



PUBLIC DISCLOSURE

April 30, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Radius Bank

Charter Number: 708433

One Harbor Street, Suite 201, Boston, MA 02210

Office of the Comptroller of the Currency

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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: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The primary factors supporting the CRA rating are as follows:

- Radius Bank's (Radius or the Bank) level of lending, as reflected by its loan-to-deposit (LTD) ratio, is more than reasonable.
- The majority of the Bank's originated and purchased loans are made within the Bank's assessment area (AA).
- The overall borrower distribution of loans reflects reasonable penetration among individuals and businesses of different income levels.
- The overall geographic distribution of loans reflects reasonable dispersion in low- and moderate-income geographies.
- The Bank demonstrates excellent responsiveness to community development needs in its AA.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the Bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a Bank's record of meeting the credit needs of its local community, 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, home equity 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 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancing, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan 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) and the Thrift Financial Reporting (TFR) 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 One 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.

Description of Institution

Radius Bank is a federally chartered stock institution headquartered in Boston, Massachusetts (MA), with total assets of \$1.2 billion as of March 31, 2018. During the evaluation period, the Bank went through a change in the ownership structure. The Bank was previously owned by three pension funds. Effective June 3, 2016, the Bank became owned by Radius Bancorp, whose voting stock is held by a group of private equity investors.

The Bank operates one full-service branch and four automated teller machines (ATMs) within their AA during the evaluation period. Two of the ATMS within the AA are full-service ATMs and the remaining two are withdrawal-only machines. The full-service branch is located at the Bank's headquarters in Boston, MA (which is in a geography with an unidentified tract income, or 'N/A'). All four of the ATMs are located in Boston, MA. The Bank has one full-service ATM located at the main office and the other full-service ATM is located in a moderate-income census tract. Branch hours are typically 8:30 am to 4:30 pm Monday through Friday and 9:00 am to 1:00 pm on Saturdays, with extended hours until 6:00 pm on Thursdays.

Radius offers a full suite of commercial lending options, deposit products, and cash management services. Radius Bank's lending strategies include both traditional community bank local lending and nationally focused lending. The Bank is comprised of four distinct lending groups including Commercial (traditional lending: commercial real estate/commercial and industrial loans) in the Boston footprint; Retail (consumer yacht loans made nationwide); and nationwide specialty lending groups: Radius Equipment Finance (REF) and Government Guarantee Lending (Small Business Administration (SBA) lending). The Bank on-boarded the SBA lending team and the REF group during 2016. Radius Bank has a nationwide lending footprint for the consumer yacht, SBA, and the equipment financing portfolios. The Bank does not originate any residential mortgages. All residential mortgages are purchased from the secondary market. The majority of the residential loans purchased during the evaluation period have been for home purchase loans.

Radius Bank is a full service, intrastate institution, offering a standard array of traditional deposit products for personal and business customers through their branch network as well as their online platform. The Bank's website www.radiusbank.com, provides a full listing and description of the deposit and loan services offered by the Bank. Radius Bank also offers a variety of account access alternatives including bank-by-phone, online banking, and a mobile banking application. Account access alternatives for business customers include a business online banking platform and remote deposit capture. In addition to the four ATMs operated within the AA, the Bank also participates in New York Currency Exchange's (NYCE) shared deposit program. The NYCE shared deposit program lets Bank customers make account deposits at ATMs of other program members. This helps the Bank extend the geographic reach of their deposit-taking services, translating to additional debit and ATM cardholder convenience.

Total assets have increased by \$453 million or 65 percent since the last CRA evaluation as the Bank has expanded origination channels to operate as a nationwide commercial lender. As of March 31, 2018, total assets, total deposits and net tier one capital were \$1.2 billion, \$971 million, and \$106 million, respectively. The loan portfolio totaled \$852 million, or approximately 74 percent of total assets, as of March 31, 2018. The following table provides a summary of the loan mix:

Table 1 - Loan Portfolio Summary by Loan Product March 31, 2018	
Loan Category	% of Gross Loans and Leases
Individual (Yacht Loans)	27
1-4 Family Residential Mortgage - Closed End	21
Commercial Real Estate	20
Leasing Business	14
Commercial & Industrial	11
Multifamily	4
Construction	3
Total	100%

Source: FDIC Call Report

The Bank has no financial or legal impediments to meeting the credit needs of the community. The Bank received a "Satisfactory" rating using Intermediate Small Bank (ISB) procedures at the last CRA evaluation dated December 1, 2014.

Scope of the Evaluation

The Bank's CRA performance was evaluated using ISB CRA evaluation procedures. The ISB procedures include a lending test and a community development (CD) test. The lending test evaluates the Bank's record of performance in meeting the credit needs of its AA during the evaluation period through its record of lending. The CD Test evaluates the Bank's responsiveness to the community development needs in its AA through qualified community development loans, investments, and services.

The evaluation period for the lending test covers the Bank's performance from January 1, 2015, through December 31, 2017. Due to updates made to the demographic information during the evaluation period, the Bank's 2015 and 2016 performance was evaluated independently of the 2017 performance metrics. The Bank's lending performance between January 1, 2015 and December 31, 2016 was compared to the 2010 U.S. Census Data. The Bank's performance for 2017 was compared to the 2015 American Community Survey (ACS) data.

When evaluating the Bank's overall lending performance, a significant emphasis was placed on loans originated during 2015-2016 timeframe. The Bank originated and/or purchased a majority of their primary products during that timeframe, with home loans

and commercial loans representing 83 and 56 percent of overall purchases/originations, respectively.

The Bank's primary loan products, based on loan originations and purchases during the evaluation period include commercial loans and HMDA reportable residential loans. Among all loans originated and/or purchased during our evaluation period, commercial loans and HMDA-reportable loans accounted for approximately 65 percent and 33 percent, respectively. Within HMDA reportable residential lending, home purchase and refinance loans represent the majority of all home mortgages, at 75 and 19 percent, respectively. Therefore, we placed significant emphasis on the Bank's record of lending among these loan products when determining lending test conclusions. The Bank purchased a very low volume of home refinance and home improvement loans during 2017; therefore, an analysis of these loans was not meaningful.

Among commercial loans, which were also identified as a primary product, the portfolio was segmented further into two separate products, Commercial and Commercial-SBA 7a loans to better reflect the Bank's nationwide lending strategy. The Bank originated and/or purchased 447 commercial loans during the evaluation period. Traditional commercial loans totaled 162 or 36 percent of total originations and SBA loans totaled 285 or 64 percent of originations during the evaluation period. When considered amongst the entirety of loan originations/purchases, Commercial-General loans accounted for approximately 23 percent, while Commercial-SBA 7a loans accounted for approximately 41 percent of loan originations/purchases.

We included all HMDA reportable loans and a random sampling of commercial and SBA 7a loans originated and/or purchased within the Bank's AA during the evaluation period to evaluate the Bank's lending performance. These results were appropriately weighted as discussed to reflect each product's level of lending relative to the Bank's overall lending activity during our evaluation period.

The evaluation period for the CD Test covers the Bank's performance from December 1, 2014, the date of the last CRA evaluation, through March 31, 2018. Community development loans, investments, and services submitted by management were verified to ensure they met the regulatory definition for community development.

Data Integrity

The Bank reports data under the requirements of the HMDA. Prior to the start of this evaluation, we reviewed the accuracy of HMDA data for residential real estate loans originated and/or purchased, and found that the data was reliable. All residential real estate loans originated and/or purchased during the evaluation period were included in our evaluation of the Bank's lending. Additionally, to evaluate the Bank's lending inside its AA we used a random sample of 20 commercial loans and the entire population of SBA 7a loans originated and/or purchased during January 1, 2015 through December 31, 2016 and 20 commercial loans and the SBA 7a loans originated and/or purchased during January 1, 2017 through December 31, 2017. The activities presented for CD

consideration by the Bank were also reviewed for the purpose of determining whether the activities met the regulatory definitions.

Selection of Areas for Full-Scope Review

The CRA requires a bank to define its AA in which it will be evaluated. Radius Bank has one AA that meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income geographies. Radius Bank's AA is part of the greater Boston-Cambridge-Newton, MA-NH multistate MSA (#14460). The AA includes the entire Boston, MA Metropolitan Division (MD) (#14454), comprised of Suffolk County, Norfolk County, and Plymouth County as well as portions of Middlesex County, which is a subset of the Cambridge-Newton-Framingham, MA MD (#15764). The Boston, MA MD and the Cambridge-Newton-Framingham, MA MD are both part of the greater Boston-Cambridge-Newton, MA-NH multistate Metropolitan Statistical Area (MSA) (#14460); therefore, the Boston MA, MD and the segmented portion of Middlesex County was evaluated as one AA.

Ratings

The Bank's overall rating is a blend of the lending test and the community development test ratings. The Bank's performance during 2015-2016 was most heavily weighted in arriving at overall conclusions as the substantial majority of loan originations and/or purchases were during this timeframe. Home loans and commercial loans originated during 2015-2016 represented 83 percent and 56 percent of total originations, respectively. Refer to the "Selection of Areas for Full-Scope Review" above and the "Scope" section for information regarding how each product was weighted in arriving at the respective ratings for the lending test.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 195.28(c), in determining a federal savings association's (FSA) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the FSA, or in any assessment area by an affiliate whose loans have been considered as part of the FSA'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 (HUD), and the Consumer Financial Protection Bureau (CFPB).

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

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

information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Conclusions with Respect to Performance Tests

LENDING TEST

The Bank's performance under the Lending Test is rated "Satisfactory." The Bank's loan-to-deposit (LTD) ratio is more than reasonable and a majority of the Bank's lending was made within their delineated AA. Overall, the Bank's distribution of lending among business and borrowers of different income levels is considered reasonable. The geographic distribution of loans reflects a reasonable dispersion within geographies of different income levels.

Loan-to-Deposit Ratio

The Bank's loan-to-deposit ratio (LTD) is more than reasonable given the Bank's size, financial condition, and the credit needs of its AA. The Bank's net LTD ratio averaged 99.61 percent over the 14 quarters since the last CRA evaluation. During this period, the LTD ratio ranged from a quarterly low of 82.66 percent and a quarterly high of 111.41 percent. The Bank's LTD ratio is higher than the assessment area peer bank quarterly average of 91.35 percent over the same period.

Lending in Assessment Area

A majority of the Bank's primary loan products were made inside the Bank's AA and meet the standard for satisfactory performance. Radius originated and/or purchased 79 percent by number and 73 percent by dollar amount of loans in the AA. SBA 7a was the only loan product with significant loan originations outside the Bank's AA. This is explained by the Bank's nationwide strategy for SBA lending. The following table details the Bank's lending within the AA by number and dollar amount of loans:

Loan Category of Type	Number of Loans					Dollar Volume				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%	#	\$(000s)	%	\$(000s)	%	\$(000s)
Home Mortgages	195	86	31	14	226	116,960	83	24,339	17	141,299
Commercial Loans	13	65	7	35	20	16,915	80	4,153	20	21,068
SBA 7a Loans	3	15	17	85	20	1,620	7	20,723	93	22,343
Total Lending	211	79	55	21	266	135,495	73	49,215	27	187,710

Source: HMDA-reportable loans and selected sample of 20 commercial and 20 SBA 7a loans originated and/or purchased from 1/1/2015 – 12/31/2017.

Lending to Borrowers of Different Incomes

Radius Bank's distribution of lending among borrowers of different incomes is reasonable. The Bank's level of lending among businesses reflects excellent penetration among businesses of different income levels. The Bank's level of lending among borrowers of different income levels reflects reasonable penetration given significant competition and the demographic factors within the AA.

Business Loans 2015-2016 and 2017

The distribution of commercial loans to businesses originated during the evaluation period is excellent. The Bank's lending to small businesses significantly exceeds the percentage of peer aggregate lending for small businesses. Commercial loans to small businesses (businesses with revenues of \$1 million or less) represented 90 percent and 80 percent of our commercial loan samples during 2015-2016 and 2017, respectively. This is significantly higher when compared to the 45 percent represented by the peer aggregate lending data for lending to business with revenues under \$1.0 million within the Bank's AA.

Distribution by size of the loans originated by the Bank shows that 25 percent of commercial loans during 2015-2016 and 30 percent of commercial loans during 2017 were for \$250 thousand or less. We noted that a majority of the Bank's loans to small businesses were for amounts equal to or less than \$500 thousand.

The following tables show the distribution of small business loans among businesses of different sizes by count and dollar amount:

Table 3A - Borrower Distribution of Commercial Loans to Businesses in the Massachusetts AA – 2015-2016				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% Peer Aggregate Lending to AA Businesses	45	55	0	100
% of Bank Loans in AA by #	90	10	0	100
% of Bank Loans in AA by \$	97	3	0	100

Source: Selected Sample of 20 commercial loans originated and/or purchased during 2015 – 2016; 2016 Peer Small Business Data.

Table 3B - Borrower Distribution of Commercial Loans to Businesses in the Massachusetts AA – 2017				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% Peer Aggregate Lending to AA Businesses	45	55	0	100
% of Bank Loans in AA by #	80	20	0	100
% of Bank Loans in AA by \$	65	35	0	100

Source: Selected sample of 20 commercial loans originated and/or purchased during 2017; 2016 Peer Small Business Data.

SBA 7a Loans 2015-2016 and 2017

The distribution of SBA 7a loans to businesses originated during the evaluation period is excellent. The Bank’s lending of SBA 7a loans significantly exceeds the percentage of peer aggregate lending for small businesses. SBA 7a loans to small businesses (businesses with revenues of \$1 million or less) represented 61 percent and 71 percent of our loan samples during 2015-2016 and 2017, respectively. This is significantly higher when compared to the 45 percent represented by the peer aggregate lending data within the Bank’s AA.

Distribution by size of the loans originated by the Bank shows that 61 percent of SBA 7a loans during 2015-2016 and 29 percent of SBA 7a originations during 2017 were for \$250 thousand or less. We noted that a majority of the Bank’s SBA 7a loans were for amounts equal to or less than \$500 thousand.

The following tables show the distribution of SBA 7a loans among businesses of different sizes by count and dollar amount:

Table 3C - Borrower Distribution of SBA 7a Loans to Businesses in the Massachusetts AA – 2015-2016				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% Peer Aggregate Lending to AA Businesses	45	55	0	100
% of Bank Loans in AA by #	61	39	0	100
% of Bank Loans in AA by \$	56	44	0	100

Source: Sample of 18 SBA 7a loans (entire population) originated and/or purchased during 2015 – 2016; 2016 Peer Small Business Data.

Table 3D - Borrower Distribution of SBA 7a Loans to Businesses in the Massachusetts AA – 2017				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% Peer Aggregate Lending to AA Businesses	45	55	0	100
% of Bank Loans in AA by #	71	29	0	100
% of Bank Loans in AA by \$	86	14	0	100

Source: Sample of 7 SBA 7a loans (entire population) originated and/or purchased during 2017; 2016 Peer Small Business Data.

Home Loans 2015-2016

The overall distribution of home loans during 2015-2016 reflects reasonable penetration among borrowers of different income levels given the demographic factors and significant competition inherent within the AA. The Bank originated/purchased only one home improvement loan during 2015-2016; therefore, an analysis of this category was not meaningful. Based on originations/purchases during this period, the Bank’s primary home loan products are home purchase and home refinance loans. The percent of home purchase loans made to low- and moderate-income borrowers falls within a

reasonable range below the peer aggregate lending data. The Bank did not make any home refinance loans to low- or moderate-income borrowers during this period.

The Bank’s performance is considered satisfactory given the lack of affordable housing within the AA and the significant market competition for home loans. The Bank does not originate home loans in-house as their strategy is to purchase these loans from the secondary market and loan purchases are focused on home purchase transactions. The lack of affordable housing limits lending opportunities for low- and moderate-income borrowers. The housing values within the Bank’s AA continue to increase and are very high relative to the median family income in the AA. The 2016 FFIEC updated median family income is \$94,896, which means that a low-income borrower would earn less than \$46,499, making it difficult to qualify for a home loan. A moderate-income borrower would also encounter difficulty qualifying for a home loan with an income range of at least \$47,448 but less than \$75,917. The difficulty for a low-and moderate-income borrower to afford housing in the Bank’s AA was also confirmed by our community contact.

Market competition for home loans is significant within the Bank’s AA. According to the 2016 peer mortgage market share data for home purchase and home refinance loans made to low- and moderate-income borrowers, mortgage lending in the AA is dominated by larger nationwide/regional banks and mortgage companies.

The following table illustrates the distribution of home loans to borrowers of different income levels within the AA during 2015 – 2016:

Table 3E - Borrower Distribution of Residential Real Estate Loans in the Massachusetts AA – 2015-2016								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lending Data	% of Bank Loans						
Home Purchase	4	2	16	12	25	12	55	74
Home Improvement	4	0	13	0	24	0	59	0
Home Refinance	3	0	13	0	26	33	58	67

*Source: HMDA-reportable loans originated and/or purchased during 2015 – 2016; 2016 Peer Mortgage Data.
The Bank purchased one home improvement loan during this period. However, no income information was available for this loan.*

Home Loans 2017

The overall distribution of home loans during 2017 reflects excellent penetration among borrowers of different income levels. The Bank's performance during 2017 is not inconsistent with the Bank's performance during the 2015 – 2016 time period. The percentage of home purchase loans made to low- and moderate-income borrowers significantly exceeds the percent of peer aggregate lending data. The Bank originated and/or purchased two home refinance loans during 2017. There were no home improvement loans originated or purchased during this period. Therefore, an analysis of these two categories was not meaningful.

The following table illustrates the distribution of home loans to borrowers of different income levels within the AA during 2017:

Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans
Home Purchase	4	14	16	21	25	17	55	48
Home Improvement	4	0	13	0	24	0	59	0
Home Refinance	3	0	13	0	26	0	58	100

Source: HMDA-reportable loans originated and/or purchased during 2017; 2016 Peer Mortgage Data.

Geographic Distribution of Loans

Radius Bank's overall lending among geographies of different incomes is reasonable. The Bank's geographic distribution of business loans reflects excellent dispersion within low- and moderate-income geographies of the AA. The Bank's geographic distribution of home loans reflects reasonable dispersion, given demographic characteristics as well as significant market competition within the AA.

Business Loans 2015-2016 and 2017

The Bank's geographic distribution of commercial loans to businesses reflects excellent dispersion in the low- and moderate-income census tracts. The percentage of commercial loans made in low- and moderate-income geographies of the AA during the evaluation period significantly exceeds the peer aggregate lending data.

The following tables illustrate the Bank’s lending performance compared to the level of aggregate lending data in each census tract by income level:

Table 4A - Geographic Distribution of Commercial Loans to Businesses In the Massachusetts AA – 2015-2016								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lending Data	% of Bank Loans						
Commercial Loans	5	20	13	30	39	25	43	25

Source: Selected Sample of 20 commercial loans originated and/or purchased during 2015 – 2016; 2016 Peer Small Business Data.

Table 4B - Geographic Distribution of Commercial Loans to Businesses in the Massachusetts AA – 2017								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lending Data	% of Bank Loans						
Commercial Loans	5	10	13	35	39	25	43	30

Source: Selected Sample of 20 commercial loans originated and/or purchased during 2017; 2016 Peer Small Business Data.

SBA 7a Loans 2015 – 2016 and 2017

The Bank’s geographic distribution of SBA 7a loans reflects reasonable dispersion in the low- and moderate-income census tracts. During 2015-2016, the percentage of SBA 7a loans made in low-income geographies exceeded the percent of peer aggregate lending while the loans made in moderate-income geographies significantly exceeded the percent of peer aggregate lending. During 2017, the Bank did not make any SBA 7a loans within low-income geographies and the percentage of SBA 7a loans within moderate-income geographies exceeded the percentage of peer aggregate lending. The Bank’s performance is considered reasonable given that the Bank originated a limited amount of SBA 7a loans within their AA during this period. Additionally, based on the Bank’s strategy, the SBA loan product has a nationwide focus.

The following tables illustrate the Bank’s lending performance compared to the level of aggregate lending data in each census tract by income level:

Table 4C - Geographic Distribution of SBA 7a Loans to Businesses in the Massachusetts AA – 2015-2016								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans
SBA 7a Loans	5	6	13	17	39	39	43	38

Source: Random Sampling of 18 SBA 7a loans (entire population) originated and/or purchased during 2015 – 2016; 2016 Peer Small Business Data.

Table 4D - Geographic Distribution of SBA 7a Loans to Businesses in the Massachusetts AA – 2017								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans
SBA 7a Loans	5	0	13	14	39	14	43	72

Source: Random Sampling of 7 SBA 7a loans (entire population) originated and/or purchased during 2017; 2016 Peer Small Business Data.

Home Loans 2015 – 2016

The overall distribution of home loans during 2015-2016 reflects excellent dispersion among geographies of different income levels. The Bank purchased only one home improvement loan during 2015-2016; therefore, an analysis of this category was not meaningful. Based on originations during this period, the Bank’s primary home loan products are home purchase and home refinance loans. The percent of home purchase loans within low- and moderate-income geographies significantly exceeds the percent of peer aggregate lending data. The percent of home refinance loans within low-income geographies significantly exceeds the percent of peer aggregate lending. The percent of home refinance loans within moderate-income geographies is near to the percent of peer aggregate lending.

Market competition for home refinance loans remains significant within the Bank’s AA, as indicated by the 2016 Peer Mortgage Data Loan Market Share report. During 2016 there were a total of 345 competing home finance lenders within the AA, and the top 20 accounted for approximately 50 percent of the market share.

The following table illustrates the distribution of home loans among geographies of different income levels within the MA AA during 2015-2016:

Table 4E – Geographic Distribution of Residential Real Estate Loans in the Massachusetts AA – 2015-2016								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans
Home Purchase	3	14	13	17	45	19	39	50
Home Improvement	2	0	11	0	43	0	44	100
Home Refinance	3	15	12	9	43	18	42	58

Source: HMDA-reportable loans originated and/or purchased during 2015 – 2016; 2016 Peer Mortgage Data.

Home Loans 2017

The overall distribution of home loans during 2017 reflects reasonable dispersion among geographies of different income levels. The Bank’s performance during 2017 is not inconsistent with the Bank’s performance during the 2015-2016 period. The Bank originated and/or purchased two home refinance loans during 2017. There were no home improvement loans originated or purchased during this period. Therefore, an analysis of these two categories was not meaningful.

The Bank did not make any home purchase loans within low-income geographies of the AA during 2017. The percent of home purchase loans made within moderate-income geographies significantly exceeds the percent of peer aggregate lending. The Bank’s performance is considered reasonable given the demographic characteristics within the AA that limit lending as well as significant market competition. The low number of owner-occupied units within low-income geographies limits home purchase lending within the AA. Additionally, the 2016 Peer Mortgage Data Loan Market Share report for home purchase loans within low-income geographies, indicates that there were a total of 220 lenders within the AA competing for home purchase loans and the top 20 lenders accounted for approximately 50 percent of market share.

The following table illustrates the distribution of home loans among geographies of different income levels within the MA AA during 2017:

Table 4F – Geographic Distribution of Residential Real Estate Loans in the Massachusetts AA – 2017								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans	% of Aggregate Lending Data	% of Bank Loans
Home Purchase	3	0	13	21	45	28	39	51
Home Improvement	2	0	11	0	43	0	44	0
Home Refinance	3	0	12	0	43	50	42	50

Source: HMDA-reportable loans originated and/or purchased during 2017; 2016 Peer Mortgage Data.

Responses to Complaints

There were no CRA-related complaints received by the Bank or the OCC during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The Bank's performance under the CD test is rated Outstanding. Radius Bank's community development performance demonstrates excellent responsiveness to the community development needs in its assessment area through CD loans, investments, and services.

Number and Amount of Community Development Loans

Radius Bank originated a high level of CD loans during the evaluation period. The Bank originated 11 loans totaling \$14.9 million during the evaluation period that qualified as CD loans. The CD loans made by the Bank provided financing for organizations that support affordable housing, promote economic development and/or revitalize low- or moderate-income geographies, and provide services targeted towards low- and moderate-income individuals.

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

- A \$3.3 million loan to finance the construction of a 24 unit apartment building within the Bank's AA area, which was an affordable housing project for low-income veterans. All the residential units in the project were leased to military veterans with low-incomes. The project also included three units that were set aside for formerly homeless veterans.

- Two loans totaling \$1.1 million to a local organization that educates and mobilizes individuals and communities to increase affordable and sustainable homeownership across Massachusetts. The proceeds from the loan were used to fund construction costs for the organization's new headquarters located within the Bank's AA.
- A \$1 million line of credit to a local organization, which is a private, mission driven economic development company that provides financing and investment capital for growing companies in New England. The company was established to promote, stimulate, develop, and advance the business prosperity and economic welfare of New England based companies.
- A \$529 thousand loan to a local organization, which is a Massachusetts limited partnership formed to acquire, rehabilitate, own, maintain, and operate 45 units of low- and moderate-income housing located in Roxbury, MA. The units operated are subject to a regulatory agreement with the U.S. Department of Housing and Urban Development (HUD), which requires, among other terms, that the apartments are rented only to persons and households of low- and moderate-income as defined by HUD.
- A \$440 thousand loan to finance the purchase of a four family investment property located within the Bank's AA. All of the four tenants occupying the units are "Section 8 Tenants" that receive rental assistance through HUD.
- A \$424 thousand loan to finance the purchase of a six unit multifamily investment property located within the Bank's AA. All of the tenants occupying the units are "Section 8 Tenants" that receive rental assistance through HUD.

The Bank also made four loans totaling \$8.2 million, which were made under the Small Business Administration's (SBA) 504 loan program. The SBA's certified development company/504 Loan Program was created to promote economic development and create/retain jobs. The program helps banks attract and serve small business borrowers that need financing and may not meet conventional underwriting criteria. Loans of greater than \$1 million made under the 504 program are considered community development loans. The highlights of the SBA 504 loans are as follows:

- A \$2.7 million loan to a local business located within a moderate-income geography of the Bank's AA to help fund a renovation and to purchase new equipment.
- A \$2.5 million participation made to purchase land and construct an ice hockey complex in the Bank's AA.
- A \$1.7 million loan to help fund the purchase of new office space for a local commercial furniture business located within the Bank's AA.

- A \$1.3 million loan to construct a franchise location of a school, which is a national system of accredited private preschools that provides early education and child care for children and families within the Bank's AA.

Number and Amount of Qualified Investments

The Bank's level of CD investments and donations is outstanding considering the Bank's capacity, significant market competition, and the availability of community development opportunities. Radius Bank's investments and donations during the assessment period totaled approximately \$19.2 million. This comprises ten CD investments and 27 grants/donations to ten community development organizations within the Bank's AA. While the actual level of Bank donations made was higher, these donations met the definition of CD. Additionally, there were two prior period investments with an outstanding balance of \$989 thousand as of our evaluation date.

The highlights of the Bank's CD Investments are as follows:

- A CD investment in two bonds totaling \$6.4 million issued by a government sponsored enterprise that supports senior affordable housing projects within the Bank's AA.
- Five CD investments in mortgage backed securities totaling \$10.1 million issued by a government sponsored enterprise that provided 42 mortgages targeted towards low- and moderate-income families within Bank's AA.
- A CD investment in two bonds totaling \$1.6 million issued by a local agency that raises capital by selling bonds and lends the proceeds to low- and moderate-income homebuyers and homeowners and to developers who build or preserve affordable and/or mixed-income rental housing within Massachusetts.
- A \$1.1 million CD investment in a mortgage backed security issued by a government agency whose mission is to promote home ownership and expand affordable housing finance throughout the country. The Bank's investment helped provide four mortgages targeted towards low- and moderate-income families within the Bank's AA.

Extent to Which the Bank Provides Community Development Services

The Bank's level of community development services is satisfactory. During the evaluation period, the Bank had seven officers/employees provide financial expertise to seven local community development organizations. The organizations that the Bank officer/employees were involved with promote affordable housing and credit availability, provide community service and financial literacy targeted towards low- and moderate-income individuals, and promote economic development within the Bank's AA.

Additionally, there were 12 Bank officers/employees that spent several hours during the evaluation period conducting training and information sessions on careers in banking. These sessions were conducted in conjunction with a local workforce development board whose participants are primarily low-income individuals. While the actual level of community service involvement was higher, these services met the definition of CD.

The highlights of the Bank's CD services are as follow:

- An officer of the Bank serves on the advisory board of a local organization that provides affordable and accessible after school programs for children and teens within the Bank's AA. The majority of the children served by the organization come from low-income families.
- A Bank employee serves on the leadership committee of a local organization whose mission is to prevent homelessness and promote affordable housing within the Bank's AA. The employee also serves on the Board of Trustees at a local community service organization that primarily serves low-and moderate-income students.
- A Bank employee serves on the executive and finance committees of a local community service organization whose mission is to promote self-sufficiency and well-being for at-risk urban children within the Bank's AA.
- A Bank employee provides assistance to a money management program offered by a local community organization. The mission of the money management program is to promote and prolong independent living for low-income elders by assisting them with their routine financial needs.
- A Bank employee serves on the finance committee of a local organization that promotes affordable housing within the Bank's AA.

Responsiveness to Community Development Needs

Considering the Bank's capacity, the need, and the availability of CD opportunities, Radius Bank's CD performance, through CD loans, investments, and services demonstrates excellent responsiveness to the needs of the AA.

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 metropolitan and nonmetropolitan areas 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: (1/1/15 to 12/31/17) Community Development Test: (12/1/14 to 04/30/18)	
Financial Institution	Products Reviewed	
Radius Bank ("Radius" or "the Bank") Boston, Massachusetts	Residential mortgage loans (home loans) via HMDA LAR, commercial loans (General and SBA 7a) via sampling procedures, and community development loans, investments, and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None reviewed.		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Massachusetts Assessment Area	Full-Scope	<ul style="list-style-type: none"> • Boston-Cambridge-Newton, MA-NH multistate MSA(#14460) <ul style="list-style-type: none"> ○ Boston, MA MD (#14454) <ul style="list-style-type: none"> ○ Suffolk County ○ Norfolk County ○ Plymouth County ○ Cambridge-Newton-Framingham, MA MD (#15764) <ul style="list-style-type: none"> ○ Middlesex County <ul style="list-style-type: none"> ○ Reading, North Reading, Wilmington, Burlington, Woburn, Winchester, Stoneham, Wakefield, Melrose, Malden, Everett, Medford, Somerville, Cambridge, Watertown, Belmont, Arlington, Lexington, Bedford, Lincoln, Waltham, Newton, Weston, Wayland, Natick, Sherborn, Holliston, Hopkinton, Ashland, Framingham, Marlborough, Hudson, Stow, Boxborough, Acton, Maynard, Sudbury, Concord.

Appendix B: Community Profiles for Full-Scope Areas

Radius Bank's Assessment Area (AA)

Radius Bank's AA is part of the greater Boston-Cambridge-Newton, MA-NH multistate MSA (#14460). The AA includes the entire Boston, MA Metropolitan Division (MD) (#14454), comprised of Suffolk County, Norfolk County, and Plymouth County as well as portions of Middlesex County, which is a subset of the Cambridge-Newton-Framingham, MA MD (#15764). Since the Boston, MA MD and the Cambridge-Newton-Framingham, MA MD are part of the greater Boston-Cambridge-Newton, MA-NH multistate, MSA, they were evaluated as one AA. The AA includes full cities/towns and does not arbitrarily exclude any geographies. Due to updates made to the demographic information during the evaluation period, the Bank's 2015 and 2016 performance was evaluated independently of the 2017 performance metrics. The Bank's lending performance between January 1, 2015 and December 31, 2016 was compared to the 2010 U.S. Census Data. The Bank's performance for 2017 was compared to the 2015 ACS data.

Radius Bank AA: 2015 – 2016

Demographic information of Radius Bank's AA during 2015-2016 is detailed in the table below:

Demographic Information for Full Scope Area: Radius Bank AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	682	9.68	18.62	37.10	32.40	2.20
Population by Geography	3,052,916	8.09	18.13	39.94	33.72	0.12
Owner-Occupied Housing by Geography	700,326	2.61	12.15	44.16	41.07	0.01
Business by Geography	233,160	5.20	12.58	36.38	45.57	0.26
Farms by Geography	3,782	1.45	8.33	45.98	44.24	0.00
Family Distribution by Income Level	714,923	21.63	15.69	20.05	42.63	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	266,802	14.18	26.15	39.69	19.97	0.01
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		87,319 94,896 11%	Median Housing Value Unemployment Rate (2010 US Census) (BLS Average of Middlesex, Plymouth, Norfolk, & Suffolk Counties 3/31/18)		439,571 3.91% 3.38%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

During the 2015-2016, the AA was comprised of 682 census tracts. There were 66 low-income tracts (10 percent), 127 moderate-income tracts (19 percent) within the Bank's AA. As of the 2010 US Census, the population of the AA is approximately 3.05 million and includes 1.17 million households and 714,923 families. The FFIEC Adjusted Median Family Income (MFI) for 2016 was \$94,896 and the 2010 Median Housing Value was \$439,571. Approximately 22 percent of the families within the AA are low-income, 16 percent are moderate-income, 20 percent are middle-income, and 42 percent are upper-income. The AA demographics indicates that 11 percent of the households within the AA were below the poverty level.

Radius Bank AA: 2017

Demographic information of Radius Bank's AA during 2017 is detailed in the table below:

Demographic Information for Full Scope Area: Radius Bank AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	682	9.24	19.65	35.19	33.43	2.49
Population by Geography	3,155,730	7.71	19.91	36.85	35.12	0.41
Owner-Occupied Housing by Geography	698,884	2.54	13.70	40.50	43.10	0.17
Business by Geography	241,289	5.16	14.00	34.88	45.44	0.52
Farms by Geography	4,009	1.82	10.73	40.31	47.09	0.05
Family Distribution by Income Level	735,184	22.61	15.53	18.77	43.09	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	280,406	14.04	28.43	36.73	20.61	0.19
Median Family Income FFIEC Adjusted Median Family Income for 2017 Households Below Poverty Level		95,783 99,814 11%	Median Housing Value Unemployment Rate: (2015 ACS US Census) (BLS Average of Middlesex, Plymouth, Norfolk, & Suffolk Counties 3/31/18)		436,546 3.98% 3.38%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2015 ACS US Census and 2017 FFIEC updated MFI

During the 2017, the AA was still comprised of 682 census tracts. There are 63 low-income tracts (8 percent) and 134 moderate-income census tracts (20 percent) within the Bank's AA. Based on the 2015 ACS update, the population of the AA is approximately 3.16 million and includes 1.2 million households and 735,184 families. The FFIEC Adjusted MFI for 2017 was \$99,814 and the 2015 Median Housing Value was \$436,546. Approximately 23 percent of the families within the AA are low-income, 16 percent are moderate-income, 19 percent are middle-income, and 43 percent are

upper-income. The AA demographics indicates that 11 percent of the households within the AA are below the poverty level.

Radius operates in a highly competitive market area with significant market competition from a variety of financial intermediaries, including large, nationwide institutions, commercial banks, credit unions, and local savings institutions. The Federal Deposit Insurance Corporation's Institution Deposit Market Share report as of June 30, 2017 indicates that 105 financial institutions operate branches within the Bank's AA. Radius Bank ranks 30th with a deposit market share of less than one percent. Local deposit competitors within the Bank's AA include: Eastern Bank, Middlesex Savings Bank, Century Bank, Brookline Bank, Blue Hills Bank, and Leader Bank. Larger nationwide financial institutions that provide further competition and are deposit market share leaders include: State Street Bank and Trust Company, Bank of America, National Association, and Citizens Bank, National Association.

Several nationwide lenders and mortgage companies provide competition for mortgage and business loans within the Bank's AA and include: Wells Fargo Bank, NA; J.P. Morgan Chase Bank, NA; Guaranteed Rate; Quicken Loans; American Express, FSB; and Bank of America, N.A. The 2016 Institution Market Share report indicates that Radius Bank competes with 624 lenders within its AA for mortgage loans and the top 20 lenders account for 47 percent of the market share. Competition for business loans is more significant, with the Bank competing with 172 business lenders within its AA, and the top three lenders accounting for 51 percent of the overall market share.

The most recent economic indicators as of January 2018 highlight that the local economy in the greater Boston region remains robust with strong and steady employment growth. The strong finance, technology, and healthcare industries are expected to continue to contribute to the economic growth in the region. The unemployment rate in the region remains low and compares favorably to national and state averages. As of March 31, 2018, the Bureau of Labor Statistics (BLS) average unemployment rate among the four counties that comprise the Bank's AA was 3.4 percent, compared to the national unemployment rate of 4.1 percent and the MA state unemployment rate of 3.5 percent.

Major employers within the Greater Boston region which includes the Bank's AA consist of the following: Partners Healthcare, University of Massachusetts, Stop and Shop Supermarkets, Beth Israel Deaconess Medical Center, State Street Corp, and Massachusetts General Hospital. The Boston Metro region is expected to outperform the region due to the presence of world-class universities, a highly educated workforce, and a dynamic set of industry drivers.

In assessing the Bank's performance, we contacted a local community organization whose mission is to increase affordable and sustainable homeownership across Massachusetts. The contact indicated that the availability of affordable home-ownership opportunities in the Boston area is diminishing as the average price of real estate increases across the area. The contact also indicated that the local financial institutions

are supportive of the credit and community development needs, but as financial institutions asset size increases, their presence in the local market pertaining to affordable housing initiatives diminishes.

Our contact mentioned that there are numerous opportunities that exist for local financial institutions to participate in CD activities. The area is served by multiple well-established community based organizations and CD entities that focus on affordable housing, economic development, financial education, community services, and youth programs. These entities are open to partnership opportunities with area financial institutions. The contact mentioned that the local banks can engage with these entities to support affordable housing around the state. Housing costs in the Boston, MA and surrounding AA communities are high and unaffordable for both low- moderate-income households and therefore lenders can support affordable housing by lending in cities that are further away from the Boston area. Banks can also help by participating in affordable loan programs.

In addition, we contacted another local community organization whose mission is to promote high quality, sustainable, and affordable communities across the city of Boston. The organization focuses on purchasing land in the city of Boston and developing affordable rental units. Our contact echoes the same concerns and needs identified by the community organization discussed above. The contact indicated that the banks in the area have been very responsive to the needs in the community and can continue to help by offering affordable loan program and participating in Community Investment Tax Programs to support affordable housing.