



PUBLIC DISCLOSURE

September 30, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Westfield Bank
Charter Number: 717968

141 Elm Street
Westfield, MA 01805

Office of the Comptroller of the Currency

99 Summer Street
Suite 1400
Boston, MA 02110

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 following table indicates the performance level of Westfield Bank (“Westfield” or “the Bank”) with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- The Lending Test (LT) rating is based on a combination of the State of Massachusetts (MA) and Connecticut (CT) ratings. Performance in MA was weighted most heavily because it represents the Bank’s primary area with 96 percent of the deposit base, 95 percent of primary product lending, and 92 percent of the Bank’s branch locations.
- The Investment Test rating is based on a combination of the State of MA and CT ratings. Performance in the Investment Test was weighted in the same manner as the Lending Test.
- The Service Test rating is based on a combination of the State of MA and CT ratings. Performance in the Service Test was weighted in the same manner as the Lending test.
- A substantial majority of the Bank’s loans are located within its delineated Assessment Area (AA).
- Lending levels reflect excellent responsiveness to AA credit needs.
- The institution has an excellent level of qualified CD investments and donations.
- Service delivery systems are accessible to geographies and individuals of different income levels and to the extent changes have been made, the institution’s opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Lending in Assessment Area

A substantial majority of the Bank's loans are located within its delineated AA.

The Bank originated and purchased 85.9 percent of its total loans by number inside the AA during the full evaluation period of January 1, 2016 through December 31, 2018. Additionally, Westfield originated and purchased 68.7 percent by dollar amount of its total loans inside the AA during the evaluation period. This lending analysis was performed at the Bank, rather than the AA level and meets the standard for outstanding performance.

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	174	50.4	171	49.6	345	30,751	21.4	112,851	78.6	143,602
2017	379	80.5	92	19.5	471	63,478	52.3	57,950	47.7	121,428
2018	507	89.1	62	10.9	569	104,148	73.1	38,372	26.9	142,520
Subtotal	1,060	76.5	325	23.5	1,385	198,377	48.7	209,173	51.3	407,550
Small Business										
2016	443	93.7	30	6.3	473	78,739	92.1	6,710	7.9	85,449
2017	587	93.2	43	6.8	630	116,795	92.2	9,843	7.8	126,638
2018	572	93.8	38	6.2	610	118,701	93.6	8,090	6.4	126,791
Subtotal	1,602	93.5	111	6.5	1,713	314,235	92.7	24,643	7.3	338,878
Total	2,662	85.9	436	14.1	3,098	512,612	68.7	233,816	31.3	746,428

Source: Evaluation Period: 01/01/2016 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0.

Description of Institution

Westfield Bank is an interstate federally chartered savings bank headquartered in Westfield, MA with \$2.1 billion in reported total assets as of December 31, 2018. The Bank is wholly owned by Western New England Bancorp, Inc., a one-bank shell holding company, and operates three subsidiaries, Elm Street Securities Corp, WB Real Estate Holdings, LLC, and CSB Colts, Inc. The subsidiaries were not included in the scope of this CRA performance evaluation and the Bank does not have any affiliates.

The Bank operates as a full-service institution and offers a standard array of loan and deposit products for both personal and commercial business lines. Westfield's website, www.westfieldbank.com, provides a full listing and description of products and services. Personal product offerings include, but are not limited to: checking, savings, and money market accounts, retirement accounts, residential mortgage loans, home equity lines of credit, auto loans, e-Banking services, and ID theft/fraud protection services. Business product offerings include, but are not limited to: commercial checking and money market accounts, payroll services, commercial loans, cash management services, and merchant services. The Bank also offers a variety of different account access alternatives to their customer base, including but not limited to: telephone banking, online banking/bill pay options, and mobile banking services.

Since the previous CRA performance evaluation, due to demographic data updates stemming from the 2015 American Community Survey (ACS) and merger activity with the former Chicopee Savings Bank as of October 21, 2016, Westfield Bank has experienced some changes in the distribution of their branch delivery systems. As of this evaluation, the Bank maintains 22 full service branches, 18 of which are in Hampden County, MA (#013), two in Hampshire County, MA (#015), and two located in Hartford County, CT (#003). Hampden and Hampshire Counties are both located within the Springfield, MA Metropolitan Statistical Area (MSA) (#44140), while Hartford County is located within the Hartford-West Hartford-East Hartford, CT MSA (#25540). This activity accounted for an initial increase of eight Westfield Bank AA branch locations within the State of MA during the fourth quarter of 2016 and an additional single branch opening during the third quarter of 2018 within Springfield, MA. No branches were closed during our evaluation period and the Bank operates full-service ATMs at all branch locations.

As of December 31, 2018, Westfield reported total assets, total deposits, and tier 1 capital of \$2.1 billion, \$1.6 billion, and \$223.5 million, respectively. The loan portfolio totaled approximately \$1.70 billion or 80.2 percent of total assets.

This table provides a summary of the loan mix as of December 31, 2018:

Loan Portfolio Summary by Loan Product December 31, 2018	
Loan Category	% of Gross Loans and Leases
1-4 Family Residential Mortgages – Closed End	37.4
Other Real Estate (Commercial)	31.3
Commercial & Industrial	13.5
Multifamily	4.8
Construction & Development	5.4
Home Equity	4.1
Municipal Bonds/Loans	2.4
Consumer	0.2
Other	0.8
Total	100

Source: Federal Deposit Insurance Corporation Call Report, December 31, 2018. Due to rounding, totals do not equal 100.0.

The Bank has no financial or legal impediments in meeting the credit needs of the AA. The Bank was rated ‘Outstanding’ using Large Bank (LB) procedures during the previous CRA performance evaluation dated July 5, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Westfield Bank was evaluated using LB evaluation procedures, which assesses the Bank's CRA performance according to three different testing criteria, namely a Lending Test, Investment Test, and Service Test.

The evaluation period for the LT, apart from Community Development (CD) loans, is January 1, 2016 through December 31, 2018. Our conclusions as to the Bank's lending performance during the evaluation period are based on two identified primary product types, residential mortgage loans as reported via Westfield's Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR), and small loans to businesses as reported via the Bank's CRA LAR. The Bank had minimal multifamily activity and did not exhibit any small farm lending during our evaluation period, therefore an assessment of the Bank's lending performance among these product lines was not performed as any such analysis would not be considered meaningful. Furthermore, consumer loans were not evaluated as they represent a small portion of the Bank's business. The evaluation period for CD lending, investments and services is July 5, 2016, the date of the previous CRA performance evaluation, through December 31, 2018.

The Bank's primary lending products were identified to be residential mortgage loans and small loans to businesses based on originations and purchases occurring during the LT evaluation period. Specifically, home mortgages and small business accounted for approximately 44.7 and 55.3 percent by number and 54.6 and 45.4 percent by dollar amount of primary product loan originations and purchases occurring during the January 1, 2016 to December 31, 2018 evaluation period.

As previously mentioned, the 2015 ACS Census update caused demographic data changes to occur within the Bank's delineated AAs. Consequently, we evaluated the Bank's 2016 lending performance independent of 2017-2018 performance metrics. For year 2016, performance was compared to the 2010 U.S. Census data as well as 2016 Dun & Bradstreet (D&B) data. For years 2017-2018, performance was compared to 2015 ACS data and 2018 D&B data. Peer Mortgage Market Share data for 2016 and 2018 was used as supporting performance context (as applicable) for the evaluation periods of 2016 and 2017-2018, respectively. Peer Small Business data (CRA Aggregate data) for 2016 and 2017 was used as supporting performance context (as applicable) for the evaluation periods of 2016 and 2017-2018, respectively. 2018 Peer Small Business data was not available for consideration at the time of this evaluation.

When evaluating the Bank's lending performance, more consideration was given to those primary loan products originated and purchased during the 2017-2018 evaluation period as the majority of primary product lending occurred during this time. Specifically, for the full evaluation period of January 1, 2016 through December 31, 2018, the number of residential mortgage loans originated and purchased during 2017-2018 accounted for approximately 75.1 percent of all residential lending, while the number of small loans to businesses occurring during 2017-2018 accounted for approximately 72.4 percent of all small business lending. Lastly, when considering just primary product activity, more weight was applied to the Bank's small loans to businesses as approximately 55.3 percent by number of all primary product lending was attributed to this product type.

Selection of Areas for Full-Scope Review

In each state where the Bank has an office, one or more AAs within that state were selected for a full-scope (FS) review. For purposes of this evaluation, bank delineated AAs located within the same 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.

The CRA requires an institution to define its AA in which it will be evaluated. Westfield has delineated two FS AAs, a FS MA AA and a FS CT AA, that meet the requirements of the regulation by consisting of wholly-contiguous political subdivisions, containing the entirety of the customer deposit base, and by not arbitrarily excluding and low- or moderate-income census tracts.

The FS MA AA is composed of the entirety of Hampden County (#013) and portions of the adjacent Hampshire County (#015), specifically the following cities/towns: Amherst, Belchertown, Easthampton, Granby, Hadley, Huntington, South Hadley, Southampton, and Ware. Both Hampden and Hampshire Counties comprise components of the greater Springfield, MA MSA (#44140). Additionally, despite not having a branch presence and being located within the Worcester, MA-CT MMSA (#49340), senior bank management included three adjacent Worcester County (#027) geographies that were near the 350 Palmer Road, Ware MA 01082 branch location and contained components of the Bank's lending activity as part of their delineated FS MA AA. These adjacent geographies contain the cities/towns of Hardwick, New Braintree, Warren, and West Brookfield.

The FS CT AA is composed of portions of the adjacent Hartford (#003) and Tolland (#013) Counties, specifically the following cities/towns: Canton, East Granby, East Windsor, Enfield, Granby, Hartland, Simsbury, Suffield, Windsor Locks, Ellington and Somers. Both Hartford and Tolland Counties comprise components of the greater Hartford-West Hartford-East Hartford, CT MSA (#25540). Additionally, despite not having a branch presence and being located within a non-MSA (#99999) CT geography, senior bank management included a single adjacent Litchfield County (#005) census tract that was near the 10 Hartford Avenue, Granby CT 06035 branch location and contained components of the Bank's lending activity as part of their delineated FS CT AA. This adjacent geography contains the town of Barkhamsted.

When drawing overall conclusions regarding the Bank's lending performance, heavy consideration was given to the Bank's performance within the FS MA AA as the majority of primary product lending over the course of our evaluation period occurred within this delineated AA. Specifically, for the full evaluation period of January 1, 2016 through December 31, 2018, 94.5 percent of residential mortgage and 95.3 percent of small business lending occurred within the FS MA AA. Furthermore, as the Bank exhibited limited home mortgage lending within the FS CT AA during the 2016 evaluation period, an assessment of Westfield's lending in this space was not performed as such an analysis would not be considered meaningful.

Refer to the "Scope" section under each State Rating section for further details regarding how FS AAs were selected.

Refer to the 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.

As previously discussed, Westfield Bank's primary lending products were identified to be residential mortgage loans and small loans to businesses based on originations and purchases occurring during the LT evaluation period where mortgages and small business loans accounted for nearly 44.7 and 55.3 percent by number and 54.6 and 45.4 percent by dollar amount of primary product loan originations and purchases. Amongst the two primary products, we assigned more weight to the Bank's small loans to businesses as approximately 55.3 percent of all primary product lending was attributed to this product type and we also assigned more weight to lending activity occurring during 2017-2018 as approximately 73.6 percent of primary product lending occurred during this time period. As 95 percent of all primary product lending occurred within the FS MA AA, more consideration was placed on the Bank's performance within the FS MA AA when compared to the FS CT AA. Lastly, as the Bank had limited home mortgage lending within the FS CT AA during the 2016 evaluation period, an analysis of the Bank's lending performance for this product type during this period was not performed as such an evaluation would not be considered significant.

We also reviewed deposit activity when determining weightings between the FS MA and FS CT AAs. As indicated by the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share report as of June 30, 2018, approximately 95.9 percent of the Bank's deposit base and 90.9 percent (20/22) of the Bank's branches are located within the FS MA AA. Consequently, the Bank's performance within the FS MA AA was weighted more heavily when arriving at overall conclusions.

The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each 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 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 Consumer Financial Protection Bureau, 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 Massachusetts

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

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- The Bank exhibits a good geographic distribution of loans in its FS MA AA, stemming from an adequate geographic distribution of home mortgage loans and good geographic distribution of small loans to businesses.
- Given the product lines offered, the Bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes within the FS MA AA, which stems from good borrower distribution of home mortgage loans and excellent borrower distribution of small loans to businesses.
- The institution is a leader in making CD loans as Westfield originated a total of 47 qualified CD loans to 29 different community organizations within its FS MA AA totaling approximately \$66.4 million.
- The institution has an excellent level of qualified CD investments and donations as Westfield invested approximately \$13.9 million in qualified CD investments and donated approximately \$792,788 in qualified charitable giving.
- Service delivery systems are accessible to geographies and individuals of different income levels particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals
- The institution is a leader in providing CD services; during the evaluation period, 29 employees provided approximately 2,559 service hours across 36 different qualified CD organizations that benefit the FS MA AA and greater statewide region.

Description of Institution's Operations in Massachusetts

The State of Massachusetts represents Westfield's primary area of operations. As previously discussed, Westfield Bank's MA AA is comprised of a single rating area that includes adjacent MA geographies within both the Springfield, MA MSA (#44140) and the Worcester, MA-CT MMSA (#49340). This FS MA AA consists of a total 128 census tracts, including 24 low-, 23 moderate-, 39 middle-, and 39 upper-income census tracts, while the remaining three tracts were not assigned an income classification as of the 2015 ACS Census update.

The Bank operates 20 branches/deposit taking ATMs within MA as of the end of our evaluation period, all of which are located within the delineated FS MA AA. Specifically, Westfield Bank maintains 18 branches within Hampden County, MA (#013) and two branches within Hampshire County, MA (#015). As mentioned previously, the Bank does not have a branch presence within Worcester County, MA (#027); however, as part of AA delineation, bank management included three adjacent Worcester County geographies that were in close proximity to the 350 Palmer Road, Ware MA 01082 branch and contained components of the Bank's lending activity as part of their delineated MA AA. This AA delineation is considered appropriate as it meets the regulatory definition by consisting of wholly-contiguous political subdivisions and does not arbitrarily exclude any low- or moderate-income census tracts.

Considering the above AA delineation, we reviewed FDIC Deposit Market Share data as of June 30, 2018, among the three counties of Hampden, Hampshire, and Worcester. As of this time-period, Westfield Bank was ranked seventh among 42 other competing financial institutions in this market area with 4.6 percent deposit market share representing approximately \$1.5 billion in deposits. This accounted for approximately 95.9 percent of all Westfield Bank deposits.

Despite ranking seventh among 42 other deposit-taking institutions, competition for consumer deposits within the FS MA AA remains significant. Primary competitors consist mainly of larger institutions that have a national or regional presence, such as Bank of America (13.9 percent market share), TD Bank (10.6 percent), Berkshire Bank (8.4 percent), and Santander Bank (4.7 percent). Furthermore, the top 12 lenders within this space account for nearly 65 percent of all deposits, with all lenders outside of the top 12 maintaining less than three percent deposit market share.

As previously discussed, Westfield Bank's primary business focus during the evaluation period consisted of residential home mortgages and commercial-small business loans. During the evaluation period, the Bank originated and purchased approximately 95 percent of both primary product types within the FS MA AA. Consequently, more weight was given to the Bank's performance within the State of MA when drawing overall conclusions as to the Bank's lending performance according to the CRA.

As reported by Moody's Analytics Inc. in May 2019, the economies of both the Springfield, MA MSA and the Worcester, MA-CT MMSA are anticipated to experience slower growth over the coming year when compared to both Northeast and national standards. This decelerated growth is attributed to several economic and demographic factors, mainly: continued out-migration of skilled workers from Springfield and Worcester to more favorably paying jobs in Hartford, CT and Boston, MA, respectively; a falling college-age population limiting enrollment in the Springfield MA higher education industry; and weaknesses within the Worcester MA-CT manufacturing industry as trade tensions increase overall operating costs.

During our evaluation, we conducted a local community contact to obtain relevant performance context, to better understand the demographics of the area, and to identify the primary credit needs within the FS MA AA. The organization we contacted is a local non-profit community group whose mission is to provide community services, including educational and professional skill training, to those populations within the FS MA AA and greater region whom suffer from intellectual or developmental disability. The majority of the organization's client base is either low- or moderate-income, and our contact stated that there are many opportunities within the surrounding communities for financial institutions to participate in the delivery of community and financial services to those populations most in need. Some common needs and opportunities our contact identified were providing financial literacy training seminars, conducting one-on-one banking and technical training for low- and moderate-income groups, and increased accessibility to banking products and financial services for the mentally/developmentally disabled, including those categorized as low- and moderate-income.

Please refer to the tables below for demographic information of the Bank's FS MA AA during the 2017-2018 and 2016 evaluation periods:

Table A1 – Demographic Information of the AA						
Assessment Area: Westfield FS MA AA-2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	128	18.8	18.0	30.5	30.5	2.3
Population by Geography	598,794	15.1	16.9	31.6	33.8	2.7
Housing Units by Geography	241,526	14.9	17.9	34.1	33.1	0.1
Owner-Occupied Units by Geography	139,656	5.0	14.1	36.3	44.7	0.0
Occupied Rental Units by Geography	83,373	29.9	23.1	31.1	15.7	0.2
Vacant Units by Geography	18,497	21.9	22.9	30.8	24.0	0.3
Businesses by Geography	32,386	15.8	17.5	27.6	38.3	0.8
Farms by Geography	1,039	2.5	7.3	32.1	57.8	0.3
Family Distribution by Income Level	143,543	25.4	15.9	17.9	40.8	0.0
Household Distribution by Income Level	223,029	27.5	14.7	15.5	42.2	0.0
Median Family Income MSA - 44140 Springfield, MA MSA		\$67,381	Median Housing Value			\$203,633
Median Family Income MSA - 49340 Worcester, MA-CT MSA		\$81,137	Median Gross Rent			\$845
			Families Below Poverty Level			12.2%

Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.

Table A2 – Demographic Information of the AA						
Assessment Area: Westfield_ FS MA AA-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	128	17.2	19.5	33.6	28.1	1.6
Population by Geography	591,684	13.6	20.4	34.7	30.8	0.5
Housing Units by Geography	240,163	12.6	20.7	37.6	29.1	0.0
Owner-Occupied Units by Geography	143,701	3.4	16.0	41.8	38.8	0.0
Occupied Rental Units by Geography	79,795	26.8	27.4	31.2	14.4	0.1
Vacant Units by Geography	16,667	23.7	28.9	31.3	16.1	0.0
Businesses by Geography	31,941	15.5	17.5	32.1	34.6	0.3
Farms by Geography	977	2.1	7.6	39.6	50.6	0.1
Family Distribution by Income Level	142,883	24.1	16.1	19.2	40.6	0.0
Household Distribution by Income Level	223,496	27.8	14.2	16.4	41.7	0.0
Median Family Income MSA - 44140 Springfield, MA MSA		\$65,262	Median Housing Value			\$211,536
Median Family Income MSA - 49340 Worcester, MA-CT MSA		\$77,128	Median Gross Rent			\$748
			Families Below Poverty Level			11.7%

Source: 2010 U.S. Census and 2016 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 Massachusetts

We completed a full-scope review of the Bank's delineated MA AA. This AA delineation is considered appropriate as it meets the regulatory definition by consisting of wholly-contiguous political subdivisions, contains all the Bank's MA-based branch locations, and does not arbitrarily exclude any low- or moderate-income census tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Massachusetts

LENDING TEST

The Bank's performance under the Lending Test in Massachusetts is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank's performance in the Massachusetts based AA is considered excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	%State Loans	%State Deposits
FS MA AA	1002	1526	47	2,575	100%	100%

Dollar Volume of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	%State Loans	%State Deposits
FS MA AA	\$186,925	\$297,491	\$66,444,700	\$66,929,116	100%	100%

Westfield Bank's lending market share within the FS MA AA is considered excellent given the significant market competition in the AA for both residential mortgage and small business lending. The Bank's lending patterns are reflective of the credit needs of the community when considering the high level of competition from both nationwide, regional, and large local lenders. Additionally, the Bank's loan-to-deposit ratio serves as an additional indicator of the Bank's level of lending as Westfield's net loan-to-deposit ratio averaged approximately 102.4 percent over the 12 quarters since the previous performance evaluation, January 1, 2016 through December 31, 2018.

2018 Peer Mortgage Market Share data indicates that Westfield ranked sixth among 324 lenders that reported home mortgage loans with a market share of 3.38 percent representing 486 instances of lending, indicative of an excellent level of lending. Lending levels were reduced in 2016, but still considered excellent given AA competition and demographic factors. 2016 Peer Mortgage Market Share data indicates that Westfield ranked 28th among 332 lenders that reported home mortgage loans with a market share of 1.14 percent representing 166 instances of lending.

2017 Peer Small Business data indicates that Westfield ranked 12th among 117 lenders that reported small business lending with a market share of 2.22 percent representing 571 instances of lending, indicative of an excellent level of lending. Additionally, lending levels were comparable during the 2016 period where Westfield ranked 11th among 117 lenders that reported small business lending with a market share of 1.57 percent representing 423 instances of lending.

Distribution of Loans by Income Level of the Geography

The Bank exhibits a good geographic distribution of loans in its FS MA AA, stemming from an adequate geographic distribution of home mortgage loans and good geographic distribution of small loans to businesses.

As previously discussed, due to demographic data updates occurring during the full evaluation period, January 1, 2016 to December 31, 2018, we segmented our analysis between two separate timeframes, specifically 2016 and 2017-2018. Loans originated and purchased in 2016 were compared to 2010 US Census data and loans originated and purchased during the 2017-2018 period were compared to 2015 ACS data. For the 2016 evaluation period, among the 128 AA census tracts, 22 were designated as low-income, 25 were designated as moderate-income, and two census tracts were not assigned an income classification as of the 2010 US Census. Among the 128 census tracts comprising the FS MA AA for the 2017-2018 evaluation period, 24 were designated as low-income, 23 were designated as moderate-income, and three census tracts were not assigned an income classification as of the 2015 ACS.

Home Mortgage Loans

The Bank's geographic distribution of home mortgage loans within the FS MA AA is considered adequate for both the evaluation periods of 2016 and 2017-2018, given performance context. Overall, the geographic distribution of home mortgage loans reflects adequate distribution of loans in the AA's low- and moderate-income census tracts when considering significant market competition and demographic barriers present in the AA. Specifically, for the 2016 evaluation period, the Bank's level of lending amongst low-income geographies falls within a reasonable range below the aggregate comparator, while the level of lending amongst moderate-income geographies is near to the aggregate lending data. Westfield's level of lending during the 2017-2018 evaluation period amongst both low- and moderate-income geographies falls within a reasonable range below the aggregate lending data, our primary comparator. This performance is considered adequate across both evaluation periods given the Bank's position within the market and comparable dispersion of home mortgage lending relative to the percentage level of owner-occupied housing within the FS MA AA. When considering 2018 Peer Mortgage Data for home mortgage lending to low- and moderate-income geographies within the AA, Westfield ranked 17th amongst 198 lenders with 1.88 percent market share representing 62 instances of lending. Similarly, for 2016 Peer Mortgage Data within the AA, Westfield was ranked 31st amongst 176 lenders with 0.94 percent market share representing 26 instances of lending.

Please refer to Tables O in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

Small Loans to Businesses

The Bank's geographic distribution of small loans to businesses of different sizes within the FS MA AA is considered excellent for both evaluation periods, 2016 and 2017-2018, given performance context. Overall, the geographic distribution of small loans to businesses in the FS MA AA reflects good distribution amongst the low-income census tracts and excellent distribution of loans amongst the moderate-income census tracts. Specifically, Westfield's level of AA lending to moderate-income geographies for both evaluation periods exceeds the aggregate lending comparator. For low-income geographies, the Bank's level of lending falls within a reasonable range below the reported aggregate lending data. This performance is considered excellent across both evaluation periods given the Bank's position among competitors in the market, particularly for low-income geographies, and comparable dispersion of small loans to businesses relative to the percentage of businesses located within low- and moderate-income census tracts. When considering 2017 Peer Small Business Data for small business lending to low-income FS MA AA geographies, Westfield ranked 12th among 117 lenders with 2.55 percent market share representing 62 instances of lending. Similarly, for 2016 Peer Small Business Data within the AA, Westfield was also ranked 12th among 117 lenders with 1.64 percent market share representing 40 instances of lending. For both sets of peer data, the top five lenders of small loans to businesses located in low-income geographies remained unchanged and consisted of large national/regional institutions, including: American Express, Citibank, Bank of America, Capital One Bank, and Barrington Bank and Trust. These top five lenders accounted for approximately 58 percent and 50 percent of this market for the 2016 and 2017 reporting years, respectively, and all lenders outside of the top five maintained less than six percent market share across both time periods.

Please refer to Tables Q in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the geographic distribution of the Bank's origination and purchase of small loans to businesses.

Lending Gap Analysis

We reviewed demographic and AA mapping reports and held discussions with senior bank management as part of our assessment of Westfield's home mortgage and small business lending activity occurring during the evaluation period to identify potential gaps in the Bank's geographic lending patterns. Data detailing the Bank's lending activity for home mortgage and small business loans did not reveal any unexplained conspicuous gaps within the FS MA AA. During the evaluation period, Westfield consistently ranked amongst the top peer lenders in market share for home mortgage and small business lending to both low- and moderate-income geographies.

Distribution of Loans by Income Level of the Borrower

The Bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes within the FS MA AA, given the product lines offered by the institution. Borrower distribution of home mortgage loans is good and borrower distribution of small loans to businesses is excellent.

As previously discussed, due to demographic data updates occurring during the full evaluation period, January 1, 2016 to December 31, 2018, we segmented our analysis between two separate timeframes, specifically 2016 and 2017-2018. Loans originated and purchased in 2016 were compared to 2010 US Census data and loans originated and purchased during the 2017-2018 period were compared to 2015 ACS data. Within the FS MA AA for the 2016 period, 40 percent of families were designated as either low- or moderate-income and 82 percent of businesses reported annual revenues less than \$1 million. For the 2017-2018 evaluation period, 41 percent of families were designated as either low- or moderate-income and 82 percent of businesses reported annual revenues less than \$1 million.

Home Mortgage Loans

During the full evaluation period of January 1, 2016 to December 31, 2018, the Bank's borrower distribution of home mortgage loans within the FS MA AA is considered good given performance context. Performance during 2016 was excellent and performance during 2017-2018 was good. Overall, the borrower distribution of home mortgage loans reflects good penetration amongst individuals of different income levels when considering market competition within the AA, inherent demographic factors, and product lines offered by the Bank. Specifically, the Bank's level of lending during the 2016 evaluation period to both low- and moderate-income borrowers exceeds the aggregate lending comparator, meeting the standard for excellent performance. Westfield's level of lending during the 2017-2018 evaluation period to low-income borrowers falls within a reasonable range below the aggregate data, while the level of lending to moderate-income borrowers is near to the aggregate lending data, our primary comparator. This performance is deemed good for the 2017-2018 evaluation period when considering 2018 Peer Mortgage Data for home mortgage lending to both low- and moderate-income borrowers within the FS MA AA where Westfield ranked 10th among 202 competing lenders with 2.73 percent market share representing 121 instances of lending. This performance remains consistent when considering only those loans made to either low- or moderate-income borrowers. For low-income borrowers within the AA, 2018 Peer Mortgage Data indicates that Westfield maintains 2.14 percent of the market, ranking 16th amongst 128 lenders via 24 instances of lending. The 2018 Peer Mortgage Data also indicates that for moderate-income borrowers in the AA, Westfield maintains 2.92 percent share of the market and ranks 8th amongst 185 lenders via 97 instances of lending.

Please refer to Tables P in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the borrower distribution of the Bank's home mortgage loan originations and purchases.

Small Loans to Businesses

The Bank's borrower distribution of small loans to businesses of different sizes within the FS MA AA is considered excellent for both evaluation periods, 2016 and 2017-2018, given performance context. Overall the borrower distribution of small loans to businesses reflects excellent penetration among businesses of different sizes, given the product lines offered by the Bank, as Westfield's level of lending by number during both the 2016 and 2017-2018 evaluation periods to businesses with revenues less than \$1 million exceeds the aggregate CRA data, our primary comparator. This performance is supported by 2016 and 2017 Peer Small Business Data which indicates that Westfield consistently ranked among the leading lenders within the FS MA AA for both general small business lending and small business lending to those businesses with reported revenues less than or equal to \$1 million. Specifically, 2017 Peer Small Business Data shows that for general small business loans, Westfield ranked 12th amongst 117 lenders with 2.22 percent market share via 571 instances of lending. This 2017 lending performance remains consistent when filtered to only consider those small business loans made to

companies with reported revenues less than or equal to \$1 million, where Westfield ranked 9th amongst 117 lenders with 2.35 percent market share representing 276 instances of lending. For 2016, Peer Small Business Data indicates that for general small business lending Westfield ranked 11th amongst 117 lenders with 1.57 percent market share via 423 instances of lending. This 2016 lending performance remains consistent when filtered to only consider those small business loans made to firms with reported revenues less than or equal to \$1 million, where Westfield ranked 8th amongst 117 lenders with 1.85 percent market share representing 211 instances of lending.

Please refer to Tables R in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the borrower distribution of the Bank's origination and purchase of small loans to businesses.

Community Development Lending

The institution is a leader in making CD loans.

The Lending Activity Tables above, Number of Loans and Dollar Volume of Loans, sets 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.

Community Development lending within the State of MA is considered excellent and is reflected by the Bank's excellent CD lending within the FS MA AA during the CD evaluation period of July 5, 2016 through December 31, 2018. Specifically, Westfield originated a total of 47 qualified CD loans to 29 different community organizations within its FS MA AA totaling approximately \$66.4 million or approximately 29.7 percent of tier 1 capital as of December 31, 2018, meeting the standard for outstanding performance. The CD loans made by the Bank largely provided financing for local community groups who provide affordable housing and community services to low- and moderate-income and 'at risk' groups within the FS MA AA. These 'at risk' groups include the elderly, homeless, women, minorities, and those with medical or developmental disabilities. While the Bank's actual level of lending within its surrounding community was higher, these 47 instances of lending were verified as meeting the definition of community development.

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

- A \$3 million revolving line of credit that provides working capital to a community organization within Springfield, MA that provides community services to low- and moderate-income youth and adults with mental and developmental disabilities. This line of credit was renewed annually during the evaluation period.
- A \$3.49 million commercial mortgage to a local community group that provides family, housing, and emergency support community services to low- and moderate-income and 'at risk' populations. This commercial mortgage served to expand the community group's scope of operations so to be able to reach more people in need.
- A \$3 million revolving line of credit provided to the Massachusetts Business Development Corporation to support programming addressing community development needs throughout the greater MA statewide region, inclusive of the Bank's delineated FS MA AA. This line of credit was renewed annually during the evaluation period.

- Two loans totaling approximately \$7.53 million were made as part of the SBA 504 program to a Certified Development Company for the acquisition/renovation of affordable housing units for low- and moderate-income tenants within Holyoke, MA.
- A \$2.24 million commercial mortgage loan to an apartment community where the majority of the housing units are designated for low- and/or moderate-income populations. Furthermore, this apartment community participates in the Section 236 Preservation Program and receives funding through the Low-Income Housing Tax Credits program.

Product Innovation and Flexibility

The institution makes use of innovative and flexible lending practices in order to serve needs in the State of MA.

Since the previous CRA performance evaluation, Westfield continues to offer a standard array of lending products to its customers using flexible and specialized loan practices so to meet the credit needs of its delineated FS MA AA. These flexible/specialized loan practices help to promote lending amongst low- and moderate-income populations, small businesses, and first-time homebuyers.

A listing of the flexible/specialized lending programs Westfield offers are listed below:

- Small Business Banking Partnership – State of Massachusetts
- SBA Preferred Lender
- SBA 504/Certified Development Company Program
- Massachusetts Business Development Corporation Capital Access Program
- FHLB – Jobs New England
- Internal 1st Time Homebuyer Seminars
- MHFA 1st Home Buyers
- Mass Small Business Development Center

INVESTMENT TEST

The Bank's performance under the Investment Test in MA is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank's performance in the MA AA is considered excellent for the evaluation period of July 5, 2016 through December 31, 2018.

The institution has an excellent level of qualified CD investments and donations, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
FS MA AA	6	6,093	7	7,801	13	100	13,894	100	--	--

* *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.

Westfield's investments and donations demonstrate excellent responsiveness to credit and community development needs of the delineated FS MA AA. Qualified investments totaled approximately \$13.9 million or 6.22 percent of tier 1 capital as of December 31, 2018. The Bank made seven new investments in pools of mortgage backed securities, of which \$7.8 million was earmarked to benefit low- and moderate-income geographies and populations within the MA AA. As of this evaluation, the Bank also had six prior period investments earmarked to the FS MA AA totaling \$6.09 million.

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

- A \$3.66 million prior period investment in a CRA Qualified Investment Fund. The fund invests in CRA qualified projects, which primarily entails investments in debt instruments supporting affordable housing for low- and moderate-income populations/geographies and economic development for small businesses. Of the \$3.66 million prior period investment, \$1.72 million is earmarked to the MA-based AA.
- A \$2.08 million prior period investment in the Access Capital Community Investment Fund whose mission is to invest in debt securities that promote community development activities servicing low- and moderate-income populations. Of the \$2.08 million prior period investment, \$1.78 million is earmarked to the MA AA.
- A \$1.3 million prior period investment in the Solomon Hess SBA Loan Fund whose mission is to promote economic development by supporting permanent job creation, retention, and/or

improvement in low- or moderate-income geographies or in area targeted for redevelopment by federal, state, or local governments.

- A \$1.4 million period investment in a Government National Mortgage Association mortgage-backed security that provides affordable housing for low- and moderate-income populations, of which \$568,242 is earmarked to the FS MA AA.
- A \$3.18 million investment in a mortgage-backed security that provides affordable housing for low- and moderate-income individuals, of which \$3 million is earmarked to the FS MA AA.
- A \$1.5 million investment in a mortgage-backed security that provides affordable housing for low- and moderate-income individuals, all of which is earmarked to the FS MA AA.

For qualified donations, Westfield made 121 CD-eligible donations across 76 different community groups within the FS MA AA, totaling approximately \$792,788 for the evaluation period. Donations were made to qualified CD organizations that promote economic development among small businesses and affordable housing and community services, including educational services, healthcare, and professional training, targeted towards low- and moderate-income individuals within MA. While the Bank's actual level of charitable giving within its surrounding communities was higher, these 121 instances of giving were verified as meeting the definition of community development.

SERVICE TEST

The Bank's performance under the Service Test in MA is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank's performance in the FS MA AA is considered excellent for the evaluation period of July 5, 2016 through December 31, 2018.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
FS MA AA	100	20	100	10.0	35.0	35.0	20.0	15.1	16.9	31.6	33.8

Due to rounding, totals may not equal 100.0 and 2.7 percent of the FS MA AA population was located within geographies that have not been assigned an income classification.

Service delivery systems are accessible to geographies and individuals of different income levels. As of the end of our evaluation period, Westfield maintains 20 branches within their FS MA AA with two or 10 percent located in a low-income geography and seven or 35 percent located in a moderate-income geography. The Bank's distribution of their branch delivery system among low-income census tracts falls within a reasonable range below the percentage of the population located within low-income geographies. Specifically, 2015 ACS data indicates that within the FS MA AA, approximately 15 percent of the population is in a low-income geography and approximately 19 percent or 24 of the 128 AA census tracts are classified as low-income. The Bank's distribution of their branch delivery system among moderate-income census tracts exceeds the percentage of the population located within moderate-income geographies. Of the remaining 11 branches within the FS MA AA, seven are in middle-income census tracts and four are located in upper-income census tracts.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
FS MA AA	9	--	+1	+4	+4	---

During the evaluation period of 01/01/2016 – 12/31/2018 the Bank added nine additional branch locations within the FS MA AA.

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

As previously discussed, over the course of this evaluation Westfield acquired Chicopee Savings Bank as of October 21, 2016, inclusive of all of Chicopee's former branch locations. This resulted in an initial increase of eight Westfield branch locations dispersed throughout the FS MA AA during the fourth quarter of 2016, thereby increasing the total number of MA based branches to 20 locations. Among these eight acquired branches, one is located within a low-income geography and three are located within moderate-income geographies. Additionally, Westfield also opened an additional branch in the FS MA AA during the third quarter of 2018 at 1342 Liberty Street in Springfield, MA which is in a moderate-income geography. These four branches all located within moderate-income geographies are in close proximity with low-income census tracts in the FS MA AA and therefore also work to serve the credit needs of low-income geographies/individuals in the AA. Lobby and drive-up hours are similar between all full-service branches in the AA

Services, including where appropriate, business hours, do not vary in a way that inconveniences the FS MA AA, particularly low- and moderate-income geographies and individuals.

Lobby and drive-up hours are largely similar between all branches within the FS MA AA, with branches generally opening at 9:00 AM and closing between 4:00-6:00 PM, Monday through Friday, and between 12:00-1:00 PM on Saturdays. Drive-up hours are also available at most branch locations, opening earlier at 8:30 AM and closing between 4:00-6:00 PM, Monday through Friday, and between 12:00-1:00 PM on Saturdays.

Community Development Services

The institution is a leader in providing CD services.

During the evaluation period, 29 employees provided approximately 2,559 service hours across 36 different qualified CD organizations that benefit the FS MA AA and greater statewide region. All service hours were provided to organizations that provide for community services or affordable housing targeted for LMI populations and/or geographies or promotes economic development by providing financing to small businesses.

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

- An officer of the Bank serves on both the Board and finance committee for a local community organization that specializes in the provision of educational services and job skill training for low- and moderate-income populations with mental or developmental disabilities.
- A bank officer is a council member for a local economic development committee that promotes growth and investment in the region's economy via small business financing initiatives.
- A senior bank officer serves on the Board for a local community college finance committee whom oversees an endowment that provides scholarships for low- and moderate-income students.
- Eight Bank employees provided financial literacy training and credit counseling services for a local non-profit organization that caters to low- and moderate-income youth. Additionally, a senior bank officer also serves as the Chair for this non-profit's oversight committee.

- A Bank employee serves on the Board for a local non-profit organization that provides essential community services for low- and moderate-income elders based in the FS MA AA.
- The CRA Officer serves as a Board member for a local community organization that provides community services and educational programming for low- and moderate-income students.
- A Bank employee is an instructor/creator of a financial literacy program offered at a local small business development center whose mission is to promote economic development within the FS MA AA and broader state-wide region.

State Rating

State of Connecticut

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

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- The Bank exhibits a good geographic distribution of loans in its FS CT AA, stemming from an excellent geographic distribution of home mortgage loans and a poor geographic distribution of small loans to businesses.
- The Bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes within the FS CT AA, given the product lines offered by the institution. Borrower distribution of home mortgage loans is excellent and borrower distribution of small loans to businesses is good.
- The institution did not make any CD loans within its FS CT AA during the CD LT evaluation period of July 5, 2016 to December 31, 2018.
- The institution has an excellent level of qualified CD investments and donations as Westfield invested approximately \$6.10 million in qualified CD investments and donated \$23,510 in qualified charitable giving.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels and 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 low- and moderate-income geographies and/or to low- and moderate-income individuals
- The institution provides an adequate level of CD services, as during the evaluation period, one bank employee provided approximately three service hours to one qualified CD organization that benefits the FS CT AA.

Description of Institution's Operations in Connecticut

The State of CT represents Westfield's secondary area of operations. As previously discussed, Westfield's CT AA is comprised of a single rating area that includes adjacent CT geographies within both Hartford-West Hartford-East Hartford, CT MSA (#25540) and a single, adjacent non-MSA (#99999) CT geography. The FS CT AA consists of a total of 39 census tracts, including one low-, 21 middle-, and 15 upper-income census tracts, while the remaining two tracts were not assigned an income classification as of the 2015 ACS Census update. Additionally, as of the 2015 ACS Census update Westfield's FS CT AA did not contain any moderate-income tracts.

The Bank operates two branches/deposit taking ATMs within CT as of the end of our evaluation period, all of which are located within the delineated FS CT AA. Specifically, Westfield Bank maintains both branch locations within Hartford County, CT (#003), one in a middle- and one in upper-income tract. Mentioned previously, senior management included all CT-based geographies that are adjacent to those census tracts which contain the Bank's branch locations as part of their AA delineation as these areas contained components of the Bank's lending activity. This resulted in the inclusion of the following wholly-contiguous political subdivisions, namely the cities/towns of Ellington and Somers within Tolland County, CT (#013) and the Town of Barkhamsted, which is categorized as a non-MSA (#99999) CT geography within Litchfield County (#005) as of the 2015 ACS. This AA delineation is considered appropriate as it meets the regulatory definition and does not arbitrarily exclude any low- or moderate-income census tracts.

Considering the above AA delineation, we reviewed FDIC Deposit Market Share data as of June 30, 2018 among the three counties of Hartford, Tolland, and Litchfield. As of this time-period, Westfield was ranked 29th among 33 other competing financial institutions in this market area with 0.15 percent market share representing approximately \$69 million in deposits. This accounted for approximately 3.91 percent of all Westfield's deposits.

Competition for consumer deposits within the FS CT AA remains strong since the previous CRA performance evaluation. Primary competitors consist mainly of larger institutions that have a national or regional presence, such as Bank of America (42.69 percent market share/ranked first), Webster Bank (10.74 percent), United Bank (7.94 percent), TD Bank (6.65 percent), and People's United Bank (5.21 percent). Furthermore, the top six lenders within this space account for approximately 78 percent of all deposits, with the remaining 27 lenders each individually maintaining less than four percent market share.

As previously discussed, Westfield Bank's primary lending activity during the evaluation period consisted of residential home mortgages and commercial-small business loans. During the evaluation period, the Bank originated and purchased approximately 5.03 percent of both primary product types within the FS CT AA. Consequently, less weight was given to the Bank's performance within the State of CT when drawing overall conclusions as to the Bank's lending performance according to the CRA. Furthermore, due to the FS CT AA not having any moderate-income census tracts during the 2017-2018 evaluation period, nor any low-income census tracts during the 2016 evaluation period, an assessment of the Bank's geographic distribution of loans amongst these geographies was not performed as such an analysis would not be considered meaningful. Lastly, since the Bank had a limited number of home mortgage originations and purchases in the FS CT AA during the 2016 evaluation period, an analysis of the Bank's lending performance for this product type during this period was not performed as such an evaluation would not be considered significant.

As reported by Moody's Analytics Inc. in May 2019, the State of CT, including the Hartford-West Hartford-East Hartford CT MSA, is expected to continue as an economic underperformer when compared to the greater New England region and the nation. High business and labor costs, poor migration patterns, and appreciating housing prices continue to contribute to tepid recovery across the state, however housing has begun to show signs of affordability. Despite a less than favorable outlook, CT does have several strong economic characteristics that could contribute to long time growth, namely a highly educated labor force, an advanced manufacturing base, and low employment volatility.

During our evaluation, we were not able to make contact with a local community group for discussion on current credit needs, however, conversations with senior management, an assessment of demographic data, and a review of bank submitted CD loans, investments, donations, and service hours identified a variety of needs within the FS CT AA pertaining to community development. Noted activities included those pertaining to affordable housing or community services targeted towards low- and/or moderate-income populations or economic development by financing small businesses.

Please refer to the tables below for demographic information of the Bank's FS CT AA during the 2016 and 2017-2018 evaluation periods:

Table A5 – Demographic Information of the AA						
Assessment Area: Westfield FS CT AA-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	0.0	10.3	41.0	43.6	5.1
Population by Geography	167,241	0.0	9.0	40.8	48.7	1.4
Housing Units by Geography	63,877	0.0	10.2	42.3	47.6	0.0
Owner-Occupied Units by Geography	49,601	0.0	7.3	41.6	51.1	0.0
Occupied Rental Units by Geography	11,971	0.0	21.6	43.5	34.9	0.0
Vacant Units by Geography	2,305	0.0	12.6	49.4	38.0	0.0
Businesses by Geography	11,400	0.0	7.1	41.6	50.6	0.6
Farms by Geography	540	0.0	3.7	31.7	64.6	0.0
Family Distribution by Income Level	43,782	13.3	16.1	23.3	47.3	0.0
Household Distribution by Income Level	61,572	16.7	14.0	18.9	50.4	0.0
Median Family Income MSA - 25540 Hartford-West Hartford-East Hartford, CT MSA		\$82,299	Median Housing Value			\$275,503
			Median Gross Rent			\$959
Median Family Income Non-MSAs – CT		\$84,890	Families Below Poverty Level			2.8%

Source: 2010 U.S. Census and 2016 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.*

Table A4 – Demographic Information of the AA						
Assessment Area: Westfield FS CT AA-2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	2.6	0.0	53.8	38.5	5.1
Population by Geography	167,963	3.0	0.0	52.2	43.6	1.2
Housing Units by Geography	65,371	3.7	0.0	53.5	42.8	0.0
Owner-Occupied Units by Geography	48,519	0.6	0.0	53.6	45.8	0.0
Occupied Rental Units by Geography	12,962	13.7	0.0	53.8	32.5	0.0
Vacant Units by Geography	3,890	9.3	0.0	52.1	38.6	0.0
Businesses by Geography	11,852	1.9	0.0	52.4	45.1	0.5
Farms by Geography	588	0.0	0.0	45.1	54.9	0.0
Family Distribution by Income Level	43,576	14.3	16.2	22.4	47.1	0.0
Household Distribution by Income Level	61,481	17.6	13.6	18.6	50.2	0.0
Median Family Income MSA - 25540 Hartford-West Hartford-East Hartford, CT MSA		\$88,016	Median Housing Value			\$249,921
			Median Gross Rent			\$1,080
Median Family Income Non-MSAs – CT		\$89,735	Families Below Poverty Level			3.1%
<i>Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Connecticut

We completed a full-scope review of the Bank's delineated CT AA. This AA delineation is considered appropriate as it meets the regulatory definition by consisting of wholly-contiguous political subdivisions, contains all the Bank's CT-based branch locations, and does not arbitrarily exclude any low- or moderate-income census tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Connecticut

LENDING TEST

The Bank's performance under the LT in CT is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs when considering the Bank's scope of business within CT and the significant number of competing lenders in the FS CT AA.

Number of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	%State Loans	%State Deposits
FS CT AA	58	76	0	134	100%	100%

Dollar Volume of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	%State Loans	%State Deposits
FS CT AA	\$11,452	\$16,744	0	\$28,196	100%	100%

Westfield's lending market share within the FS CT AA is considered good given the significant market competition within the AA for both residential home mortgages and small business loans and the scope of the Bank's operations within the State of CT. Additionally, the Bank's quarterly net loan-to-deposit ratio also reflects good lending levels despite the significant, competing deposit bases of national and regional institutions. The Bank's net loan-to-deposit ratio averaged approximately 102.44 percent over the 12 quarters since the previous performance evaluation, January 1, 2016 through December 31, 2018.

2018 Peer Mortgage Market Share data indicates that Westfield ranked 47th among 267 lenders that reported home mortgage loans with a market share of less than one percent representing 30 instances of lending, indicative of a good level of lending given the competition and demographic factors. 2018 Peer

Mortgage Market Share data also indicates that the top five lenders within this space account for nearly 23 percent of the market while all remaining 262 lenders individually maintaining less than three percent market share. 2016 Peer Mortgage Market Share data indicates that Westfield's position in the market during this timeframe is not inconsistent with the Bank's position during the 2018 reporting year.

2017 Peer Small Business data indicates that Westfield ranked 39th among 114 lenders that reported small business lending with a market share of less than one percent representing 36 instances of lending. This is considered a good level of lending relative to the significant number of competing lenders in this space where the top five account for nearly 57 percent of the market. Additionally, lending levels were comparable during the 2016 period where Westfield ranked 38th among 123 lenders that reported small business lending with a market share of less than one percent representing 34 instances of lending.

Distribution of Loans by Income Level of the Geography

The Bank exhibits a good geographic distribution of loans in its FS CT AA, stemming from an excellent geographic distribution of home mortgage loans and a poor geographic distribution of small loans to businesses.

As previously discussed, due to demographic data updates occurring during the full evaluation period, January 1, 2016 to December 31, 2018, we segmented our analysis between two separate timeframes, specifically 2016 and 2017-2018. Loans originated and purchased in 2016 were compared to 2010 US Census data and loans originated and purchased during the 2017-2018 period were compared to 2015 ACS data. For the 2016 evaluation period, among the 39 AA census tracts four were designated as moderate-income and two census tracts were not assigned an income classification as of the 2010 US Census. Among the 39 census tracts comprising the FS CT AA for the 2017-2018 evaluation period, one was designated as low-income and two census tracts were not assigned an income classification as of the 2015 ACS. As there were no low-income census tracts during the 2016 evaluation period and no moderate-income census tracts in the FS CT AA during the 2017-2018 evaluation period, an assessment of the Bank's lending performance in this space was not considered meaningful.

Home Mortgage Loans

Overall, the Bank's geographic distribution of home mortgage loans within the FS CT AA is considered excellent, given performance context, and stems from excellent performance among low-income geographies during 2017-2018 as there were no moderate-income geographies in the AA during 2017-2018. Specifically, the Bank's level of lending for this product type exceeds the aggregate lending data, our primary comparator, as well as the percentage level of owner-occupied housing within FS CT AA. As only eight instances of home mortgage lending occurred within the FS CT AA during the 2016 evaluation period, an assessment of the Bank's lending performance in this space was not deemed significant. Overall the Bank's performance during 2016 is inconsistent with the Bank's performance during the 2017-2018 time period.

Please refer Tables O in the State of Connecticut section of Appendix D for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

Small Loans to Businesses

The Bank's geographic distribution of small loans to businesses of different sizes within the FS CT AA is considered poor, given performance context, and stems from an adequate performance during 2016 and a very poor performance during 2017-2018. Performance among low-income geographies in 2016 and moderate-income geographies in 2017-2018 was not assessed as the AA did not contain any such areas during these time periods. During 2016, the Bank's performance among moderate-income geographies falls within a reasonable range below the reported aggregate lending data and the percentage of businesses located within moderate-income census tracts. 2016 Peer Small Business data indicates competition remains significant for moderate-income geographies within the FS CT AA where the top five lenders accounted for nearly 57 percent of the market. During 2017-2018, none of the 50 small business loans originated and purchased in the FS CT AA were made in low-income geographies. 2017 Peer Small Business data indicates that within the FS CT AA the top five small business lenders accounted for nearly 55 percent of the market, illustrating the significant competition within this space.

Please refer to Tables Q in the State of Connecticut section of Appendix D for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of small loans to businesses.

Lending Gap Analysis

We reviewed demographic and AA mapping reports and held discussions with senior bank management as part of our assessment of Westfield's home mortgage and small business lending activity occurring during the evaluation period so to identify potential gaps in the Bank's geographic lending patterns. Data detailing the Bank's lending activity for home mortgage and small business loans did not reveal any unexplained conspicuous gaps within the FS CT AA, given the significant level of market competition for both home mortgage and small business loans.

Distribution of Loans by Income Level of the Borrower

The Bank exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes within the FS CT AA, given the product lines offered by the institution, and stems from an excellent borrower distribution of home mortgage loans and a good borrower distribution of small loans to businesses.

As previously discussed, due to demographic data updates occurring during the full evaluation period, January 1, 2016 to December 31, 2018, we segmented our analysis between two separate timeframes, specifically 2016 and 2017-2018. Loans originated and purchased in 2016 were compared to 2010 US Census data and loans originated and purchased during the 2017-2018 period were compared to 2015 ACS data. Within the FS CT AA, for the 2016 period, 29 percent of families were designated as either low- or moderate-income and 85 percent of businesses reported annual revenues less than \$1 million. For the 2017-2018 evaluation period, approximately 31 percent of families were designated as either low- or moderate-income and 86 percent of businesses reported annual revenues less than \$1 million.

Home Mortgage Loans

During the full evaluation period of January 1, 2016 to December 31, 2018, the Bank's borrower distribution of home mortgage loans within the FS CT AA is considered excellent, given performance

context, and is driven primarily by the Bank's excellent lending penetration during the 2017-2018 evaluation period. The distribution of home mortgage loans to moderate-income borrowers significantly exceeds the aggregate comparator, our primary benchmark, and percentage of families within moderate-income tracts. The distribution of home mortgage loans to low-income borrowers meets the aggregate comparator. As only eight instances of home mortgage lending occurred within the FS CT AA during the 2016 evaluation period, an assessment of the Bank's lending performance in this space was not deemed significant. Overall the Bank's performance during 2016 is not consistent with the Bank's performance during the 2017-2018 time period.

Please refer to Tables P in the State of Connecticut section of Appendix D for the facts and data used to evaluate the borrower distribution of the Bank's home mortgage loan originations and purchases.

Small Loans to Businesses

Overall, the Bank's borrower distribution of small loans to businesses of different sizes within the FS CT AA is considered good and reflects good penetration among businesses of different sizes given product lines offered by the Bank. The Bank's level of lending by number during the 2016 evaluation period to businesses with revenues less than \$1 million exceeds the aggregate CRA data. The Bank's level of lending by number during the 2017-2018 evaluation period to businesses with revenues less than \$1 million is near to the aggregate CRA data, our primary comparator.

Please refer to Tables R in the State of Connecticut section of Appendix D for the facts and data used to evaluate the borrower distribution of the Bank's origination and purchase of small loans to businesses.

Community Development Lending

The institution did not make any CD loans within its FS CT AA during the CD LT evaluation period of July 5, 2016 to December 31, 2018.

Product Innovation and Flexibility

The institution makes limited use of innovative and flexible lending practices in order to serve needs in the State of CT.

Since the previous CRA performance evaluation, Westfield continues to offer a standard array of lending products to its customers using flexible and specialized loan practices to meet the credit needs of its delineated FS CT AA. These flexible/specialized loan practices help to promote lending amongst low- and moderate-income populations, small businesses, and first-time homebuyers.

A listing of the flexible/specialized lending programs Westfield offers are listed below:

- SBA Preferred Lender
- SBA 504/Certified Development Company Program
- FHLB – Jobs New England
- Internal 1st Time Homebuyer Seminars

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank's performance in the CT AA is considered excellent for the evaluation period of July 5, 2016 through December 31, 2018.

Overall, the institution has an excellent level of qualified CD investments and donations, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
FS CT AA	5	3,105	6	2,998	11	84.62100	6,103	100	--	--

* 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.

Westfield's investments and donations demonstrate excellent responsiveness to credit and community development needs of the delineated FS CT AA. Qualified investments totaled approximately \$6.1 million or 2.7 percent of tier 1 capital as of December 31, 2018. The Bank made six new investments in pools of mortgage backed securities, of which \$3.0 million was earmarked to benefit low- and moderate-income geographies and populations within the CT-based AA. As of this evaluation, the Bank also had five prior period investments earmarked to the FS CT AA totaling \$3.1 million.

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

- A \$3.66 million prior period investment in a CRA Qualified Investment Fund. The fund invests in CRA qualified projects, which primarily entails investments in debt instruments supporting affordable housing for low- and moderate-income populations/geographies and economic development for small businesses. Of the \$3.66 million prior period investment, \$1.94 million is earmarked to the CT-based AA.
- A \$2.08 million prior period investment in the Access Capital Community Investment Fund whose mission is to invest in debt securities that promote community development activities servicing low- and moderate-income populations. Of the \$2.08 million prior period investment, \$295,694 is earmarked to the CT AA.
- A \$1.4 million period investment in a Government National Mortgage Association mortgage-backed security that provides affordable housing for low- and moderate-income populations, of which \$443,585 is earmarked to the FS CT AA.

- A \$3.18 million investment in a mortgage-backed security that provides affordable housing for low- and moderate-income individuals, of which \$170,651 is earmarked to the FS CT AA.

For qualified donations, Westfield made seven CD-eligible donations across five different community groups within the FS CT AA, totaling \$23,510 for the evaluation period. Donations were made to qualified CD organizations that promote economic development among small businesses and affordable housing and community services, including educational services, healthcare, and professional training, targeted towards low- and moderate-income individuals within CT. While the Bank’s actual level of charitable giving within its surrounding communities was higher, these seven instances of giving were verified as meeting the definition of community development.

SERVICE TEST

The Bank’s performance under the Service Test in CT is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank’s performance in the FS CT AA is considered adequate for the evaluation period of July 5, 2016 through December 31, 2018.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
FS CT AA	100	2	100	0.0	0.0	50.0	50.0	3.0	0.0	52.2	43.6

Due to rounding, totals may not equal 100.0 and 1.2 percent of the FS MA AA population was located within geographies that have not been assigned an income classification.

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AA. As of the end of our evaluation period, Westfield maintains two branches within their FS CT AA; however, neither branch is located within a low- or moderate-income geography. Furthermore, the Bank’s delineated FS CT AA did not have any moderate-income tracts during the 2017-2018 evaluation period, and only one of the 39 census tracts or 2.6 percent were designated as low-income. One of the Bank’s two FS CT AA branches is located in a geography that is adjacent to the single low-income census tract within the delineated AA.

Westfield did not open, close, or make any other changes to the branches within its FS CT AA during the assessment period.

Services and business hours, do not vary in a way that inconveniences the FS CT AA, particularly low- and moderate-income geographies and individuals.

Lobby and drive-up hours are largely similar between all branches within the FS MA AA, with branches generally opening at 9:00 AM and closing between 4:00-6:00 PM, Monday through Friday, and between 12:00-1:00 PM on Saturdays. Drive-up hours are also available at most branch locations, opening earlier at 8:30 AM and closing between 4:00-6:00 PM, Monday through Friday, and between 12:00-1:00 PM on Saturdays.

Community Development Services

The institution provides an adequate level of community development services.

During the evaluation period, one bank employee provided approximately three service hours to one qualified CD organization that benefits the FS CT AA. Service hours were provided to an organization that fosters worker readiness and provides other community services targeted to the low- and moderate-income populations within the FS CT AA.

Appendix A: Scope of Examination

The following table identifies the time-period covered in this evaluation, affiliate activities that were reviewed (if applicable), and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time-Period Reviewed:	Lending Test – (01/01/2016 to 12/31/2018) Community Development Lending, Investment Test, Service Test – (07/05/2016 to 12/31/2018)	
Bank Products Reviewed:	HMDA-reportable, residential mortgage loans CRA-reportable, small business loans Community Development-eligible loans, investments, and services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None reviewed.		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Massachusetts		
FS MA AA – portions of both the Springfield, MA MSA (#44140) and the adjacent Worcester, MA-CT MSA (#49340)	Full-scope	<ul style="list-style-type: none"> • Springfield, MA MSA (#44140) <ul style="list-style-type: none"> ○ full Hampden County (#013) ○ portions of Hampshire County (#015) <ul style="list-style-type: none"> ▪ Amherst, Belchertown, Easthampton, Granby, Hadley, Huntington, South Hadley, Southampton, and Ware. • Worcester, MA-CT MSA (#49340) <ul style="list-style-type: none"> ○ portions of Worcester County (#027) <ul style="list-style-type: none"> ▪ Hardwick, New Braintree, Warren, and West Brookfield (three census tracts).
Connecticut		
FS CT AA – portions of the Hartford-West Hartford-East Hartford, CT MSA (#25540) and a single, non-MSA (#99999) census tract located in the adjacent Litchfield County (#005)	Full-scope	<ul style="list-style-type: none"> • Hartford-West Hartford-East Hartford, CT MSA (#25540) <ul style="list-style-type: none"> ○ portions of Hartford County (#003) <ul style="list-style-type: none"> ▪ Canton, East Granby, East Windsor, Enfield, Granby, Hartland, Simsbury, Suffield, Windsor Locks. ○ portions of Tolland County (#013) <ul style="list-style-type: none"> ▪ Ellington and Somers. • Connecticut non-MSA geographies (#99999) <ul style="list-style-type: none"> ○ portions of Litchfield County (#005) <ul style="list-style-type: none"> ▪ Barkhamsted (one census tract).

Appendix B: Summary of State Ratings

RATINGS – Westfield Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Westfield Bank	Outstanding	Outstanding	Outstanding	Outstanding
State:				
Massachusetts	Outstanding	Outstanding	Outstanding	Outstanding
Connecticut	Satisfactory	Outstanding	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: 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/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.

Westfield Bank – #717968

Full-Scope Massachusetts Assessment Area: 2017-2018 Evaluation Period

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
Westfield MA AA	836	158,104	100.0	14,395	5.0	4.4	6.3	14.1	9.5	16.6	36.3	34.1	35.7	44.7	52.0	41.3	0.0	0.0	0.0
Total	836	158,104	100.0	14,395	5.0	4.4	6.3	14.1	9.5	16.6	36.3	34.1	35.7	44.7	52.0	41.3	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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Westfield MA AA	836	158,104	100.0	14,395	25.4	4.7	7.8	15.9	20.9	23.1	17.9	21.2	23.1	40.8	44.3	30.4	0.0	9.0	15.7
Total	836	158,104	100.0	14,395	25.4	4.7	7.8	15.9	20.9	23.1	17.9	21.2	23.1	40.8	44.3	30.4	0.0	9.0	15.7

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

Westfield Bank – #717968

Full-Scope Massachusetts Assessment Area: 2017-2018 Evaluation Period

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-2018

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Westfield MA AA	1,109	224,579	100.0	10,007	15.8	10.6	14.4	17.5	26.0	16.9	27.6	30.8	28.3	38.3	32.6	40.2	0.8	0.0	0.2
Total	1,109	224,579	100.0	10,007	15.8	10.6	14.4	17.5	26.0	16.9	27.6	30.8	28.3	38.3	32.6	40.2	0.8	0.0	0.2

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-2018

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Westfield MA AA	1,109	224,579	100.0	10,007	81.6	46.1	45.2	6.3	53.7	12.1	0.5
Total	1,109	224,579	100.0	10,007	81.6	46.1	45.2	6.3	53.7	12.1	0.5

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

Westfield Bank – #717968

Full-Scope Massachusetts Assessment Area: 2016 Evaluation Period

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
Westfield MA AA	166	28,821	100.0	14,615	3.4	2.4	3.5	16.0	13.3	15.4	41.8	41.6	41.3	38.8	42.8	39.8	0.0	0.0	0.0
Total	166	28,821	100.0	14,615	3.4	2.4	3.5	16.0	13.3	15.4	41.8	41.6	41.3	38.8	42.8	39.8	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Westfield MA AA	166	28,821	100.0	14,615	24.1	9.0	5.7	16.1	21.7	19.8	19.2	17.5	23.4	40.6	38.0	35.5	0.0	13.9	15.7
Total	166	28,821	100.0	14,615	24.1	9.0	5.7	16.1	21.7	19.8	19.2	17.5	23.4	40.6	38.0	35.5	0.0	13.9	15.7

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

Westfield Bank – #717968

Full-Scope Massachusetts Assessment Area: 2016 Evaluation Period

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2016		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate			
Westfield MA AA	417	72,912	100.0	11,772	15.5	9.6	12.5	17.5	18.9	15.3	32.1	40.5	34.4	34.6	30.9	37.7	0.3	0.0	0.2			
Total	417	72,912	100.0	11,772	15.5	9.6	12.5	17.5	18.9	15.3	32.1	40.5	34.4	34.6	30.9	37.7	0.3	0.0	0.2			

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Westfield MA AA	417	72,912	100.0	11,772	81.6	49.6	40.9	6.4	50.4	12.0	0.0		
Total	417	72,912	100.0	11,772	81.6	49.6	40.9	6.4	50.4	12.0	0.0		

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

Westfield Bank – #717968

Full-Scope Connecticut Assessment Area: 2017-2018 Evaluation Period

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
Westfield CT AA	50	9,522	100.0	4,955	0.6	2.0	0.9	0.0	0.0	0.0	53.6	52.0	52.0	45.8	46.0	47.0	0.0	0.0	0.0
Total	50	9,522	100.0	4,955	0.6	2.0	0.9	0.0	0.0	0.0	53.6	52.0	52.0	45.8	46.0	47.0	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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Westfield CT AA	50	9,522	100.0	4,955	14.3	10.0	10.0	16.2	40.0	23.4	22.4	20.0	23.6	47.1	22.0	30.0	0.0	8.0	13.0
Total	50	9,522	100.0	4,955	14.3	10.0	10.0	16.2	40.0	23.4	22.4	20.0	23.6	47.1	22.0	30.0	0.0	8.0	13.0

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

Westfield Bank – #717968

Full-Scope Connecticut Assessment Area: 2017-2018 Evaluation Period

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-2018		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Westfield CT AA	50	10,917	100.0	3,245	1.9	0.0	1.6	0.0	0.0	0.0	52.4	68.0	52.8	45.1	32.0	45.4	0.5	0.0	0.2		
Total	50	10,917	100.0	3,245	1.9	0.0	1.6	0.0	0.0	0.0	52.4	68.0	52.8	45.1	32.0	45.4	0.5	0.0	0.2		

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-2018	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Westfield CT AA	50	10,917	100.0	3,245	85.5	54.0	55.0	5.2	46.0	9.3	0.0		
Total	50	10,917	100.0	3,245	85.5	54.0	55.0	5.2	46.0	9.3	0.0		

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

Westfield Bank – #717968

Full-Scope Connecticut Assessment Area: 2016 Evaluation Period

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	
Westfield CT AA	8	1,930	100.0	5,317	0.0	0.0	0.0	7.3	0.0	7.6	41.6	25.0	40.5	51.1	75.0	51.9	0.0	0.0	0.0	
Total	8	1,930	100.0	5,317	0.0	0.0	0.0	7.3	0.0	7.6	41.6	25.0	40.5	51.1	75.0	51.9	0.0	0.0	0.0	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Westfield CT AA	8	1,930	100.0	5,317	13.3	0.0	6.3	16.1	0.0	17.5	23.3	25.0	23.7	47.3	25.0	36.2	0.0	50.0	16.3	
Total	8	1,930	100.0	5,317	13.3	0.0	6.3	16.1	0.0	17.5	23.3	25.0	23.7	47.3	25.0	36.2	0.0	50.0	16.3	

*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*

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Full-Scope Connecticut Assessment Area: 2016 Evaluation Period

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Westfield CT AA	26	5,827	100.0	3,919	0.0	0.0	0.0	7.1	3.8	6.5	41.6	53.8	40.5	50.6	42.3	52.9	0.6	0.0	0.1	
Total	26	5,827	100.0	3,919	0.0	0.0	0.0	7.1	3.8	6.5	41.6	53.8	40.5	50.6	42.3	52.9	0.6	0.0	0.1	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Westfield CT AA	26	5,827	100.0	3,919	84.9	65.4	50.1	5.3	34.6	9.8	0.0		
Total	26	5,827	100.0	3,919	84.9	65.4	50.1	5.3	34.6	9.8	0.0		

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