branches in moderate-income geographies.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

New York CSA

The bank provides a good level of CD services.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to

conduct specific activities. Bank employees from various lines of business provided technical assistance to 286 different CD organizations totaling 3,822 hours during the evaluation period. Included in these services are 1,661 hours where bank employees served in leadership roles.

Example of these services:

- Four bank employees provided 70 hours of service, including one employee who served on the board at a regional nonprofit organization created to address the growing demand for affordable housing. The organization serves Kings, Nassau, and Suffolk counties. It provides a variety of programs and services that address the dynamic challenges faced by LMI individuals who live and work on Long Island.

State Rating

State of Connecticut

CRA rating for the State of Connecticut²: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to credit needs in its AA;
- A good geographic distribution of home mortgage loans and small loans to businesses;
- A good distribution of loans among individuals of different income levels and businesses of different sizes;
- An excellent level of qualified investments that provides good responsiveness to community needs in the rating area; and
- The bank provides a very good level of CD services.

Description of Bank's Operations in Connecticut

The bank's operations in the AA include geographies in Connecticut. The bank included Hartford, Middlesex, New London, and Tolland Counties in the Hartford CSA.

The bank operated 76 branches in the AA or 18 percent of its total branches as of December 31, 2018. Based on FDIC Deposit Market Share data as of June 30, 2018, the bank had \$3.1 billion in deposits in the AA representing 9.6 percent of its total deposits. The bank ranked fourth with 6.1 percent market share. The three banks ahead of Peoples by deposit market share are Bank of America with 40.6 percent, Webster 9 percent, and United Bank with 7.3 percent.

The top lender in the market was Wells Fargo with a 5.3 percent market share followed by Quicken Loans with 4.6 percent, and Webster with 2.9 percent. In small loans to businesses, the bank ranked 21st with 0.8 percent market share. The top three lenders with a combined market share of 40 percent were American Express with 20.4 percent, U.S. Bank with 10.3 percent, and Bank of America with 4.3 percent. There are 119 small business lenders in the AA.

Three community contacts and one CRA listening session conducted in the AA were reviewed as part of the performance evaluation. Community contacts included organizations focused on economic development, affordable housing, housing services, social services, workforce development, and small business development. A number of needs were identified for the AA including affordable housing, affordable home repair and rehab programs for ownership and rental properties, economic development, affordable consumer and small business credit products including small dollar loans, low cost financial products and services, financial education, and improved transportation options.

² This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Hartford MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Hartford CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	356	14.6	14.6	37.9	30.6	2.2
Population by Geography	1,487,241	12.1	14.1	39.2	33.4	1.3
Housing Units by Geography	629,256	12.6	14.8	40.6	32.1	0.0
Owner-Occupied Units by Geography	384,379	3.8	10.5	44.1	41.6	0.0
Occupied Rental Units by Geography	189,062	28.0	23.0	34.3	14.7	0.1
Vacant Units by Geography	55,815	20.6	16.5	37.4	25.4	0.1
Businesses by Geography	110,805	9.5	11.7	41.3	37.2	0.4
Farms by Geography	3,698	2.9	7.1	43.2	46.8	0.0
Family Distribution by Income Level	376,134	22.0	16.7	20.8	40.5	0.0
Household Distribution by Income Level	573,441	25.4	15.0	17.5	42.2	0.0
Median Family Income MSA - 25540 Hartford-West Hartford-East Hartford, CT MSA		\$88,016	Median Housing Value			\$240,452
Median Family Income MSA - 35980 Norwich-New London, CT MSA		\$82,349	Median Gross Rent			\$1,014
			Families Below Poverty Level			7.6%
<i>Source: 2015 ACS Census and 2018 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.</i>						

Scope of Evaluation in Connecticut

The Hartford CSA received a full-scope review. The bank delineated AAs located in the Hartford and Norwich MSAs are combined, analyzed, and presented as the Hartford CSA. The AA represents all of the bank's lending, deposits, and branches in the rating area.

Refer to the Scope of Evaluation Table in Appendix A for AA delineations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT

LENDING TEST

The bank's performance under the Lending Test in Connecticut is rated Satisfactory.

Conclusions for Area Receiving Full-scope Review

Based on a full-scope review, the bank's performance in the Hartford CSA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Hartford CSA	1,622	850	0	3	2,475

Dollar Volume of Loans (000s)*					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Hartford CSA	\$397,548	\$154,231	0	\$735	\$552,514

*The Tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank ranked fourth in deposits with 6.1 percent market share. According to 2018 peer mortgage data, the bank ranked 22nd with a market share of 1.3 percent. While the HMDA lending market share is lower than the bank's deposit market share, this is a highly competitive market with 510 home mortgage lenders. The top lender in this market was Wells Fargo Bank with a 5.3 percent market share followed by Quicken Loans with 4.6 percent, and Webster Bank with 2.9 percent. In small loans to businesses, Peoples ranked 21st with 0.8 percent market share. The top three lenders with a combined market share of 40 percent were American Express with 20.4 percent, U.S. Bank with 10.3 percent, and Bank of America with 4.3 percent. There are 119 small business lenders in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Connecticut 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.

2017 to 2018

The proportion of loans in low-income geographies equaled the proportion of owner-occupied housing in those geographies and substantially met the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below both the proportion of owner-occupied housing and the aggregate distribution of loans.

2016

Performance was consistent with performance in 2017 to 2018.

Small Loans to Businesses

Refer to Table Q in the state of Connecticut section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

2017 to 2018

The proportion of loans in low-income geographies was near to the proportion of businesses in those geographies and exceeded the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below both the proportion of businesses and the aggregate distribution of loans.

2016

The proportion of loans in low-income geographies was below the proportion of businesses in those geographies and substantially meets the aggregate distribution of loans. The proportion of loans in moderate-income geographies approximates the proportion of businesses and equaled the aggregate distribution of loans.

Lending Gap Analysis

The OCC reviewed summary reports and maps to analyze home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Connecticut 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.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income families in the AA and equaled the aggregate distribution of loans. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

The proportion of loans to low-income borrowers was below the proportion of low-income families in the AA and was below the aggregate distribution of loans. Performance to moderate-income borrowers was consistent with performance in 2017 to 2018.

Small Loans to Businesses

Refer to Table R in the state of Connecticut section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

2017 to 2018

The proportion of loans to small businesses was well below the proportion of small businesses and below the aggregate distribution of loans.

2016

Performance was consistent with performance in 2017 to 2018.

Community Development Lending

The bank has made a low level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These Tables include all CD loans, including multifamily loans that also qualify as CD loans.

CD loan originations represent 0.1 percent of allocated tier 1 capital. The loans were somewhat responsive to the identified needs in the AA.

Product Innovation and Flexibility

The bank uses flexible lending practices in order to serve AA credit needs. In addition to the programs offered bank-wide, the bank originated loans through the Connecticut Housing Finance Agency (CHFA). CHFA offers a variety of home loans at below-market or competitive interest rates to eligible first-time homebuyers and to prior homeowners intending to purchase homes in areas targeted for revitalization. During the evaluation period, the bank originated 495 loans, or 30 percent of all home mortgage originations, totaling \$89.2 million through CHFA.

INVESTMENT TEST

The bank's performance under the Investment Test in Connecticut is rated Outstanding.

Based on a full-scope review, the bank's performance in the Hartford CSA is good.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Hartford CSA	5	14,561	152	14,703	157	77.0	29,264	87.5	1	226
CT Statewide with P/M/F	2	1,760	45	2,436	47	23.0	4,196	12.5	1	2,198

* 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 bank's financial reporting system.

Hartford CSA

Qualified investments totaled \$29.3 million, with current period investments of \$14.7 million and prior period investments of \$14.6 million. Total qualified investments represented 7.5 percent of allocated tier 1 capital and consisted of Low Income Housing Tax Credit (LIHTC) and Fund participations supporting affordable housing for LMI individuals within the AA. At the end of the evaluation period, the bank had one unfunded commitment totaling \$226 thousand.

CT-Statewide

The bank made current period qualified investments totaling \$2.4 million and prior period investments totaling \$1.8 million in the statewide area that had a purpose, mandate, or function (P/M/F) to serve one or more of the bank's AAs in the state. These investments had a positive impact on the performance in the rating area.

SERVICE TEST

The bank's performance under the Service Test in Connecticut is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Hartford CAA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Hartford CSA	100.0	76	100.0	5.3	17.1	46.0	31.6	12.1	14.1	39.2	33.4

Hartford CSA

The bank has 76 branches in the AA with four branches in low-income and 13 branches in moderate-income geographies. The percentage of branches located in low-income areas was significantly below the percentage of the population residing in these geographies. However, the percentage of branches located in moderate-income geographies exceeded the percentage of the population residing in those geographies.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. No significant weight was placed on these services, as no data was available to determine their impact on LMI individuals.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Hartford CSA		1		-1		

To the extent changes have been made, the bank’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or LMI individuals. The bank closed one branch in a moderate-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

The bank provides an adequate level of CD services.

Hartford CSA

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities. Bank employees from various lines of business provided technical assistance to 72 different CD organizations totaling 965 hours during the evaluation period. Included in these services are 469 hours where bank employees served in leadership roles.

Example of these services:

- Two employees provided 35 hours of service including 23 hours of board service to a nonprofit organization dedicated to providing services that strengthen LMI families, promote health, and prevent child abuse and neglect.

State Rating

State of Maine

CRA rating for the State of Maine³:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to credit needs in its AA;
- A good geographic distribution of home mortgage loans and small loans to businesses;
- An adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- An excellent level of qualified investments that provides excellent responsiveness to community needs in the rating area; and
- The bank provides a very good level of CD services.

Description of Bank's Operations in Maine

The bank's operations in the AA include geographies in Maine. The bank included Penobscot County in the Bangor MSA; Hancock, Kennebec, Somerset, and Waldo Counties in the ME Non-MSA; and Cumberland, Sagadahoc, and York Counties in the Portland MSA.

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank operated 26 branches and had \$1.3 billion in deposits in the state. The Portland MSA accounted for nearly 65 percent of these branches and 77 percent of these deposits. The bank ranked sixth in deposit market share at 6.1 percent. The three largest banks by market share were TD Bank with 14.3 percent, Bangor Savings Bank with 12.3 percent, and KeyBank with 9.4 percent.

The top lender in the ME Non-MSA was Camden National Bank with 8.6 percent market share followed by Bangor Savings Bank with 7.6 percent and Quicken Loans with 5.8 percent. In small loans to businesses, the bank ranked 25th with 0.3 percent market share. The top three lenders with a combined market share of 35.3 percent were U.S. Bank with 10.2 percent, Camden National Bank with 9.6 percent, and American Express with 9.5 percent. There are 71 small business lenders in the AA.

The top lender in the Portland MSA was Residential Mortgage Services with a 5.8 percent market share followed by Wells Fargo Bank with 4.6 percent and Quicken Loans with 3.9 percent. In small loans to businesses, the bank ranked 21st with 1.0 percent market share. The top three lenders with a combined market share of 35.3 percent were American Express with 18.3 percent, Capital One with 8.7 percent, and Bank of America with 8.3 percent. There are 89 small business lenders in the AA.

³ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Nine community contacts were made within the combined AAs. Contacts included a government planning agency and organizations focused on affordable housing, financial stability, health and human services, and economic development. A number of needs were identified including affordable housing, housing services, financing for housing rehabilitation, affordable child care, health care and social services, technical assistance for small businesses, and rural broadband infrastructure.

ME Non-MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: ME Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	0.0	5.4	73.0	20.3	1.4
Population by Geography	266,323	0.0	2.9	75.5	21.5	0.0
Housing Units by Geography	154,233	0.0	5.1	72.8	22.1	0.0
Owner-Occupied Units by Geography	83,741	0.0	3.3	73.3	23.4	0.0
Occupied Rental Units by Geography	30,761	0.0	2.0	82.7	15.3	0.0
Vacant Units by Geography	39,731	0.0	11.1	64.2	24.8	0.0
Businesses by Geography	15,195	0.0	2.3	76.3	21.4	0.0
Farms by Geography	752	0.0	2.8	76.6	20.6	0.0
Family Distribution by Income Level	71,743	19.4	17.2	20.3	43.0	0.0
Household Distribution by Income Level	114,502	23.2	16.1	16.7	44.0	0.0
Median Family Income Non-MSAs - ME		\$54,862	Median Housing Value			\$159,456
			Median Gross Rent			\$715
			Families Below Poverty Level			10.3%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Portland MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Portland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	117	3.4	22.2	53.0	18.8	2.6

Population by Geography	520,893	2.7	21.0	56.3	20.0	0.0
Housing Units by Geography	265,113	2.6	22.7	56.2	18.5	0.0
Owner-Occupied Units by Geography	150,789	0.9	16.4	60.5	22.3	0.0
Occupied Rental Units by Geography	63,878	7.6	36.0	44.1	12.4	0.0
Vacant Units by Geography	50,446	1.5	24.7	58.6	15.1	0.0
Businesses by Geography	35,409	2.4	26.2	50.3	21.1	0.0
Farms by Geography	1,268	0.8	15.0	62.1	22.2	0.0
Family Distribution by Income Level	134,957	20.7	17.8	21.8	39.7	0.0
Household Distribution by Income Level	214,667	23.9	16.2	18.1	41.8	0.0
Median Family Income MSA - 38860 Portland-South Portland, ME MSA		\$74,701	Median Housing Value			\$248,747
			Median Gross Rent			\$941
			Families Below Poverty Level			7.2%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Maine

The ME Non-MSA and Portland MSA received a full-scope review. The ME Non-MSA is important to the AA and Portland MSA represents the majority of deposits, branches, and lending in the rating area. Bank delineated non-MSAs within the state are combined, analyzed, and presented as one AA for the purposes of the evaluation. The Portland MSA received substantially greater weight based on the volume of deposits and loans.

Refer to the Scope of Evaluation Table in Appendix A for AA delineations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MAINE

LENDING TEST

The bank's performance under the Lending Test in Maine is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews the bank's performance in the ME Non-MSA is adequate. Based on full-scope reviews, the bank's performance in the Portland MSA is good.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Bangor MSA	176	250	5	1	432	29.5	4.8
ME Non-MSA	80	61	0	0	141	9.6	18.0
Portland MSA	478	407	0	4	889	60.9	77.2

Dollar Volume of Loans (000s)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Bangor MSA	\$19,001	\$30,071	\$993	\$300	\$50,365	20.2	4.8
ME Non-MSA	\$48,761	\$8,952	0	0	\$17,713	7.1	18.0
Portland MSA	\$125,767	\$53,041	0	\$2,800	\$181,608	72.7	77.2

*The Tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

ME Non-MSA

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank ranked 12th in deposits with 1.3 percent market share. According to 2018 peer mortgage data, the bank ranked 37th with a market share of 0.7 percent. While the HMDA lending market share is lower than the bank's deposit market share, this is a very competitive market with 259 home mortgage lenders. The top lender in this market was Camden National Bank with 8.6 percent market share followed by Bangor Savings Bank with 7.6 percent and Quicken Loans with 5.8 percent. In small loans to businesses, Peoples ranked 25th with 0.3 percent market share. The top three lenders with a combined market share of 35.3 percent were U.S. Bank with 10.2 percent, Camden National Bank with 9.6 percent, and American Express with 9.5 percent. There are 71 small business lenders in the AA.

Portland MSA

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank ranked fourth in deposits with 7.5 percent market share. According to 2018 peer mortgage data, the bank ranked 45th with a market share of 0.7 percent. While the HMDA lending market share is lower than the bank's deposit market share, this is a very competitive market with 395 home mortgage lenders. The top lender in this market was Residential Mortgage Services with a 5.8 percent market share followed by Wells Fargo Bank with 4.6 percent and Quicken Loans with 3.9 percent. In small loans to businesses, Peoples ranked 21st with 1 percent market share. The top three lenders with a combined market share of 35.3 percent were American Express with 18.3 percent, Capital One with 8.7 percent, and Bank of America with 8.3 percent. There are 89 small business lenders in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs. In the ME Non-MSA, there are no low-income geographies and conclusions are based on performance in moderate-income geographies.

Home Mortgage Loans

Refer to Table O in the state of Maine 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.

ME Non-MSA

2017 to 2018

The proportion of loans significantly exceeded both the proportion of owner-occupied housing and the aggregate distribution of loans.

2016

The proportion of loans was below the proportion of owner-occupied housing and substantially met the aggregate distribution of loans.

Portland MSA

2017 to 2018

The proportion of loans in both LMI geographies exceeded the proportion of owner-occupied housing in those geographies. In low-income geographies, the proportion of loans equaled and in moderate-income geographies substantially met the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018 performance.

Small Loans to Businesses

Refer to Table Q in the state of Maine section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

ME Non-MSA

2017 to 2018

The bank did not originate any loans in moderate-income geographies.

2016

The proportion of loans was significantly below both the proportion of businesses and the aggregate distribution of loans.

Portland MSA

2017 to 2018

The proportion of loans in low-income geographies was significantly below both the proportion of businesses in those geographies and the aggregate distribution of loans. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses and the aggregate distribution of loans.

2016

In both LMI geographies, the proportion of loans exceeded the proportion of businesses. The aggregate distribution of loans exceeded the proportion of loans in low-income geographies and substantially met the proportion of loans in moderate-income geographies.

Lending Gap Analysis

The OCC reviewed summary reports and maps to analyze home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Maine 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.

ME Non-MSA

2017 to 2018

The proportion of loans to low-income borrowers was near to the proportion of low-income families and exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

The proportion of loans to low-income borrowers was below the proportion of low-income families and near to the aggregate distribution of loans. Performance to moderate-income borrowers was consistent with 2017 to 2018 performance.

Portland MSA

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income families and exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers was near to the proportion of moderate-income families and substantially met the aggregate distribution of loans.

2016

The proportion of loans to low-income borrowers was well below the proportion of low-income families and exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families and substantially met the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the state of Maine section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

ME Non-MSA

2017 to 2018

The proportion of loans to small businesses was significantly below both the proportion of small businesses and the aggregate distribution of loans.

2016

The proportion of loans to small businesses was significantly below the proportion of small businesses and below the aggregate distribution of loans.

Portland MSA

2017 to 2018

The proportion of loans to small businesses was below the proportion of small businesses and exceeded the aggregate distribution of loans.

2016

The proportion of loans to small businesses was well below the proportion of small businesses and exceeded the aggregate distribution of loans.

Community Development Lending

The bank has made an adequate level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These Tables include all CD loans, including multifamily loans that also qualify as CD loans.

CD loan originations represent 1.9 percent of allocated tier 1 capital. The loans were somewhat responsive to the identified needs in the AA.

Product Innovation and Flexibility

The bank uses flexible lending practices in order to serve AA credit needs. In addition to the programs offered bank-wide, the bank originated loans through the Finance Authority of Maine (FAME) and the Maine State Housing Authority (MSHA). FAME is an independent state agency that develops and administers programs related to the financing of both higher education and business in the State of Maine. MSHA is an independent state agency that bridges public and private housing finance, combining them to benefit Maine's LMI residents. During the evaluation period, the bank originated nine loans totaling \$1.9 million under the FAME program and 21 loans totaling \$1.9 million under the MSHA program.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Lending Test in the Bangor MSA is consistent with the bank’s overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through T in the state of Maine section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in Maine is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the ME Non-MSA is excellent and in the Portland MSA is excellent.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
ME Non-MSA	1	1,955	12	2,918	13	12.0	4,873	11.0	0	0
Portland MSA	5	8,915	53	17,379	58	53.7	26,294	59.1	1	249
Bangor MSA	8	8,648	22	117	30	27.8	8,765	19.7	1	31
ME Statewide with P/M/F	1	393	6	4,147	7	6.5	4,540	10.2	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 bank's financial reporting system.

ME Non-MSA

Qualified investments totaled \$4.9 million, with current period investments of \$2.9 million and prior period investments of \$2 million. Total qualified investments represented 61.1 percent of allocated tier 1 capital and consisted of LIHTC supporting affordable housing for LMI individuals within the AA.

Portland MSA

Qualified investments totaled \$26.3 million, with current period investments of \$17.4 million and prior investments of \$8.9 million. Total qualified investments represented 20.6 percent of allocated tier 1 capital and consisted of LIHTC and fund investments supporting affordable housing for LMI within the AA. At the end of the evaluation period, the bank had one unfunded commitment totaling \$249 thousand.

ME Statewide

The bank made current investments totaling \$4.1 million and one prior period investment totaling \$393 thousand in the statewide area that had a P/M/F to serve one or more of the bank's AAs in the state. These investments had a positive impact on the performance in the rating area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, performance in the Bangor MSA is excellent. Qualified investments totaled \$8.8 million. The excellent performance positively impacted conclusions about the bank's performance in the state

SERVICE TEST

The bank's performance under the Service Test in Maine is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the ME Non-MSA is adequate. Based on a full-scope review, the bank's performance in the Portland MSA is excellent.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
ME Non-MSA	4.8	2	7.7	0.0	0.0	100.0	0.0	0.0	2.9	75.5	21.5
Portland MSA	77.2	17	65.4	5.9	23.5	41.2	29.4	2.7	21.0	56.3	20.0
Bangor MSA	18.0	7	26.9	0.0	14.2	42.9	42.9	0.0	16.4	56.3	24.3

ME Non-MSA

The bank has two branches in the AA, neither of which is in a moderate-income geography. There are no low-income geographies in this AA. Although there are no branches in a moderate-income geography, only 2.9 percent of geographies in this AA are moderate-income.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. No significant weight was placed on these services, as no data was available to determine their impact on LMI individuals.

Portland MSA

The bank has 17 branches in the AA with one branch in low-income and four branches in moderate-income geographies. The percentage of the bank’s branches in LMI geographies greatly exceeds the percentage of population living in those geographies.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. No significant weight was placed on these services, as no data was available to determine their impact on LMI individuals.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
ME Non-MSA						
Portland MSA	1		+1			
Bangor MSA		1				-1

To the extent changes have been made, the bank’s opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or LMI individuals. During the evaluation period, there were no branch openings or closings in the ME Non-MSA. However, the bank opened one branch in a low-income geography in the Portland MSA.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AAs, particularly LMI geographies and/or individuals.

Community Development Services

The bank provides a relatively high level of CD services.

ME Non-MSA

CD services were not effective and responsive in helping the bank address community needs. The bank conducted or supported few CD services. The bank employees from various lines of business provided technical assistance to one CD organization, totaling three hours during the evaluation period. All three service hours were in a leadership role.

Portland MSA

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a substantial number of CD services, consistent with its capacity and expertise to conduct specific activities. The bank employees from various lines of business provided technical assistance to 30 different CD organizations totaling 362 hours during the evaluation period. Included in these services are 221 hours where bank employees served in leadership roles.

Examples of some of these services:

- Two employees provided 80 hours of service that included 77 hours in leadership positions to an organization dedicated to helping people LMI individuals in need. The organization provides food, clothing, counseling, and referral services.

- Five bank employees provided 36 hours of financial literacy training for an organization that provides programs to foster work-readiness, entrepreneurship, and financial literacy to LMI students.

Conclusions for Area Receiving a Limited-Scope Review

- Based on a limited-scope review, the bank's performance under the Service Test in the Bangor MSA is consistent with the bank's overall performance under the Service Test in the full-scope areas.

State Rating

State of Massachusetts

CRA rating for the State of Massachusetts⁴:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to credit needs in its AA;
- A good geographic distribution of home mortgage loans and small loans to businesses;
- An adequate distribution of loans among individuals of different income levels and businesses of different sizes;
- An excellent level of qualified investments that provides good responsiveness to community needs in the rating area; and
- The bank provides a very good level of CD services.

Description of Bank’s Operations in Massachusetts

The bank’s operations in the AA include geographies in Massachusetts. The bank included Franklin, Hampden, and Hampshire Counties in the Springfield CSA.

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank operates 11 branches with \$561.4 million in deposits.

The top three lenders with a combined market share of 37.3 percent were American Express with 17.6 percent, Citigroup with 10.9 percent, and Capital One with 8.8 percent. There are 83 small business lenders in the AA. In HMDA lending, the bank ranked 44th with a market share of 0.6 percent. While the HMDA lending market share is lower than the bank’s deposit market share, this is a very competitive market with 363 home mortgage lenders. The top lender in the market was a federal credit union with a 4.6 percent market share followed by Quicken Loans with 4.6 percent, and Wells Fargo Bank with 3.7 percent.

Three community contacts conducted in the AA were reviewed as part of the performance evaluation. Community contacts included organizations focused on economic development, affordable housing and housing services. A number of needs were identified for the AA including affordable housing, flexible small business loan products, grant support for revitalization activities, and financial education.

Springfield MSA

Table A – Demographic Information of the Assessment Area

⁴ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Assessment Area: Springfield CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	157	15.9	15.9	35.0	30.6	2.5
Population by Geography	699,944	13.3	15.5	35.4	33.3	2.6
Housing Units by Geography	288,606	12.8	16.1	38.5	32.5	0.1
Owner-Occupied Units by Geography	168,524	4.3	12.7	40.3	42.7	0.0
Occupied Rental Units by Geography	97,209	26.4	21.1	35.6	16.6	0.3
Vacant Units by Geography	22,873	17.9	20.1	36.9	24.8	0.4
Businesses by Geography	40,773	12.9	15.2	34.7	36.5	0.8
Farms by Geography	1,503	1.9	6.0	44.2	47.6	0.2
Family Distribution by Income Level	167,860	24.2	16.1	18.5	41.2	0.0
Household Distribution by Income Level	265,733	26.9	14.7	15.9	42.4	0.0
Median Family Income MSA - 44140 Springfield, MA MSA		\$67,381	Median Housing Value			\$210,226
Median Family Income Non-MSAs - MA		\$73,868	Median Gross Rent			\$857
			Families Below Poverty Level			11.5%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Massachusetts

The Springfield CSA received a full-scope review. The AA represents all of the bank's deposits, branches, and lending in the rating area. Small loans to businesses was given greater weight based on the volume of loan originations during the evaluation period. The bank delineated AAs located in the Greenfield Town MSA and Springfield MSA are combined, analyzed, and presented as the Springfield CSA.

Refer to the Scope of Evaluation Table in Appendix A for AA delineations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the AA is good.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Springfield CSA	263	339	1	7	610

Dollar Volume of Loans (000s)*					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Springfield CSA	\$48,564	\$54,084	\$10	\$2,784	\$105,442

*The Tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank ranked 12th in deposits with 3.3 percent market share. In small loans to businesses, the bank ranked 26th with 0.5 percent market share. The top three lenders with a combined market share of 37.3 percent were American Express with 17.6 percent, Citigroup with 10.9 percent, and Capital One with 8.8 percent. There are 83 small business lenders in the AA. In HMDA lending, Peoples ranked 44th with a market share of 0.6 percent. While the HMDA lending market share is lower than the bank's deposit market share, this is a very competitive market with 363 home mortgage lenders. The top lender in this market was a federal credit union with a 4.6 percent market share followed by Quicken Loans with 4.6 percent, and Wells Fargo Bank with 3.7 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O 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.

2017 to 2018

The proportion of loans in both LMI geographies exceeded both the proportion of owner-occupied housing in those geographies and the aggregate distribution of loans.

2016

Performance in low-income geographies was consistent with 2017 to 2018 performance. In moderate-income geographies the proportion of loans was well below both the proportion of owner-occupied housing and the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table Q in the state of Massachusetts section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

2017 to 2018

The proportion of loans in low-income geographies exceeded both the proportion of businesses and the aggregate distribution of loans. The proportion of loans in moderate-income geographies was below the proportion of businesses and substantially met the aggregate distribution of loans.

2016

The proportion of loans in both LMI geographies exceeded both the proportion of businesses in those geographies and the aggregate distribution of loans.

Lending Gap Analysis

The OCC reviewed summary reports and maps to analyze home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P 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.

2017 to 2018

The proportion of loans to low-income borrowers was below the proportion of low-income families and exceeded the aggregate distribution of loans by nearly two times. The proportion of loans to moderate-income borrowers exceeded both the proportion of low-income families and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018 performance.

Small Loans to Businesses

Refer to Table R in the state of Massachusetts section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

2017 to 2018

The proportion of loans to small businesses was well below the proportion of small businesses and below the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018 performance.

Community Development Lending

The bank has made an adequate level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank’s level of CD lending. These Tables include all CD loans, including multifamily loans that also qualify as CD loans.

CD loan originations represent 4.0 percent of allocated tier 1 capital. The loans were responsive to the identified needs in the AA, including affordable housing, economic development, community services, revitalization, and stabilization.

Product Innovation and Flexibility

The bank uses flexible lending practices in order to serve AA credit needs. In addition to the programs offered bank-wide, the bank originated 15 loans totaling \$3.2 million through the Massachusetts Housing Finance Agency (MHFA). The MHFA program is designed to provide sustainable homeownership to LMI borrowers.

INVESTMENT TEST

The bank’s performance under the Investment Test in Massachusetts is rated Satisfactory.

Based on a full-scope review, the bank’s performance in the Springfield CSA is good.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Springfield CSA	2	4,504	69	10,983	71	93.4	15,487	89.3	1	29
MA Statewide	1	1,008	4	841	5	6.6	1,849	10.7	1	179

* 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 bank's financial reporting system.

Springfield MSA

Qualified investments totaled \$15.5 million, with current period investments of \$11 million, and prior period investments totaling \$4.5 million. Total qualified investments represented 22.1 percent of allocated tier 1 capital and consisted of housing fund that supported affordable housing for LMI. At the end of the evaluation period, the bank had one unfunded commitment totaling \$29 thousand.

MA Statewide

The bank made four qualified investments totaling \$841 thousand and one prior period investment totaling \$1 million in the statewide area that had P/M/F to serve one or more of the bank’s AAs in the state. These investments had a neutral impact on the performance in the rating area.

SERVICE TEST

The bank’s performance under the Service Test in Massachusetts is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank’s performance in the Springfield CSA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Springfield CSA	100.0	11	100.0	9.1	9.1	45.4	36.4	13.3	15.5	35.4	33.3

Springfield CSA

The bank has 11 branches in the AA with one branch in a low-income and one branch in a moderate-income CT. The percentage of branches located in LMI geographies are below the percentage of the population residing in those geographies.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. No significant weight was placed on these services, as no data was available to determine their impact on LMI individuals.

The bank did not open or close branches in the AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals.

Community Development Services

Springfield CSA

The bank is a leader in providing CD services.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a substantial number of CD services, consistent with its capacity and expertise to conduct specific activities. Bank employees from various lines of business provided technical assistance to 17 different CD organizations totaling 172 hours during the evaluation period. Included in these services are 122 hours where bank employees served in leadership roles.

Examples of some of these services:

- Four employees provided 100 hours of financial literacy education to low-income individuals at a nonprofit organization that works with individuals and families to help them meet basic needs, identify strengths, address oppression, and overcome barriers to employment.
- One employee provided 97 hours of service for a nonprofit organization dedicated to impacting LMI children by working to bring security and hope to abused and neglected children in the foster care system.

State Rating

State of New Hampshire

CRA rating for the State of New Hampshire⁵:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Lending levels that reflect adequate responsiveness to credit needs in its AA;
- A poor geographic distribution of both home mortgage loans and small loans to businesses;
- A good distribution of loans among individuals of different income levels and businesses of different sizes;
- A very good level of qualified investments that provides good responsiveness to community needs in the rating area; and
- The bank provides an adequate level of CD services.

Description of Bank’s Operations in New Hampshire

The bank’s operations in the AA include geographies in New Hampshire. The bank included Carroll, Cheshire, and Sullivan Counties in the NH Non-MSA.

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank operates four branches with \$381.4 million in deposits.

The top mortgage lender in the market was Quicken Loans with a 7.3 percent market share followed by Wells Fargo Bank with 5.8 percent, and LendUS LLC with 5.6 percent. In small loans to businesses, the bank ranked 17th with 1.3 percent market share. The top three lenders with a combined market share of 39.7 percent were American Express with 17.5 percent, Citigroup with 11.6 percent, and Capital One with 10.6 percent. There are 69 small business lenders in the AA.

Two community contacts conducted in the AA were reviewed as part of the performance evaluation. The contacts included a government planning agency and an organization focused on economic development. Key needs identified for the AA include general banking and credit needs and commercial and residential building rehabilitation.

NH Non-MSA

<p>Table A – Demographic Information of the Assessment Area Assessment Area: NH Non-MSA</p>
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⁵ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	37	0.0	18.9	67.6	13.5	0.0
Population by Geography	167,078	0.0	17.9	69.4	12.7	0.0
Housing Units by Geography	97,374	0.0	17.8	68.4	13.7	0.0
Owner-Occupied Units by Geography	51,532	0.0	17.6	69.5	12.9	0.0
Occupied Rental Units by Geography	17,732	0.0	21.3	68.6	10.1	0.0
Vacant Units by Geography	28,110	0.0	16.1	66.4	17.5	0.0
Businesses by Geography	10,831	0.0	19.1	68.0	12.8	0.0
Farms by Geography	476	0.0	15.3	68.5	16.2	0.0
Family Distribution by Income Level	44,805	20.4	20.1	22.9	36.5	0.0
Household Distribution by Income Level	69,264	24.2	17.4	19.4	39.0	0.0
Median Family Income Non- MSAs - NH		\$71,699	Median Housing Value			\$208,687
			Median Gross Rent			\$916
			Families Below Poverty Level			5.8%
<i>Source: 2015 ACS Census and 2018 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.</i>						

Scope of Evaluation in New Hampshire

The NH Non-MSA received a full-scope review. Bank delineated non-MSAs within the state are combined, analyzed, and presented as one AA for the purposes of the evaluation. The AA represents all of the bank's lending, deposits, and branches in the rating area.

Refer to the Scope of Evaluation Table in Appendix A for AA delineations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW HAMPSHIRE

LENDING TEST

The bank's performance under the Lending Test in New Hampshire is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the NH Non-MSA is adequate.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NH Non-MSA	231	147	2	1	381

Dollar Volume of Loans (000s)*					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
NH Non-MSA	\$41,963	\$20,897	\$17	\$250	\$63,127

*The Tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank ranked third in deposits with 10.4 percent market share. According to 2018 peer mortgage data, the bank ranked 18th with a market share of 1.5 percent. While the HMDA lending market share is lower than the bank's deposit market share, this is a highly competitive market with 307 home mortgage lenders. The top lender in this market was Quicken Loans with a 7.3 percent market share followed by Wells Fargo Bank with 5.8 percent, and Lendus LLC with 5.6 percent. In small loans to businesses, Peoples ranked 17th with 1.3 percent market share. The top three lenders with a combined market share of 39.7 percent were American Express with 17.5 percent, Citigroup with 11.6 percent, and Capital One with 10.6 percent. There are 69 small business lenders in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits a poor geographic distribution of loans in its AA. There are no low-income geographies in the AA. Conclusions are based on performance in moderate-income geographies.

Home Mortgage Loans

Refer to Table O in the state of New Hampshire 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.

2017 to 2018

The proportion of loans is well below both the proportion of owner-occupied housing and aggregate distribution of loans.

2016

The proportion of loans is below the proportion of owner-occupied housing and well below the aggregate distribution of loans.

Small Loans to Businesses

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

2017 to 2018

The proportion of loans is well below both the proportion of businesses and the aggregate distribution of loans.

2016

The proportion of loans is significantly below both the proportion of businesses and the aggregate distribution of loans.

Lending Gap Analysis

The OCC reviewed summary reports and maps to analyze home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of New Hampshire 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.

2017 to 2018

The proportion of loans to low-income borrowers is well below the proportion of low-income families but exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

The proportion of loans to low-income borrowers is significantly below the proportion of low-income families but exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families and comparable to the aggregate distribution of loans.

Small Loans to Businesses

Refer to Table R in the state of New Hampshire section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

2017 to 2018

The proportion of loans to small businesses was well below the proportion of small businesses and comparable to the aggregate distribution of loans.

2016

The proportion of loans to small businesses was below the proportion of small businesses and exceeded the aggregate distribution of loans.

Community Development Lending

The bank has made a low level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These Tables include all CD loans, including multifamily loans that also qualify as CD loans.

The one CD loan originated represents 0.6 percent of allocated tier 1 capital. The loan was somewhat responsive to the identified needs in the AA.

Product Innovation and Flexibility

The bank uses flexible lending practices in order to serve AA credit needs. In addition to programs offered bank-wide, the bank originated loans through the New Hampshire Housing Finance Authority. The program provides LMI persons with financing for the purchase of their first home. The bank originated 23 loans totaling \$4.7 million.

INVESTMENT TEST

The bank's performance under the Investment Test in the New Hampshire is rated Satisfactory when taking into account statewide investments.

Based on a full-scope review, the bank's performance in the NH Non-MSA is adequate.

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
NH Non-MSA	1	1,997	12	68	69	85.2	2,065	26.0	0	0
NH Statewide P/M/F	4	2,783	8	3,097	12	14.8	5,880	74.0	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 bank's financial reporting system.

NH Non-MSA

Qualified investments totaled \$2.1 million, the bank did not have any current period investments, however, prior period investments totaled \$2 million. Total qualified investments represented 4.4 percent of allocated tier 1 capital.

NH Statewide

The bank made 12 qualified investments totaling \$5.9 million in the statewide area that had P/M/F to serve one or more of the bank’s AAs in the state. These investments had a positive impact on the performance in the rating area.

SERVICE TEST

The bank’s performance under the Service Test in New Hampshire is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank’s performance in the NH Non-MSA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	# of Bank Branches	% of Rated Area Branches in AA	Branches				Population			
	% of Rated Area Deposits in AA			Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
NH Non-MSA	100.0	4	100.0	0.0	0.0	100.0	0.0	0.0	17.9	69.4	12.7

NH Non-MSA

The bank has four branches in the AA with no branches in moderate-income geographies. There are no low-income geographies in the AA. The bank has no branches located in moderate-income geographies in the AA.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. No significant weight was placed on these services, as no data was available to determine their impact on LMI individuals.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
NH Non-MSA		1			-1	

To the extent changes have been made, the bank’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

NH – Non-MSA

The bank provides an adequate level of CD services.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities. Bank employees from various lines of business provided technical assistance to two different CD organizations totaling 84 hours during the evaluation period. Bank employees served in leadership roles for all 84 hours.

Example of these services:

- One bank employee served 82 hours on the board of an organization that focuses on child neglect, lack of education, and living wages while helping to ensure that foundational needs, such as food and shelter, are available for LMI individuals.

State Rating

State of Vermont

CRA rating for the State of Vermont⁶:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to credit needs in its AA;
- An excellent geographic distribution of home mortgage loans and small loans to businesses;
- A good distribution of loans among individuals of different income levels and businesses of different sizes;
- An excellent of qualified investments that provides excellent responsiveness to community needs in the rating area; and
- The bank provides an excellent level of CD services.

Description of Bank's Operations in Vermont

The bank's operations in the AA include geographies in Vermont. The bank included Chittenden, Franklin, and Grand Isle Counties in the Burlington MSA; and Addison, Bennington, Lamoille, Orange, Orleans, Rutland, Washington, Windham, and Windsor Counties in the VT Non-MSA.

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank operated 38 branches with total deposits of \$3.1 billion.

The top HMDA lender in the market was Quicken Loans with an 8.2 percent market share followed by the Vermont State Employees Federal Credit Union with 7.0 percent. In small loans to businesses, the bank ranked fifth with 4.1 percent market share. The top four lenders ahead of the bank were American Express with 18 percent, Capital One with 11.1 percent, Citigroup with 10.5 percent, and Chase USA Bank with 8.4 percent. There are 79 small business lenders in the AA.

Seven community contacts conducted in the AAs were reviewed as part of the performance evaluation. Contacts included a regional economic development commission and organizations focused on housing, community services, and economic development. A number of needs were identified including social programs for LMI individuals, affordable housing, higher paying jobs, greater access to affordable credit for consumers and small businesses, rental and homebuyer assistance, economic development, job creation, and funding for improvements to infrastructure in underserved areas.

VT Non-MSA

Table A – Demographic Information of the Assessment Area

⁶ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Assessment Area: VT Non MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	124	0.0	7.3	79.0	13.7	0.0
Population by Geography	374,304	0.0	7.4	78.0	14.7	0.0
Housing Units by Geography	210,118	0.0	6.0	79.1	14.9	0.0
Owner-Occupied Units by Geography	113,947	0.0	5.0	79.5	15.5	0.0
Occupied Rental Units by Geography	43,084	0.0	13.3	74.0	12.7	0.0
Vacant Units by Geography	53,087	0.0	2.5	82.2	15.3	0.0
Businesses by Geography	31,387	0.0	8.5	75.1	16.5	0.0
Farms by Geography	2,076	0.0	2.4	81.1	16.5	0.0
Family Distribution by Income Level	98,108	19.4	17.6	22.6	40.4	0.0
Household Distribution by Income Level	157,031	23.5	15.8	18.4	42.3	0.0
Median Family Income Non- MSAs - VT		\$64,849	Median Housing Value			\$214,558
			Median Gross Rent			\$851
			Families Below Poverty Level			7.8%
<i>Source: 2015 ACS Census and 2018 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.</i>						

Scope of Evaluation in Vermont

The VT Non-MSA received a full-scope review. Bank delineated non-MSAs within the state are combined, analyzed, and presented as one AA for the purposes of the evaluation. The AA accounted for the majority of deposits, branches, and lending in the rating area. There are no low-income geographies in the VT Non-MSA. The geographic distribution conclusion is based on performance in moderate-income geographies.

Refer to the Scope of Evaluation Table in Appendix A for AA delineations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VERMONT

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the VT Non-MSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Burlington MSA	471	296	5	6	778	32.6	47.5
VT Non-MSA	1,248	329	13	23	1,613	67.4	52.5

Dollar Volume of Loans (000s)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Burlington MSA	241,683	39,745	710	24,693	306,831	51.6	47.5
VT Non-MSA	212,144	41,230	1,783	33,155	288,312	48.4	52.5

*The Tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank ranked first in deposits with 21.7 percent market share. According to 2018 peer mortgage data, the bank ranked third with a market share of 4.7 percent. While the HMDA lending market share is significantly lower than the bank's deposit market share, this is a competitive market with 265 home mortgage lenders. The top lender in this market was Quicken Loans with an 8.2 percent market share followed by the Vermont State Employees Federal Credit Union with 7 percent. In small loans to businesses, Peoples ranked fifth with 4.1 percent market share. The top four lenders ahead of the bank were American Express with 18 percent, Capital One with 11.1 percent, Citigroup with 10.5 percent, and Chase USA Bank with 8.4 percent. There are 79 small business lenders in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of Vermont 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.

2017 to 2018

The proportion of loans exceeds both the proportion of owner-occupied housing and the aggregate distribution of loans.

2016

Performance was consistent with 2017 to 2018 performance.

Small Loans to Businesses

Refer to Table Q in the state of Vermont section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

2017 to 2018

The proportion of loans exceeded both the proportion of businesses and the aggregate distribution of loans.

2016

The proportion of loans is near to the proportion of businesses and exceeds the aggregate distribution of loans.

Lending Gap Analysis

The OCC reviewed summary reports and maps to analyze home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Vermont 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.

2017 to 2018

The proportion of loans to low-income borrowers was significantly below the proportion of low-income families and exceeded the aggregate distribution of loans. The proportion of loans to moderate-income borrowers exceeded both the proportion of moderate-income families and the aggregate distribution of loans.

2016

The proportion of loans to loans to low-income borrowers was significantly below the proportion of low-income families and exceeded the aggregate distribution of loans. Performance to moderate-income borrowers was consistent with 2017 to 2018 performance.

Small Loans to Businesses

Refer to Table R in the state of Vermont section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

2017 to 2018

The proportion of loans to small businesses was well below the proportion of small businesses and below the aggregate distribution of loans.

2016

Performance was slightly stronger. While the proportion of loans was well below the proportion of small businesses, the bank was generally near to the aggregate distribution of loans.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These Tables include all CD loans, including multifamily loans that also qualify as CD loans.

CD loan originations represent nearly 15 percent of allocated tier 1 capital. The loans were responsive to the identified needs in the AA, including affordable housing, economic development, community services, revitalization, and stabilization.

Product Innovation and Flexibility

The bank makes extensive use of flexible lending practices in order to serve AA credit needs. In addition to bank-wide programs, the bank originated loans through the Vermont Housing Finance Agency. The program provides low interest rate financing to first-time homebuyers with down payment and closing cost assistance available. During the evaluation period, the bank originated 300 loans totaling \$304.8 million.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Burlington MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to Tables O through R in the state of Vermont section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Vermont is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the VT Non-MSA is excellent.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
VT Non-MSA	11	14,914	85	38,092	96	55.8	53,006	67.5	0	0
Burlington MSA	1	1,242	58	21,338	59	34.3	22,580	28.8	1	36
VT Statewide P/M/F	2	1,549	15	1,385	17	9.9	2,934	3.7	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 bank's financial reporting system.

Qualified investments totaled \$53 million, with current period investments of \$38 million, and prior period investments totaling \$14.9 million. Total qualified investments represented 25.9 percent of allocated tier 1 capital and consisted of LIHTC and housing funds that supported affordable housing for LMI.

VT Statewide

The bank made 17 qualified investments totaling \$2.9 million in the statewide area that had P/M/F to serve one or more of the bank's AAs in the state. These investments had a neutral impact on the performance in the rating area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, performance in the Burlington MSA is on par with the bank's overall Investment Test performance in the state and is considered excellent. Excellent performance had a positive impact on conclusions about the bank's performance in the state.

SERVICE TEST

The bank's performance under the Service Test in Vermont is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the VT Non-MSA is rated excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
VT Non-MSA	47.5	27	71.1	0.0	14.8	70.4	14.8	0.0	7.4	78.0	14.6
Burlington MSA	52.5	11	28.9	0.0	18.2	63.6	18.2	1.4	19.4	60.3	18.9

VT Non-MSA

The bank's branches are readily accessible to geographies and individuals of different income levels. The bank has 27 branches in the AA, with four located in moderate-income neighborhoods. The AA has no low-income geographies. The percentage of branches located in moderate-income geographies greatly exceeds the percentage of the population residing in those geographies.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. No significant weight was placed on these services, as no data was available to determine their impact on LMI individuals.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
VT Non-MSA						
Burlington MSA		1			-1	

The bank did not open and closed one middle-income branch in the AA during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals.

Community Development ServicesVT Non-MSA

The bank is a leader in providing CD services.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a substantial number of CD services, consistent with its capacity and expertise to conduct specific activities. Bank employees from various lines of business provided technical assistance to 39 different CD organizations totaling 554 hours during the evaluation period. Included in these services are 501 hours where bank employees served in leadership roles.

Examples of some of these services:

- Two employees provided 336 hours of board service to a regional medical center. The objective was to provide expertise related to budgeting, human resources, information technology, strategic planning, small business education, and mortgage counseling. The organization uses this expertise to further its objective to improve the health of the Rutland and surrounding communities by providing appropriate, integrated, preventative, diagnostic, and therapeutic health services. The hospital provides low and no-cost care for eligible residents of the area through a financial assistance program. The hospital also provides free services and educational programming as a key support for the continuing health of the community.

- One employee provided 35 hours of board service to an organization dedicated to improving the personal financial literacy of Vermont's youth.

Conclusions for Area Receiving Limited-Scope Review

Based on a limited-scope review, the bank's performance in the Burlington MSA is weaker than the bank's overall performance under the Service Test in the full-scope area. The primary reason for this conclusion is the lack of branches located in low-income geographies. The percent of branches located in moderate-income geographies closely approximates the percentage of the population residing in those geographies. Bank performance in this limited-scope AA therefore has a neutral impact on the overall conclusions.

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	Lending Test (excludes CD Loans): 01/01/16 to 12/31/18 Investment and Service Tests and CD Loans: 01/01/16 to 12/31/18	
Bank Products Reviewed	Home mortgage and small business Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
People’s United Charitable Foundation		Grants
People’s United Charitable Foundation of Eastern MA		Grants
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
<u>MMSA</u> Boston CSA	Full-scope	CT: Windham County MA: Essex, Middlesex, Norfolk, Suffolk, and Worcester Counties NH: Belknap, Hillsborough, Merrimack, Rockingham, and Stratford Counties
New York CSA	Full-scope	CT: Fairfield, Litchfield, and New Haven Counties NY: Bronx, Dutchess, Kings, Nassau, New York, Orange, Putnam, Queens, Richmond, Rockland, Suffolk, Ulster (all branches closed 7/23/16), and Westchester Counties
<u>Connecticut</u> Hartford CSA	Full-scope	Hartford, Middlesex, New London, and Tolland Counties
<u>Maine</u> Bangor MSA ME Non-MSA Portland MSA	Limited-scope Full-scope Full-scope	Penobscot County Hancock, Kennebec, Somerset, and Waldo Counties Cumberland, Sagadahoc, and York Counties
<u>Massachusetts</u> Springfield CSA	Full-scope	Franklin, Hampden, and Hampshire Counties
<u>New Hampshire</u> NH Non-MSA	Full-scope	Carroll, Cheshire, and Sullivan Counties
<u>Vermont</u> Burlington MSA VT Non-MSA	Limited-scope Full-scope	Chittenden, Franklin, and Grand Isle Counties Addison, Bennington, Lamoille, Orange, Orleans, Rutland, Washington, Windham, and Windsor Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS People's				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
People's United Bank	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
MMSA or State:				
Boston CSA	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
New York CSA	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Connecticut	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Maine	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Massachusetts	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
New Hampshire	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Vermont	Outstanding	Outstanding	Outstanding	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests 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: 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: 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: 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: 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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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 bank as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income: 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.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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 a bank with domestic branches in only one state, the bank's CRA rating would be the state rating. If a bank maintains domestic branches in more than one state, the bank will receive a rating for each state in which those branches are located. If a bank maintains domestic branches in two or more states within a multistate metropolitan statistical area, the bank 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.

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 loans are treated the same 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.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The Table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -
Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The Table also presents aggregate peer small farm data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	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	
Boston CSA	2,265	1,220,525	100.0	176,558	3.3	3.3	4.8	14.6	11.1	16.5	45.5	36.3	44.6	36.6	48.9	33.9	0.1	0.5	0.1	
Total	2,265	1,220,525	100.0	176,558	3.3	3.3	4.8	14.6	11.1	16.5	45.5	36.3	44.6	36.6	48.9	33.9	0.1	0.5	0.1	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	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	
Boston CSA	1,376	744,177	100.0	217,096	2.8	2.6	3.4	13.9	8.2	13.6	48.6	34.8	47.2	34.7	54.4	35.8	0.0	0.0	0.0	
Total	1,376	744,177	100.0	217,096	2.8	2.6	3.4	13.9	8.2	13.6	48.6	34.8	47.2	34.7	54.4	35.8	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Boston CSA	2,265	1,220,525	100.0	176,558	22.9	4.0	5.4	16.4	9.7	17.9	19.9	17.0	23.5	40.7	63.6	39.8	0.0	5.7	13.5
Total	2,265	1,220,525	100.0	176,558	22.9	4.0	5.4	16.4	9.7	17.9	19.9	17.0	23.5	40.7	63.6	39.8	0.0	5.7	13.5

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Boston CSA	1,376	744,177	100.0	217,096	21.8	2.2	4.2	16.8	7.8	14.9	21.1	14.4	22.8	40.4	72.4	43.7	0.0	3.2	14.4
Total	1,376	744,177	100.0	217,096	21.8	2.2	4.2	16.8	7.8	14.9	21.1	14.4	22.8	40.4	72.4	43.7	0.0	3.2	14.4

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Boston CSA	1,196	186,885	100.0	130,296	7.0	5.4	6.4	15.5	14.4	15.5	38.7	53.9	39.6	38.0	24.4	38.0	0.7	1.8	0.6
Total	1,196	186,885	100.0	130,296	7.0	5.4	6.4	15.5	14.4	15.5	38.7	53.9	39.6	38.0	24.4	38.0	0.7	1.8	0.6

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Boston CSA	734	128,057	100.0	132,486	6.8	4.4	5.8	14.3	16.6	14.1	41.6	52.5	42.4	37.1	25.6	37.5	0.2	1.0	0.2
Total	734	128,057	100.0	132,486	6.8	4.4	5.8	14.3	16.6	14.1	41.6	52.5	42.4	37.1	25.6	37.5	0.2	1.0	0.2

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Boston CSA	1,196	186,885	100.0	130,296	83.2	35.0	47.0	6.9	50.6	9.8	14.5
Total	1,196	186,885	100.0	130,296	83.2	35.	47.0	6.9	50.	9.8	14.5
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Boston CSA	734	128,057	100.0	132,486	83.0	37.3	44.4	7.1	47.5	9.8	15.1
Total	734	128,057	100.0	132,486	83.0	37.	44.4	7.1	47.	9.8	15.1
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
New York CSA	4,365	1,901,076	100.0	209,917	3.0	2.7	3.7	15.2	12.6	16.0	40.8	32.4	40.1	40.9	52.2	40.0	0.1	0.0	0.1
Total	4,365	1,901,076	100.0	209,917	3.0	2.7	3.7	15.2	12.6	16.0	40.8	32.4	40.1	40.9	52.2	40.0	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
New York CSA	2,022	1,007,715	100.0	227,120	2.7	2.2	3.1	15.2	10.1	14.7	43.1	31.2	42.3	39.0	56.5	39.9	0.0	0.0	0.0
Total	2,022	1,007,715	100.0	227,120	2.7	2.2	3.1	15.2	10.1	14.7	43.1	31.2	42.3	39.0	56.5	39.9	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
New York CSA	4,365	1,901,076	100.0	209,917	26.8	6.7	4.0	16.1	16.8	13.5	17.5	19.6	21.1	39.6	52.9	47.8	0.0	3.9	13.5
Total	4,365	1,901,076	100.0	209,917	26.8	6.7	4.0	16.1	16.8	13.5	17.5	19.6	21.1	39.6	52.9	47.8	0.0	3.9	13.5

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
New York CSA	2,022	1,007,715	100.0	227,120	25.6	4.7	3.5	16.9	12.8	12.5	18.7	16.4	21.0	38.9	63.5	48.5	0.0	2.6	14.5
Total	2,022	1,007,715	100.0	227,120	25.6	4.7	3.5	16.9	12.8	12.5	18.7	16.4	21.0	38.9	63.5	48.5	0.0	2.6	14.5

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
New York CSA	2,264	324,098	100.0	447,257	7.7	7.1	8.8	17.1	21.0	17.4	31.1	39.4	29.8	42.6	32.3	42.7	1.5	0.2	1.3
Total	2,264	324,098	100.0	447,257	7.7	7.1	8.8	17.1	21.0	17.4	31.1	39.4	29.8	42.6	32.3	42.7	1.5	0.2	1.3

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
New York CSA	1,017	136,113	100.0	468,941	7.3	8.4	7.6	17.9	20.7	17.6	33.8	37.9	33.5	39.4	32.6	39.9	1.5	0.4	1.5
Total	1,017	136,113	100.0	468,941	7.3	8.4	7.6	17.9	20.7	17.6	33.8	37.9	33.5	39.4	32.6	39.9	1.5	0.4	1.5

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
New York CSA	2,264	324,098	100.0	447,257	86.5	55.9	49.8	6.5	32.9	7.0	11.3
Total	2,264	324,098	100.0	447,257	86.5	55.	49.8	6.5	32.	7.0	11.3
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
New York CSA	1,017	136,113	100.0	468,941	86.2	53.6	43.1	6.7	23.6	7.1	22.8
Total	1,017	136,113	100.0	468,941	86.2	53.	43.1	6.7	23.	7.1	22.8
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
New York CSA	7	739	100.0	576	3.7	0.0	4.2	15.6	14.3	10.6	39.7	57.1	37.2	40.7	28.6	48.1	0.3	0.0	0.0
Total	7	739	100.0	576	3.7	0.0	4.2	15.6	14.3	10.6	39.7	57.1	37.2	40.7	28.6	48.1	0.3	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
New York CSA	1	490	100.0	524	3.2	0.0	2.1	14.6	0.0	12.0	43.4	0.0	40.5	38.6	100.0	44.8	0.2	0.0	0.6
Total	1	490	100.0	524	3.2	0.0	2.1	14.6	0.0	12.0	43.4	0.0	40.5	38.6	100.0	44.8	0.2	0.0	0.6

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
New York CSA	7	739	100.0	576	95.9	71.4	55.7	2.6	20.0	1.5	50.0
Total	7	739	100.0	576	95.9	71.4	55.7	2.6	20.0	1.5	50.0
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
New York CSA	1	490	100.0	524	95.9	100.0	35.5	2.7	0.0	1.4	0.0
Total	1	490	100.0	524	95.9	100.0	35.5	2.7	0.0	1.4	0.0
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Hartford CSA	1,130	291,690	100.0	36,515	3.8	3.7	4.4	10.5	7.4	10.7	44.1	40.0	44.1	41.6	48.9	40.7	0.0	0.0	0.0
Total	1,130	291,690	100.0	36,515	3.8	3.7	4.4	10.5	7.4	10.7	44.1	40.0	44.1	41.6	48.9	40.7	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Hartford CSA	492	105,858	100.0	39,804	3.2	4.9	2.8	11.3	8.5	9.9	48.6	47.2	47.5	37.0	39.4	39.7	0.0	0.0	0.0
Total	492	105,858	100.0	39,804	3.2	4.9	2.8	11.3	8.5	9.9	48.6	47.2	47.5	37.0	39.4	39.7	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Hartford CSA	1,130	291,690	100.0	36,515	22.0	9.4	9.4	16.7	23.4	22.7	20.8	23.3	22.6	40.5	40.6	30.3	0.0	3.4	15.0
Total	1,130	291,690	100.0	36,515	22.0	9.4	9.4	16.7	23.4	22.7	20.8	23.3	22.6	40.5	40.6	30.3	0.0	3.4	15.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Hartford CSA	492	105,858	100.0	39,804	20.8	4.9	6.4	17.4	25.0	18.8	22.3	20.9	22.5	39.5	43.3	34.7	0.0	5.9	17.6
Total	492	105,858	100.0	39,804	20.8	4.9	6.4	17.4	25.0	18.8	22.3	20.9	22.5	39.5	43.3	34.7	0.0	5.9	17.6

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Hartford CSA	590	106,847	237.9	30,168	9.5	9.0	8.7	11.7	9.2	11.9	41.3	37.5	41.4	37.2	44.1	37.8	0.4	0.3	0.2
Total	590	106,847	237.9	30,168	9.5	9.0	8.7	11.7	9.2	11.9	41.3	37.5	41.4	37.2	44.1	37.8	0.4	0.3	0.2

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Hartford CSA	260	47,384	100.0	31,258	8.2	5.8	6.8	12.3	11.9	12.0	43.5	51.9	45.4	35.8	30.0	35.6	0.4	0.4	0.2
Total	260	47,384	100.0	31,258	8.2	5.8	6.8	12.3	11.9	12.0	43.5	51.9	45.4	35.8	30.0	35.6	0.4	0.4	0.2

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Hartford	590	106,847	100.0	30,168	84.6	42.2	50.4	5.7	48.0	9.6	9.8
Total	590	106,847	100.0	30,168	84.6	42.2	50.4	5.7	48.0	9.6	9.8

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Hartford CSA	260	47,384	100.0	31,258	84.4	36.2	48.1	5.8	48.1	9.8	15.8
Total	260	47,384	100.0	31,258	84.4	36.	48.1	5.8	48.	9.8	15.8

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Hartford	1	200	100.0	148	2.9	0.0	1.4	7.1	0.0	4.7	43.2	100.0	37.8	46.8	0.0	56.1	0.0	0.0	0.0
Total	1	200	100.0	148	2.9	0.0	1.4	7.1	0.0	4.7	43.2	100.0	37.8	46.8	0.0	56.1	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Hartford	1	200	100.0	148	96.2	0.0	65.5	2.2	100.0	1.5	0.0
Total	1	20	100.0	148	96.2	0.0	65.5	2.2	100.0	1.5	0.0
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Bangor MSA	114	11,016	22.7	3,717	0.0	0.0	0.0	13.4	8.8	9.9	61.0	59.6	59.5	25.3	30.7	30.3	0.3	0.9	0.2
ME Non-MSA	74	10,197	14.7	5,742	0.0	0.0	0.0	3.3	6.8	3.6	73.3	79.7	73.1	23.4	13.5	23.4	0.0	0.0	0.0
Portland MSA	315	75,554	62.6	20,521	0.9	1.9	1.9	16.4	16.8	18.9	60.5	46.3	58.3	22.3	34.9	20.9	0.0	0.0	0.0
Total	503	96,768	100.0	29,980	0.5	1.2	1.3	12.0	13.5	14.8	64.4	54.3	61.3	23.1	30.8	22.6	0.0	0.2	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Bangor MSA	62	7,985	23.1	3,790	0.2	0.0	0.0	17.8	14.5	11.6	56.5	59.7	54.7	25.4	25.8	33.7	0.0	0.0	0.0
ME Non-MSA	43	5,723	16.0	5,940	0.0	0.0	0.0	7.0	4.7	4.9	71.2	86.0	69.0	21.7	9.3	26.1	0.0	0.0	0.0
Portland MSA	163	50,213	60.8	22,503	0.3	1.8	0.7	10.4	9.8	9.9	63.2	58.9	62.7	26.1	29.4	26.6	0.0	0.0	0.0
Total	268	63,921	100.0	32,233	0.2	1.1	0.5	10.5	10.1	9.2	64.5	63.4	62.9	24.7	25.4	27.4	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bangor MSA	114	11,016	22.7	3,717	21.1	10.5	5.6	17.7	18.4	15.0	20.5	20.2	21.1	40.7	41.2	38.0	0.0	9.6	20.3
ME Non-MSA	74	10,197	24.9	5,742	19.4	12.2	4.4	17.2	21.6	16.9	20.3	20.3	23.5	43.0	44.6	37.9	0.0	1.4	17.3
Portland MSA	315	75,554	62.6	20,521	20.7	10.8	5.9	17.8	16.5	19.6	21.8	20.0	22.3	39.7	45.7	37.3	0.0	7.0	14.9
Total	503	96,768	100.0	29,980	20.4	10.9	5.6	17.6	17.7	18.5	21.1	20.1	22.4	40.8	44.5	37.5	0.0	6.8	16.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Bangor MSA	62	7,985	23.1	3,790	21.2	4.8	5.8	17.1	21.0	14.7	22.0	16.1	21.7	39.7	48.4	38.7	0.0	9.7	19.1
ME Non-MSA	43	5,723	16.0	5,940	18.7	7.0	4.6	17.2	25.6	16.7	21.7	14.0	20.9	42.4	53.5	39.6	0.0	0.0	18.2
Portland MSA	163	50,213	60.8	22,503	19.0	5.5	5.2	18.3	14.1	16.5	23.6	17.8	22.5	39.2	52.1	40.2	0.0	10.4	15.6
Total	268	63,921	100.0	32,233	19.3	5.6	5.1	17.8	17.5	16.4	22.8	16.8	22.1	40.2	51.5	39.9	0.0	8.6	16.5

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bangor MSA	149	16,916	31.7	2,981	0.0	0.0	0.0	20.7	10.7	14.8	49.4	55.7	54.7	28.8	33.6	30.1	1.1	0.0	0.3
ME NON-MSA	51	7,322	10.9	5,253	0.0	0.0	0.0	2.3	0.0	2.3	76.3	90.2	73.1	21.4	9.8	24.6	0.0	0.0	0.0
Portland MSA	270	33,130	109.8	11,943	2.4	0.7	2.4	26.2	32.6	22.9	50.3	45.6	51.8	21.1	21.1	22.9	0.0	0.0	0.0
Total	470	57,368	191.1	20,177	1.5	0.4	1.4	19.2	22.1	16.3	56.9	53.6	57.8	22.2	23.8	24.4	0.2	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Bangor MSA	101	13,155	37.3	2,951	0.3	0.0	0.2	18.4	11.9	14.5	53.7	58.4	53.1	27.6	29.7	32.2	0.0	0.0	0.0
ME Non-MSA	33	6,493	12.2	5,032	0.0	0.0	0.0	10.1	3.0	7.9	66.3	87.9	66.4	23.6	9.1	25.7	0.0	0.0	0.0
Portland MSA	137	19,911	50.6	11,593	8.3	13.1	7.5	10.4	10.2	10.0	56.9	56.2	55.3	24.4	20.4	27.2	0.0	0.0	0.0
Total	271	39,559	100.0	19,576	4.9	6.6	4.5	11.4	10.0	10.1	59.0	60.9	57.8	24.7	22.5	27.5	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Bangor MSA	149	16,916	31.7	2,981	75.5	40.9	46.6	8.1	33.6	16.4	25.5	
ME NON-MSA	51	7,322	10.9	5,253	79.0	11.8	55.5	6.4	66.7	14.6	21.6	
Portland MSA	270	33,130	57.4	11,943	81.8	56.3	49.2	6.7	31.1	11.5	12.6	
Total	470	57,368	100.0	20,177	80.2	46.6	50.5	6.8	35.7	12.9	17.7	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Bangor MSA	101	13,155	37.3	2,951	75.5	55.4	44.1	8.3	28.7	16.2	15.8	
ME Non MSA	33	6,493	12.2	5,032	79.3	36.4	53.0	6.3	45.5	14.3	18.2	
Portland MSA	137	19,911	50.6	11,593	81.3	46.7	46.3	7.1	29.2	11.6	24.1	
Total	271	39,559	100.0	19,576	80.0	48.7	47.7	7.1	31.0	13.0	20.3	

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bangor MSA	3	608	100.0	37	0.0	0.0	0.0	9.4	0.0	2.7	68.7	100.0	78.4	21.6	0.0	18.9	0.3	0.0	0.0
ME Non-MSA	0	0	0.0	376	0.0	0.0	0.0	2.8	0.0	2.9	76.6	0.0	80.1	20.6	0.0	17.0	0.0	0.0	0.0
Portland MSA	0	0	0.0	110	0.8	0.0	0.9	15.0	0.0	17.3	62.1	0.0	61.8	22.2	0.0	20.0	0.0	0.0	0.0
Total	3	608	100.0	523	0.4	0.0	0.2	10.3	0.0	5.9	67.6	100.0	76.1	21.6	0.0	17.8	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Bangor MSA	2	385	100.0	38	0.0	0.0	2.6	11.6	0.0	5.3	60.7	100.0	76.3	27.7	0.0	15.8	0.0	0.0	0.0
ME Non-MSA	0	0	0.0	320	0.0	0.0	0.0	5.0	0.0	2.5	76.3	0.0	79.1	18.7	0.0	18.4	0.0	0.0	0.0
Portland MSA	0	0	0.0	86	2.7	0.0	4.7	7.5	0.0	10.5	64.0	0.0	61.6	25.8	0.0	23.3	0.0	0.0	0.0
Total	2	385	100.0	444	1.4	0.0	1.1	7.2	0.0	4.3	67.7	100.0	75.5	23.7	0.0	19.1	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bangor MSA	3	608	100.0	37	92.3	0.0	56.8	5.2	100.0	2.6	0.0
Total	3	608	100.0	523	95.4	0.0	83.0	2.9	100.0	1.7	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Bangor MSA	2	385	100.0	38	93.0	0.0	57.9	5.3	100.0	1.8	0.0
Total	2	385	100.0	38	93.0	0.0	57.9	5.3	100.0	1.8	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Springfield CSA	192	35,213	100.0	16,712	4.3	6.8	4.9	12.7	17.7	14.0	40.3	44.3	40.5	42.7	31.3	40.5	0.0	0.0	0.0
Total	192	35,213	100.0	16,712	4.3	6.8	4.9	12.7	17.7	14.0	40.3	44.3	40.5	42.7	31.3	40.5	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Springfield CSA	71	13,351	100.0	17,375	2.9	2.8	2.9	16.0	8.5	15.9	44.2	56.3	43.2	36.9	32.4	38.0	0.0	0.0	0.0
Total	71	13,351	100.0	17,375	2.9	2.8	2.9	16.0	8.5	15.9	44.2	56.3	43.2	36.9	32.4	38.0	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Springfield CSA	192	35,213	100.0	16,712	24.2	10.4	5.6	16.1	21.4	19.3	18.5	24.0	23.4	41.2	32.8	36.8	0.0	11.5	14.9
Total	192	35,213	100.0	16,712	24.2	10.4	5.6	16.1	21.4	19.3	18.5	24.0	23.4	41.2	32.8	36.8	0.0	11.5	14.9

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Springfield CSA	71	13,351	100.0	17,375	23.4	9.9	6.0	16.4	22.5	19.8	19.6	29.6	23.4	40.6	35.2	36.0	0.0	2.8	14.8
Total	71	13,351	100.0	17,375	23.4	9.9	6.0	16.4	22.5	19.8	19.6	29.6	23.4	40.6	35.2	36.0	0.0	2.8	14.8

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Springfield CSA	191	32,255	100.0	12,056	12.9	21.5	12.3	15.2	12.6	14.7	34.7	36.6	34.0	36.5	29.3	38.7	0.8	0.0	0.3	
Total	191	32,255	100.0	12,056	12.9	21.5	12.3	15.2	12.6	14.7	34.7	36.6	34.0	36.5	29.3	38.7	0.8	0.0	0.3	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Springfield CSA	148	21,829	100.0	13,935	12.3	14.9	10.5	19.0	22.3	15.8	36.7	42.6	37.4	31.8	20.3	36.1	0.2	0.0	0.1	
Total	148	21,829	100.0	13,935	12.3	14.9	10.5	19.0	22.3	15.8	36.7	42.6	37.4	31.8	20.3	36.1	0.2	0.0	0.1	

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Springfield CSA	191	32,255	100.0	12,056	81.8	31.9	46.0	6.1	49.2	12.0	18.8
Total	191	32,255	100.0	12,056	81.8	31.9	46.0	6.1	49.2	12.0	18.8
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Springfield CSA	148	21,829	100.0	13,935	81.9	25.7	41.5	6.2	50.7	11.8	23.6
Total	148	21,829	100.0	13,935	81.9	25.7	41.5	6.2	50.7	11.8	23.6
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Springfield CSA	1	10	100.0	84	1.9	0.0	0.0	6.0	0.0	1.2	44.2	100.0	45.2	47.6	0.0	53.6	0.2	0.0	0.0
Total	1	10	100.0	84	1.9	0.0	0.0	6.0	0.0	1.2	44.2	100.0	45.2	47.6	0.0	53.6	0.2	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Springfield CSA	1	10	100.0	84	95.9	100.0	46.4	2.3	0.0	1.8	0.0
Total	1	10	100.0	84	95.9	100.0	46.4	2.3	0.0	1.8	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	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	
NH Non- MSA	164	28,543	100.0	4,427	0.0	0.0	0.0	17.6	9.1	14.3	69.5	80.5	69.7	12.9	10.4	16.0	0.0	0.0	0.0	
Total	164	28,54	100.0	4,427	0.0	0.0	0.0	17.6	9.1	14.3	69.5	80.5	69.7	12.9	10.4	16.0	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	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	
NH Non- MSA	67	13,420	100.0	4,427	0.0	0.0	0.0	19.4	14.9	22.0	65.5	59.7	62.3	15.1	25.4	15.8	0.0	0.0	0.0	
Total	67	13,420	100.0	4,427	0.0	0.0	0.0	19.4	14.9	22.0	65.5	59.7	62.3	15.1	25.4	15.8	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NH Non-MSA	164	28,543	100.0	4,427	20.4	6.7	5.6	20.1	26.8	18.2	22.9	23.2	19.9	36.5	39.6	40.9	0.0	3.7	15.4
Total	164	28,543	100.0	4,427	20.4	6.7	5.6	20.1	26.8	18.2	22.9	23.2	19.9	36.5	39.6	40.9	0.0	3.7	15.4

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NH Non-MSA	67	13,420	100.0	4,427	19.2	6.0	4.8	20.3	16.4	18.2	24.2	19.4	18.5	36.2	49.3	41.7	0.0	9.0	16.9
Total	67	13,420	100.0	4,427	19.2	6.0	4.8	20.3	16.4	18.2	24.2	19.4	18.5	36.2	49.3	41.7	0.0	9.0	16.9

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
NH Non-MSA	88	12,782	100.0	3,139	0.0	0.0	0.0	19.1	9.1	17.1	68.0	83.0	69.5	12.8	8.0	13.3	0.0	0.0	0.0
Total	88	12,782	100.0	3,139	0.0	0.0	0.0	19.1	9.1	17.1	68.0	83.0	69.5	12.8	8.0	13.3	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
NH Non-MSA	59	8,115	100.0	3,050	0.0	0.0	0.0	21.2	8.5	21.1	66.1	79.7	64.8	12.7	11.9	14.2	0.0	0.0	0.0
Total	59	8,115	100.0	3,050	0.0	0.0	0.0	21.2	8.5	21.1	66.1	79.7	64.8	12.7	11.9	14.2	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NH Non-MSA	88	12,782	100.0	3,139	81.3	47.7	49.8	6.6	37.5	12.2	14.8
Total	88	12,782	100.0	3,139	81.3	47.	49.8	6.6	37.	12.2	14.8

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
NH Non-MSA	59	8,115	100.0	3,050	82.1	67.8	47.0	6.1	18.6	11.8	13.6
Total	59	8,115	100.0	3,050	82.1	67.	47.0	6.1	18.	11.8	13.6

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
NH Non-MSA	2	17	100.0	29	0.0	0.0	0.0	15.3	0.0	24.1	68.5	100.0	65.5	16.2	0.0	10.3	0.0	0.0	0.0
Total	2	17	100.0	29	0.0	0.0	0.0	15.3	0.0	24.1	68.5	100.0	65.5	16.2	0.0	10.3	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
NH Non-MSA	2	17	100.0	29	97.1	100.0	51.7	1.7	0.0	1.3	0.0
Total	2	17	100.0	29	97.1	100.0	51.7	1.7	0.0	1.3	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Burlington	317	149,003	27.7	6,417	1.0	0.9	1.4	13.2	16.4	14.5	65.6	56.2	66.7	20.2	26.5	17.4	0.0	0.0	0.0
VT Non-MSA	828	133,633	72.3	8,202	0.0	0.0	0.0	5.0	7.1	4.5	79.5	78.6	75.8	15.5	14.3	19.7	0.0	0.0	0.0
Total	1,145	282,636	100.0	14,619	0.3	0.3	0.6	7.7	9.7	8.9	74.8	72.4	71.8	17.1	17.6	18.7	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	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
Burlington MSA	154	92,680	26.8	7,813	0.4	1.3	0.7	15.6	14.9	14.4	58.4	48.1	59.5	25.5	35.7	25.5	0.1	0.0	0.0
VT Non-MSA	420	78,511	73.2	8,766	0.0	0.0	0.0	9.2	10.2	8.6	75.2	75.7	73.0	15.6	14.0	18.3	0.0	0.0	0.0
Total	574	171,191	100.0	16,579	0.2	0.3	0.3	11.3	11.5	11.3	69.7	68.3	66.6	18.9	19.9	21.7	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-18

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Burlington MSA	317	149,003	27.7	6,417	20.5	7.3	6.5	17.9	16.4	20.1	23.1	19.2	25.9	38.5	42.6	37.6	0.0	14.5	10.0
VT Non-MSA	828	133,633	72.3	8,202	19.4	8.1	5.0	17.6	23.9	14.6	22.6	24.9	21.1	40.4	39.3	46.9	0.0	3.9	12.5
Total	1,145	282,636	100.0	14,619	19.8	7.9	5.6	17.7	21.8	17.0	22.8	23.3	23.2	39.8	40.2	42.8	0.0	6.8	11.4

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Burlington MSA	154	92,680	26.8	7,813	18.3	8.4	6.6	19.0	17.5	20.8	23.5	23.4	25.3	39.2	37.0	35.6	0.0	13.6	11.8
VT Non-MSA	420	78,511	73.2	8,766	18.5	5.0	4.5	18.5	21.7	14.2	22.8	26.4	21.7	40.2	41.9	46.2	0.0	5.0	13.5
Total	574	171,191	100.0	16,579	18.4	5.9	5.5	18.7	20.6	17.3	23.0	25.6	23.4	39.9	40.6	41.2	0.0	7.3	12.7

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Burlington MSA	547	73,210	48.0	4,497	0.9	0.5	1.2	23.5	22.7	21.1	53.8	42.4	54.3	21.6	33.6	23.1	0.2	0.7	0.3	
VT Non-MSA	592	86,436	52.0	6,997	0.0	0.0	0.0	8.5	9.0	6.2	75.1	75.8	73.6	16.5	15.2	20.2	0.0	0.0	0.0	
Total	1,139	159,646	100.0	11,494	0.3	0.3	0.5	14.0	15.5	12.0	67.3	59.8	66.1	18.4	24.1	21.3	0.1	0.4	0.1	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Burlington MSA	296	39,745	47.4	6,410	1.1	0.3	0.5	20.2	23.0	17.3	52.7	49.0	55.1	25.9	27.7	26.9	0.2	0.0	0.1	
VT Non-MSA	329	41,230	52.6	7,804	0.2	0.0	0.1	12.8	11.2	9.8	69.7	74.8	71.1	17.3	14.0	19.0	0.0	0.0	0.0	
Total	625	80,975	100.0	14,214	0.5	0.2	0.3	15.4	16.8	13.2	63.6	62.6	63.9	20.4	20.5	22.6	0.1	0.0	0.1	

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Burlington MSA	547	73,210	48.0	4,497	83.3	28.5	42.9	6.3	50.3	10.4	21.2	
VT Non-MSA	592	86,436	52.0	6,997	82.5	37.0	48.9	6.0	39.9	11.6	23.1	
Total	1,139	159,646	100.0	11,494	82.8	32.9	46.6	6.1	44.9	11.1	22.2	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Burlington MSA	296	39,745	47.4	6,410	83.0	32.4	36.9	6.5	48.0	10.5	19.6	
VT Non-MSA	329	41,230	52.6	7,804	82.6	40.7	43.7	6.0	34.0	11.4	25.2	
Total	625	80,975	100.0	14,214	82.8	36.8	40.6	6.1	40.6	11.1	22.6	

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Burlington MSA	4	600	33.3	62	0.1	0.0	0.0	12.6	0.0	24.2	67.7	75.0	61.3	19.6	25.0	14.5	0.0	0.0	0.0	
VT Non-MSA	8	1,063	66.7	171	0.0	0.0	0.0	2.4	0.0	0.6	81.1	62.5	78.9	16.5	37.5	20.5	0.0	0.0	0.0	
Total	12	1,663	100.0	233	0.0	0.0	0.0	5.4	0.0	6.9	77.2	66.7	74.2	17.4	33.3	18.9	0.0	0.0	0.0	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2016	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Burlington MSA	1	110	16.7	59	0.6	0.0	0.0	20.3	0.0	20.3	54.5	100.0	64.4	24.6	0.0	15.3	0.0	0.0	0.0	
VT Non-MSA	5	720	83.3	142	0.0	0.0	0.0	7.2	0.0	6.3	74.9	80.0	78.9	17.9	20.0	14.8	0.0	0.0	0.0	
Total	6	830	100.0	201	0.2	0.0	0.0	11.0	0.0	10.4	69.0	83.3	74.6	19.8	16.7	14.9	0.0	0.0	0.0	

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Burlington MSA	4	600	33.3	62	97.3	75.0	30.6	1.3	33.3	1.4	0.0
VT Non-MSA	8	1,063	66.7	171	96.9	37.5	35.1	2.2	37.5	0.9	33.3
Total	12	1,663	100.0	233	97.0	50.0	33.9	1.9	33.3	1.1	22.2

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Burlington MSA	1	110	16.7	59	97.6	100.0	23.7	1.5	0.0	0.9	0.0
VT Non-MSA	5	720	83.3	142	97.1	40.0	33.1	2.1	40.0	0.8	20.0
Total	6	83	100.0	201	97.3	50.0	30.3	1.9	33.3	0.8	16.7

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0