



PUBLIC DISCLOSURE

May 6, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Savings Bank, FSB
Charter Number: 708384

300 N. Beretania Street
Honolulu, HI 96817

Office of the Comptroller of the Currency

1551 North Tustin Avenue
Suite 1050
Santa Ana, CA 92705

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

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Overall CRA Rating

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

The following table indicates the performance level of American Savings Bank, FSB with respect to the Lending, Investment, and Service Tests:

Performance Levels	American Savings Bank, FSB Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
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 rating is based on the bank’s overall lending performance in the state of Hawaii. Good lending performance in the Hawaii Non-Metropolitan Statistical Area (MSA) and the Urban Honolulu MSA, combined with adequate lending performance in the Kahului-Wailuku-Lahaina MSA contribute to the overall “High Satisfactory” Lending Test rating. In addition, a substantial majority of the bank’s loans are originated or purchased in the bank’s assessment areas (AA).
- The Investment Test rating is based on the bank’s overall investment performance in the state of Hawaii. The excellent level of qualified community development (CD) investments in the Hawaii Non-MSA and the Urban Honolulu MSA offset a very low level of CD investments in the Kahului-Wailuku-Lahaina MSA, which results in a “High Satisfactory” Investment Test rating.
- The Service Test rating is based on the bank’s distribution of retail branches and CD services in the state of Hawaii. Reasonably accessible retail branches in the Hawaii Non-MSA and readily accessible retail branches in the Kahului-Wailuku-Lahaina MSA and the Urban Honolulu MSA offset an overall low level of CD services which results in a “High Satisfactory” Service Test rating.

Lending in Assessment Area

A substantial majority of the bank's loans are originated and purchased in ASB's AAs.

The bank originated and purchased 98.8 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. The 98.8 percent does not include extensions of credit by affiliates that may be considered under the other performance criteria. The substantial majority of the bank's loans originated and purchased in the AA positively impacted the bank's geographic distribution of lending by income level of geography.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	5,684	99.6	20	0.4	5,704	1,888,388	99.7	5,636	0.3	1,894,023
Small Business	6,781	98.0	136	2.0	6,917	416,770	96.7	14,244	3.3	431,014
Small Farm	1	100.0	0	0.0	1	500	100.0	0	0.0	500
Total	12,466	98.8	156	1.2	12,622	2,305,658	99.1	19,880	0.9	2,325,537

Description of Institution

American Savings Bank, FSB (ASB or bank) is a full-service federally chartered stock savings bank headquartered in Honolulu, Hawaii. As of December 31, 2018, the bank had total assets of \$7.0 billion, total deposits of \$6.2 billion, total loans of \$4.8 billion, and tier one capital of \$634.4 million. ASB is a wholly owned subsidiary of American Savings Holdings, Inc., a subsidiary of Hawaiian Electric Industries, Inc. (HEI). HEI is a Hawaii-based holding company with two core operating companies, ASB and Hawaiian Electric Company, Inc. (HECO).

ASB is an intrastate bank that operates 49 branches throughout Hawaii. Eight branches are located in the Hawaii Non-MSA, seven branches are located in the Kahului-Wailuku-Lahaina MSA, and 34 branches are located in the Urban Honolulu MSA. ASB operates 58 full-service automated teller machines (ATMs), with at least one full-service ATM at each of its branch locations. The bank also operates 53 freestanding cash-dispensing ATMs. See Service Test for additional information. There has not been any merger or acquisition activity since the prior evaluation.

ASB has three assessment areas: Hawaii Non-MSA (Islands of Hawaii and Kauai), the Kahului-Wailuku-Lahaina MSA (Island of Maui), and the Urban Honolulu MSA (Island of Oahu). ASB is ranked third in each assessment area with a 10.9 percent deposit market share in the Hawaii Non-MSA, a 17.3 percent deposit share in the Kahului-Wailuku-Lahaina MSA, and a 13.8 percent deposit share in the Urban Honolulu MSA. The bank's major deposit competitors are First Hawaiian Bank, Bank of Hawaii, Central Pacific Bank, and Territorial Savings Bank.

ASB offers a full range of loan and deposit products and services. Bank products and services are provided through the bank's branch network and other alternative delivery systems such as online banking, mobile banking, telephone banking, bill payment, direct deposit, and ATM services.

Approximately 83 percent of the bank's loan portfolio is composed of real estate loans with the primary focus on one-to-four family residential mortgage loans. The bank also originates home equity loans and lines of credit, multifamily loans, construction loans, commercial loans, other non-residential real estate loans, consumer loans, and small business loans.

American Savings Bank, FSB	
Outstanding Loan Balances	
by Major Product Types	
as of December 31, 2018	
Construction	126,772
1-4 Residential	3,123,409
5+ Residential	75,712
Non-residential	665,622
Commercial & Industrial	539,170
Agriculture	5,584
Consumer	263,950
Other Loans	45,190
Total Loans	4,845,409

There are no known legal, financial, or other factors that impede the bank's ability to help meet the credit needs of its AAs. The bank received an "Outstanding" rating at its last CRA examination dated May 9, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We reviewed home mortgage loans and small loans to businesses for the period beginning January 1, 2016 through December 31, 2018. We did not review small farm loans in this evaluation as ASB originated one small farm loan during the evaluation period. We reviewed CD loans, investments, and services for the period beginning May 10, 2016 through December 31, 2018.

For the lending test, an analysis was conducted for 2016 using the 2006-2010 American Community Survey (ACS) data. Lending data for 2017-2018 was analyzed separately using the 2011 through 2015 ACS data that applies to these years. Specifically, comparative data was different for the two review periods due to changes in certain census tract codes and definitions. Between 2016 and 2017 there were also changes to the median family income values.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MSA 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. The combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under the State Rating section for details regarding how full-scope AAs were selected. Also refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

ASB's overall rating is based on its performance in the Hawaii Non-MSA, the Kahului-Wailuku-Lahaina MSA, and the Urban Honolulu MSA. However, we placed the most weight on performance in the Urban Honolulu MSA since 74 percent of the dollar volume of home mortgage loans and 71 percent of the dollar volume of small loans to businesses was originated or purchased in this AA. In addition, 82 percent of the deposits are gathered from the Urban Honolulu MSA.

When evaluating the bank's performance under the lending test, we placed substantially greater weight on home mortgage loans than on small business loans because of the identified community credit need for home mortgage loans. In addition, home mortgage lending is the bank's business focus. Based on number, 42 percent of total reportable loans are home mortgage loans; 58 percent are small business loans. However, based on dollar volume, 93 percent of the dollar volume is home mortgage loans and only seven percent of the dollar volume is small business loans.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution 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 Hawaii

CRA rating for the State of Hawaii: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs of all the bank's AAs.
- Overall good geographic distribution of loans in bank's AAs, with adequate distribution in the Hawaii Non-MSA, excellent distribution in the Kahului-Wailuku-Lahaina MSA and good distribution in the Urban Honolulu MSA.
- A significant portion of the bank's loans that were made within the bank's AAs.
- Overall adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank, with adequate distribution in the Hawaii Non-MSA, the Kahului-Wailuku-Lahaina MSA, and the Urban Honolulu MSA.
- A high level of CD lending in the Hawaii Non-MSA and the Urban Honolulu MSA, which contributed positively to the bank's overall lending test rating.
- An overall good level of qualified investments and grants in the bank's AAs.
- Service delivery systems that are reasonably accessible to geographies and individuals of different income levels in the Hawaii Non-MSA and readily accessible to geographies and individuals of different income levels in the Kahului-Wailuku-Lahaina MSA and the Urban Honolulu MSA.

Description of Institution's Operations

Hawaii Non-MSA

Demographic Information of the Assessment Area						
Assessment Area: Hawaii Non-MSA 2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	66	4.5	9.1	43.9	12.1	30.3
Population by Geography	261,173	6.2	13.7	57.9	22.2	0.0
Housing Units by Geography	114,894	6.3	14.5	58.4	20.8	0.0
Owner-Occupied Units by Geography	57,012	4.5	16.3	57.5	21.7	0.0
Occupied Rental Units by Geography	30,441	10.7	11.4	58.4	19.5	0.0
Vacant Units by Geography	27,441	5.2	14.1	60.3	20.4	0.0
Businesses by Geography	14,982	10.3	4.5	66.4	18.8	0.0
Farms by Geography	774	5.0	8.9	66.0	20.0	0.0
Family Distribution by Income Level	58,971	22.4	16.0	20.4	41.3	0.0
Household Distribution by Income Level	87,453	26.9	13.9	17.3	41.9	0.0
Median Family Income Non-MSAs – HI		\$64,822	Median Housing Value			\$376,745
			Median Gross Rent			\$1,164
			Families Below Poverty Level			12.3%
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.						

The Hawaii Non-MSA consists of Hawaii County and Kauai County. Hawaii County is made up of the Island of Hawaii (commonly known as the “Big Island”), while Kauai County consists of the islands of Kauai and Niihau. The bank has elected to exclude Niihau from this AA because the bank does not have branches in Niihau. ASB operates eight branches, representing 16 percent of the bank’s total branches, with 10 full-service ATMs in the AA. The bank also operates nine freestanding cash-dispensing ATMs throughout the AA. Home mortgage loans in the AA represent 17 percent of total home mortgage loans. Small business loans represent 11 percent of total small business loans.

The bank gathered eight percent of its deposits from the Hawaii Non-MSA. According to the June 30, 2018 FDIC deposit data, ASB ranks third among eight financial institutions, with a 10.9 percent deposit market share. The bank’s most significant deposit competitors in this AA are First Hawaiian Bank and Bank of Hawaii. Combined, First Hawaiian Bank and Bank of Hawaii hold 78 percent of the deposit market share. Other deposit competitors include Central Pacific Bank and Territorial Savings Bank. There is also significant competition for home mortgage and small business loans from large banks located on the mainland, mortgage brokers, and finance companies.

The largest employment sectors in this AA are tourism, government, health care, and agriculture. The unemployment rate as of December 31, 2018 was 2.9 percent for Hawaii County and 2.3 percent for Kauai County. In comparison, the state unemployment rate was 2.3 percent and the U.S. unemployment rate was 3.9 percent.

Affordability of single-family residences varies based on the location. The price of homes that sold in 2017 varied from a low of \$200,000 to nearly \$600,000. However, affordable homes at the lower end are not abundant.

There is significant opportunity to make small business loans in the AA, as there are numerous small businesses located in the Hawaii Non-MSA. Demographic data indicates that 87 percent of the businesses have nine or fewer employees.

Kahului-Wailuku-Lahaina MSA

Demographic Information of the Assessment Area						
Assessment Area: Kahului-Wailuku-Lahaina MSA 2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	35	0.0	20.0	60.0	11.4	8.6
Population by Geography	151,870	0.0	15.3	73.6	11.1	0.0
Housing Units by Geography	67,777	0.0	15.3	73.3	11.3	0.0
Owner-Occupied Units by Geography	29,375	0.0	12.6	74.9	12.5	0.0
Occupied Rental Units by Geography	21,297	0.0	20.1	71.1	8.8	0.0
Vacant Units by Geography	17,105	0.0	14.1	73.3	12.6	0.0
Businesses by Geography	10,619	0.0	19.0	71.3	9.7	0.0
Farms by Geography	412	0.0	20.4	70.6	9.0	0.0
Family Distribution by Income Level	34,644	19.6	18.0	22.1	40.3	0.0
Household Distribution by Income Level	50,672	23.4	16.0	19.5	41.1	0.0
Median Family Income MSA - 27980 Kahului-Wailuku-Lahaina, HI MSA		\$76,193	Median Housing Value			\$550,192
			Median Gross Rent			\$1,343
			Families Below Poverty Level			7.7%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Kahului-Wailuku-Lahaina MSA consists of Maui County. The MSA includes the islands Maui, Lanai, Kahoolawe, Molokini, and parts of Molokai. The Kahoolawe and Molokini islands are excluded because they are uninhabited. The island of Maui is the second largest Hawaiian island, and has the third largest population.

The bank gathered 10 percent of its deposits from the Kahului-Wailuku-Lahaina MSA. According to the June 30, 2018 FDIC deposit data, ASB has \$607.8 million in deposits and ranks third, with a 17.3 percent deposit market share. The bank's most significant deposit competitors in this AA are Bank of Hawaii and First Hawaiian Bank. Combined, they hold 69 percent of total deposit market share. Other significant deposit competitors are Central Pacific Bank and Territorial Savings Bank. There is also significant competition for home mortgage and small business loans from large banks located on the mainland, mortgage brokers, and finance companies. ASB operates seven branches with seven full-service ATMs in the AA. In addition, the bank operates nine freestanding cash dispensing ATMs throughout this AA. Home mortgage loans in the AA represent 18 percent of total home mortgage loans. Small business loans represent 12 percent of total small business loans.

The largest employment sectors in this AA are agriculture and tourism. The AA has a low unemployment rate. As of December 31, 2018, the unemployment rate was 2.3 percent. This is the same as the state unemployment rate of 2.3 percent, but lower than the U.S. unemployment rate of 3.9 percent.

Housing affordability is a significant issue in the AA as the median price of a single-family home continues to rise. In 2016, the median price for a single-family home was \$636,750. By the end of 2017, the median price had risen to \$700,000. While home purchase lending presents a challenge, there are opportunities to partner with CD organizations to make loans to LMI individuals. In addition, there are opportunities to make home improvement and home refinance loans in the AA.

There is abundant opportunity to make small business loans in the AA, as there are numerous small businesses located in the Kahului-Wailuku-Lahaina MSA. Demographic data indicates that 90 percent of the businesses have nine or fewer employees.

Urban Honolulu MSA

Demographic Information of the Assessment Area						
Assessment Area: Urban Honolulu MSA 2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	244	4.1	20.9	42.2	26.6	6.1
Population by Geography	984,178	3.2	22.3	46.4	28.0	0.2
Housing Units by Geography	341,239	2.9	24.0	45.2	27.8	0.1
Owner-Occupied Units by Geography	168,551	1.0	12.0	48.4	38.6	0.0
Occupied Rental Units by Geography	141,051	5.4	37.5	41.4	15.6	0.2
Vacant Units by Geography	31,637	2.3	28.1	44.9	24.6	0.2
Businesses by Geography	54,043	4.8	19.4	35.1	35.9	4.8
Farms by Geography	808	3.8	14.1	45.9	33.5	2.6
Family Distribution by Income Level	217,945	19.6	18.4	22.0	40.0	0.0
Household Distribution by Income Level	309,602	22.4	16.7	19.6	41.4	0.0
Median Family Income MSA - 46520 Urban Honolulu, HI MSA		\$86,366	Median Housing Value			\$523,593
			Median Gross Rent			\$1,637
			Families Below Poverty Level			6.5%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Urban Honolulu MSA consists of all of Honolulu County, which is also the Island of Oahu. Oahu is the third largest Hawaiian Island and the most populated. Based on the 2015 Census, the population of the AA was 984,178. The city of Honolulu is the state's capital and the primary population center. Much of the eastern portion of the Island of Oahu is made up of forest reserves and watersheds. A small portion of the western area is also made up of forest reserves.

ASB operates 34 branches and 40 full-service ATMs in this AA. The bank also operates 37 freestanding cash-dispensing ATMs throughout the Urban Honolulu MSA. The bank's branches in the Urban Honolulu MSA represent 72 percent of the total branches. The bank's primary business focus in all of its AAs is home mortgage lending. Home mortgage loans in the Urban Honolulu MSA represent 65 percent of total home mortgage loans. Small business loans represent 77 percent of total small business loans.

According to the June 30, 2018 FDIC deposit data, the bank had just over \$5 billion in deposits in this AA, representing 82 percent of its total deposits. ASB ranks third among 12 deposit-taking institutions, with a market share of 13.79 percent. ASB's main deposit competitors include four Hawaii-based banks: First Hawaiian Bank, Bank of Hawaii, Central Pacific Bank, and Territorial Savings Bank. First Hawaiian Bank and Bank of Hawaii each have more than

twice the volume of deposits and together hold 65 percent of the deposit market share. In addition, there is significant home mortgage lending competition from local banks, large banks located on the mainland, and non-bank lenders.

Oahu is home to the United States Military Command for the Pacific. Aside from the large military presence, Honolulu's economy is heavily dependent on tourism. Over five million tourists visit the island annually. Consequently, services and trade are considered to be the two largest industries in the county. The unemployment rate is low at 2.3 percent as of December 31, 2018. However, a significant portion of the jobs are minimum wage service jobs, which forces many to work two or three jobs in order to survive, ranking Hawaii as second in the nation for multiple part-time employment.

Housing affordability is a significant issue in Oahu. Because land is scarce and tourist development has driven up the cost of living, Hawaii is one of the top-ranking states in housing costs. The median sales price of a single-family home in 2016 was \$760,000. As of June 2018, the median price had risen to \$795,000. While home purchase lending is a challenge, there are opportunities to partner with community groups to make home purchase loans to LMI individuals. In addition, there are also opportunities to make home improvement and home refinance loans to LMI individuals who own their homes.

There is abundant opportunity to make small business loans in the AA, as there are numerous small businesses located in the Urban Honolulu MSA. Demographic data indicates that 86 percent of the businesses have nine or fewer employees.

Community Development Needs for All AAs

We discussed the community development needs of all the bank's AAs with 12 community groups. These individuals stated the following are the greatest needs in the AAs:

- Flexible affordable housing loans for LMI individuals.
- Financing for tiny home development for LMI individuals.
- Financing for development of affordable housing, both rentals and purchase.
- Access to loans under \$50,000 with more flexible manual underwriting, rather than standard credit scoring for start-up and small businesses.
- Funding for transitional housing for homeless individuals.
- Funding for Hawaiian Homelands projects.
- Investments and grants to address housing and other needs for homeless individuals.
- Financial literacy education for LMI and older consumers.
- Partnerships to assist community development groups' access to grant and federal money.
- Direct investments in Low-Income Housing Tax Credits (LIHTC) instead of syndicators.
- Participation in outreach and affordable housing fairs.
- Investments to provide for the needs of LMI senior citizens, as the need is growing but government funding remains flat.
- Disaster recovery loans are needed on every island where the people do not have funds.

Scope of Evaluation

ASB operates only in the state of Hawaii. This evaluation includes a full-scope analysis of all AAs where the bank has branches. This includes the Hawaii Non-MSA, the Kahului-Wailuku-Lahaina MSA, and the Urban Honolulu MSA. We elected to perform full-scope reviews of all three AAs due to ASB's significance in each of the AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's performance under the Lending Test in Hawaii is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Non-MSA and the Urban Honolulu MSA was good. In the Kahului-Wailuku-Lahaina MSA, the bank's performance was adequate.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Assessment Area	Home Mortgage	Small Business	Community Development	Total	* Loans	% Deposits
Hawaii Non-MSA	965	784	5	1,754	14%	8%
Kahului-Wailuku-Lahaina MSA	1,025	794	1	1,820	15%	10%
Urban Honolulu MSA	3,694	5,203	15	8,912	71%	82%

*The tables present the data for all assessment areas, which are also the full-scope areas.

Hawaii Non-MSA

Based on the facts and data in the above table and performance context considerations, we concluded ASB's home mortgage and small business lending levels reflect excellent responsiveness to the credit needs in the Hawaii Non-MSA.

The bank originated and/or purchased 965 home mortgage loans totaling \$255 million and 784 small business loans totaling \$36 million in the Hawaii Non-MSA during the evaluation period. In addition, the bank also provided five community development loans totaling \$52 million.

The bank has a deposit market share in the AA of 10.90 percent with a rank of third out of 12 deposit-taking institutions (25th percentile). The top two largest institutions in this AA hold 78 percent of the deposit market share.

For home mortgage lending, the bank has a market share of 2.93 percent, with a rank of 12th out of 143 home purchase lenders (8th percentile); 3.22 percent, with a market rank of eighth out of 145 home refinance lenders (5th percentile); and 6.95 percent, with a market rank of fourth out of 51 home improvement lenders (8th percentile). The market for home mortgage loans is very competitive and consists of national and local lenders of different sizes. Five of the largest lenders captured 35 percent of the home purchase loan market; five of the largest lenders captured 42 percent of the home refinance loan market; and two lenders captured 32 percent of the home improvement loan market.

For small business loans, the bank has a market share of 4.14 percent, with a rank of eighth out of 66 lenders (12 percentile). The market for small business lending is also very competitive. Three of the largest lenders captured 50 percent of the small business loan market.

Kahului-Wailuku-Lahaina MSA

Based on the facts and data in the above table and performance context considerations, we concluded ASB's home mortgage and small business lending levels reflect excellent responsiveness to the credit needs of the Kahului-Wailuku-Lahaina MSA.

The bank originated and/or purchased 1,025 home mortgage loans totaling \$359 million and 794 small business loans totaling \$29 million in the Kahului-Wailuku-Lahaina MSA during the evaluation period. In addition, the bank also provided one community development loan totaling \$2.4 million.

The bank has a deposit market share in the AA of 17.29 percent with a rank of third out of seven deposit-taking institutions (43rd percentile). The top two largest institutions in this AA hold 69 percent of the deposit market share.

For home mortgage lending, the bank has a market share of 9.69 percent, with a rank of third out of 116 home purchase lenders (3rd percentile); 4.30 percent, with a market rank of eighth out of 145 home refinance lenders (5th percentile); and 7.77 percent, with a market rank of sixth out of 192 home improvement lenders (3rd percentile). The market for home mortgage loans is very competitive and consists of national and local lenders of different sizes. Two of the largest lenders captured 24 percent of the home purchase loan market; four of the largest lenders captured 34 percent of the home refinance loan market; and four of the largest lenders captured 42 percent of the home improvement loan market.

For small business loans, the bank has a market share of 6.77 percent, with a rank of sixth out of 53 lenders (11th percentile). The market for small business lending is also very competitive. Two of the largest lenders captured 34 percent of the small business loan market.

Urban Honolulu MSA

Based on the facts and data in the above table and performance context considerations, we concluded ASB's home mortgage and small business lending levels reflect excellent responsiveness to the credit needs of the Urban Honolulu MSA.

The bank originated and/or purchased 3,694 home mortgage loans totaling nearly \$1.3 billion and 5,203 small business loans totaling \$352 million in the Urban Honolulu MSA during the evaluation period. In addition, the bank also provided 15 community development loans totaling just over \$62 million.

The bank has a deposit market share in the AA of 13.78 percent with a rank of third out of 12 deposit-taking institutions (25th percentile). The top two largest institutions in this AA hold 65 percent of the deposit market share.

For home mortgage lending, the bank has a market share of 2.82 percent, with a rank of 13th out of 162 home purchase lenders (8th percentile); 3.35 percent, with a market rank of seventh out of 171 home refinance lenders (4th percentile); and 7.77 percent, with a market rank of 11th out of 74 home improvement lenders (15th percentile). The market for home mortgage loans is very competitive and consists of national and local lenders of different sizes. Four of the largest lenders captured 28 percent of the home purchase loan market; five of the largest lenders captured 32 percent of the home refinance loan market; and one lender captured 28 percent of the home improvement loan market.

For small business loans, the bank has a market share of 8.72 percent, with a rank of fifth out of 70 lenders (7th percentile). The market for small business loans is also very competitive. Three of the largest lenders captured 46 percent of the small business loan market.

Distribution of Loans by Income Level of the Geography

Overall, the bank exhibits good geographic distribution of loans in its AAs. For home mortgage loans, the geographic distribution in low- and moderate-income CTs is adequate in the Hawaii Non-MSA, excellent in the Kahului-Wailuku-Lahaina MSA, and good in the Urban Honolulu MSA. Geographic distribution of small business loans is adequate in the Hawaii Non-MSA and excellent in the Kahului-Wailuku-Lahaina MSA and the Urban Honolulu MSA.

Home Mortgage Loans

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

Hawaii Non-MSA

During the 2016 evaluation period, the distribution of the bank's home mortgage lending in LMI geographies is good. The proportion of the bank's loans in low-income CTs significantly exceeds the proportion of owner-occupied housing units. However, the proportion of home mortgage loans in moderate-income CTs is well below the proportion of owner-occupied units. In addition, the proportion of the bank's loans in low-income CTs exceeds the 2016 aggregate, but the proportion of the bank's loans in moderate-income CTs is below the 2016 aggregate.

Distribution of home mortgage loans during the 2017-2018 evaluation period is poor. The proportion of the bank's loans in low-income CTs is well below the proportion of owner-occupied housing units. The proportion of the bank's loans in moderate-income CTs is below

the proportion of owner-occupied housing units. In addition, the proportion of the bank's loans is well below the 2017 aggregate in low-income CTs, and the proportion of the bank's loans in moderate-income CTs is below the 2017 aggregate.

Kahului-Wailuku-Lahaina MSA

During the 2016 evaluation period, the distribution of the bank's home mortgage loans in moderate-income geographies is excellent. The proportion of the bank's loans in moderate-income CTs meets the proportion of owner-occupied units and significantly exceeds the 2016 aggregate. There are no low-income CTs in this AA.

Distribution of home mortgage loans during the 2017-2018 evaluation period is comparable to that noted during the 2016 evaluation period, which is excellent. The proportion of the bank's loans in moderate-income CTs significantly exceeds the proportion of owner-occupied units and the 2017 aggregate.

Urban Honolulu MSA

During the 2016 evaluation period, the distribution of the bank's home mortgage loans in low- and moderate-income geographies is good. The proportion of the bank's loans in low-income CTs is below the proportion of owner-occupied housing units. The proportion of home mortgage loans in moderate-income CTs is near to the proportion of owner-occupied housing units. The proportion of the bank's loans in both low- and moderate-income CTs exceeds the 2016 aggregate.

Distribution of home mortgage loans during the 2017-2018 evaluation period is good. The proportion of the bank's loans in low-income CTs exceeds the proportion of owner-occupied housing units. The proportion of the bank's loans in moderate-income CTs is near to the proportion of owner-occupied units. In addition, the proportion of the bank's loans exceeds the 2017 aggregate in low-income CTs and is near to the aggregate in moderate-income CTs.

Small Loans to Businesses

Refer to Tables Q in appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Hawaii Non-MSA

During the 2016 evaluation period, the distribution of the bank's small business loans is adequate, based on a good distribution to low-income tracts and poor distribution in moderate-income geographies. The proportion of the bank's small business loans in low-income CTs is below the proportion of businesses; and the proportion of the bank's small business loans in moderate-income CTs is well below the proportion of businesses in these CTs. The proportion of the bank's loans exceeds the 2016 aggregate in low-income CTs and is below the 2016 aggregate in moderate-income CTs.

Distribution of small business loans during the 2017-2018 evaluation period is similar and is adequate. The distribution of the bank's small business loans in low-income CTs is good and poor in the moderate-income CTs. The proportion of the bank's loans is below the proportion of businesses in both low- and moderate-income CTs. Furthermore, the proportion of the bank's loans exceeds the 2017 aggregate in low-income CTs, but the proportion of the bank's loans is below the 2017 aggregate in moderate-income CTs.

Kahului-Wailuku-Lahaina MSA

During the 2016 evaluation period, the distribution of the bank's small business loans in moderate-income geographies is excellent. The proportion of the bank's small business loans in moderate-income CTs is similar to the proportion of businesses in these CTs and exceeds the 2016 aggregate.

Distribution of small business loans during the 2017-2018 evaluation period is identical to 2016 performance, which is excellent. The proportion of the bank's small business loans in moderate-income CTs exceeds the proportion of businesses in moderate-income CTs and the 2017 aggregate.

Urban Honolulu MSA

During the 2016 evaluation period, the distribution of the bank's small business loans in low- and moderate-income geographies is excellent. The proportion of the bank's small business loans in low-income CTs exceeds the proportion of businesses; and the proportion of the bank's small business loans in moderate-income CTs is near to the proportion of businesses in these CTs. The proportion of the bank's loans exceeds the 2016 aggregate in both low- and moderate-income CTs.

Distribution of small business loans during the 2017-2018 evaluation period is excellent. The proportion of the bank's small business loans exceeds the proportion of businesses in low-income CTs and is near to the proportion of businesses in moderate-income CTs. The proportion of the bank's small business loans exceeds the 2017 aggregate in both low- and moderate-income CTs.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed the bank's home mortgage and small business lending activity over the evaluation period to identify any gaps in geographic distribution of loans. We did not identify any unexplained conspicuous gaps in any of the AAs.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution. Distribution of home mortgage loans to low- and moderate-income borrowers is adequate in the Hawaii Non-MSA, the Kahului-Wailuku-Lahaina MSA, and the Urban Honolulu MSA.

Distribution of small business loans to businesses of different sizes is poor in the Hawaii Non-MSA and adequate in the Hawaii Non-MSA and the Kahului-Wailuku-Lahaina MSA.

Home Mortgage Loans

Refer to Tables P in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. In concluding on the bank's distribution of home mortgage loans to LMI borrowers, we considered housing affordability in all the bank's AAs. However, we also considered that 45 percent of the bank's home mortgage loans consist of home improvement and refinance loans.

Hawaii Non-MSA

The distribution of the bank's home mortgage lending during the 2016 evaluation period is adequate after considering volume of lending in this AA during this review period. The proportion of home mortgage loans to low-income borrowers is substantially below the proportion of low-income families and the proportion of these loans to moderate-income borrowers is below the proportion of moderate-income families. In addition, the proportion of home mortgage loans to low-income borrowers is below the 2016 aggregate; however, the proportion of these loans to moderate-income borrowers exceeds the 2016 aggregate.

The bank's lending performance during the 2017-2018 evaluation period is adequate. The proportion of home mortgage loans to low-income borrowers is well below the proportion of low-income families and the proportion of these loans to moderate-income borrowers is below the proportion of moderate-income families. In addition, the proportion of home mortgage loans to both low- and moderate-income borrowers exceeds the 2017 aggregate.

Kahului-Wailuku-Lahaina MSA

The distribution of the bank's home mortgage lending during the 2016 evaluation period is adequate after considering the volume of lending in this AA during this review period. The proportion of the bank's home mortgage loans to low-income borrowers is significantly below the proportion of low-income families. However, the proportion of home mortgage loans to moderate-income borrowers is near to the proportion of moderate-income families. Furthermore, the proportion of the bank's home mortgage loans to low-income borrowers is near to the 2016 aggregate and the proportion of these loans to moderate-income borrowers exceeds the 2016 aggregate.

The bank's lending performance during the 2017-2018 evaluation period is similar and is adequate. The proportion of home mortgage loans to low-income borrowers is significantly below the proportion of low-income families; and the proportion of these loans to moderate-income borrowers is below the proportion of moderate-income families. Furthermore, the proportion of the bank's loans to both low- and moderate-income borrowers exceeds the 2017 aggregate.

Urban Honolulu MSA

The distribution of the bank's home mortgage lending during the 2016 evaluation period is adequate after considering the volume of lending in this AA. The proportion of the bank's home mortgage loans to low-income borrowers is significantly below the proportion of low-income families. However, the proportion of home mortgage loans to moderate-income borrowers is near to the proportion of moderate-income families. Furthermore, the proportion of loans to both low- and moderate-income borrowers exceeds the 2016 aggregate.

The bank's lending performance during the 2017-2018 evaluation period is identical to 2016 performance, which is adequate. The proportion of the bank's home mortgage loans to low-income borrowers is significantly below the proportion of low-income families. However, the proportion of home mortgage loans to moderate-income borrowers is near to the proportion of moderate-income families. Furthermore, the proportion of loans to both low- and moderate-income borrowers exceeds the 2017 aggregate.

Small Loans to Businesses

Refer to Tables R in appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses. Distribution of small loans to businesses is poor in the Hawaii Non-MSA and adequate in the Kahului-Wailuku-Lahaina MSA and the Urban Honolulu MSA. This conclusion is based on the bank's lending performance during the 2017-2018 evaluation period only. The bank did not collect gross annual revenues for small business loan borrowers during the 2016 evaluation period.

Hawaii Non-MSA

The bank's lending performance during the 2017-2018 evaluation period is poor. The proportion of loans to small businesses (businesses with gross annual revenues of \$1 million or less) is well below the proportion of small businesses. However, the proportion of these loans exceeds the 2017 aggregate.

Kahului-Wailuku-Lahaina MSA

The bank's lending performance during the 2017-2018 evaluation period is adequate. The proportion of loans to small businesses is below the proportion of small businesses; and the proportion of these loans exceeds the 2017 aggregate.

Urban Honolulu MSA

The bank's lending performance during the 2017-2018 evaluation period is adequate. The proportion of loans to small businesses is below the proportion of small businesses; and the proportion of these loans exceeds the 2017 aggregate.

Community Development Lending

ASB made a relatively high level of CD loans in the Hawaii Non-MSA and the Urban Honolulu MSA. The level of CD loans in the Kahului-Wailuku-Lahaina MSA was adequate. The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Hawaii Non-MSA

ASB originated five CD loans totaling just over \$52 million in the Hawaii Non-MSA. This represents an excellent level of CD lending. The loans were not complex or innovative and they were not specifically responsive to identified CD needs in the AA. However, they did help retain jobs in LMI areas.

Kahului-Wailuku-Lahaina MSA

The bank provided one CD loan in the Kahului-Wailuku-Lahaina MSA totaling \$2.4 million. This represents an adequate level of CD lending. The loan was responsive to an identified CD need. However, it was not complex or innovative.

Urban Honolulu MSA

ASB provided 15 CD loans totaling just over \$62 million in the Urban Honolulu MSA. This represents an excellent level of CD lending. While the loans were responsive to identified CD needs, they were not complex or innovative. The following are examples of CD loans that were particularly responsive to stated CD needs in the AA:

- A \$3.6 million loan which was used to rehabilitate a 76-unit apartment complex which provides affordable housing for LMI seniors.
- A \$5.5 million loan which provides 31 units of affordable rental housing for LMI families.
- A \$4.2 million loan which provides 56 units of affordable housing for LMI families.
- A \$4.9 million loan which provides 70 units of affordable housing LMI families.

Product Innovation and Flexibility

The bank did not offer any innovative loan products during the review period. However, ASB did make use of flexible lending products in order to serve AA credit needs. This includes a variety of residential loan products that benefit LMI individuals, such as the FNMA HomeReady Mortgage, the Freddie Mac Home Possible, and the Mortgage Credit Certificate Program (issued through Hawaii Housing Finance and Development Corporation). The bank also offers a secured credit card for individuals who previously had poor credit history. In addition, ASB offers SBA lending programs, such as the SBA Express program, which benefits small businesses.

INVESTMENT TEST

The bank's performance under the Investment Test is rated High Satisfactory. The bank's excellent level of qualified investments in the Hawaii Non-MSA and the Urban Honolulu MSA offset very poor performance in the Kahului-Wailuku-Lahaina MSA. Qualified investments in the broader statewide area, which have the purpose and mandate to serve all the bank's AAs, further support this rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Hawaii Non-MSA and the Urban Honolulu MSA is excellent. In the Kahului-Wailuku-Lahaina MSA, performance is very poor.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Hawaii Non-MSA	1	1,684	5	6,903	6	15	8,587	16	3	7,437
Kahului-Wailuku-Lahaina MSA	0	0	4	52	4	10	52	<1	1	3,084
Urban Honolulu MSA	7	21,541	18	15,047	25	62	36,588	69	6	7,016
Broader Statewide or Regional Area	2	8,083	3	60	5	13	8,143	15	0	0

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

Hawaii Non-MSA

ASB has an excellent level of qualified CD investments and grants in the Hawaii Non-MSA. However, the bank did not act in a leadership position, particularly in providing investments that are not routinely provided by private investors in the Hawaii Non-MSA. The bank made six qualified investments and grants totaling nearly \$8.6 million in this AA. This represents 17 percent of allocated tier one capital. While the bank did not make use of innovative investments to support CD initiatives, ASB exhibits excellent responsiveness to the credit and community economic development needs in the Hawaii Non-MSA. Examples of some of the qualified investments that were responsive to the CD needs in the AA include the following:

- A qualified investment of \$4.4 million in an affordable housing project, which will provide 30 housing units of affordable housing for low-income seniors.
- A qualified investment of which \$1.8 million has been funded. (The total investment is \$7.6 million and \$5.7 million remains unfunded.) The housing project will provide 134 units of affordable housing for low- and moderate-income families.

Kahului-Wailuku-Lahaina MSA

ASB has few qualified CD investments or grants in this AA, particularly those that are not routinely provided by private investors in the AA, although there are a number of opportunities available for banks to provide qualified investments in this AA. The bank made four qualified grants totaling \$36.8 thousand. ASB also made an investment totaling \$3.1 million. However, a majority of the investment is unfunded; as of December 31, 2018, the bank had funded only \$15.5 thousand. The funded portion of the investment and the grants represents 0.08 percent of allocated tier one capital. Although the bank made the large investment during the review period, the majority of the investment has not been funded. The investment/grants are not innovative or complex. However, they are responsive to the economic development needs in the AA.

Urban Honolulu MSA

ASB has an excellent level of qualified CD investments and grants in the Urban Honolulu MSA. The bank made 25 investments and grants totaling \$36.6 million in this AA. This represents seven percent of allocated tier one capital. The bank did not act in a leadership position, particularly in providing investments that are not routinely provided by private investors in the Urban Honolulu MSA. In addition, the bank did not make use of innovative investments to support CD initiatives. However, ASB exhibits excellent responsiveness to the credit and community economic development needs in the AA. Examples of some of the qualified investments that are responsive to the CD needs in the AA include the following:

- A \$50,000 grant to a federally qualified health center located in a medically underserved area in Waimanalo. This grant was provided in response to a capital campaign to build a new facility.
- A qualified investment of \$2.7 million in an affordable housing project that will provide 62 units of affordable housing for low-income seniors.

We also gave the bank credit for 13 investments/grants totaling just over \$8 million which benefit a broader statewide area. These investments have a purpose and mandate to serve the bank's AAs.

SERVICE TEST

The bank's performance under the Service Test is rated High Satisfactory. Service delivery systems that are reasonably accessible to geographies and individuals of different income levels in the Hawaii Non-MSA and readily accessible to geographies and individuals of different income levels in the Kahului-Wailuku-Lahaina MSA and the Urban Honolulu MSA offset an overall poor level of CD services. Alternative delivery systems including ATM services, online banking and night deposit services supplement the institution's branch network and serve to increase accessibility of banking services.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Hawaii Non-MSA is adequate. Performance in the Kahului-Wailuku-Lahaina MSA and the Urban Honolulu MSA is good.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the Hawaii Non-MSA and readily accessible to geographies and individuals of different income levels in the Kahului-Wailuku-Lahaina MSA and the Urban Honolulu MSA.

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	Upp	Low	Mod	Mid	Upp
Hawaii Non-MSA	8	8	16	13	0	75	13	6.2	13.7	57.9	22.2
Kahului-Wailuku-Lahaina MSA	10	7	14	0	43	57	0	0.0	15.3	73.6	11.1
Urban Honolulu MSA	82	34	70	9	23	44	23	3.2	22.3	46.4	28.0

Distribution of Branch Openings/Closings					
Branch Openings/Closings					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp
0	6		-1	-3	-2

Hawaii Non-MSA

ASB's service delivery systems in the Hawaii Non-MSA are reasonably accessible to geographies and individuals of different incomes in the AA. The bank operates eight branches with 10 full-service ATMs in this AA. One branch is located in a low-income CT; six branches are located in middle-income CTs; and one branch is located in an upper-income CT. Although the bank does not have any branches in moderate-income CTs, the proportion of the bank's branches in low-income CTs is near to the proportion of the population that lives in low-income CTs. However, as noted above, this represents one branch.

Branch services and hours are tailored to the convenience and needs of the AA. However, the branch located in the low-income CT is not open on Saturdays, Sundays, or holidays. The bank operates one drive-up facility in a low-income CT.

Delivery systems are reasonably accessible to essentially all portions of the AA. ASB offers the same deposit products, loan programs, and alternative systems for delivering retail banking services in this AA as it does in the other AAs.

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 bank consolidated two branches in middle-income CTs with two other branches in middle-income CTs.

ASB offers a wide variety of traditional banking products and services to meet the needs of the AA. The bank's deposit products include personal checking accounts that require no minimum balance and no fee. All branches also provide cashing of U.S. government checks. ASB continues to offer Individual Development Accounts (IDAs) through a partnership with a local non-profit organization. The bank also offers a variety of loan products, some which are tailored to meet the needs of LMI individuals.

Kahului-Wailuku-Lahaina MSA

The bank's service delivery systems in the Kahului-Wailuku-Lahaina MSA are readily accessible to geographies and individuals of different incomes in the AA. The bank operates seven branches in this AA. The bank also operates a full-service ATM at each branch location and one freestanding cash dispensing ATM in a moderate-income CT. Three branches representing 43 percent of the bank's branches are located in moderate-income CTs. This substantially exceeds the proportion of the population that lives in moderate-income CTs. There are no low-income CTs in this AA.

Branch services and hours are tailored to the convenience and needs of the bank's AA. One of the branches located in a moderate-income CT has Saturday hours.

Delivery systems are readily accessible to essentially all portions of the AA. ASB offers the same deposit products, loan programs, and alternative systems for delivering retail banking services in this AA as it does in its other AAs.

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. ASB closed one branch in a middle-income CT and consolidated it with another branch in a middle-income CT. In addition, a branch in a middle-income CT was relocated within the same CT.

ASB offers a wide variety of traditional banking products and services to meet the needs of the AA. The bank's deposit products include personal checking accounts that require no minimum balance and no fee. All branches also provide cashing of U.S. government checks. ASB

continues to offer IDAs through a partnership with a local non-profit organization. The bank also offers a variety of loan products, some which are tailored to meet the needs of LMI individuals.

Urban Honolulu MSA

The bank's delivery systems in the Urban Honolulu MSA are readily accessible to geographies and individuals of different incomes in the AA. The bank operates 34 branches in the Urban Honolulu MSA. The proportion of the bank's branches in low- and moderate-income CTs exceeds the proportion of the population living in these CTs. Three branches representing nine percent of the total branches are located in low-income CTs and eight branches representing 23 percent are located in moderate-income CTs. The bank also has 24-hour full-service ATMs at each branch location and 40 freestanding cash dispensing ATMs throughout the AA; eight of the cash-dispensing ATMs are in moderate-income CTs and two are in low-income CTs.

Branch services and hours are tailored to the convenience and needs of the AA. Two branches in low-income CTs and six branches in moderate-income CTs have Saturday hours. Four branches in moderate-income CTs have Sunday hours and three branches in moderate-income CTs also have holiday hours.

Delivery systems are readily accessible to essentially all portions of the AA. ASB offers the same deposit products, loan programs, and alternative systems for delivering retail banking services in this AA as it does in its other AAs.

To the extent changes have been made, the institution's opening and closing of branches has not had a significantly adverse effect on the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. One branch in a low-income CT was relocated to another low-income CT. Two branches in upper-income CTs were closed; one was consolidated with a branch in a moderate-income CT and the other was consolidated with a branch in a middle-income CT. Finally, a branch in a moderate-income CT was closed and consolidated with a branch in a middle-income CT.

ASB offers a wide variety of traditional banking products and services to meet the needs of the AA. The bank's deposit products include personal checking accounts that require no minimum balance and no fee. All branches also provide cashing of U.S. government checks. ASB continues to offer IDAs through a partnership with a local non-profit organization. The bank also offers a variety of loan products, some which are tailored to meet the needs of LMI individuals.

Community Development Services

Overall, the bank provides a poor level of CD services. The majority of the CD services the bank provided consist of serving as board members. However, the bank also provided some financial literacy training in schools where the majority of the students are low- and moderate-income. Twenty-three out of 1,200 employees provided qualified CD services to 18 CD organizations and to school-age children at five schools where the majority of the students are LMI. Thirteen of the organizations focus on the Urban Honolulu MSA, while the other five

organizations are statewide organizations. All five schools where employees taught financial literacy are located in Urban Honolulu.

Hawaii Non-MSA

ASB did not provide any qualified CD services to qualified CD organizations in the Hawaii Non-MSA, despite the fact that there are numerous opportunities for financial institutions to provide CD services in this AA. However, the bank did provide some qualified services to statewide CD organizations that serve the entire state of Hawaii.

Kahului-Wailuku-Lahaina MSA

ASB did not provide any qualified CD services to qualified CD organizations in the Kahului-Wailuku-Lahaina MSA, despite the fact that there are numerous opportunities for financial institutions to provide CD services in this AA. However, as noted above, the bank did provide some qualified services to statewide CD organizations that serve the entire state of Hawaii.

Urban Honolulu MSA

Twenty-three bank employees provided qualified CD services to 13 different CD organizations and to schools where the majority of the students are LMI. The majority of the services consist of serving on the boards of the CD organizations. Some of the organizations provide loans and assistance to small businesses, while other organizations focus on affordable housing for LMI individuals. Employees also provided financial literacy training at five schools where the students are primarily LMI.

Statewide

The bank provided qualified CD services to five different CD organizations that serve the state of Hawaii. All of the services consist of serving on the boards of the organizations. The organizations provide services to LMI individuals and assistance to small businesses.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/16 – 12/31/18	
Bank Products Reviewed:	Home mortgage and small business loans: 01/01/16 – 12/31/18 Community development loans, qualified investments, community development services: 05/10/16 – 12/31/18	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Hawaiian Electric Industries, Inc. (HEI)	Parent	Donations and community service hours
Hawaiian Electric Company, Inc. (HECO)	Affiliate	Donations and community service hours
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Urban Honolulu MSA #46520	Full-Scope	Honolulu County (Island of Oahu)
Kahului–Wailuku–Lahaina MSA #27980	Full-Scope	Maui County (Island of Maui and Molokai, but excluding Islands of Kahoolawe and Lanai), and
Hawaii Non-MSA #99999	Full-Scope	Hawaii County (Island of Hawaii), Kauai County (Island of Kauai, but excluding Niihau Island)

Appendix B: Summary of Ratings

RATINGS		American Savings Bank, FSB		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Satisfactory	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of

incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 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	
Hawaii Non-MSA	281	83,633	20.6	5,796	1.0	2.1	0.8	22.8	13.5	19.8	60.6	65.5	57.9	15.6	18.9	21.5	0.0	0.0	0.0	
Kahului-Wailuku-Lahaina MSA	272	106,969	20.0	4,209	0.0	0.0	0.0	13.9	13.2	9.7	59.2	65.1	60.3	27.0	21.7	30.1	0.0	0.0	0.0	
Urban Honolulu MSA	809	367,534	59.4	28,054	1.1	0.9	0.7	13.2	11.4	10.8	46.6	52.2	53.6	39.1	35.6	34.9	0.0	0.0	0.0	
Total	1,362	558,136	100.0	38,059	1.0	1.0	0.7	15.4	12.2	12.0	51.0	57.5	55.0	32.7	29.4	32.3	0.0	0.0	0.0	

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-2018

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
Hawaii Non-MSA	684	171,482	15.8	5,726	4.5	2.3	4.2	16.3	11.1	16.6	57.5	56.0	55.0	21.7	30.6	24.1	0.0	0.0	0.0
Kahului-Wailuku-Lahaina MSA	753	252,144	17.4	3,629	0.0	0.0	0.0	12.6	13.3	11.7	74.9	71.6	74.4	12.5	15.1	13.8	0.0	0.0	0.0
Urban Honolulu MSA	2,885	906,626	66.8	21,490	1.0	1.9	0.7	12.0	10.6	12.5	48.4	44.4	44.1	38.6	43.1	42.7	0.0	0.0	0.1
Total	4,322	1,330,252	100.0	30,845	1.7	1.6	1.3	13.0	11.2	13.2	53.5	51.0	49.7	31.8	36.3	35.8	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 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
Hawaii Non-MSA	281	83,633	20.6	5,796	21.4	2.1	2.7	16.7	11.4	7.7	21.8	26.3	19.5	40.0	60.1	59.6	0.0	0.0	10.5
Kahului-Wailuku-Lahaina MSA	272	106,969	20.0	4,209	20.6	3.3	3.7	17.5	15.1	12.2	22.1	22.4	22.6	39.8	59.2	50.5	0.0	0.0	11.0
Urban Honolulu MSA	809	367,534	59.4	28,054	19.8	5.1	2.5	18.2	14.1	10.8	22.8	25.2	23.5	39.2	55.0	42.0	0.0	0.6	21.2
Total	1,362	558,136	100.0	38,059	20.2	4.1	2.6	17.9	13.7	10.5	22.5	24.9	22.8	39.4	56.9	45.6	0.0	0.4	18.4

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-2018

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
Hawaii Non-MSA	684	171,482	15.8	5,726	22.4	6.4	3.8	16.0	12.3	11.1	20.4	26.9	22.2	41.3	53.4	55.1	0.0	1.0	7.9
Kahului-Wailuku-Lahaina MSA	753	252,144	17.4	3,629	19.6	2.5	2.1	18.0	13.5	8.5	22.1	25.1	18.4	40.3	58.4	63.3	0.0	0.4	7.7
Urban Honolulu MSA	2,885	906,626	66.8	21,490	19.6	4.6	2.8	18.4	14.9	10.8	22.0	27.8	25.0	40.0	51.9	47.3	0.0	0.9	14.1
Total	4,322	1,330,252	100.0	30,845	20.1	4.5	2.9	17.9	14.2	10.6	21.7	27.2	23.7	40.3	53.2	50.7	0.0	0.8	12.2

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				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	
Hawaii Non-MSA	213	10,946	10.9	8,749	4.7	3.3	2.3	12.9	7.5	10.7	66.3	73.7	69.4	16.1	15.5	17.6	0.0	0.0	0.0	
Kahului-Wailuku-Lahaina MSA	220	8,922	11.2	6,075	0.0	0.0	0.0	20.0	20.0	14.6	52.6	55.9	57.0	27.4	24.1	28.4	0.0	0.0	0.0	
Urban Honolulu MSA	1,529	111,451	77.9	35,846	3.8	3.9	2.6	35.1	33.9	23.2	34.9	37.9	37.7	23.4	22.1	34.1	2.8	2.2	2.4	
Total	1,962	131,319	100.0	50,670	3.4	3.4	2.2	28.9	29.5	20.0	43.1	43.8	45.5	22.6	21.6	30.6	1.9	1.7	1.7	

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 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
Hawaii Non-MSA	571	25,041	11.8	5,480	10.5	7.9	7.5	4.7	3.5	6.1	66.1	69.0	62.9	18.8	19.6	23.6	0.0	0.0	0.0
Kahului-Wailuku-Lahaina MSA	574	19,919	11.9	3,999	0.0	0.0	0.0	19.1	23.3	16.3	71.3	69.9	71.6	9.6	6.8	12.2	0.0	0.0	0.0
Urban Honolulu MSA	3,674	240,491	76.2	18,954	4.9	7.3	4.9	19.6	18.2	18.1	34.7	36.0	36.9	36.0	35.3	36.1	4.8	3.2	3.9
Total	4,819	285,451	100.0	28,433	5.3	6.5	4.7	16.7	17.0	15.5	45.5	44.0	46.8	29.2	30.0	30.3	3.3	2.5	2.6

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												2016
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	
Hawaii Non-MSA	213	10,946	10.9	8,749	82.4	0.0	36.4	5.4	0.0	12.2	100.0	
Kahului-Wailuku-Lahaina MSA	220	8,922	11.2	6,075	87.1	0.0	34.1	4.1	0.0	8.8	100.0	
Urban Honolulu MSA	1,529	111,451	77.9	35,846	82.5	0.0	28.9	7.1	0.0	10.4	100.0	
Total	1,962	131,319	100.0	50,670	83.1	0.0	30.8	6.4	0.0	10.5	100.0	
<i>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</i>												

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	
Hawaii Non-MSA	571	25,041	11.8	5,480	84.0	57.6	47.7	4.9	13.3	11.1	29.1	
Kahului-Wailuku-Lahaina MSA	574	19,919	11.9	3,999	87.6	65.9	47.9	3.9	11.7	8.6	22.5	
Urban Honolulu MSA	3,674	240,491	76.2	18,954	83.8	58.9	48.9	6.4	18.9	9.9	22.2	
Total	4,819	285,451	100.0	28,433	84.3	59.6	48.6	5.8	17.3	9.9	23.1	
<i>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</i>												