PUBLIC DISCLOSURE

June 15, 2020

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Columbia Bank
Charter Number: 702454

19-01 Route 208 North
Fair Lawn, NJ 07410

Office of the Comptroller of the Currency

343 Thornall Street
Suite 610
Edison, NJ 08837

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

Overall CRA Rating

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

The following table indicates the performance level of Columbia Bank (Bank) with respect to the Lending, Investment, and Service Tests:

	Columbia Bank Performance Tests		
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

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

- As a single state bank, the Bank's overall and component test ratings were derived directly from its performance under those factors in the New Jersey rating area.

Lending in Assessment Area (AA)

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

The Bank originated and purchased 85.8 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 AA										
	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
Loan Category	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	5,072	85.0	897	15.0	5,969	1,923,536	74.4	660,980	25.6	2,584,517
Small Business	1,009	90.3	108	9.7	1,117	326,990	88.3	43,339	11.7	370,329
Total	6,081	85.8	1,005	14.2	7,086	2,250,526	76.2	704,319	23.8	2,954,846

New York Metropolitan Statistical Area (MSA)

Lending activity in the New York MSA is excellent. Based on the most recent FDIC Deposit Market Share data as of June 30, 2019, the Bank ranked 13 of 94 institutions in deposits with 1.7 percent market

share, ranking the bank in the upper 14th percentile. The highest ranked depository institutions were Bank of America, Wells Fargo, and TD Bank

The mortgage market in the New York MSA is highly competitive with a range of local and nationwide banks, mortgage brokers and mortgage bankers of different sizes. According to 2018 peer mortgage data, the Bank ranked 20 of 739 mortgage lenders with a market share of 0.9 percent ranking the Bank in the top three percent. The top lenders were Wells Fargo Bank, Bank of America, and Chase. In small loans to businesses, the bank ranked 39 of 205 lenders with a 0.2 percent market share ranking the Bank in the top 20 percent. The top lenders were American Express, Chase, and Bank of America.

Philadelphia MSA

Lending activity in the Philadelphia MSA is excellent. Based on the most recent FDIC Deposit Market Share data as of June 30, 2019, the Bank ranked 12 of 32 institutions in deposits with 2.3 percent market share ranking the bank in the top 38 percent. The top depository institutions were TD Bank, PNC, and Wells Fargo.

The mortgage market in the Philadelphia MSA is competitive with competition consisting of both local and national banks of different sizes. According to 2018 peer mortgage data, the bank ranked 43 of 573 mortgage lenders with a market share of 0.7 percent ranking the bank in the top eight percent. The top lenders were Wells Fargo Bank, TD, And PNC. In small loans to businesses, the Bank ranked 44 of 137 lenders with a 0.2 percent market share ranking the Bank in the top 40 percent. The top lenders were American Express, Chase, and Citibank.

Description of Institution

The Bank is an intrastate community bank headquartered in Fair Lawn, New Jersey, Bergen County, since 1927. The Bank is a wholly owned subsidiary of Columbia Financial, Inc., which became a public corporation in April 2018. In June 2019, Columbia Financial, Inc. signed a merger agreement with Stewardship Financial Corporation, the holding company for Atlantic Stewardship Bank also headquartered in New Jersey. As of November 1, 2019, Columbia Financial, Inc. completed the acquisition of Stewardship Financial Corporation and its wholly owned subsidiary Atlantic Stewardship Bank.

The Bank's primary market consists of eight counties in northern New Jersey, and three counties in central New Jersey. As of December 31, 2019, the Bank has 64 branches across Bergen, Burlington, Camden, Essex, Gloucester, Hudson, Middlesex, Monmouth, Morris, Passaic, and Union Counties. These counties comprise the Bank's two AAs in their only rating area, the state of New Jersey.

In April 2018, Columbia Financial, Inc., the holding company for Columbia Bank, became a public corporation. In June 2019, Columbia Financial, Inc. signed a merger agreement with Stewardship Financial Corporation, the holding company for Atlantic Stewardship Bank also headquartered in New Jersey.

As of December 31, 2019, the Bank had $8.2 billion in total assets that included $6.2 billion in total loans, representing 75.6 percent of total assets. The Bank's loan mix consists of 41.3 percent residential real estate loans, 31.5 percent commercial real estate loans, 14.6 percent multifamily real estate loans, 7.8 percent commercial loans, 4.8 percent construction loans, and less than 1 percent consumer loans. As of December 31, 2019, the Bank had tier 1 capital of $782.9 million.

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 April 24, 2017.

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 for the Lending Test, except for Community Development (CD) loans, is January 1, 2017 through December 31, 2019. CD Loans, and the Investment and Service Tests, have an evaluation period from April 25, 2017 to December 31, 2019.

In evaluating the Bank's lending performance, the OCC reviewed home mortgage loans home equity installment loans, home equity lines of credit, and commercial real estate loans secured by multifamily dwellings 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.

Under the Lending Test, separate analyses of 2017 through 2018 and 2019 data were performed in the New York MSA. Prior to May 31, 2019, the Bank took part of Morris County in the New York MSA. After May 31, 2019, the Bank took the entirety of Morris County and added Hudson County to the AA. Lending Test analysis in the Philadelphia MSA was performed on combined 2017 through 2019 data.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are not addressed in this evaluation. Bank-qualifying activities will be considered in the subsequent evaluation.

Selection of Areas for Full-Scope Review

For purposes of this evaluation, the Bank-delineated AAs located within the same MSA are combined and evaluated as a single AA. Refer to the "Scope" section under the State Rating section for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full-scope AAs.

Ratings

The Bank's overall rating is based on the state rating.

The Bank's performance in each of the analysis periods is weighted equally, because the Bank originated similar numbers of HMDA loans, its primary product, in both periods. The New York MSA carried the greatest emphasis as this area represented the Bank's most significant market with 86.4 percent of deposits, 83.4 percent of HMDA loans and small loans to businesses, and 89.1 percent of the total branch network.

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.

The state rating is based on performance in both bank AAs. Refer to the "Scope" section under the State 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 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the Bank, or in any 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of New Jersey

CRA rating for the State of New Jersey: Satisfactory
    The Lending Test is rated: 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 activity reflects excellent responsiveness to community credit needs.

- The geographic distribution of the bank's originations and purchases of home mortgage loans is adequate and small loans to businesses is good. The borrower income distributions of the Bank's originations and purchases of both home mortgage loans and small loans to businesses are adequate.

- CD loans were highly effective in helping the Bank address community credit needs, which had a positive impact on the lending test rating.

- Qualified investments were effective and responsive in helping the Bank address community credit needs. The Bank made a good level of investments in the New York MSA.

- The Bank's branches and alternative delivery systems were accessible to limited portions of the Bank's AAs.

- CD services were responsive in helping the bank address community needs. The Bank conducted or supported a relatively high level of CD services in New Jersey.

Description of Institution's Operations in New Jersey

The Bank's operations in the rating area included full counties in New Jersey except for a period of time in Morris County. The Bank delineated Bergen, Essex, Hudson, Middlesex, Monmouth, Morris, Passaic, and Union Counties as the New York MSA AA. In 2017 and 2018, the Bank delineated 77 of the 100 geographies in Morris County. In 2019, the Bank delineated all of Morris County and added Hudson County. Full Counties in Burlington, Camden, and Gloucester Counties were delineated as the Philadelphia MSA AA. Both AAs were reviewed as full-scope AAs. With a median housing value between 7.8 to 11.1 times the 50 percent of median family income threshold for low-income families in the three metropolitan divisions within the New York MSA AA, making homeownership generally unaffordable to low-income borrowers.

Based on FDIC Deposit Market Share data as of June 30, 2019, the Bank operated 43 branches and had $4.9 billion in deposits in the New York MSA. This AA accounted for 84.3 percent of branches, 86.4 percent of deposits, and 83 percent of originations and purchases. The Bank ranked 13 of 94 depository institutions with a 1.7 percent deposit market share. The three largest banks by market share were Bank of America with 17.8 percent, Wells Fargo with 10.8 percent, and TD with 9.3 percent.

Based on FDIC Deposit Market Share data as of June 30, 2019, the Bank operated eight branches and had $663.7 million in deposits in Philadelphia MSA. The AA accounted for 15.7 percent of branches, 13.6 percent of deposits, and 17 percent of originations and purchases. The Bank ranked 12 of 32 depository institutions with a 2.3 percent deposit market share. The three largest banks by market share were TD with 31.1 percent, PNC with 10.5 percent, and Wells Fargo with 9.9 percent.

New York MSA
Six community contacts were completed within the AA. The organizations provide financial literacy, homebuyer counseling, services oriented to ending homelessness, mental health assistance for teenagers, and other CD services. The identified needs in the AA include affordable housing, first-time homebuyer programs, closing cost assistance, tax preparation assistance, small business development, and business start-up capital.

Philadelphia MSA
Two community contacts were completed within the AA. The organizations provide social services to the poor or engage in community revitalization projects. The contacts mentioned the need for home loan products and homebuyer counseling for the underbanked, credit building programs, and financial literacy education.

New York MSA

Table A – Demographic Information of the AA AA: New York MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,182	14.3	17.6	29.2	38.2	0.7
Population by Geography	5,394,553	11.7	17.0	29.2	42.0	0.1
Housing Units by Geography	2,067,894	11.8	17.0	29.7	41.3	0.1
Owner-Occupied Units by Geography	1,106,252	3.6	10.6	30.2	55.6	0.0
Occupied Rental Units by Geography	799,716	21.3	25.0	29.8	23.8	0.1
Vacant Units by Geography	161,926	21.7	21.0	26.5	30.7	0.2
Businesses by Geography	445,837	8.4	12.3	28.5	50.6	0.2
Farms by Geography	7,556	4.2	8.4	27.3	60.1	0.0
Family Distribution by Income Level	1,324,444	21.5	14.2	16.5	47.7	0.0
Household Distribution by Income Level	1,905,968	24.1	13.5	15.3	47.1	0.0
Median Family Income MSA - 35084 Newark, NJ-PA		$90,570	Median Housing Value			$373,632
Median Family Income MSA - 35154 New Brunswick-Lakewood, NJ		$95,564	Median Gross Rent			$1,264
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ		$67,560	Families Below Poverty Level			8.8%

Source: 2015 ACS and 2019 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.

Philadelphia MSA

Table A – Demographic Information of the AA						
AA: Philadelphia MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	304	6.3	17.1	51.3	25.0	0.3
Population by Geography	1,252,852	6.4	14.9	49.6	28.8	0.3
Housing Units by Geography	494,271	6.5	16.3	50.2	26.7	0.3
Owner-Occupied Units by Geography	334,575	3.1	12.5	51.8	32.5	0.0
Occupied Rental Units by Geography	120,453	13.0	25.4	46.7	13.9	1.0
Vacant Units by Geography	39,243	14.9	20.9	47.4	16.1	0.7
Businesses by Geography	82,998	3.4	12.5	48.8	35.2	0.1
Farms by Geography	2,157	0.8	9.1	49.7	40.3	0.0
Family Distribution by Income Level	315,592	21.1	17.1	21.4	40.3	0.0
Household Distribution by Income Level	455,028	24.8	15.7	17.6	41.9	0.0
Median Family Income MSA - 15804 Camden, NJ		$87,133	Median Housing Value			$218,478
			Median Gross Rent			$1,082
			Families Below Poverty Level			7.0%
Source: 2015 ACS and 2019 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.						

Scope of Evaluation in New Jersey

The Bank's operations in the AA included full counties in New Jersey except for a period of time in Morris County. The Bank delineated Bergen, Essex, Hudson, Middlesex, Monmouth, Morris, Passaic, and Union Counties in the New York MSA. These counties comprised three separate metropolitan areas with the New York MSA. In 2017 and 2018, the Bank delineated 77 of the 100 CTs in Morris County. In 2019, the Bank delineated all of Morris County and added Hudson County. Full Counties in Burlington, Camden, and Gloucester Counties were delineated in the Philadelphia MSA. Both AAs were reviewed as full-scope AAs.

Since the New York MSA AA accounted for 84.3 percent of branches, 86.4 percent of deposits, and 83 percent of originations and purchases greater emphasis was given to conclusions in the New York MSA AA than to the conclusions in the Philadelphia MSA AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW JERSEY

LENDING TEST

The Bank's performance under the Lending Test in New Jersey is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the New York MSA is adequate and in the Philadelphia MSA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*						
AA	Home Mortgage	Small Business	CD	Total	% State Loans	% State Deposits
New York MSA	4,173	878	61	5,112	83.2	86.4
Philadelphia MSA	899	131	4	1,034	16.8	13.6

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

Dollar Volume of Loans*						
AA	Home Mortgage	Small Business	CD	Total	% State* Loans	% State Deposits
New York MSA	$1,773,145	$285,646	$130,554,936	$132,613,727	97.7	86.4
Philadelphia MSA	$150,392	$41,344	$2,864,000	$3,055,736	2.3	13.6

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

New York MSA
Based on FDIC Deposit Market Share data as of June 30, 2019, the Bank ranked 13 in deposits of 94 depository institutions placing it in the top 14 percent. According to 2018 peer mortgage data, the Bank ranked 20 in HMDA lending of 2,011 lenders placing it in the top three percent. According to 2018 small business data, the Bank ranked 39 in small business lending of 310 lenders placing it in the top 20 percent.

Philadelphia MSA
Based on FDIC Deposit Market Share data as of June 30, 2019, the Bank ranked 12 in deposits of 32 depository institutions placing it in the top 38 percent. According to 2018 peer mortgage data, the Bank ranked 43 in HMDA lending of 416 lenders placing it in the top eight percent. According to 2018 small business data, the Bank ranked 44 in small business lending of 137 lenders placing it in the top 33 percent.

Distribution of Loans by Income Level of the Geography

The Bank exhibits an adequate geographic distribution of loans in its AA(s).

Home Mortgage Loans

The geographic distribution of home mortgage loans in the New York MSA in 2019 was good, but poor in 2017 through 2018. The geographic distribution of home mortgage loans in the Philadelphia MSA was adequate.

Refer to Table O in Appendix D for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

New York MSA

2019
The Bank's level of home mortgage loans in low-income geographies exceeds the demographic data and is somewhat near to aggregate performance. The Bank's level of home mortgage loans in moderate-income geographies exceeds the demographic data and is near to aggregate performance.

2017 to 2018
The Bank's level of home mortgage loans in low-income geographies is below the demographic data and well below aggregate performance. The Bank's level of home mortgage loans in moderate-income geographies is below both the demographic data and aggregate performance.

Philadelphia MSA
The Bank's level of home mortgage loans in low-income geographies is significantly below both the demographic data and aggregate performance. However, the Bank's level of home mortgage loans in moderate-income geographies exceeds both the demographic data and aggregate performance.

Small Loans to Businesses

The geographic distribution of small loans to businesses in the New York MSA in 2019 was excellent, but adequate in 2017 through 2018. The geographic distribution of home mortgage loans in the Philadelphia MSA was good.

Refer to Table Q in 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.

New York MSA

2019
The Bank's origination of small loans to businesses in low-income geographies is somewhat near to the demographic data and exceeds aggregate performance. The Bank's origination of small loans to businesses in moderate-income geographies significantly exceeds both the demographic data and aggregate performance.

2017-2018
The Bank's origination of small loans to businesses in low-income geographies is significantly below the demographic data and well below aggregate performance. The Bank's origination of small loans to businesses in moderate-income geographies exceeds both the demographic data and aggregate performance.

Philadelphia MSA
The Bank's origination of small loans to businesses in low-income geographies is well below both the demographic data and aggregate performance. The Bank's origination of small loans to businesses in moderate-income geographies significantly exceeds both the demographic data and aggregate 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 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.

Home Mortgage Loans

The borrower distribution of home mortgage loans in the New York MSA in 2019 was good, but poor in 2017 through 2018. The geographic distribution of home mortgage loans in the Philadelphia MSA in 2019 was good.

Refer to Table P in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

New York MSA

2019
The Bank's level of home mortgage loans to low-income borrowers is significantly below the demographic data but exceeds aggregate performance. The Bank's level of home mortgage loans to moderate-income borrowers is below the demographic data but exceeds aggregate performance. The high median housing value constrained lending to low- to moderate-income (LMI) borrowers in the AA.

2017-2018
The Bank's level of home mortgage loans to low-income borrowers is significantly below the demographic data and below aggregate performance. The Bank's level of home mortgage loans to moderate-income borrowers is significantly below the demographic data and below aggregate performance. The high median housing value constrained lending to LMI borrowers in the AA.

Philadelphia MSA
The Bank's level of home mortgage loans to low-income borrowers is significantly below the demographic data but exceeds to aggregate performance. The Bank's level of home mortgage loans to moderate-income borrowers exceeds both the demographic data and aggregate performance.

Small Loans to Businesses

The borrower distribution of small loans to businesses in the New York MSA was adequate. The geographic distribution of home mortgage loans in the Philadelphia MSA was poor.

Refer to Table R in 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.

New York MSA

2019
The Bank's origination of small loans to small businesses is significantly below the demographic data and somewhat near to aggregate performance.

2017-2018
The Bank's origination of small loans to small businesses is significantly below the demographic data and below aggregate performance.

Philadelphia MSA
The Bank's origination of small loans to small businesses is significantly below the demographic data and below to aggregate performance

CD Lending

The institution has made a high level of CD loans, which had a positive impact on the Lending Test rating.

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

New York MSA
The Bank made an excellent level of CD loans in the New York MSA. The Bank originated 61 loans totaling $130.6 million or 19.3 percent of allocated tier 1 capital. Thirty-two of the loans supported affordable housing loans were primarily made to companies that support growth and development of communities through revitalization and stabilization projects and those that provide healthcare and housing services to LMI individuals and communities.

Philadelphia MSA
The Bank made an adequate number of CD loans in the Philadelphia MSA. Four loans were originated during the evaluation period totaling $2.9 million or 1.7 percent of allocated tier 1 capital. One loan was made to a nonprofit organization that provides housing and job training for LMI individuals in the AA. Loans were also made to companies focused on revitalization and stabilization.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. In the first quarter of 2018, the Bank hired a dedicated CRA Mortgage Account Executive to originate loans to first time homebuyers that are LMI. Program features include a down payment as low as 3 percent, rate reduction of 0.5 percent, no points and loan to value greater than 90 percent. During the evaluation period, the Bank originated 136 loans totaling $23.6 million.

INVESTMENT TEST

The bank's performance under the Investment Test in New Jersey is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the Bank's performance in the New York MSA good and in the Philadelphia MSA is adequate.

The institution has a significant level of qualified CD investments and grants, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
AA	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
New York MSA	0	0	169	55,959	169	86.2	55,959	94.5	0	0
Philadelphia MSA	0	0	27	3,230	27	13.8	3,230	5.5	0	0
Statewide w/out P/M/F	0	0	1	3	1	-	3	-	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

New York MSA

Qualified investments totaled $55.9 million during the evaluation period. The vast majority of investments, by dollar amount, were mortgage-backed securities (MBS) which suffice the identified need in the AA of affordable housing. Total qualified investments represented 8.3 percent of allocated tier 1 capital. The Bank invested $60,725 in a nonprofit organization providing housing for homeless battered women and their children that was facing foreclosure. The Bank invested $88,000 in a nonprofit organization providing housing, food, and support services to individuals and families dealing with drug addiction. The Bank invested $93,700 in a nonprofit organization providing food and support services to low-income individuals and families.

Philadelphia MSA

Qualified investments totaled $3.2 million during the evaluation period. The vast majority of investments, by dollar amount, were MBS which suffice the identified need in the AA of affordable housing. Total qualified investments represented 2.8 percent of allocated tier 1 capital. The Bank invested $52,000 in a nonprofit organization providing food and support services to LMI individuals and families. The Bank invested $30,000 in a nonprofit organization providing temporary shelter and affordable housing to the homeless. The Bank invested $92,422 in a nonprofit organization providing after school services to low-income children.

SERVICE TEST

The bank's performance under the Service Test in New Jersey is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the Bank's performance in both the New York MSA and the Philadelphia MSA is adequate.

Retail Banking Services

Service delivery systems are accessible to limited portions of the institution's AA.

Distribution of Branch Delivery System											
	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			
AA				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
New York MSA	86.4	57	89.1	1.8	1.8	22.8	73.6	11.7	17.0	29.2	42.0
Philadelphia MSA	13.6	7	10.9	0.0	0.0	57.1	42.9	6.4	14.9	49.6	28.8

New York MSA

The Bank has 57 branches in the AA with one branch each in LMI geographies.

The Bank complements its traditional service delivery methods with deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. No significant weight was placed on these services. Six branches in middle- or upper-income geographies were considered serving LMI areas and had a positive impact. One branch in an upper-income geography is located in a high school with the majority of the student body receiving free or reduced lunch.

Philadelphia MSA

The Bank has seven branches in the AA, none of which are located in LMI geographies.

The Bank complements its traditional service delivery methods with deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. No significant weight was placed on these services. Three branches in middle- or upper-income geographies were considered serving LMI areas and had a positive impact.

Distribution of Branch Openings/Closings						
			Branch Openings/Closings			
AA	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
New York MSA	6	2	+1	0	+1	+2
Philadelphia MSA	0	1	0	0	0	-1

To the extent changes have been made, the institution'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 AAs, particularly LMI geographies and/or individuals. Most branch offices offer extended hours on various days of the week and have Saturday hours.

CD Services

The institution provides a relatively high level of CD services, which positively impacted the Service Test rating.

New York MSA

Sixty Bank employees provided support to 35 organizations, devoting over 1,300 hours to CD activities during the evaluation period. Included in the services are 8 employees who served in a leadership role, such as a Board or Committee member.

Examples of CD services:

- Twenty-eight Bank employees provided 336 hours to facilitate financial literacy to adolescents in Passaic and Paterson.

- Three Bank employees provided 114 hours of service, including one employee who provided financial expertise to the nonprofit organization's advisory committee, at a nonprofit organization that provides affordable housing. The organization serves Bergen, Hudson, and Passaic counties.

Philadelphia MSA

Six Bank employees devoted over 100 hours to six nonprofit organizations. One employee served in a leadership capacity.

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 that received comprehensive examination review, designated by the term "full-scope,".

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/17 to 12/31/19 Investment and Service Tests and CD Loans 04/25/17 to 12/31/19	
Financial Institution	**Products Reviewed**	
Columbia Bank	Home Mortgage, Home Equity Installment Loans, Home Equity Lines of Credit, Multifamily loans, Small Business, and CD Loans Qualified Investments and Services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
None		
List of AAs and Type of Examination		
AA	**Type of Exam**	**Counties**
New Jersey New York MSA	Full-scope	Bergen, Essex, Hudson (added May 2019), Middlesex, Monmouth, Morris (full county taken May 2019), Passaic, and Union Counties
Philadelphia MSA	Full-scope	Burlington, Camden, and Gloucester Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS Columbia Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
Columbia Bank	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
MMSA or State:				
New Jersey	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §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 institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units**.**

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased 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/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

Table O. **AA 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. **AA 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. **AA 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 AA.

Table R. **AA 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 O: AA Distribution of Home Mortgage Loans by Income Category of the Geography **2019**

AA:	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 MSA	1,933	903,500	100.0	131,086	3.6	4.4	5.3	10.6	10.7	11.1	30.2	19.8	21.9	55.6	65.0	61.7	0.0	0.1	0.0
Total	**1,933**	**903,500**	**100.0**	**131,086**	**3.6**	**4.4**	**5.3**	**10.6**	**10.7**	**11.1**	**30.2**	**19.8**	**21.9**	**55.6**	**65.0**	**61.7**	**0.0**	**0.1**	**0.0**

Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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

AA:	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 MSA	2,240	869,645	100.0	115,316	3.9	2.8	5.8	7.8	4.4	8.6	22.6	14.1	21.7	65.7	78.8	63.8	0.0	0.0	0.0
Total	**2,240**	**869,645**	**100.0**	**115,316**	**3.9**	**2.8**	**5.8**	**7.8**	**4.4**	**8.6**	**22.6**	**14.1**	**21.7**	**65.7**	**78.8**	**63.8**	**0.0**	**0.0**	**0.0**

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

Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower   **2019**

AA:	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 MSA	1,933	903,500	100.0	131,086	21.5	2.8	2.5	14.2	11.5	10.5	16.5	15.7	18.1	47.7	57.9	51.8	0.0	12.1	17.1
Total	**1,933**	**903,500**	**100.0**	**131,086**	**21.5**	**2.8**	**2.5**	**14.2**	**11.5**	**10.5**	**16.5**	**15.7**	**18.1**	**47.7**	**57.9**	**51.8**	**0.0**	**12.1**	**17.1**

Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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

AA:	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 MSA	2,240	869,645	100.0	115,316	20.7	1.1	2.6	14.0	6.1	10.9	16.5	15.7	18.6	48.8	71.8	50.8	0.0	5.3	17.0
Total	**2,240**	**869,645**	**100.0**	**115,316**	**20.7**	**1.1**	**2.6**	**14.0**	**6.1**	**10.9**	**16.5**	**15.7**	**18.6**	**48.8**	**71.8**	**50.8**	**0.0**	**5.3**	**17.0**

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

Table Q: AA Distribution of Loans to Small Businesses by Income Category of the Geography   **2019**

AA:	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 MSA	279	98,278	100.0	178,961	8.5	7.2	6.3	12.3	23.3	12.0	28.5	25.8	22.7	50.5	43.7	58.9	0.2	0.0	0.1
Total	**279**	**98,278**	**100.0**	**178,961**	**8.5**	**7.2**	**6.3**	**12.3**	**23.3**	**12.0**	**28.5**	**25.8**	**22.7**	**50.5**	**43.7**	**58.9**	**0.2**	**0.0**	**0.1**

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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

AA:	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 MSA	599	187,368	100.0	158,296	8.5	2.3	6.8	10.5	11.0	10.0	22.0	24.5	22.6	58.8	62.1	60.5	0.1	0.0	0.1
Total	**599**	**187,368**	**100.0**	**158,296**	**8.5**	**2.3**	**6.8**	**10.5**	**11.0**	**10.0**	**22.0**	**24.5**	**22.6**	**58.8**	**62.1**	**60.5**	**0.1**	**0.0**	**0.1**

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

Table R: AA Distribution of Loans to Small Businesses by Gross Annual Revenues   **2019**

AA:	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 MSA	279	98,278	100.0	178,961	86.4	38.7	41.3	6.0	61.3	7.5	0.0
Total	**279**	**98,278**	**100.0**	**178,961**	**86.4**	**38.7**	**41.3**	**6.0**	**61.3**	**7.5**	**0.0**

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: AA Distribution of Loans to Small Businesses by Gross Annual Revenues   **2017-18**

AA:	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 MSA	599	187,368	100.0	158,296	84.4	37.4	41.2	7.2	61.9	8.4	0.7
Total	**599**	**187,368**	**100.0**	**158,296**	**84.4**	**37.4**	**41.2**	**7.2**	**61.9**	**8.4**	**0.7**

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

Table O: AA Distribution of Home Mortgage Loans by Income Category of the Geography   **2017-19**

AA:	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
Philadelphia MSA	899	150,392	100.0	38,059	3.1	0.2	1.5	12.5	15.5	12.1	51.8	43.4	53.2	32.5	40.9	33.2	0.0	0.0	0.0
Total	**899**	**150,392**	**100.0**	**38,059**	**3.1**	**0.2**	**1.5**	**12.5**	**15.5**	**12.1**	**51.8**	**43.4**	**53.2**	**32.5**	**40.9**	**33.2**	**0.0**	**0.0**	**0.0**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower   **2017-19**

AA:	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
Philadelphia MSA	899	150,392	100.0	38,059	21.1	10.0	9.1	17.1	25.9	20.7	21.4	20.4	21.4	40.3	39.6	27.4	0.0	4.1	21.4
Total	**899**	**150,392**	**100.0**	**38,059**	**21.1**	**10.0**	**9.1**	**17.1**	**25.9**	**20.7**	**21.4**	**20.4**	**21.4**	**40.3**	**39.6**	**27.4**	**0.0**	**4.1**	**21.4**

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: AA Distribution of Loans to Small Businesses by Income Category of the Geography   **2017-19**

AA:	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
Philadelphia MSA	131	41,344	100.0	26,296	3.4	0.0	2.2	12.5	26.0	11.6	48.8	41.2	48.3	35.2	32.8	37.9	0.1	0.0	0.0
Total	131	41,344	100.0	26,296	3.4	0.0	2.2	12.5	26.0	11.6	48.8	41.2	48.3	35.2	32.8	37.9	0.1	0.0	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: AA Distribution of Loans to Small Businesses by Gross Annual Revenues   **2017-19**

AA:	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
Philadelphia MSA	131	41,344	100.0	26,296	84.3	30.5	43.8	5.8	68.7	9.9	0.8
Total	131	41,344	100.0	26,296	84.3	30.5	43.8	5.8	68.7	9.9	0.8

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%