



## **PUBLIC DISCLOSURE**

June 13, 2016

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

RBC Bank (Georgia), N.A.  
Charter Number: 23416

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

Office of the Comptroller of the Currency

International Banking Supervision  
340 Madison Avenue, 9th floor  
New York, New York 10173

**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.

**Table of Contents**

**GENERAL INFORMATION AND OVERALL CRA RATING..... 3**

**DEFINITIONS AND COMMON ABBREVIATIONS.....5**

**DESCRIPTION OF INSTITUTION..... 9**

**SCOPE OF THE EVALUATION..... 11**

**DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW ..... 12**

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS..... 13**

    LENDING TEST..... 13

    INVESTMENT TEST ..... 15

    SERVICE TEST..... 16

**APPENDIX A: SCOPE OF EXAMINATION .....A-1**

**APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS ... B-1ERROR! BOOKMARK NOT DEFINED.**

**APPENDIX C: TABLES OF PERFORMANCE DATA.....C-1**

## General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution’s record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of RBC Bank (Georgia), N.A. (RBCG or bank) issued by the Office of the Comptroller of the Currency (OCC), the institution’s supervisory agency, for the evaluation period starting July 1, 2013 through December 31, 2015. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

## Overall CRA Rating

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

The following table indicates the performance level of RBC Bank (Georgia), N.A. with respect to the lending, investment, and service tests:

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

\*The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The lending activity reflects an adequate responsiveness to credit needs in the assessment area (AA).
- The bank’s geographic distribution of loans reflects excellent penetration throughout the AA.
- The bank had an adequate distribution of loans among individuals of different income levels, given the product lines offered by the bank.
- The bank’s level of qualified investments was adequate in relationships to the bank’s

financial resources and community development opportunities. The qualified investments exhibit an adequate level of responsiveness to community needs.

- The bank's level of community development services exhibit an adequate level of responsiveness to community needs.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,200 and 8,000 people, with an optimum size of 4,000 people.

**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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** A group of two or more people (one of whom is the householder) related by birth, marriage, or adoption, residing together. A family household may also include non-relatives living with the family.

**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 race, gender, and the income of the applicant, amount of the loan requested, the disposition of the application (e.g., originated, denied, and withdrawn) loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**Household:** Consists of one or more persons, whether related (family) or unrelated (nonfamily), 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 income, or a geography with a median family income, that is less than 50 percent of the area median income.

**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 MA/assessment area.

**Median Family Income (MFI):** The median income for families determined by the U.S. Census Bureau's American Community Survey every five years and used to determine the income level category of geographies. The MFI is updated annually by the Federal Financial Institutions Examination Council (FFIEC) and estimates the income level of individuals within a geography. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget.

**Metropolitan Division:** A Metropolitan Division is defined by the Office of Management and Budget and consists of one or more counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. MDs represent one or more employment centers, identified as a main county and, as applicable, contiguous counties with strong commuting ties to the main county.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as one or more whole counties having at least one urbanized area that has a population of at least 50,000. An MSA may include adjacent counties that have a high degree of social and economic integration with the urbanized area as measured through commuting ties.

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

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

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

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Rated Area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, or multistate metropolitan area, the state or multistate rating is the institution's CRA rating. If an institution maintains domestic branches in more than one state, the institution will receive a separate rating for each state in which branches are located, unless those branches are within a multistate metropolitan statistical area. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a single rating for the multistate metropolitan 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 One 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, or a geography with a median family income, that is at least 120 percent of the area median income.



## Description of Institution

RBC Bank (Georgia), N.A. (RBCG or bank) is a wholly owned subsidiary of Royal Bank of Canada (RBC), an \$868 billion (Canadian dollars) financial services company headquartered in Montreal, Quebec. Since 2012, RBCG has offered U.S. banking products to fulfill the stateside banking needs of RBC's Canadian clients while also providing full access to their Canadian accounts. The bank does not operate a branch network in the United States. The Atlanta, GA location is the official headquarters location prior to the selling of the United States branch network to PNC Financial Group Inc. (PNC) on March 2, 2012. Following this sale, the bank has zero branch locations. The bank President and operations center are located in Raleigh, NC while the CRA Development Manager/Mortgage Specialist is the lone employee that resides in GA. RBCG utilizes a RBC customer call center in Canada and small regional sales force in Raleigh, NC to open deposit accounts and process loans applications. RBCG offers an on-line banking platform and debit card product to allow seamless access to Canadian domiciled accounts in the United States. Additionally, customers can use PNC-owned automated teller machines (ATMs) and RBC Canadian ATMs, to make exchanges of American dollars and Canadian dollars automatically from/to the deposit account (dual currency transfer). Without a branch network, the bank relies heavily on technology and affiliate support for marketing to attract new customers. Previously, RBCG accounts were limited to customers who had an existing account relationship with the parent bank. After the expiration of the non-compete clause on March 2, 2015, all products and services are available to individuals living in the AA.

As of December 31, 2015, the bank's assets totaled \$3.3 billion, tier one capital totaled \$250 million and the bank's loan and lease portfolio totaled \$779 million and represented 24 percent of total assets. The loan portfolio consisted primarily of first lien single-family mortgage loans, which represented 78 percent of the total loan portfolio. Consumer loans, home equity lines of credit, construction and land development loans, and second lien single-family mortgage loans represented 13 percent, 9 percent, 0.22 percent, and 0.10 percent, respectively. According to the FDIC Summary of Deposits Market Share dated June 30, 2015, RBCG had deposits of \$2.73 billion, representing 1.87 percent of the market share in the AA.

During the majority of the evaluation period, the bank was subject to a non-compete clause in an agreement with PNC that restricted the bank from establishing additional physical locations for conducting branch-banking business, and from actively marketing mortgage and deposit products to new clients within the AA. The aforementioned agreement was the result of the bank's sale of its non-cross border business and non-cross border credit card assets to PNC (including its branch and distribution network), and expired March 2, 2015. Therefore, the bank's ability to originate loans or provide deposit services to new customers in the AA was impeded for the majority of the evaluation period, from July 1, 2013 to March 2, 2015. During that timeframe, the bank was limited to soliciting existing RBC customers and purchasing mortgages secured by properties located in the AA. Since the agreement expired, the bank now also offers deposit and loan products to individuals living in the bank's AA.

There are no financial or other factors that impede the bank's ability to meet the credit needs of its AA. RBCG was rated "Satisfactory" at the last CRA examination dated July 8, 2013 completed by the OCC.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The evaluation period for the Lending Test is July 1, 2013 to December 31, 2015. The evaluation period for the Community Development loans, Qualified Investments, and Community Development Services tests is July 9, 2013 to December 31, 2015. Conclusions regarding the bank's lending performance are based on Home Mortgage Disclosure Act (HMDA) reportable loan data for home purchase and home refinance loans purchased or originated. The bank did not originate or purchase any home improvement, multi-family, small business or small farm loans during the evaluation period. The lending tables for these products are not included in the PE. Due to their business strategy, the bank does not offer the aforementioned products.

### **Data Integrity**

As part of our ongoing supervision of the bank, we tested the reliability of the bank's HMDA lending data that would be used to evaluate the bank's CRA performance. We also reviewed loans, investments, and services submitted by management for community development consideration to ensure they met the regulatory definition for community development.

### **Selection of Areas for Full-Scope Review**

RBCG delineated the entire Atlanta-Sandy Springs-Roswell, GA Metropolitan Statistical Area (MSA) as its AA. This AA received a full-scope review.

### **Ratings**

RBCG's overall rating is based on the one delineated full-scope area in Georgia.

## **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 Consumer Financial Protection Bureau, as applicable.

The OCC did not identify evidence of discriminatory or other illegal credit practices with respect to this institution.

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

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the lending test is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Atlanta-Sandy Springs-Roswell, GA (MSA) is adequate.

### **Lending Activity**

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity.

RBCG's lending reflects an adequate responsiveness to credit needs in the Atlanta-Sandy Springs- Roswell, GA (MSA). During the evaluation period, the bank purchased or originated 199 home purchase or home refinance loans totaling \$28.9 million. In the AA, RBCG had a deposit market share of 1.87 percent as of June 30, 2015 and ranked seventh among 97 depository institutions. Home mortgage lending in the AA is highly competitive with 730 lenders in the AA. RBCG's market share in home purchase lending ranked 146<sup>th</sup> with a .05 percent market share and ranked 240<sup>th</sup> in home refinancing lending with a .02 percent market share. The bank's low level of lending is due to the non-compete clause that expired March 2, 2015. During that timeframe, the bank was limited to soliciting existing RBC customers and purchasing mortgages secured by properties located in the AA.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution of loans reflects an excellent penetration throughout the AA. The geographic distribution of home mortgage loans was excellent.

In evaluating the geographic distribution of home mortgage loans, we considered the existence of the non-compete clause for the majority of the evaluation period. Further, market share was not considered in the overall evaluation of the lending test.

### ***Home Mortgage Loans***

Refer to Tables 2 and 4 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan purchases and originations.

### ***Home Purchase Loans***

RBCG's geographic distribution of home purchase loans in the AA reflects excellent penetration throughout its AA. The percentage of home purchase loans among low and moderate-income geographies exceeded the percentage of owner-occupied housing units in those geographies.

### ***Home Refinance Loans***

RBCG's geographic distribution of home refinance loans in the AA reflects good penetration throughout its AA. The percentage of home refinance loans among low-income geographies was somewhat lower than the percentage of owner-occupied housing units in low-income census tracts. The percentage of home refinance loans among moderate-income geographies exceeded the percentage of owner-occupied housing units in moderate-income CTs.

### ***Lending Gap Analysis***

We evaluated the lending distribution in this AA to determine if any unexplained conspicuous gaps existed. We used lending reports and maps to compare the geographies where loans were made to the geographies in the AA. No unexplained conspicuous gaps were identified.

### ***Inside/Outside Ratio***

A small percentage of RBCG's loans were made in the institution's AA. Overall, 85.49 percent of the home mortgage loans were originated outside of the bank's AA. The remainder of the bank's home mortgage loans consisted of loan purchases and originations within the AA. This analysis was performed on the entire bank rather than by AA.

We consider the bank's performance adequate given the banks' business strategy and the non-compete clause in effect for a significant portion of the evaluation period. The business strategy of the bank contributed to the low volume of home mortgage lending within the AA. The bank does not offer home improvement, multi-family, small business or small farm loan products.

The non-compete clause also contributed to the bank's limited ability to originate home mortgage loans within the AA. The bank's strategy during the non-compete clause was to service RBC clients residing throughout the United States.

### **Distribution of Loans by Income Level of the Borrower**

The overall distribution of loans by borrowers of income level reflects good penetration among borrowers of different levels income levels.

In evaluating the borrower distribution of home mortgage loans, we considered the non-compete clause that expired March 2, 2015. During that timeframe, the bank was limited to soliciting existing RBC customers and purchasing mortgages secured by properties located in the AA. Another mitigating factor is 11.35 percent of households living below the poverty level in the AA. Due to the non-compete clause for the majority of the evaluation period, market share was not considered in the overall evaluation of the lending test.

### ***Home Mortgage Loans***

Refer to Tables 8 and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Home Purchase Loans***

The distribution of home purchase loans to borrowers of different incomes was excellent compared to area demographics. Lending to low- and moderate-income borrowers was excellent and exceeded the percentage of those families.

### ***Home Refinance Loans***

The distribution of home refinance loans to borrowers of different incomes was adequate compared to area demographics. Lending to low-income borrowers was poor and below the percentage of low-income families. Lending to moderate-income borrowers was good and near to the percentage of moderate-income families.

### **Community Development Lending**

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending.

The bank made a low level of community development loans during the evaluation period. RBCG's community development lending was limited to one loan. The non-compete clause, which expired March 2, 2015, contributed to the bank's limited ability to originate community development loans within the AA. In addition, the bank does not have the expertise to originate community development loans as the CRA Development Manager responsibility is originating affordable housing products to individuals. This also contributed to the low level of community development loans. The affordable housing loan was a \$500 thousand loan to a certified Community Development Financial Institution. The level of community development lending represents 0.20 percent of tier 1 capital.

### **Product Innovation and Flexibility**

RBCG has not used any innovative or flexible loan products during the evaluation period.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the investment test in the Atlanta-Sandy Springs-Roswell, GA AA is rated "Low Satisfactory." Based on a full-scope review, the bank's performance was adequate.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

RBCG has an adequate level of qualified investments. The bank's qualified investments showed adequate responsiveness to community development needs. Refer to the Market Profile section for details on community needs and opportunities. Qualified investments in the Atlanta-Sandy Springs-Roswell, GA AA totaled \$8.66 million representing approximately 3.46 percent of the bank's December 31, 2015 tier 1 capital. The bank's qualified investments are

comprised of investments in affordable housing mortgage backed securities. The bank also made \$203 thousand in donations, which are qualified investments by definition.

The bank purchased three affordable housing mortgage pools from three large financial institutions. The three pools are invested in 122 mortgage loans to low- and moderate-income borrowers within the Atlanta-Sandy Springs-Roswell, GA AA. The current balance of prior period investments totals \$8.46 million. The prior period investments had a continuing impact on the community development needs in the AA.

The current period qualified investments consisted of \$203 thousand in financial contributions to three community organizations involved in community development initiatives. The organizations provided affordable housing or services to low- and moderate-income individuals.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

RBCG's performance under the Service test is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Atlanta-Sandy Springs-Roswell MSA is adequate relative to the bank's resources and community development opportunities.

### **Retail Banking Services**

The bank does not have a retail banking service presence due to their business strategy of primarily serving as a cross-border conduit for RBC clients, as referenced in the Description of Institution section. Due to the mitigating factors described in the Description of Institution, more weight was placed on community development services. The retail banking service tables are not included.

### **Community Development Services**

RBCG provided an adequate level of community development services in the Atlanta-Sandy Springs-Roswell AA. Over the evaluation period, eight employees supported five community development organizations in the AA. The majority of RBCG's employees reside in the operations center in Raleigh, North Carolina. Only one mortgage specialist employee is permanently located in the AA. Refer to the demographic profile section for additional information on the available community development needs and opportunities in the AA.

The following are examples of the community development services provided:

- Served on the advisory board of an organization who advocates for the equitable distribution of affordable housing throughout the Atlanta AA;
- Served on the loan fund board for an organization that offers loans for the development of affordable housing for low- and moderate-income individuals/families (Certified Community Development Financial Institution); and
- Presented home buyer and credit education workshops on behalf of three organizations whose missions include providing financial education to low- and moderate-income



individuals/families. Approximately 705 adult and youth individuals attended the workshops.

Refer to the Market Profile section for additional information on the available community development opportunities in this AA.

## 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 metropolitan and nonmetropolitan areas 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”).

<b>Time Period Reviewed</b>	Lending Test: (07/01/2013 to 12/31/2015) CD Loans, Investment and Service Tests: (07/09/2013 to 12/31/2015)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
RBC Bank (Georgia) N.A. Atlanta, GA	Residential Mortgage Loans Community Development Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
City National Bank	Subsidiary of parent company	None
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Atlanta-Sandy Springs-Roswell, GA MSA	Full-Scope	

## Appendix B: Market Profiles for Full-Scope Areas

### Atlanta-Sandy Springs-Roswell, GA MSA

Demographic Information for Full-Scope Area: Atlanta-Sandy Springs-Roswell, GA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	951	9.78	24.61	34.70	30.39	0.53
Population by Geography	5,286,728	6.20	23.68	38.85	31.16	0.11
Owner-Occupied Housing by Geography	1,276,774	2.81	18.69	41.12	37.38	0.00
Businesses by Geography	506,558	4.61	21.09	35.20	39.02	0.08
Farms by Geography	9,698	2.83	20.25	44.02	32.87	0.03
Family Distribution by Income Level	1,282,154	22.00	17.20	19.59	41.21	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	1,282,154	5.27	22.22	39.48	33.03	0.00
Median Family Income	= \$73,691					
HUD Adjusted Median Family Income for 2015	= \$68,300					
Households Below the Poverty Level	=11.35%					
				Median Housing Value	= \$210,023	
				Unemployment Rate	= 4.8%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 U.S. Census and 2015 HUD updated MFI.

The Atlanta-Sandy Springs-Roswell AA is comprised of all the counties within the entire MSA. During the evaluation period, the bank did not have a retail banking service presence due to their business strategy of primarily serving as a cross-border conduit for RBC clients, as referenced in the Description of Institution section. Since the non-compete clause has expired, the bank now also offers deposit and loan products to individuals living in the bank's AA in addition to serving RBC clients. The AA is located in the northwestern area of Georgia.

The largest employers in the AA are Delta Airlines, Wal-Mart Stores, Inc., Emory University/Emory Healthcare and The Home Depot.

Nine community contact forms and the HUD Atlanta 2015-2019 Consolidated Plan identified the below community development needs of the AA. We determined the primary needs of the AA are affordable housing and loan products, homelessness assistance, short-term financial solutions, credit counseling, financial literacy, employment opportunities, small business financing, affordable commercial property, public transportation, and technical and financial support for community development organizations. Opportunities are available in the AA such as investments in Community Development Financial Institutions (CDFI's) and four annual entitlement grants from the U. S. Department of Housing and Urban Development (HUD). These grants are the

Community Development Block Grant (CDBG); Home Investment Partnership program (HOME); the Emergency Solutions Grant (ESG); and the Housing Opportunities for Persons with AIDS (HOPWA) program.

## Appendix C: Tables of Performance Data

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### Content of Standardized 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 as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 households within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.
- Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Table 1. Lending Volume**

LENDING VOLUME		Geography: ATLANTA-SANDY SPRINGS-ROSWELL, GA MSA						Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Atlanta-Sandy Springs-Roswell AA	100.00	199	28,914	0	0	0	0	1	500	200	29,414	100.00

\* Loan Data as of DECEMBER 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from JULY 9, 2013 to DECEMBER 31, 2015.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.



**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: ATLANTA-SANDY SPRINGS-ROSWELL, GA MSA								Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Roswell, AA	143	100	2.81	6.29	19.20	34.27	41.58	29.37	36.41	30.07	.05	.00	.00	.00	.00

\* Based on 2014 Peer Mortgage Data.

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: ATLANTA-SANDY SPRINGS-ROSWELL, GA MSA Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015															
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Roswell, AA	56	100	2.81	1.79	19.20	25.00	41.58	32.14	36.41	41.07	.02	.00	.00	.00	.00

<sup>\*</sup> Based on 2014 Peer Mortgage Data:

<sup>\*\*</sup> Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2010 Census information.

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE															Geography: ATLANTA-SANDY SPRINGS-ROSWELL, GA MSA					Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total*	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Atlanta-Sandy Springs-Roswell, AA	143	100	5.27	6.29	22.68	34.27	39.86	29.37	32.18	30.07	.05	.00	.00	.00	.00									

\* Based on 2014 Peer Mortgage Data.

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: ATLANTA-SANDY SPRINGS-ROSWELL, GA MSA Evaluation Period: JULY 1, 2013 TO DECEMBER 31, 2015															
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>***</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Roswell, AA	56	100	5.27	1.79	27.68	25.00	39.86	32.14	32.18	41.07	.02	.00	.00	.00	.00

<sup>\*</sup> Based on 2014 Peer Mortgage Data:

<sup>\*\*</sup> Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ATLANTA-SANDY SPRINGS-ROSWELL, GA MSA				Evaluation Period: JULY 1, 2013 to DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments <sup>*</sup>		Current Period Investments		Total Investments			Unfunded Commitments <sup>**</sup>	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Atlanta-Sandy Springs-Roswell, GA MSA	3	\$8,462	13	203	16	\$8,665	100	0	0

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

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