



PUBLIC DISCLOSURE

June 17, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

RBC Bank (Georgia), National Association
Charter Number: 23416

3475 Piedmont Road, NE, Suite 550
Atlanta, GA 30305

Office of the Comptroller of the Currency

Large Bank Supervision
400 7th Street SW
Washington, DC 20219

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

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Overall CRA Rating

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

The following table indicates the performance level of RBC Bank (Georgia), National Association (N.A.) with respect to the Lending, Investment, and Service Tests:

Performance Levels	RBC Bank (Georgia), N.A Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	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.

The major factors that support this rating include:

- Community development (CD) lending had a negative impact on Lending Test performance.
- Lending levels reflect excellent responsiveness to assessment area (AA) credit needs;
- Overall, the geographic distribution of loans reflects excellent distribution throughout the AA;
- The distribution of borrowers reflects excellent penetration among customers of different income levels;
- The bank had an overall adequate level of qualified investments. Investments demonstrated adequate responsiveness to CD needs;
- The bank provides an adequate level of CD services in the (AA). Bank delivery systems are reasonably accessible to geographies and individuals of different income levels in its AA.

Lending in Assessment Area

Although a very small percentage of both the number and dollar amount of RBC Bank (Georgia), N.A.’s (RBCG or bank) loans originated or purchased during the evaluation period were within the bank’s AA, the bank’s level of lending in the AA is excellent considering that 5.2 percent (\$21.7 million) of total deposits are from depositors who reside in Georgia, compared to the 8.5 percent (\$58.7 million) of total loans originated or purchased in the AA. The percentage of lending in the AA by number of loans and dollar amount of loans exceeds the level of deposits taken from the AA by 163 percent and 270 percent, respectively.

The high level of loans outside the AA results from providing banking services to RBC's Canadian customers living or vacationing in the United States.

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										
2016	128	20.4	500	79.6	628	19,382	10.0	174,891	90.0	194,273
2017	119	18.0	543	82.0	662	20,410	9.4	196,735	90.6	217,145
2018	97	12.7	666	87.3	763	18,916	6.8	260,252	93.2	279,168
Total	344	16.8	1,709	83.2	2,053	58,708	8.5	631,878	91.5	690,586

Description of Institution

RBCG is a wholly owned subsidiary of RBC USA Holdco Corporation (USA Holdco), which is a wholly owned subsidiary of Royal Bank of Canada (RBC Canada), a \$1.27 trillion (CAD) global financial services company headquartered in Montreal, Canada. RBCG held total assets of \$4.95 billion and tier 1 capital of \$372.5 million as of December 31, 2018. The bank is headquartered in Atlanta, GA, RBCG's single location; however, the majority of its employees are located in Raleigh, NC. The bank has no branches or bank owned ATMs. The bank has taken the entire Atlanta-Sandy Springs-Roswell, GA Metropolitan Statistical Area (MSA) as its AA. The AA consists of 951 census tracts, of which 37.1 percent are low or moderate income.

RBCG's primary purpose is to fulfill the banking needs of RBC Canada's Canadian clients while they are traveling or living in the United States. The institution does not have a branch presence within the AA, and a limited number of lending and deposit products are available to those without existing RBC accounts from Canadian affiliates. RBCG utilizes online banking, telephone banking, PNC-owned automated teller machines (ATMs), and the Allpoint ATM network to service its customers in the United States. The bank's strategic objective is to be the leader in serving the cross-border lifestyle needs of Canadians in the United States. Working in close alignment with RBC Canada, RBCG offers unique and differentiated cross border solutions to anchor and attract clients.

Products offered include mortgage loans, home equity lines of credit, credit cards, personal lines of credit, and checking accounts. Some of the aforementioned products are only available to existing RBC Canada customers. Establishing an account with RBCG also allows for easy transfer of funds from RBC Canada accounts and conversion to United States currency. RBCG offers a product designed specifically for low- and moderate-income borrowers in the AA, allowing relaxed credit standards, non-traditional credit references, and higher loan-to-value ratios of 97% and 100%, without requiring private mortgage insurance (PMI). Customers who qualify for this product are also eligible for a deposit account at RBCG and the bank's adjustable rate mortgage product. Additionally, residents of the bank's AA are eligible for the bank's mortgage loan products.

As of December 31, 2018, the bank's loan portfolio consisted primarily of first lien single-family mortgage loans, which represents 81.3 percent of the total loan portfolio. Originated versus purchased loans was 68 percent versus 32 percent. Credit cards and home equity lines of credit followed, representing 11.6 percent and 8.2 percent, respectively. Loans represented 24.7 percent of total assets. According to the FDIC's June 30, 2018, *Deposit Market Share Report*, the bank ranks seventh in the

Atlanta MSA, with a total of \$4.37 billion in deposits, or 2.52 percent of the market. The FDIC *Deposit Market Share Report* attributed all of the bank's deposits to the Atlanta MSA, given the location of its headquarters and the fact that the bank has no branches. According to internal reports generated by the bank, approximately 5.2 percent, or \$21.7 million, of the bank's deposits are from the state of Georgia. Major competitors in the Atlanta MSA in order of market share include SunTrust Bank; Bank of America, N.A.; Wells Fargo Bank, N.A.; Branch Banking and Trust Company; JPMorgan Chase Bank, N.A.; and Synovus Bank.

During the evaluation period, RBCG partnered with the following three non-profit organizations: Operation HOPE, Atlanta Neighborhood Development Partnership, Inc. (ANDP), and D&E, A Housing & Economic Empowerment Center, Inc. The bank consults with these organizations to determine the community development needs in the AA. The CRA Portfolio Manager, located in Raleigh, NC, travels to Atlanta each month and works closely with each of these organizations. A part-time CRA Administrative Assistant assists the CRA Portfolio Manager with CRA outreach efforts.

There were no financial or legal impediments that affected RBCG's ability to meet the credit needs in its AA. The last CRA performance evaluation, dated June 13, 2016, resulted in a "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC used the interagency *Large Institution CRA Examination Procedures* to assess RBCG's record of meeting the credit needs of its community. The procedures include the following three tests: Lending Test, Investment Test, and Service Test.

For the Lending Test, examiners evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA). The bank does not offer small business or small farm loans. The evaluation period for the Lending Test is January 1, 2016, through December 31, 2018. Under the Lending Test, examiners performed separate analyses of 2016 data and 2017-2018 data. This is due to the changes instituted by the 2015 American Community Survey (ACS), which updated population and housing information. The ACS also resulted in changes to the income designations of some census tracts (CTs). The 2017-2018 analysis period received more weight than the 2016 analysis period, as this period represents a larger portion of the bank's lending activity. RBCG did not change its lending strategy during the two analysis periods.

The evaluation period for community development (CD) loans, the Investment Test, and the Service Test is also January 1, 2016, through December 31, 2018.

Selection of Areas for Full-Scope Review

RBCG designated the entire Atlanta-Sandy Springs-Roswell, GA MSA as its AA. It is the bank's only AA and it received a full-scope review.

Ratings

The overall rating reflects the bank's performance in its sole AA, the Atlanta MSA. The Lending Test received more weight than the Investment and Service Tests in the overall rating.

Market Profile for AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Atlanta MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	951	9.8	24.6	34.7	30.4	0.5
Population by Geography	5,286,728	6.2	23.7	38.9	31.2	0.1
Housing Units by Geography	2,136,162	7.3	24.9	37.2	30.6	0.0
Owner-Occupied Units by Geography	1,276,774	2.8	18.7	41.1	37.4	0.0
Occupied Rental Units by Geography	603,757	14.1	35.0	30.8	20.1	0.0
Vacant Units by Geography	255,631	14.0	32.1	32.5	21.4	0.0
Businesses by Geography	460,413	4.7	21.4	34.9	38.9	0.1
Farms by Geography	8,861	2.7	20.0	43.7	33.5	0.1
Family Distribution by Income Level	1,282,154	21.8	17.1	19.6	41.5	0.0
Household Distribution by Income Level	1,880,531	23.0	17.0	18.3	41.7	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Roswell, GA MSA		\$67,374	Median Housing Value			\$210,023
			Median Gross Rent			\$919
			Families Below Poverty Level			9.6%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Atlanta MSA 2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	951	10.6	26.5	30.6	31.4	0.8
Population by Geography	5,535,837	7.4	26.2	34.3	31.8	0.3
Housing Units by Geography	2,202,308	8.3	26.9	33.0	31.7	0.1
Owner-Occupied Units by Geography	1,248,212	3.2	20.8	37.3	38.7	0.0
Occupied Rental Units by Geography	716,104	14.7	35.4	27.1	22.5	0.3
Vacant Units by Geography	237,992	15.8	33.1	28.6	22.4	0.1
Businesses by Geography	498,542	5.5	22.5	31.2	40.2	0.6
Farms by Geography	9,974	3.4	21.2	40.4	34.9	0.1
Family Distribution by Income Level	1,331,952	23.1	16.8	18.2	41.9	0.0
Household Distribution by Income Level	1,964,316	23.9	16.5	17.5	42.1	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Roswell, GA MSA		\$67,322	Median Housing Value			\$184,540
			Median Gross Rent			\$996
			Families Below Poverty Level			12.0%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the bank’s CRA plan, the Atlanta MSA is the most populated area within the state of Georgia and the ninth largest in the country. Competition from financial institutions is strong.

The institution does not have branch presence within the AA, and a limited number of lending and deposit products are available to those without existing RBC accounts from Canadian affiliates. The only available lending products offered by RBCG within the AA are adjustable-rate mortgages and an affordable housing product (AHP), available to low- and moderate-income borrowers. The bank's strategic objective and limited product offerings available to non-Canadians residing in the AA provides the greatest challenge to serving the credit needs of its AA.

Employment and Economic Factors

As of December 2018, the unemployment rate in the MSA was 3.5 percent according to the Bureau of Labor Statistics. This level is slightly lower than the 3.70 percent rate for the state of Georgia and 3.90 percent national rate.

The Atlanta MSA has experienced strong economic growth since the 2008 financial crisis and subsequent recession. The MSA has experienced improvement in unemployment and wage levels, with consistent improvement in both metrics since 2015. Atlanta continues to serve as a national and regional headquarter location for large corporations in industries such as technology, healthcare, aviation, and consumer goods. There is also a high level of local and federal government employment opportunities, as Atlanta is the capital of Georgia. The five largest Atlanta area employers are Delta Air Lines, Emory University & Healthcare, The Home Depot, Northside Hospital, and Piedmont Healthcare.

Housing

Per 2018 HMDA data, the median housing value for the AA is \$184,540, which is high relative to the \$67,322 median family income. According to Moody's Analytics, contractors in the Atlanta market have found it more profitable to focus on high dollar homes in recent years, which has contributed to a lack of affordable housing in the area. The Atlanta HUD 2015-2019 Consolidated Plan identified affordable housing and homeless assistance as the highest priorities in the region. Owner-occupied housing in low- and moderate-income tracts totaled 3.2 percent and 20.8 percent, respectively, compared to Housing Units by Geography totaling 8.3 percent and 26.9 percent, respectively.

Community Needs

The evaluation took into consideration information derived from two community organizations within the AA. One focused on affordable housing and the other focused on financial education. According to the community contacts, the community and credit needs of the AA include financial education, foreclosure prevention, affordable rental and single-family housing, and flexible lending programs for individuals and community organizations. These needs include equity contributions for low-income housing tax credit (LIHTC) projects, particularly for the less active 4 percent LIHTC market.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's performance under the Lending Test in the Atlanta MSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the Atlanta MSA is adequate. CD lending negatively affected the Lending Test rating.

Lending Activity

Overall lending levels reflect excellent responsiveness to AA credit needs. The bank made 8.2 percent of loans in the AA compared to its state deposit percentage of 5.2 percent. The bank's loan market share to deposit market share is reasonable after adjusting for national deposits attributed to the AA.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Atlanta MSA	344	0	0	2	346

Dollar Volume of Loans \$(000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Atlanta MSA	\$58,708	0	0	\$600	\$59,308

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

RBCG's geographic distribution of home mortgage loans for 2016 is excellent. The percentage of the home mortgage loans originated and purchased by the bank in low- and moderate-income census tracts was only slightly below or exceeded both the percentage of owner-occupied housing units and the percentage of aggregate lending that occurred in those census tracts. The geographic distribution of home mortgage loans in 2017 and 2018 is also excellent. The percentage of loans within the AA that were originated in low- and moderate-income census tracts exceeded both the percentage of the AA's owner-occupied housing units and the percentage of aggregate lending that occurred in those census tracts.

Lending Gap Analysis

Examiners analyzed RBCG's home mortgage lending and loan maps over the evaluation period to identify any gaps in its geographic distribution of loans. Examiners did not identify any conspicuous or unexplained gaps, and the bank's AA consists of a whole geography that meets the requirements of the CRA regulation and does not arbitrarily exclude any low- or moderate-income areas.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

RBCG's borrower distribution of home mortgage loans is excellent. The percentage of home mortgage loans to low-income borrowers originated in 2016 was below the percentage of low-income families in the AA, but significantly exceeded the aggregate lending percentage to low-income borrowers. This is reflective of the higher median home value when compared to the median income, making homeownership difficult to afford in the AA for low income individuals. The percentage of home mortgage loans to moderate-income borrowers originated in 2016 significantly exceeded the percentage of moderate-income families in the AA and the aggregate lending percentage to moderate-income borrowers. During 2017 and 2018, the percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families in the AA and slightly higher than the aggregate lending percentage to low-income borrowers. However, the percentage of home mortgage loans to moderate-income borrowers significantly exceeded both the percentage of moderate-income families in the AA and the aggregate lending percentage to moderate-income borrowers.

Community Development Lending

The institution has made few CD loans. Community development (CD) lending had a negative impact on Lending Test performance.

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.

The bank made two CD loans during the review period, totaling \$600 thousand or 0.2 percent of tier 1 capital. Both loans were unsecured lines of credit made to a CD organization in the AA. The loan proceeds funded the purchase and rehabilitation of foreclosed properties used as affordable housing. The bank's CD lending practices and minimal visibility in the AA contributed to the low volume of CD lending. The bank does not actively seek CD lending opportunities and places the burden on CD organizations to seek out RBCG and make requests. There were no impediments to the bank's ability to make CD loans during the review period. Per a community contact made during the evaluation, CD lending is one of the primary needs in the AA, and numerous opportunities are available.

Product Innovation and Flexibility

The bank offers an affordable housing product (AHP) in the AA targeted to low- and moderate-income borrowers, which allows relaxed credit standards, non-traditional credit references, and higher loan-to-value ratios. Any borrower with an AHP loan is also eligible to open a deposit account. Customers who are eligible for the AHP loan product are able to originate a standard adjustable rate mortgage loan in lieu of the AHP product.

INVESTMENT TEST

The bank's performance under the Investment Test in the Atlanta MSA is rated Satisfactory.

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

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Atlanta MSA	3	\$4,597	28	\$14,196	31	100	\$18,793	100	0	0

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

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

Qualified investments in the AA totaled \$18.8 million or approximately 5.04 percent of the bank's Tier 1 Capital as of December 31, 2018. The qualified investments consist solely of affordable housing mortgage-backed securities and donations to community organizations within the AA. The bank has shown adequate responsiveness to investment opportunities within the AA, as affordable housing is a community need.

As of December 31, 2018, the bank had six mortgage-backed securities totaling \$18.3 million. The three pools purchased in the current period consist of 78 mortgage loans to low- and moderate-income borrowers, with a combined value of \$13.7 million. The current balance of the three pools purchased during the prior period is \$4.9 million. Investments made in the prior period had a continuing impact on the community development needs within the AA.

The bank made \$460 thousand in qualified donations to three community organizations within the AA. These organizations provide affordable housing or financial services to low- and moderate-income individuals throughout the Atlanta-Sandy Springs-Roswell MSA. The qualified donations included:

- one \$165 thousand donation to provide financial education to low and moderate income individuals,
- one \$50 thousand donation to support an affordable housing Community Development Financial Institutions fund, and
- one \$47 thousand donation to provide credit counseling sessions to low- and moderate-income individuals.

SERVICE TEST

The bank's performance under the Service Test in the Atlanta-Sandy Springs-Roswell MSA is rated Satisfactory.

Retail Banking Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA(s), particularly low- and moderate-income geographies and/or individuals. The bank operates as a virtual bank and does not have any retail branches. Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

All products and services offered by the bank are accessible online or by telephone. However, the website exclusively focuses on Canadian clients with U.S. banking needs and does not indicate that mortgages or deposit accounts are available to U.S. citizens in its AA. The primary website makes no mention in the mortgage section of its CRA product.

The bank does not own ATMs. However, deposit customers may use any PNC Bank ATM, or any ATM in the Allpoint network, free of charge.

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

Community Development Services

The institution provides an adequate level of CD services.

During the evaluation period, the bank provided CD services to three CD organizations located in the AA. Eight bank employees participated in the aforementioned services in the AA. The majority of the bank's employees reside and work in Raleigh, North Carolina. One employee works from the Atlanta headquarters. The amount of services is adequate given these circumstances.

The following are examples of the CD services provided.

- An employee served on the Advisory Board and Loan Committee of a CD organization that works to provide affordable housing throughout the AA.
- An employee taught homebuyer and financial education workshops targeted at low and moderate-income individuals in partnership with two CD organizations in the AA.
- An employee taught a financial literacy course for youth in grades four through twelve, conducted in partnership with a CD organization that serves the low and moderate-income population.

Financial education and literacy classes provided during the review period reached approximately 617 low and moderate-income individuals and totaled approximately 354 hours. 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:	(01/01/16 to 12/31/18)	
Bank Products Reviewed:	Home mortgages, community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Atlanta-Sandy Springs-Roswell, GA MSA	Full-scope	None

Appendix B: 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 C: Tables of Performance Data

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Atlanta MSA	128	19,382	100.0	229,304	2.8	2.3	1.8	18.7	40.6	13.7	41.1	27.3	40.4	37.4	29.7	44.1	0.0	0.0	0.0
Total	128	19,382	100.0	229,304	2.8	2.3	1.8	18.7	40.6	13.7	41.1	27.3	40.4	37.4	29.7	44.1	0.0	0.0	0.0

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

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Atlanta MSA	216	39,326	100.0	214,843	3.2	6.9	2.9	20.8	39.8	19.6	37.3	28.2	37.6	38.7	25.0	39.8	0.0	0.0	0.0
Total	216	39,326	100.0	214,843	3.2	6.9	2.9	20.8	39.8	19.6	37.3	28.2	37.6	38.7	25.0	39.8	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: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2016
Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Atlanta MSA	128	19,382	100.0	229,304	21.8	16.4	5.3	17.1	43.0	14.5	19.6	16.4	18.2	41.5	24.2	41.5	0.0	0.0	20.5	
Total	128	19,382	100.0	229,304	21.8	16.4	5.3	17.1	43.0	14.5	19.6	16.4	18.2	41.5	24.2	41.5	0.0	0.0	20.5	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-18
Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Atlanta MSA	216	39,326	222.7	214,843	23.1	8.8	7.6	16.8	39.4	17.0	18.2	8.8	20.3	41.9	23.1	37.8	0.0	19.9	17.3	
Total	216	39,326	222.7	214,843	23.1	8.8	7.6	16.8	39.4	17.0	18.2	8.8	20.3	41.9	23.1	37.8	0.0	19.9	17.3	

*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*