



PUBLIC DISCLOSURE

July 26, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Natbank, National Association
Charter Number: 23523

4031 Oakwood Blvd.
Hollywood, FL 33020

Office of the Comptroller of the Currency

9850 N.W. 41st Street
Suite 260
Miami, FL 33178

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

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Overall CRA Rating

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

The lending test is rated: Outstanding.

The major factors that support this rating include:

- Natbank's (or bank) loan to-deposit (LTD) ratio is more than reasonable.
- The Bank originated a majority of loans inside its assessment area (AA).
- The Bank exhibits an excellent geographic distribution of loans to low- and moderate-income (LMI) borrowers.
- The Bank exhibits a reasonable distribution of loans to LMI borrowers of different income levels.
- Community Development (CD) qualified investments exhibit adequate responsiveness to the credit needs of LMI borrowers.

Loan-to-Deposit Ratio

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

Natbank's LTD ratio is more than reasonable given the performance context of the AA, including location, local competition, and the credit needs of the AA. This determination is based on the average LTD ratio of 107.7 percent from the first quarter 2016 through the fourth quarter 2020. The quarterly average LTD ratio for three banks similarly situated was 89.1 percent ranging from a low of 80.0 percent to a high of 95.7 percent. Peer banks used in the analysis are similar in asset size and have main offices and branches in the AA.

Lending in Assessment Area

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

Natbank originated 66.3 percent of its total loans inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This performance was factored into the overall analysis of the geographic distribution of lending by income level of geography.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	145	66.5%	73	33.5%	218	43,631	67.2%	21,295	32.8%	64,925
Small Business	20	64.5%	11	35.5%	31	3,572	68.3%	1,657	31.7%	5,229
Total	165	66.3%	84	33.7%	249	47,204	67.3%	22,952	32.7%	70,156

Description of Institution

Natbank is a single state community bank headquartered in Hollywood, Florida. The Bank is wholly owned by the National Bank of Canada located in Montreal, Canada. The United States holding company is NATBC Holding Corporation. As of December 31, 2020, the National Bank of Canada had total assets of \$262.0 USD billion and NATBC had total assets of \$191.2 million. The Bank did not have any merger or acquisition activity during this evaluation period, nor did it open or close any branches during the evaluation period.

Natbank offers traditional loan and deposit products to consumers and businesses. Deposit products include checking accounts, savings accounts, money market deposit accounts, and certificates of deposit accounts. Lending products include commercial, residential, and consumer loans. Residential loan products include fixed- and adjustable-rate loans for the purchase, refinance, and land development loans of one-to-four family dwellings. The bank also offers home equity lines of credit, automobile loans, boat loans, loans secured by a certificate of deposit, and unsecured personal loans. Online banking and bill pay are available through the bank's website.

The bank's primary lending product is 1-4 family residential mortgages to individuals and small real estate investors. The majority of Natbank's customer base are Canadian customers who live part of the year in South Florida. During the evaluation period, the bank operated one branch in Broward County located in a middle-income geography and a branch in Palm Beach County located in an upper-income geography. The main office is in a low-income geography in Broward County. All locations provide lobby services and automated teller machines (ATMs) with reasonable hours of operation.

As of December 31, 2020, the bank had total assets of \$191.3 million, total net loans of \$151.3 million, total deposits of \$147.6 million, and tier one capital of \$31.4 million. During the same period, residential real estate loans represented 96.2 percent of net loans, construction & land development loans represented 1.7 percent, commercial & industrial represent 1.5 percent, and consumer loans represented 1.3 percent.

Natbank did not face any legal, financial, or other factors impeding the ability to help meet the credit needs in its AA during the evaluation period. At its last CRA evaluation dated February 29, 2016, the Bank was rated "Outstanding."

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a review of the Bank's CRA performance within its AA under the Small Bank CRA Examination procedures, based on the Lending Test performance criteria. The evaluation period was from January 1, 2018 through December 31, 2020. Natbank's primary business strategy focuses on residential lending to individuals and small independent investors. Our analysis placed more emphasis on home mortgage lending than small business lending since it represented 87.6 percent of total loan originations during the evaluation period. Lending activity from other products did not produce a meaningful analysis to measure the bank's CRA performance due to the low volume of loan originations during the evaluation period.

Selection of Areas for Full-Scope Review

In each state where the Bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The Bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Florida

CRA rating for the State of Florida¹: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loan originations among individuals and small businesses is excellent.
- The income distribution of loan originations among individuals of different income levels is reasonable.

Description of Institution's Operations in the State of Florida

Natbank's AA is comprised of all of Broward and Palm Beach Counties, which are equivalent to the Metropolitan Divisions (MD) 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL) and 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL). Both counties are part of the Metropolitan Statistical Area (MSA) 33100 Miami-Fort Lauderdale-West Palm Beach, FL. Refer to the table in appendix A for a list of all AAs under review.

The economic effect created by the COVID-19 pandemic was detrimental on families and businesses in Broward and Palm Beach Counties. On March 20, 2020, the State of Florida declared a statewide stay-at-home order which mandated the closure of all non-essential businesses in an effort to prevent the spread of the coronavirus. On May 14, 2020, non-essential businesses throughout Florida were permitted to reopen with occupancy restrictions. On April 29, 2021, the State of Florida suspended all COVID-19 public health restrictions, and businesses were allowed to open at full capacity.

A lack of affordable housing inventory, high home prices, and slow economic recovery created by the COVID-19 pandemic represent key challenges for LMI families to purchase homes. The 2015 American Community Survey (ACS) Census estimates the median value of owner-occupied housing units for the MSA 33100 to be \$227,861, while the poverty level was 16.3 percent. According to the 2015 ACS Census, 19.1 percent of households spent more than 30 percent of their income for mortgage payments. The average home value in the MSA 33100 is 12 percent above its long-term pricing trend according to a 2020 report from Florida Atlantic University. High home prices are attributed to low mortgage rates, low supply of homes for sale, and a steady arrival of new residents moving to the MSA 33100.

Rents are also high in the AA with a median monthly gross rent of \$1,194. LMI renters, particularly low-income, also need rental subsidies to assist with rental payments. Approximately 19.1 percent of households spend more than 30 percent of their income for rental payments. The economic impact of COVID-19 created an adverse housing situation for both renters and homeowners. The Coronavirus

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

Aid, Relief, and Economic Security (CARES) Act and various government programs prohibited evictions for LMI renters and homeowners requiring assistance.

The economy continues to improve from the COVID-19 recession, but employment has not returned to pre-pandemic levels. The unemployment rate in Broward County was 8.8 percent as of December 31, 2020 compared to 3.2 percent as of December 31, 2019. The unemployment rate in Palm Beach County was 7.6 percent as of December 31, 2020 compared to 3.4 percent as of December 31, 2019.

Unemployment Rates	2018	2019	2020
United States	3.9	3.6	6.7
State of Florida	3.5	3.2	5.1
Broward County	3.4	3.2	8.8
Palm Beach County	3.7	3.4	7.6

According to Moody's Analytics, a large portion of job losses in Palm Beach County were in low-wage industries such as retail, hospitality, and personal services which include dry cleaners and cosmetic salons. In Broward County, many administrative and waste services jobs which include landscaping, janitorial services, and building security were reduced or eliminated when businesses closed and ordered their employees to work remotely. While the unemployment rate increased due to the coronavirus, the U.S. Small Business Administration's (SBA) Paycheck Protection Program (PPP) had a positive impact by helping small businesses retain employees.

According to Dunn and Bradstreet, as of June 2020, there were 1,153,160 non-farm businesses in the MSA 33100, of which approximately 98.6 percent are considered small businesses. Major industries in Broward and West Palm Beach counties include trade transportation, professional services, education, and health services. According to the Greater Fort Lauderdale Alliance, the five largest employers in Broward County are Broward County Public Schools (34,218), Broward County Government (12,787), Memorial Healthcare System (11,200), Broward Health (9,882), and Nova Southeastern University (6,234). According to the Business Development Board of Palm Beach County, the five largest employers in Palm Beach County are Palm Beach County School District (22,600), Tenet Coastal Division (6,505), Palm Beach County Board County Commissioners (5,686), NextEra Energy, Inc. (5,119), and Florida Atlantic University (3,133).

Competition for financial services within the AA is intense and includes several branches of nationwide and regional banks, local community banks, credit unions, mortgage companies, and other nonbank financial service providers. As of June 30, 2020, the Federal Deposit Insurance Corporation (FDIC) reports that there are 111 banks in the AA operating 1,501 offices. Natbank is ranked 53rd with \$131.5 million in total deposits and a deposit market share of approximately 0.1 percent.

To assess community needs, we reviewed information from recent interviews with four community organizations providing services in the AA. The contacts indicated a lack of high paying jobs and affordable housing and noted loans to small business owners represent the largest credit needs in the AA. Low wages and high housing costs make it difficult for LMI individuals and families to qualify for a home mortgage loan or to support a monthly mortgage payment. The rental affordability problem is worsened by a shortage of low-cost rental housing. There is a need for small business loans from local banks. Local businesses need working capital loans to maintain their businesses open due to the impact of COVID-19.

Broward and Palm Beach Counties

Table A – Demographic Information of the Assessment Area						
Assessment Area: Miami Dade-Ft. Lauderdale-West Palm Beach 2020 (Partial)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,219	6.2	28.2	29.5	33.6	2.5
Population by Geography	5,861,000	5.8	28.9	31.5	33.4	0.4
Housing Units by Geography	2,484,604	5.5	27.9	30.9	35.3	0.3
Owner-Occupied Units by Geography	1,248,038	2.6	23.2	32.9	41.2	0.2
Occupied Rental Units by Geography	799,004	10.1	36.4	30.1	22.9	0.5
Vacant Units by Geography	437,562	5.6	25.9	26.7	41.2	0.6
Businesses by Geography	1,153,160	4.1	21.8	28.1	44.7	1.2
Farms by Geography	15,598	4.7	24.5	29.6	40.8	0.4
Family Distribution by Income Level	1,330,793	23.1	17.0	17.7	42.2	0.0
Household Distribution by Income Level	2,047,042	25.1	15.7	16.6	42.6	0.0
Median Family Income MSA – 33100 Miami-Ft Lauderdale-West Palm Beach FL		\$64,664	Median Housing Value			\$227,861
			Median Gross Rent			\$1,194
			Families Below Poverty Level			16.3%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in State of Florida

As previously mentioned, Natbank's AA is comprised of all of Broward and Palm Beach Counties, which are equivalent to the MD 22744 and MD 48424, are part of the MSA 33100. The geographic and borrower analyses are conducted at the MSA level rather than the MD level. Refer to the table in appendix A for a list of all AAs under review. Home mortgage lending data included owner occupied residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA). Small business lending data was based on a sample of 20 non owner-occupied residential mortgages originated during the evaluation period.

LENDING TEST

The Bank's performance under the Lending Test in the State of Florida is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank's performance in the State of Florida is excellent.

Distribution of Loans by Income Level of the Geography

The Bank exhibits excellent geographic distribution of loans in the State of Florida.

Home Mortgage Loans

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

The distribution of loans in both LMI geographies exceeds the aggregate lending distribution and the percentage of owner-occupied housing units in those geographies.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the Bank's originations of small loans to businesses.

The distribution of loans in both LMI geographies significantly exceeds the aggregate lending distribution and the percentage of businesses in those geographies.

Lending Gap Analysis

There were no unexplained conspicuous gaps identified within the bank's AA.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the Bank's home mortgage loan originations.

The distribution of loans to LMI individuals exhibits a poor distribution compared to the aggregate lending distribution and the percentage of families in those geographies. The Bank's performance compared to the aggregate lending data indicates limited lending opportunities. With median family income of \$64,664, low-income borrowers earn less than \$32,332 per year. Median housing values of \$227,861 would require a down payment of approximately \$45,572, making it challenging for low-income borrowers in the AA. The distribution is reasonable when considering the performance context related to high home values and the difficulty for low-income borrowers to be eligible for a home mortgage loan in the AA.

Small Loans to Businesses

The borrower distribution analysis was not performed since banks are not required to report income data for residential loans made to small business entities subject to the HMDA reporting requirements.

Responses to Complaints

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

COMMUNITY DEVELOPMENT

For Small Bank CRA evaluations, the CD Test section is used to evaluate the bank's record of making community development loans and qualified investments and providing services to LMI borrowers and geographies in its AA. This is optional for Small Bank CRA evaluations for consideration as a possible enhancement to its CRA rating.

Investment opportunities are highly competitive with banks purchasing investments to support affordable housing for LMI individuals or geographies. Many banks tend to pay a premium to purchase qualified investments such as mortgage backed securities with home mortgages made to LMI borrowers or LMI geographies and affordable housing multifamily properties located in their AAs.

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state of Florida through qualified investments considering the Bank's capacity and the need and availability of such opportunities for community development in the Bank's AA. Performance related to community development activities had a positive effect on the Bank's rating in the state of Florida considering the performance context factors. The Bank had two prior CD qualifying investments totaling \$2.1 million. The Government National Mortgage Association and Federal Home Loan Mortgage Corporation mortgage backed securities are responsive to the AA's affordable housing needs. All the underlying mortgages were made to LMI borrowers and are collateralized by properties located in 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 MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	1/1/2018 to 12/31/2020	
Bank Products Reviewed:	Home mortgage loans Small business loans Community development qualified investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Florida		
MSA 33100 Miami-Ft Lauderdale- West Palm Beach, FL (Partial)	Full Scope	Broward County Palm Beach County

Appendix B: Summary of MMSA and State Ratings

RATINGS	Natbank, National Association
Overall Bank:	Lending Test Rating
Natbank, National Association	Outstanding
MMSA or State:	
State of Florida	Outstanding

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

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

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

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2018-2020		
Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% 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	
MSA 33100 Miami Dade-Broward-West Palm Beach (Partial)	145	43,631	100.0	2.6	4.8	1.9	23.2	26.2	18.0	32.9	31.7	32.7	41.2	37.2	47.1	0.2	0.0	0.3	
Total	145	43,631	100.0	2.6	4.8	1.9	23.2	26.2	18.0	32.9	31.7	32.7	41.2	37.2	47.1	0.2	0.0	0.3	

*Source: 2015 ACS Census; 01/01/2018 - 12/21/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2018-2020		
Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
MSA 33100 Miami Dade-Broward-West Palm Beach (Partial)	145	43,631	100.0	23.1	1.4	2.1	17.0	5.5	10.1	17.7	11.0	18.2	42.2	79.3	51.9	0.0	2.8	17.7	
Total	145	43,631	100.0	23.1	1.4	2.1	17.0	5.5	10.1	17.7	11.0	18.2	42.2	79.3	51.9	0.0	2.8	17.7	

*Source: 2015 ACS Census; 01/01/2018 - 12/21/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2018-2020		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
MSA 33100 Miami Dade- Broward-West Palm Beach (Partial)	20	3,572	100.0	4.1	10.0	4.5	21.8	40.0	22.2	28.1	30.0	27.2	44.7	20.0	44.9	1.2	0.0	1.2	
Total	20	3,572	100.0	4.1	10.0	4.5	21.8	40.0	22.2	28.1	30.0	27.2	44.7	20.0	44.9	1.2	0.0	1.2	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%