



PUBLIC DISCLOSURE

September 15, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

42 North Private Bank
Charter Number: 713964

250 Royall Street
Suite 305E
Canton, MA 02021

Office of the Comptroller of the Currency

75 Federal Street
Suite 805
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 Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on 42 North Private Bank's ('42 North' or 'the bank') record of performance in meeting the credit needs of the bank's assessment areas (AAs) during the January 1, 2021, to December 31, 2023, evaluation period through its lending activities. We considered the bank's limited ability to lend due to capital restrictions, a change in business strategy during the evaluation period, and the highly competitive loan market when reaching our conclusions.
- Considering the institution's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit (LTD) ratio is more than reasonable.
- A majority of the bank's loans are outside its AA.
- The bank exhibits a reasonable geographic distribution of loans in its AAs, given performance context.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels in the AAs, given performance context.
- The bank did not receive any CRA-related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable. The bank's quarterly LTD ratio averaged approximately 99.3 percent over the 12-quarter evaluation period, exceeding other peer institutions of similar size, business strategy, and geographic location. During this period, the LTD ratio ranged from a quarterly low of 81.2 percent to a quarterly high of 113.9 percent. The peer group had a quarterly average LTD ratio of approximately 77.0 percent over the same 12-quarter period, ranging from a quarterly low of 58.2 percent to a quarterly high of 96.5 percent.

Lending in Assessment Area

A majority of the bank's loans were outside its AAs. 42 North originated and/or purchased 46.24 percent by number and 42.18 percent by dollar volume of its total primary product loans inside its AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	43	46.24	50	53.76	93	30,149	42.18	41,323	57.82	71,472
Total	43	46.24	50	53.76	93	30,149	42.18	41,323	57.82	71,472

Source: 1/1/2021 - 12/31/2023 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

42 North Private Bank, formerly known as ‘Ethic, A Wealth Bank’ (Ethic), is a federal savings association headquartered at 250 Royall Street, Canton, Massachusetts (MA), with a reported \$234.7 million in total assets as of December 31, 2023. The institution is wholly owned by 42 North Private Holdings (the holding company), and there were no affiliate or subsidiary activities considered as part of this CRA performance evaluation. Due to 42 North’s financial condition, the bank continues to operate under a Consent Order issued by the Office of the Comptroller of the Currency (OCC) in March 2017. The Consent Order requires the bank to maintain minimum capital reserves. In response to the Consent Order, the bank’s executive management strategically curtailed lending activity during the evaluation period so to bolster liquidity and achieve minimum capital requirements, which was considered as part of this evaluation’s performance context.

While 42 North does offer traditional deposit and lending products to customers, including demand deposit accounts, certificate of deposit products, traditional residential mortgages, lines of credit, commercial loans, and consumer loans, during the evaluation period the bank’s primary business model was to provide concierge-styled, high-touch boutique private banking services catered towards high net-worth clients. 42 North fostered these clients through strategic and complimentary networking relationships with attorneys, accountants, financial advisors, and other business professional centers of influence.

The bank operates out of one main office in Canton, MA, which is open to the public by appointment only, after closing their remaining branches during the evaluation period. The bank does not have any automated teller machines (ATMs). Since the previous evaluation, the bank has refocused its lending strategy from the prior national lending profile to a more local, while still geographically large, footprint among the three states of MA, New Hampshire (NH), and Rhode Island (RI). Specifically, the bank primarily operates within the Boston-Cambridge-Newton, MA-NH multistate metropolitan statistical area (MMSA) and the Providence-Warwick, RI-MA MMSA, or the Boston MA-NH MMSA AA and the Providence RI-MA MMSA AA, respectively.

As of December 31, 2023, 42 North reported total assets, total deposits, and tier 1 capital of \$234.7 million, \$179.3 million, and \$20.6 million, respectively. The loan portfolio totaled approximately \$189.6 million, or 80.8 percent of total assets.

The table below provides a summary of the loan mix as of December 31, 2023:

Loan Portfolio Summary by Loan Product December 31, 2023	
Loan Category	% of Gross Loans and Leases
1-4 Family Residential Mortgage – Closed End	61.94
Commercial Real Estate	15.12
Consumer Loans	9.19
Multifamily	6.05
Home Equity	5.49
Construction & Development	2.03
Commercial & Industrial	0.18
Total	100.0

Source: Federal Deposit Insurance Corporation Call Report, December 31, 2023. Due to rounding, totals may not equal 100.0 percent.

The bank was rated ‘Satisfactory’ using Small Bank (SB) procedures at the previous CRA performance evaluation dated January 11, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

42 North was evaluated using SB procedures, which assess the bank’s performance according to the CRA under components of a Lending Test. The Lending Test evaluates the bank’s record of meeting the credit needs of its AA through lending activities. The bank’s performance was assessed using sampled home mortgage loans originated and/or purchased between January 1, 2021 through December 31, 2023.

Due to updates made to demographic information during the evaluation period stemming from the 2020 U.S. Census, the bank’s lending activity from January 1, 2021, to December 31, 2021, was assessed separate from lending occurring during January 1, 2022, to December 31, 2023. Between the two periods, overall consideration was first assigned to the bank’s lending during 2022-2023, as this period accounted for the majority of all loan originations compared to the 2021 time period. For the geographic and borrower distribution analyses, loan data was compared to 2010 and 2020 U.S. Census data and 2021-2023 Peer Mortgage data. For performance context, 2021-2023 Peer Mortgage data was used for support, as applicable, and Peer Deposit market share data is as of June 30, 2021-2023, based on information from the Federal Deposit Insurance Corporation (FDIC).

Additionally, performance context considered housing affordability needs, leveraging the AA’s reported median family income (MFI) and assumed maximum monthly principal and interest mortgage payments of no more than 30 percent of an applicant’s income. This was compared to the monthly payment for a 30-year mortgage with a 5 percent interest rate, not considering any down payment, homeowner’s insurance, real estate taxes, or additional monthly expenses, using the AA’s reported median housing value (MHV) to assess the affordability for either low- and moderate-income (LMI) borrowers.

Selection of Areas for Full-Scope Review

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

metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable, 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. Refer to appendix A, Scope of Examination, for a list of AAs.

The CRA requires an institution to define its AAs in which it will be evaluated. For this performance evaluation, 42 North has delineated two separate MMSA AAs, the Boston MA-NH MMSA AA and the Providence RI-MA MMSA AA, that meet the requirements of the regulation by consisting of wholly contiguous political subdivisions (counties), by containing all bank branch locations, and by not arbitrarily excluding any LMI geographies. As previously indicated, the bank did experience changes to the distribution of their branch network during the evaluation period, which impacted the OCC's analysis and selection of areas for full-scope review.

As of the beginning of our evaluation, 42 North operated two branches within their bank-wide AA, one in each of the Boston MA-NH MMSA AA and Providence RI-MA MMSA AA, located at 125 High Street, Boston, MA and 935 Jefferson Boulevard, Warwick, RI, respectively. During the 2022 evaluation year, 42 North closed the Warwick, RI branch and moved operations from the Boston, MA branch to the current Canton, MA headquarters. This resulted in branches being active in the Boston MA-NH MMSA AA for the duration of the three-year evaluation period and active in the Providence RI-MA MMSA AA for only the 2021 and 2022 evaluation years. Consequently, our analysis of the Providence RI-MA MMSA AA was conducted for only the 2021 and 2022 evaluation years while the Boston MA-NH MMSA AA analysis was conducted for the full three-year evaluation across the 2021 and 2022-2023 segmented periods.

The Boston MA-NH MMSA AA consists of three separate metropolitan divisions (MDs), the Boston, MA MD, the Cambridge-Newton-Framingham, MA MD, and the Rockingham County-Strafford County, NH MD, inclusive of all counties in the MMSA. Specifically, the Boston MA-NH MMSA AA includes Norfolk, Plymouth, Suffolk, Essex, and Middlesex Counties, MA and Rockingham and Strafford Counties, NH. The Providence RI-MA MMSA AA consists of the entirety of the Providence-Warwick, RI-MA MMSA, including Bristol, Kent, Newport, Providence, and Washington Counties, RI and Bristol County, MA.

Ratings

The bank's overall rating is a blend of the multistate ratings.

Among the two MMSA rating areas, the OCC more heavily weighted the bank's performance in the Boston MA-NH MMSA AA when drawing final conclusions, as this MMSA AA accounted for the majority of bank-wide deposits and lending activity occurring during the evaluation period.

The MMSA rating areas with a single AA are based on performance in that AA. Refer to the "Scope" section under each MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the 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.

Multistate Metropolitan Statistical Area Rating

Boston-Cambridge-Newton, MA-NH MMSA

CRA rating for the Boston MA-NH MMSA: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibited a reasonable geographic distribution of loans in the MMSA, given performance context.
- The bank exhibited a reasonable distribution of loans to individuals of different income levels in the MMSA, given performance context and the product lines offered by the bank.
- The bank did not receive any CRA related complaints during the evaluation period.

Description of Institution's Operations in Boston-Cambridge-Newton, MA-NH MMSA

The Boston MA-NH MMSA AA represents the bank's geographically largest area of operations and consists of a single rating area, the full-scope Boston MA-NH MMSA AA. As previously discussed, this rating area includes Norfolk, Plymouth, Suffolk, Essex, and Middlesex Counties, MA and Rockingham and Strafford Counties, NH. The AA consists of wholly contiguous political subdivisions in MA and NH, does not arbitrarily exclude any LMI geographies, nor does the AA delineation contain any unexplained or conspicuous gaps. As of the end of our evaluation period, the AA contains the only branch location, the main office headquartered in Canton, MA, and the entirety of the customer deposit base.

Due to previously mentioned census updates, 42 North experienced changes to the classification of geographies within the AA, which the OCC considered as part of our analysis of the bank's performance under the CRA for the 2021 and 2022-2023 segmented evaluation periods. During 2021, the Boston MA-NH MMSA AA included a total of 1,007 census tracts, including 113 low-, 197 moderate-, 389 middle-, and 288 upper-income census tracts, while the remaining 20 tracts were not assigned an income classification as of the 2010 U.S. Census. For the 2022-2023 period, the number of tracts within the AA increased to a total of 1,134 census tracts, including 111 low-, 208 moderate-, 410 middle-, and 358 upper-income census tracts, while the remaining 47 tracts were not assigned an income classification as of the 2020 U.S. Census.

Community Contact

As part of this evaluation, to better assess the bank's performance with AA context, the OCC leveraged recent community contacts made within the bank's Boston MA-NH MMSA AA during the January 1, 2021, to December 31, 2023, evaluation period. Contacts included six local community organizations that operate within Essex and Middlesex Counties, MA. One of the organizations contacted operates as a local community organization focused on creating and preserving affordable housing opportunities for LMI families and providing technical and financial assistance for small businesses. Another organization contacted operates as a 501(c)(3) community housing development corporation with a

mission to promote the development, rehabilitation, and maintenance of affordable housing in the AA, focusing on LMI individuals and families. The contacts shared that rising housing prices in the region present significant hurdles for LMI families in an area that is still recovering from COVID-19 pandemic era challenges.

2021

Moody's Analytics reports that the Boston-Cambridge-Newton, MA-NH MMSA is in the recovery phase of its business cycle for 2021. Primary industries include technology, higher education, finance, and healthcare. Employment trends have slowed in the area specifically for the finance sector, but the performance of companies has improved as asset prices increased during the COVID-19 pandemic. Given the higher cost of living within the region, many consumers have continued to telework, which has hurt the local service industry, however, as offices reopen, the service industry is anticipated to rebound. Top employers for the Boston area in 2021, include Mass General Brigham, The University of Massachusetts, and Stop and Shop Supermarket Company.

Assessment Area(s) - Boston MA-NH MMSA AA 2021						
						2021
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,007	11.22	19.56	38.63	28.60	1.99
Population by Geography	4,694,565	9.45	19.85	40.49	29.93	0.28
Housing Units by Geography	1,900,927	8.91	20.51	41.41	28.95	0.22
Owner-Occupied Housing by Geography	1,089,886	3.33	14.93	45.81	35.83	0.11
Occupied Rental Units by Geography	686,554	17.53	28.51	34.73	18.84	0.39
Vacant Units by Geography	124,487	10.21	25.24	39.75	24.47	0.34
Businesses by Geography	249,554	7.18	15.73	39.06	37.67	0.36
Farms by Geography	6,178	3.79	13.14	46.46	36.48	0.13
Family Distribution by Income Level	1,129,245	23.27	16.41	19.70	40.62	0.00
Household Distribution by Income Level	1,776,440	26.46	14.55	16.48	42.52	0.00
Unemployment rate (%)	7.04	12.73	8.42	6.60	5.08	8.70
Households Below Poverty Level (%)	10.94	30.02	15.79	7.99	5.90	29.02
Median Family Income (14454 - Boston, MA MD)		\$90,699		Median Housing Value		\$350,900
Median Family Income (15764 - Cambridge-Newton-Framingham, MA MD)		\$100,380		Median Gross Rent		\$1,203
Median Family Income (40484 - Rockingham County-Strafford County, NH MD)		\$90,150		Families Below Poverty Level		7.23
Median Family Income (14454 - Boston, MA MD) for 2021		\$113,700				
Median Family Income (15764 - Cambridge-Newton-Framingham, MA MD) for 2021		\$120,200				
Median Family Income (40484 - Rockingham County-Strafford County, NH MD) for 2021		\$110,600				
FFIEC File - 2010 Census						
2021 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

2022-2023

In 2023, Moody's Analytics reports the Boston-Cambridge-Newton, MA-NH MMSA is in the late expansion phase of its economy. Key industries continue to be technology, higher education, finance, and healthcare. Financial conditions limit both employment and growth in the tech sector as it is costly for newer companies. Growth in the finance sector will remain flat while the healthcare sector stands to benefit from the aging population requiring additional care. The top employers in the area are Mass General Brigham, Beth Israel Lahey Health, and The University of Massachusetts.

Assessment Area(s) - Boston MA-NH MMSA AA 2023						
						2022 - 2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,134	9.79	18.34	36.16	31.57	4.14
Population by Geography	4,941,632	9.15	19.02	37.96	32.73	1.14
Housing Units by Geography	1,972,346	8.58	19.24	38.98	32.18	1.02
Owner-Occupied Housing by Geography	1,143,559	3.31	15.02	42.76	38.39	0.52
Occupied Rental Units by Geography	709,196	16.92	26.07	32.81	22.49	1.71
Vacant Units by Geography	119,591	9.43	19.18	39.42	30.18	1.78
Businesses by Geography	220,742	6.30	15.50	36.68	40.25	1.27
Farms by Geography	5,486	3.34	14.35	43.09	38.68	0.55
Family Distribution by Income Level	1,172,623	22.45	16.61	20.21	40.73	0.00
Household Distribution by Income Level	1,852,755	26.21	14.63	17.10	42.06	0.00
Unemployment rate (%)	4.87	10.05	6.16	4.13	3.68	6.07
Households Below Poverty Level (%)	9.81	26.93	13.79	7.36	5.66	17.34
Median Family Income (14454 - Boston, MA MD)		\$112,607		Median Housing Value		\$447,850
Median Family Income (15764 - Cambridge-Newton-Framingham, MA MD)		\$121,481		Median Gross Rent		\$1,490
Median Family Income (40484 - Rockingham County-Strafford County, NH MD)		\$107,377		Families Below Poverty Level		5.81
Median Family Income (14454 - Boston, MA MD) for 2023		\$136,900				
Median Family Income (15764 - Cambridge-Newton-Framingham, MA MD) for 2023		\$146,200				
Median Family Income (40484 - Rockingham County-Strafford County, NH MD) for 2023		\$135,200				
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
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 Boston-Cambridge-Newton, MA-NH MMSA

The rating for the Boston-Cambridge-Newton, MA-NH MMSA is based on a full-scope review of the bank's performance in the Boston MA-NH MMSA AA. Refer to appendix A for additional information on the AA under review.

LENDING TEST

The bank's performance under the Lending Test in the Boston-Cambridge-Newton, MA-NH MMSA is rated Satisfactory.

Based on a full-scope review, the bank's performance in the Boston MA-NH MMSA AA was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited a reasonable geographic distribution of loans in the MMSA, given performance context.

Home Mortgage Loans

Refer to Table 7 in the Boston-Cambridge-Newton, MA-NH MMSA 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.

Overall, the geographic distribution of home mortgage loans in the Boston MA-NH MMSA AA is reasonable, given performance context.

2021

The geographic distribution of home mortgage loans is reasonable, given performance context.

The bank originated only nine loans during this analysis period. The bank did not originate and/or purchase any home mortgage loans in low-income geographies during the 2021 segmented period. The percentage of home mortgage loans in moderate-income geographies was below both the percentage of owner-occupied (OO) housing units located in those geographies and the aggregate percentage of all reporting lenders.

2022-2023

The geographic distribution of home mortgage loans is reasonable, given performance context.

The percentage of home mortgage loans in low-income geographies exceeded the percentage of OO housing units located in those geographies and slightly below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income geographies was significantly below both the percentage of OO housing units located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC reviewed demographic summary data and mapping reports to identify any gaps in the geographic distribution of the bank's home mortgage loans in the Boston MA-NH MMSA AA during the full evaluation period. The analysis did not identify any unexplained or conspicuous gaps in the bank's lending patterns, given performance context.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels in the MMSA, given performance context and the product lines offered by the bank.

Home Mortgage Loans

Refer to Table 8 in the Boston-Cambridge-Newton, MA-NH MMSA 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.

Overall, the borrower distribution of home mortgage loans in the Boston MA-NH MMSA AA is reasonable, given performance context.

2021

The borrower distribution of home mortgage loans is reasonable, given performance context.

The bank originated only nine loans during this analysis period. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and was well below the aggregate percentage of all reporting lenders.

The assessment of performance also considered the affordability of home ownership for low-income borrowers in the AA relative to the \$350,900, 2021 MHV. For the Boston, MA MD portion of the bank's AA, with a reported 2021 MFI of \$113,700, low-income families in the AA with a maximum annual income of \$56,850, would find it challenging to qualify for a mortgage in the MD. For the Cambridge-Newton-Framingham, MA MD portion of the bank's AA, with a reported 2021 MFI of \$120,200, low-income families in the AA with a maximum annual income of \$60,100, would find it challenging to qualify for a mortgage in the MD. For the Rockingham County-Strafford County, NH MD portion of the bank's AA, with a reported 2021 MFI of \$110,600, low-income families in the AA with a maximum annual income of \$55,300, would find it challenging to qualify for a mortgage in the MD. Additionally, during this segmented evaluation period we noted that 7.2 percent of the families in the AA were below the poverty level, and the median gross rent was \$1,203.

2022-2023

The borrower distribution of home mortgage loans is reasonable, given performance context.

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and was well below the aggregate percentage of all reporting lenders, who are also considerably below demographics. The percentage of home mortgage loans to moderate-income borrowers was well below both the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

The assessment of performance also considered the affordability of home ownership for low-income borrowers in the AA relative to the \$447,850, 2023 MHV. For the Boston, MA MD portion of the bank's AA, with a reported 2023 MFI of \$136,900, low-income families in the AA with a maximum

annual income of \$68,450, would find it challenging to qualify for a mortgage in the MD. For the Cambridge-Newton-Framingham, MA MD portion of the bank's AA, with a reported 2023 MFI of \$146,200, low-income families in the AA with a maximum annual income of \$73,100, would find it challenging to qualify for a mortgage in the MD. For the Rockingham County-Strafford County, NH MD portion of the bank's AA, with a reported 2023 MFI of \$135,200, low-income families in the AA with a maximum annual income of \$67,600, would find it challenging to qualify for a mortgage in the MD. Additionally, during this segmented evaluation period we noted that 5.8 percent of the families in the AA were below the poverty level, and the median gross rent was \$1,490.

Responses to Complaints

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

Multistate Metropolitan Statistical Area Rating

Providence-Warwick, RI-MA MMSA

CRA rating for the Providence RI-MA MMSA: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibited a reasonable geographic distribution of loans in the MMSA, given performance context.
- The bank exhibited a reasonable distribution of loans to individuals of different income levels in the MMSA, given performance context and the product lines offered by the bank.
- The bank did not receive any CRA related complaints during the evaluation period.

Description of Institution's Operations in Providence-Warwick, RI-MA MMSA

The Providence RI-MA MMSA AA represents the bank's second largest geographic area of operations and consists of a single rating area, the full-scope Providence RI-MA MMSA AA. As previously discussed, this rating area includes Bristol, Kent, Newport, Providence, and Washington Counties, RI and Bristol County, MA. The AA consists of wholly contiguous political subdivisions in RI and MA, does not arbitrarily exclude any LMI geographies, nor does the AA delineation contain any unexplained or conspicuous gaps. As the bank closed their only Providence RI-MA MMSA AA branch location towards the end of the 2022 year, our analysis of the bank's lending performance according to the CRA was limited to solely the 2021 and 2022 segmented evaluation periods.

Due to previously mentioned census updates, 42 North experienced changes to the classification of geographies within the AA which the OCC considered as part of our analysis of the bank's performance under the CRA for the 2021 and 2022 segmented evaluation periods. During 2021, the Providence RI-MA MMSA AA included a total of 370 census tracts, including 53 low-, 69 moderate-, 129 middle-, and 112 upper-income census tracts, while the remaining seven tracts were not assigned an income classification as of the 2010 U.S. Census. For the 2022 period, the number of tracts within the AA increased to a total of 381 census tracts, including 47 low-, 69 moderate-, 150 middle-, and 109 upper-income census tracts, while the remaining six tracts were not assigned an income classification as of the 2020 U.S. Census.

Community Contact

As part of this evaluation, to assess the bank's lending performance, we contacted a local organization based within the bank's AA to assist in identifying community credit needs. This community organization's mission is to create and collect, analyze, and report about affordable housing and community services predominantly within RI. The contact discussed the extent of limited housing availability for LMI households. The already expensive housing market experienced further price appreciation during the COVID-19 pandemic. The state of RI's housing stock is older and development for LMI housing is slow. The contact discussed several opportunities and programs that banks within the

community can participate in relating to affordable housing and community service, specifically by partnering with locally based organizations that work to connect financial institutions with low- and moderate-income borrowers as well as real estate developers. The contact noted that local financial institutions are supportive in meeting the community development needs of the surrounding market area; however, continued support is needed for the AA's rising credit needs.

2021

For the 2021 calendar year, Moody's Analytics reports that the Providence-Warwick, RI-MA MMSA's economy is in a recovery phase of its business lifecycle, relying on the medical sciences, tourism, and finance sectors to support economic growth. The finance and healthcare sector have kept pace as projected throughout 2021, but the overall economy remains negatively impacted by elevated labor costs. The tourism industry is set to rebound after the COVID-19 pandemic which could help to foster growth in the Providence-Warwick, RI-MA MMSA. The leading employers in the region are Lifespan, Care New England, and CVS Health.

Assessment Area(s) - Providence RI-MA MMSA AA 2021						
						2021
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	370	14.32	18.65	34.86	30.27	1.89
Population by Geography	1,606,424	11.83	16.84	35.90	34.81	0.62
Housing Units by Geography	693,886	12.12	17.53	36.44	33.53	0.37
Owner-Occupied Housing by Geography	378,517	4.27	11.20	41.52	42.84	0.17
Occupied Rental Units by Geography	244,114	22.92	27.27	31.01	18.12	0.68
Vacant Units by Geography	71,255	16.87	17.81	28.07	36.83	0.42
Businesses by Geography	73,469	9.94	15.28	35.36	38.80	0.61
Farms by Geography	2,522	4.20	9.40	32.95	53.33	0.12
Family Distribution by Income Level	396,417	23.57	16.36	19.25	40.83	0.00
Household Distribution by Income Level	622,631	26.42	14.70	15.96	42.92	0.00
Unemployment rate (%)	8.66	14.32	12.57	7.96	6.02	8.55
Households Below Poverty Level (%)	14.07	34.72	21.89	10.32	6.75	32.09
Median Family Income (39300 - Providence-Warwick, RI-MA MSA)		\$73,950		Median Housing Value		\$230,150
Median Family Income (39300 - Providence-Warwick, RI-MA MSA) for 2021		\$87,500		Median Gross Rent		\$924
				Families Below Poverty Level		9.95
FFIEC File - 2010 Census						
2021 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

2022

According to Moody's Analytics 2022 reporting, the Providence-Warwick, RI-MA MMSA economy continues to undergo a recovery period of the business cycle. Financial service jobs have rebounded from COVID-19 pandemic-related losses, but employment has slowed in this area. Healthcare jobs have also rebounded from pandemic losses, but there remains a large share of older workers in this sector making it vulnerable to early retirements. Long-term projections indicate that the Providence-Warwick, RI-MA MMSA will rank below other national metro regions for job and wage growth due to a higher cost of living and stalling population growth negatively impacting the economy. The three main employers are Lifespan, Care New England, and CVS Health, unchanged from the 2021 calendar year.

Assessment Area(s) - Providence RI-MA MMSA AA 2022						
						2022
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	381	12.34	18.11	39.37	28.61	1.57
Population by Geography	1,676,579	10.54	17.64	40.34	31.32	0.16
Housing Units by Geography	705,332	10.23	17.95	41.21	30.44	0.17
Owner-Occupied Housing by Geography	393,874	4.07	12.18	44.39	39.33	0.03
Occupied Rental Units by Geography	241,221	20.05	26.97	36.59	15.99	0.39
Vacant Units by Geography	70,237	11.02	19.29	39.29	30.24	0.16
Businesses by Geography	63,663	8.89	14.33	43.10	33.40	0.29
Farms by Geography	2,050	4.49	8.44	39.66	47.32	0.10
Family Distribution by Income Level	402,793	22.83	16.16	20.56	40.46	0.00
Household Distribution by Income Level	635,095	26.62	14.61	16.62	42.15	0.00
Unemployment rate (%)	5.46	10.11	6.10	5.28	4.12	6.28
Households Below Poverty Level (%)	12.04	28.99	17.27	10.02	5.89	47.50
Median Family Income (39300 - Providence-Warwick, RI-MA MSA)		\$89,555		Median Housing Value		\$262,800
Median Family Income (39300 - Providence-Warwick, RI-MA MSA) for 2022		\$99,600		Median Gross Rent		\$1,033
				Families Below Poverty Level		7.96
FFIEC File - 2020 Census						
2022 Dun & Bradstreet SBSF Demographics						
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 Providence-Warwick, RI-MA MMSA

The rating for the Providence-Warwick, RI-MA MMSA is based on a full-scope review of the bank's performance in the Providence RI-MA MMSA AA. Refer to appendix A for additional information on the AA under review.

LENDING TEST

The bank's performance under the Lending Test in the Providence-Warwick, RI-MA MMSA is rated Satisfactory.

Based on a full-scope review, the bank's performance in the Providence RI-MA MMSA AA was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited a reasonable geographic distribution of loans in the MMSA, given performance context.

Home Mortgage Loans

Refer to Table 7 in the Providence-Warwick, RI-MA MMSA 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.

Overall, the geographic distribution of home mortgage loans in the Providence RI-MA MMSA AA is reasonable, given performance context.

2021

The geographic distribution of home mortgage loans is reasonable, given performance context.

The bank did not originate and/or purchase any home mortgage loans within the Providence RI-MA MMSA AA during the 2021 analysis period.

2022

The geographic distribution of home mortgage loans is reasonable, given performance context.

The bank originated four loans during this analysis period. The bank did not originate and/or purchase any home mortgage loans in LMI geographies within the Providence RI-MA MMSA AA during the 2022 analysis period.

Lending Gap Analysis

The OCC reviewed demographic summary data and mapping reports to identify any gaps in the geographic distribution of the bank's home mortgage loans in the Providence RI-MA MMSA AA during the full evaluation period. The analysis did not identify any unexplained or conspicuous gaps in the bank's lending patterns, given performance context.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels in the MMSA, given performance context and the product lines offered by the bank.

Home Mortgage Loans

Refer to Table 8 in the Providence-Warwick, RI-MA MMSA 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.

Overall, the borrower distribution of home mortgage loans in the Providence RI-MA MMSA AA is reasonable, given performance context.

2021

The borrower distribution of home mortgage loans is reasonable, given performance context.

The bank did not originate and/or purchase any home mortgage loans within the Providence RI-MA MMSA AA during the 2021 analysis period.

The assessment of performance also considered the affordability of home ownership for low-income borrowers in the AA relative to the \$230,150, 2021 MHV. For the Providence-Warwick, RI-MA MMSA, with a reported 2021 MFI of \$87,500, low-income families in the AA with a maximum annual income of \$43,750, would find it challenging to qualify for a mortgage. Additionally, during this segmented evaluation period we noted that approximately 10 percent of the families in the AA were below the poverty level, and the median gross rent was \$924.

2022

The borrower distribution of home mortgage loans is reasonable, given performance context.

The bank did not originate and/or purchase any home mortgage loans to LMI borrowers within the Providence RI-MA MMSA AA during the 2022 analysis period.

The assessment of performance also considered the affordability of home ownership for low-income borrowers in the AA relative to the \$262,800, 2022 MHV. For the Providence-Warwick, RI-MA MMSA, with a reported 2022 MFI of \$99,600, low-income families in the AA with a maximum annual income of \$49,800, would find it challenging to qualify for a mortgage. Additionally, during this segmented evaluation period we noted that approximately 8 percent of the families in the AA were below the poverty level, and the median gross rent was \$1,033.

Responses to Complaints

The bank did receive any CRA related complaints during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2021 to 12/31/2023	
Bank Products Reviewed:	Home mortgage loans	
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
Boston-Cambridge-Newton, MA-NH MMSA		
Boston MA-NH MMSA AA	Full scope	<ul style="list-style-type: none"> • Boston-Cambridge-Newton, MA-NH MMSA (#14460) <ul style="list-style-type: none"> • Boston, MA MD (#14454) <ul style="list-style-type: none"> • Full Norfolk (#021), Plymouth (#023), and Suffolk (#025) Counties, MA • Cambridge-Newton-Framingham, MA MD (#15764) <ul style="list-style-type: none"> • Full Essex (#009) and Middlesex (#017) Counties, MA • Rockingham County-Strafford County, NH MD (#40484) <ul style="list-style-type: none"> • Full Rockingham (#015) and Strafford (#017) Counties, NH
Providence-Warwick, RI-MA MMSA		
Providence RI-MA MMSA AA	Full scope	<ul style="list-style-type: none"> • Providence-Warwick, RI-MA MMSA (#39300) <ul style="list-style-type: none"> • Full Bristol (#001), Kent (#003), Newport (#005), Providence (#007), and Washington (#009) Counties, RI • Full Bristol (#005) County, MA

Appendix B: Summary of MMSA Ratings

RATINGS 42 North Private Bank	
Overall Bank:	Lending Test Rating
42 North Private Bank	Satisfactory
MMSA:	
Boston MA-NH MMSA AA	Satisfactory
Providence RI-MA MMSA AA	Satisfactory

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/AA.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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 (MD): 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 (MSA): 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.

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table 7. 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 8. 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/AA. The table also presents aggregate peer data for the years the data is available.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	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
Boston MA-NH MMSA AA	96,938	100.00	297,358	3.33	--	4.07	14.93	11.11	15.22	45.81	44.44	43.87	35.83	44.44	36.69	0.11	--	0.15	
Total	96,938	100.00	297,358	3.33	--	4.07	14.93	11.11	15.22	45.81	44.44	43.87	35.83	44.44	36.69	0.11	--	0.15	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	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
Boston MA-NH MMSA AA	3021,490	100.00	236,037	3.31	3.33	4.55	15.02	3.33	15.43	42.76	33.33	40.80	38.39	60.00	38.50	0.52	--	0.72	
Total	3021,490	100.00	236,037	3.31	3.33	4.55	15.02	3.33	15.43	42.76	33.33	40.80	38.39	60.00	38.50	0.52	--	0.72	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Boston MA-NH MMSA AA	96,938		100.00	297,358	23.27	11.11	6.15	16.41	11.11	17.99	19.70	11.11	22.56	40.62	66.67	40.06	--	--	13.24
Total	96,938		100.00	297,358	23.27	11.11	6.15	16.41	11.11	17.99	19.70	11.11	22.56	40.62	66.67	40.06	--	--	13.24

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Boston MA-NH MMSA AA	30	21,490	100.00	236,037	22.45	3.33	6.97	16.61	10.00	17.61	20.21	13.33	22.11	40.73	73.33	37.23	--	--	16.08
Total	30	21,490	100.00	236,037	22.45	3.33	6.97	16.61	10.00	17.61	20.21	13.33	22.11	40.73	73.33	37.23	--	--	16.08

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	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
Providence RI-MA MMSA AA	00	0.00	96,784	4.27	--	5.03	11.20	--	11.90	41.52	--	39.64	42.84	--	43.28	0.17	--	0.16	
Total	00	0.00	96,784	4.27	--	5.03	11.20	--	11.90	41.52	--	39.64	42.84	--	43.28	0.17	--	0.16	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total Number	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
Providence RI-MA MMSA AA	41,721	100.00	53,530	4.07	--	5.23	12.18	--	14.18	44.39	25.00	43.77	39.33	75.00	36.77	0.03	--	0.05	
Total	41,721	100.00	53,530	4.07	--	5.23	12.18	--	14.18	44.39	25.00	43.77	39.33	75.00	36.77	0.03	--	0.05	

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	
Providence RI-MA MMSA AA	00	0.00	96,784	23.57	--	5.58	16.36	--	18.34	19.25	--	24.88	40.83	--	36.59	--	--	14.60	
Total	00	0.00	96,784	23.57	--	5.58	16.36	--	18.34	19.25	--	24.88	40.83	--	36.59	--	--	14.60	

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Providence RI-MA MMSA AA	4	1,721	100.00	53,530	22.83	--	6.60	16.16	--	20.71	20.56	--	26.28	40.46	100.00	34.78	--	--	11.64
Total	4	1,721	100.00	53,530	22.83	--	6.60	16.16	--	20.71	20.56	--	26.28	40.46	100.00	34.78	--	--	11.64

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%