Office of the
Comptroller of the Currency

LIMITED PURPOSE BANK

PUBLIC DISCLOSURE

May 5, 2025

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Synchrony Bank
Charter Number: 715044

170 W. Election Road, Suite 125
Draper, UT 84020

Office of the Comptroller of the Currency

Midsize and Trust Bank Supervision
425 S. Financial Place
Suite 1700
Chicago, IL 60605

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, nor should it 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.

Contents

Overall CRA Rating

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

The major factors that support this rating include:

- The institution demonstrates a high level of Community Development (CD) loans, CD services, and qualified investment activity, particularly investments that are not routinely provided by private investors.

- The institution demonstrates extensive use of innovative or complex qualified investments, CD loans, and CD services.

- The institution exhibits excellent responsiveness to credit and CD needs in its assessment area (AA).

Description of Institution

Synchrony Bank (SYB) is headquartered in Draper, Utah. The Draper location is a corporate facility, not a branch, and does not provide physical, customer-facing banking services. The bank does not have any branches. The Salt Lake City Metropolitan Statistical Area (MSA) is SYB's sole AA.

The bank has operated as a limited purpose institution (savings association) since May 1, 2009 for purposes of the CRA. Limited purpose institutions offer a narrow product line, such as credit cards or automobile loans, to a regional or broader market. Based on this limited purpose designation, SYB strives to meet performance goals set forth under the CD test, which assesses the bank's record of helping to meet community credit needs through its CD lending, qualified investments, and CD services.

SYB is a wholly owned subsidiary of Synchrony Financial (SYF), a savings and loan holding company headquartered in Stamford, Connecticut. SYF has 18 subsidiaries as of December 31, 2024 with SYB being its primary and sole banking subsidiary. SYB affiliates that received consideration for qualified investments and CD services during the evaluation period include Retail Finance International Holdings, Inc. (RIH), Synchrony International Services Private Limited, and Synchrony Global Services Philippines, Inc. As of December 31, 2024, SYB reported total assets of $112 billion.

SYB offers credit products through five primary credit card sales platforms: Home & Auto, Digital, Diversified & Value, Health & Wellness, and Lifestyle. Home & Auto offers payments and financing solutions through a network of partners and merchants providing home and automotive merchandise and services. Digital provides payments and financing solutions with integrated digital experiences through partners and merchants who primarily engage with their consumers through digital channels. Diversified & Value provides payments and financing solutions through large retail partners who sell products and services to consumers for daily needs or important life moments. Health & Wellness provides healthcare payments and financing solutions, through a network of providers and health systems for those seeking health and wellness care. Lifestyle provides payments and financing solutions through partners and merchants who offer merchandise for powersports, outdoor power equipment, and other industries focused on sporting goods, apparel, jewelry, and music.

Credit products are often marketed at point of sale, through a large network of collaborating businesses, rather than directly through SYB's own delivery channels. Deposit products are offered online, by phone, or mail, including certificates of deposit, individual retirement accounts, money market accounts, and savings accounts.

There were no known legal, financial, or other factors that impeded SYB's ability to help meet the credit and CD needs of its AA during the evaluation period.

Table 1: Financial Information (000s)

	Year-end 2022	Year-end 2023	Year-end 2024	Average for Evaluation Period
Tier 1 Capital	12,174,000	12,880,000	13,806,000	12,953,333
Total Income	12,530,000	16,684,000	18,974,000	16,062,667
Net Operating Income	2,903,000	2,001,000	2,405,000	2,436,333
Total Assets	96,300,000	109,577,000	111,939,000	105,938,667
Pass Through Receivables / Managed Assets	87,635,680	97,042,957	96,817,508	93,832,048

Source: Consolidated Report of Condition and Income and bank reported data.

Scope of the Examination

Evaluation Period/Products Evaluated

In evaluating the bank's performance under the CRA, the OCC reviewed CD activities from January 1, 2022 through December 31, 2024. The OCC reviewed the level and nature of qualified investments, CD lending, and CD services. At the bank's request, the OCC also considered qualified investments and CD services provided by its affiliates. Some real estate-based investments, i.e., low-income housing tax credit related instruments and other equity partnerships/limited liability corporation (LLCs), and grants were made through RIH, an affiliate of SYB and a subsidiary of SYF. A small percentage of CD services were performed by employees from Synchrony International Services Private Limited and Synchrony Global Services Philippines, Inc., both of which are subsidiaries of SYF. At the prior examination dated February 21, 2022, the OCC rated the bank "Outstanding."

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.

The bank adequately addressed the needs of its AA. Therefore, outside AA qualified investments, CD loans, and services were considered in evaluating its performance.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution or any affiliate whose loans have been considered as part of the institution's lending performance has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Utah

CRA Rating for Utah: Outstanding

The major factors that support this rating include:

- The institution demonstrates a high level of CD loans, CD services, or qualified investment activity in the state of Utah, particularly investments that are not routinely provided by private investors.

- The institution demonstrates extensive use of innovative or complex qualified investments, CD loans, and CD services in the state of Utah.

- The institution exhibits excellent responsiveness to credit and CD needs in the state of Utah.

Description of Assessment Area(s)

SYB's AA is the Salt Lake City MSA, which is comprised of Salt Lake and Tooele Counties. Tooele County is located in northern Utah and primarily rural. Salt Lake County is adjacent to and east of Tooele County. Salt Lake City is the largest city in the MSA and capital of Utah. The AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income (LMI) geographies. Table 2 below provides a summary of demographics for the Salt Lake City MSA.

Table 2: Utah Assessment Area Description

Assessment Area – Salt Lake City MSA						
						2022-2024
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	268	2.24	23.13	45.90	26.87	1.87
Population by Geography	1,257,936	2.03	22.95	46.97	27.45	0.60
Housing Units by Geography	427,135	1.90	25.04	46.40	26.60	0.06
Owner-Occupied Housing by Geography	275,979	0.78	18.91	47.93	32.38	0.00
Occupied Rental Units by Geography	128,492	4.08	37.13	44.30	14.30	0.19
Vacant Units by Geography	22,664	3.16	31.12	39.77	25.94	0.00
Businesses by Geography	68,513	2.13	17.33	45.52	33.91	1.11
Farms by Geography	1,615	1.55	16.97	48.36	32.57	0.56
Family Distribution by Income Level	282,565	17.83	19.45	23.43	39.30	0.00
Household Distribution by Income Level	404,471	20.98	17.36	20.55	41.11	0.00
Unemployment rate (%)	3.81	6.85	4.75	3.93	2.52	6.87
Households Below Poverty Level (%)	8.32	20.41	13.66	7.12	4.56	43.08
Median Family Income (41620 - Salt Lake City-Murray, UT MSA) for 2022-2023		$90,360	**Median Housing Value**			$313,250
Median Family Income (41620 - Salt Lake City-Murray, UT MSA) for 2024		$115,400	**Median Gross Rent**			$1,190
			Families Below Poverty Level			5.53

FFIEC File – 2024 Census
2024 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

The U.S. Census Bureau (Census) estimated the population in the AA will grow by 3.6 percent in 2024 compared to the 2020 Census. According to Moody's Analytics, the population growth can be attributed to a high rate of natural population increase. The distribution of families by income level was 17.8 percent low-, 19.5 percent moderate-, 23.4 percent middle-, and 39.4 percent upper-income. According to the Census, 25.4 percent of the AA's census tracts were LMI. Approximately 8.3 percent of households in the AA were living below the poverty level. In LMI geographies, 20.4 and 13.7 percent of households were below the poverty level, respectively.

The Salt Lake City MSA business environment remains highly competitive for CRA investments. According to the FDIC's June 30, 2024 Deposit Market Share Report, there were 51 FDIC-insured financial institutions operating 204 offices, with $943 billion in deposits. The top five institutions in the AA were Morgan Stanley Bank, Ally Bank, American Express National Bank, Goldman Sachs Bank USA, and UBS Bank USA. These institutions controlled approximately 75.4 percent of the deposit market share, with a combined $711 billion in deposits. SYB ranked sixth in the AA, with $86 billion in deposits, or 9.1 percent of the market share.

During the evaluation period, the Salt Lake City MSA maintained a low unemployment rate. Per the Bureau of Labor Statistics, the unemployment rate increased from 2.4 percent in 2022 to 3.2 percent in 2024. This mirrored the state unemployment rate of 2.4 percent and 3.2 percent for the same period. Additionally, the MSA's unemployment rates were lower than the national unemployment rates of 3.4 percent for 2022, and 3.9 percent in 2024.

According to Moody's Analytics, the area was in the mid-expansion phase of its business cycle during 2024. Despite recent slowing, the local economy remained healthy. Job creation was comparable with the state and nation. The MSA benefited from a concentration of high-wage jobs in technology and knowledge-based industries, which benefited the economy by serving as a low-cost destination for businesses relocating from Silicon Valley; stable employment; and research from nearby universities. The construction sector also led the way for job creation. After peaking in early 2022, the finance industry declined due to high interest rates and reduced loan demand. The largest industries in the Salt Lake City MSA were professional and business services; government; education and health services; retail trade; and leisure and hospitality services. The top five employers in the area were the University of Utah, Intermountain Health Care Inc., Walmart Inc., Amazon Fulfillment Services Inc., and Delta Airlines.

Housing prices have significantly increased and have deteriorated the MSA's cost-of-living advantage. Per Moody's Analytics, home prices in the area continue to be the highest level in the state. Given the increased housing prices, average home buying and rental costs have outpaced income growth, making homeownership increasingly difficult.

The Census reported 64.6 percent of total housing units in the AA as owner-occupied, 30.1 percent as rental-occupied, and 5.3 percent as vacant. Owner-occupied housing in LMI geographies represented 19.7 percent of total owner-occupied housing units. Rental units accounted for 4.1 percent of housing units in low-income geographies, and 37.1 percent of housing units in moderate-income geographies. The low ownership and high rental rates in LMI geographies further indicate a lack of affordable housing.

The OCC considered information from four existing community contacts for organizations serving the AA during this evaluation period. The organizations included a local coalition and CD financial institution that support affordable housing, a county government agency that offers economic development services, and a technical assistance provider that provides statewide support for small businesses and entrepreneurs. Challenges in the area included a shortage of affordable housing for LMI individuals; lack of access to capital and education for small businesses; and limited availability of affordable childcare. Opportunities for financial institutions included participating in Low-Income Housing Tax Credit (LIHTC) and affordable multifamily projects; providing financial literary courses; offering small dollar loans; conducting outreach and education on financing options for small businesses, including rural areas; and providing grants to fund childcare centers.

The OCC met virtually with two CD organizations that maintain CRA relationships with SYB. The entities support affordable housing and economic development, providing a range of products and services to meet the needs of LMI individuals and geographies. Each of the representatives confirmed the bank's responsiveness and how the bank's contributions helped achieve organizational goals.

Conclusions About Performance

Summary

During the performance evaluation period, SYB and its affiliates exhibited a high level of qualified investments, grants, loans, and services within its AA relative to its capacity and the highly competitive CD environment in the AA. SYB and its affiliates made a total of $180 million in qualified investments and CD grants, and originated $655 million of CD loans, during the evaluation period that benefited its AA or the broader statewide or regional area that includes the AA. In addition, SYB and its affiliates provided 1,407 hours of qualifying CD services that supported 13 organizations serving the AA or the broader statewide or regional area that includes the AA.

Due to the highly competitive environment within the bank's AA, SYB and its affiliates also provide CD loans, investments, and CD services outside its AA. SYB implemented a long-term strategy to expand its reach to LMI populations and neighborhoods in locations where SYB has significant consumer deposits and/or near the SYB corporate office and other facilities. For this performance evaluation, the OCC considered $1.1 billion in qualified investments and CD grants, and $141 million of CD loans made outside the AA. SYB and its affiliates also provided 11,223 hours of CD services that supported 28 organizations serving outside the AA.

SYB makes extensive use of innovative or complex qualified investments, including making investments that are not routinely provided by private investors. With the expertise and experience of its employees, SYB focuses on the development of loans and investments to address community needs with complex structures. Numerous investments include complex structures involving multiple investors or community partners, multiple loans, or combinations of complex loans and investments while providing service in leadership positions.

SYB's qualified CD investments, grants, loans, and services exhibit excellent responsiveness to the credit and CD needs of the AA, especially affordable housing. The identified community need for affordable housing is addressed with 99.9 percent of all AA CD loans and 92.8 percent of all qualified investments and grants in the AA.

Qualified Investments

SYB made a total of 574 current- and prior-period qualified investments and grants during the evaluation period, totaling $1.3 billion. Of these, 294 qualified investments and grants totaling $180 million directly benefited the AA or were made in the broader statewide and regional area with a purpose/mandate/function (P/M/F) to benefit the AA. SYB also had an additional $1.1 billion in current- and prior-period qualified investments made outside the AA without a P/M/F to benefit the AA. The OCC considered the additional investments in assessment of the level and responsiveness of the bank's qualified investments and grants. The investment portfolio includes investments that are directly responsive to the identified community needs of affordable housing and loans for small businesses. These investments include LIHTC, small business investment corporations, investments in funds for the preservation of affordable housing and for the development of workforce housing, mortgage-backed securities (MBS), and a CRA Mutual Fund.

SYB had 216 prior-period qualified investments totaling $40 million, which represents 3.1 percent of total qualified investments.

Table 3a: Qualified Investment Activity (000s)

	Benefits AA**	Outside AA	Totals
Originated Investments	64,648	608,858	673,506
Originated Grants	2,541	12,236	14,777
Prior-Period Investments that Remain Outstanding	112,545	476,658	589,203
Total Qualified Investments	179,734	1,097,752	1,277,486
Unfunded Commitments*	35,093	497,971	533,064

* "Unfunded Commitments" means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.
** Investments included in the Benefits AA column are located in the AA or in the broader statewide or regional area that includes the AA.

Table 4a: Qualified Investment Percentages

	Benefits AA (%) *	Outside AA (%)
Total Investments/Average Tier 1 Capital	1.39	8.47
Total Investments/Average Total Income	1.12	6.83
Total Investments/Average Pass-Through Receivables	0.19	1.17

* Investments included in the Benefits AA column are located in the AA or in the broader statewide or regional area that includes the AA.

The following are examples of significant CD investments:

- SYB invested $29 million in three syndicated multi-investor LIHTC funds benefiting the Salt Lake City MSA and greater statewide area. The investment supported 245 LMI housing units through the CRA allocation process, which directly benefited the AA. Prior period investments include seven investments totaling $59 million (remaining book value of $23 million), which provided 346 housing units that directly benefited the AA. These investments are complex due to involvement of many parties and investors.

- SYB invested $511 million in 19 syndicated multi-investor LIHTC funds supporting 5,227 affordable housing units outside the AA. Prior to the current evaluation period, SYB invested $504 million (remaining book value of $282 million) supporting 3,336 affordable housing units through CRA allocated projects. These investments are complex due to involvement of many parties and investors.

- SYB invested $35 million in two Preservation/Workforce Housing funds that preserved over 85 affordable housing units. SYB also has over $38 million in prior period Preservation/Workforce Housing fund investments preserving almost 1,200 affordable housing units. These investments are complex, involve multiple parties and investors, and are responsive to community credit needs of affordable housing.

- SYB invested $15 million in a public welfare affordable housing fund with a primary purpose of CD for LMI communities. The fund invests in communities throughout the Southeastern U.S. with a deep undersupply of affordable housing and strategically targets lower middle-market projects (less than $75 million) that often struggle to secure institutional equity. The general partner is targeting a mix that is more heavily weighted towards multifamily, including workforce/affordable housing, which is in high demand and short supply.

CD Lending

During the evaluation period, SYB originated $655 million of CD loans in or benefiting the Salt Lake City MSA. Lending in the AA accounted for 82.3 percent of all CD lending. Each of these CD loans were for the purposes of affordable housing and supported the creation of 422 affordable housing units. All CD loans were lines of credit that provided flexible terms and rates for borrowing entities. In addition to the CD loans benefiting the AA, the OCC also considered additional loans totaling $141 million made outside the AA without a P/M/F to benefit the AA. CD loans made outside the AA primarily supported affordable housing. By dollar volume, 70.9 percent of these loans funded 365 affordable housing units, 27.7 percent funded economic development initiatives, and 1.4 percent funded community services targeted to LMI individuals.

Table 5a: CD Lending Percentages

	Benefits AA (%) *	**Outside AA (%)**
Total CD Lending/Average Tier 1 Capital	5.06	1.09
Total CD Lending/Average Total Income	4.08	0.88
Total CD Lending/Average Pass-Through Receivables	0.70	0.15

* CD loans included in the Benefits AA column are located in the AA or in the broader statewide or regional area that includes the AA.

The following are examples of significant CD loans:

- SYB issued, and annually renewed, a $100 million warehouse line of credit to a housing finance agency created under the state of Utah and the federal statute. The line of credit provides flexible financing to assemble mortgage loans that will be securitized into MBS. This line of credit is responsive to community needs for affordable housing supporting lowpriced mortgages to LMI households. The financing is also complex because it involves a third-party escrow agent to coordinate collateral transfer as the new MBS pools are formed.

- SYB issued, and annually renewed, a $65 million line of credit to a Community Development Financial Institution (CDFI) that provides term financing for multifamily affordable housing, particularly LIHTC projects in the state of Utah and the surrounding regional area. This intercreditor line of credit is complex in nature as multiple lenders are involved in financing a single borrower under an intercreditor agreement. SYB also demonstrated leadership at this CDFI. The CRA Officer served on the Executive Committee and two other bank employees each served on the Board of Directors and as the Chair of the Loan Committee during the evaluation period.

- SYB issued, and annually renewed, a $1 million line of credit to a CDFI in the state of Utah that was used to acquire, rehabilitate, and preserve affordable housing in LMI communities throughout Utah. This unsecured line of credit provides the organization with flexible financing. Since its inception, the organization built or rehabilitated more than 500 affordable housing units.

- SYB established a master participation agreement with a national CDFI to facilitate the purchase of loans that serve the creation or retention of affordable housing units. This CD loan program benefits the tri-state area of New York, Connecticut, and New Jersey, a high-cost market with a limited supply of affordable housing units, especially for LMI individuals and families. During the evaluation period, the program resulted in eight participation purchases totaling $38 million along with several maturity extensions and renewals. These participations have supported the creation and maintenance of over 200 affordable housing units.

CD Services

SYB employees and affiliates actively provided 12,630 hours of service to 41 CD organizations and programs that benefit LMI individuals, families, households, and communities. Approximately 11 percent of service hours benefited the bank’s AA and 89 percent benefited areas outside the AA. The number of hours benefitting the AA reflects the small number of employees located within the AA. As of December 31, 2024, employees located in the AA totaled 51, representing less than 0.5 percent of all bank personnel in the United States.

SYB has developed and maintained strong relationships with community organizations to respond to CD needs. SYB and its employees collaborate with schools, nonprofit organizations, housing funds, and government organizations to address the needs of communities within the AA, broader statewide and regional areas, and other underserved areas nationwide. The services provided by SYB employees were highly responsive to CD needs and consistent with the bank’s capacity and expertise to conduct such activities. SYB employees and affiliates utilized their professional expertise to provide CD services focused on youth and adult financial education, technical assistance, job skills training, and affordable housing.

SYB employees demonstrated leadership and responsiveness to CD needs by serving in leadership positions on the Board of Directors and/or Committees for numerous organizations focused on community service, affordable housing, and economic development. A total of 30 bank employees served 1,407 hours in the AA while 189 bank employees and two affiliate employees served 11,223 hours outside the AA. SYB employees dedicated a significant portion of service hours to financial literacy, affordable housing, and workforce development training for LMI individuals located within the bank's AA, broader statewide and regional areas, and underserved LMI communities nationwide.

The following table summarizes the bank and its affiliate's CD service activities inside and outside the AA:

Table 6a: CD Service Activities

CD Service	Benefits AA*	Outside AA
Community Services	805	10,558
Economic Development	149	0
Affordable Housing	277	98
Combination of one or more types of CD	176	567
Total CD Service Hours	1,407	11,223

* CD services included in the Benefits AA column are located in the AA or in the broader statewide or regional area that includes the AA.

The following are examples of significant CD services:

- One bank employee provided 264 hours of service on the Board, Executive Committee, and Real Estate Development Committee of a nonprofit CDFI whose mission is to provide people with a path to financial stability and access to affordable homes. The organization provides financial education and homeownership counseling, downpayment and mortgage assistance, and affordable housing and foreclosure prevention services to LMI families. The organization also supports the creation of LMI rentals through the development of multifamily homes. Single family homes are also constructed to increase the supply of affordable housing.

- Three bank employees provided a total of 170 hours of service on the Board, Executive Committee, Loan Committee, and Pricing Committee of a nonprofit CDFI whose mission is to increase and preserve affordable housing in LMI communities across the United States, including the AA. The organization is also dedicated to increasing access to credit for LMI communities and works with various organizations to provide permanent financing for affordable housing contracts that serve LMI households. The organization offers various financial services, including underwriting, loans, and technical assistance for affordable housing projects.

- Three bank employees provided a total of 146 hours of service on the Board and Loan Committee of a nonprofit CDFI whose mission is to empower underserved communities and provide financial and technical assistance to small businesses, particularly those who may not qualify for traditional financing. The organization offers microloans and business training to entrepreneurs who are underserved in Utah, with a focus on LMI individuals. They offer live virtual classes covering financials, social media and marketing, business strategy and planning, and hiring. Participants are also able to apply for SYB's "Banking On Woman" program via the nonprofit's website, which was created through a partnership between the bank and the nonprofit to empower female business owners to start or grow their own business. The program is administered by a local university within the AA and seeks to invest in woman entrepreneurs and promote economic development through job creation and retention in local communities. The 15-week course provides tools, support, and financial resources to plan, launch, and grow businesses.

- One bank employee provided 79 hours of service on the Board, Executive Committee, and the Fundraising Committee of a nonprofit organization whose mission is to provide counseling services to LMI individuals to enable the achievement of housing, budgeting, and financial goals. The organization uses extensive resources to find affordable housing for very low-, low-, and moderate-income individuals and households, including senior citizens and those with special needs. The organization also provides financial literacy, homeownership, rental, and affordable housing counseling services to LMI individuals, homebuyers and renters, and those facing potential foreclosure or eviction. The bank's employee shared technical skills while serving as a financial literacy presenter at the organization.

- One bank employee provided 150 hours of service on the Board and Executive Committee of a nonprofit organization whose mission is to support and increase the number of women in the computer science field. The organization is committed to preparing students for jobs emerging in the technology industry, including artificial intelligence, and ensuring that students are informed on rapidly evolving technology. SYB partnered with the organization to help inspire, educate, and equip LMI high school students with computer science skills.

Appendix A: Summary of MMSA and State Ratings

RATINGS	
Overall Bank:	Overall Bank Rating
Synchrony Bank	Outstanding
State/MMSA Name	State/MMSA Rating
Utah	Outstanding

Appendix B: Definitions and Common Abbreviations

The following terms and abbreviations may be 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.

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.

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).

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

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.

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 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.

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 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 CD.

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.

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.