



PUBLIC DISCLOSURE

August 31, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Metropolitan Bank and Trust Company
80066

10 E. 53 Street
New York, NY 10022

Office of the Comptroller of the Currency

340 Madison Avenue, 9th Floor
New York, NY 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.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Needs to Improve**.

The lending test is rated: Needs to Improve.

The major factors that support this rating include:

- The average loan-to-deposit (LTD) ratio is less than reasonable given the institution's size, financial condition, and assessment area (AA) credit needs;
- The geographic distribution of loans reflects poor dispersion throughout the AA;
- The distribution of borrowers reflects, given the demographics of the AA, poor penetration among businesses of different sizes.

Loan-to-Deposit Ratio

Metropolitan Bank and Trust Company's (Metrobank NY) average LTD ratio is less than reasonable given the size, financial condition, and AA of the institution. The branch's quarterly average net LTD ratio over fifteen quarters since the prior CRA evaluation is 36.6 percent. During this period, Metrobank NY's LTD ratio ranged from a high of 51 percent as of June 30, 2016 to a low of 15 percent as of September 30, 2019. The LTD ratio at the end of the evaluation period was 21 percent.

We considered the volatility of the bank's deposit base and the impact on the LTD ratio caused by the reduction in the balance of large dollar-amount loans. As a federal branch of a foreign bank, Metrobank NY's LTD ratio is more vulnerable to volatility from changes in the amount of deposits held in the branch by the Head Office and affiliates. The payoff or change-in-balance of large dollar amount loans within the bank's small loan portfolio are additional contributing factors to the volatility of the LTD ratio. For example, a loan payoff by a borrower that no longer needed a significant line of credit contributed to significantly lower LTD ratios in each of the four quarters in 2019 compared to past quarters (low of 15 percent as of June 30, 2019 and September 30, 2019). A borrower associated with a commercial real estate loan has also substantially reduced the outstanding loan balance.

In addition, several borrowers with lines of credit with the institution did not fully draw down their lines of credit as they have sufficient internal cash flow. While the bank has a pipeline in commercial real estate loans and a plan to launch a Philippine home loan program for Filipinos residing and working in the United States, neither of these initiatives has been realized. Management expects that the LTD ratio will remain low with the assumption that borrowers with lines of credit will not fully draw down on them. We also considered the trend in the LTD ratio during the evaluation period. The LTD ratio was highest at 51 percent at the beginning of the review period as of June 30, 2016, while the LTD ratio was 21 percent at the end of the review period as of December 31, 2019.

The average net LTD ratio is computed excluding Head Office and affiliate deposits. We compared the bank's LTD ratio to the ratios of banks with comparable asset sizes. As of December 31, 2019, Metrobank NY's LTD ratio at 21 percent was significantly lower than that of its peers, including Sunnyside Federal Savings & Loan (LTD of 55.30 percent), First Federal Savings of Middletown (LTD of 70.30 percent), and National Iron Bank (LTD of 80.56 percent).

Lending in Assessment Area

A substantial majority of the bank’s loans are inside its assessment area(s) (AAs). During the evaluation period, the bank originated and/or purchased 94 percent of its total loans by count and 98 percent of its total loans by loan amount, inside the bank’s AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Commercial Loans	31	94	2	6	33	15,527	98	290	2	15,817
Total	31	94	2	6	33	15,527	98	290	2	15,817

Source: Bank provided data on commercial loan originations between 1/1/2017 and 12/31/2019

Description of Institution

Metrobank NY branch is federally licensed by the Office of the Comptroller of the Currency (OCC) and insured by the Federal Deposit Insurance Corporation (FDIC). The branch had \$34.93 million in assets and \$9.95 million in deposits as of December 31, 2019. Total loans and leases account for \$2.03 million. Metrobank NY is a branch of Metropolitan Bank and Trust Company, the flagship company of the Metrobank Group. Metrobank Group is Philippines’ largest financial conglomerate with a diversified business portfolio that includes the following: investment banking, thrift banking, leasing and financing, bancassurance, and credit cards. Metrobank NY was established in 1977 and became a full branch in 1984.

Metrobank NY offers traditional deposit products including checking, savings, and time deposit accounts. Credit products offered by the branch are primarily commercial loans supporting trade financing and working capital needs for established Filipino/Asian corporations doing business in the United States (U.S.). Metrobank NY also offers remittance service for Filipino workers overseas, foreign exchange services, and correspondent banking services, including United States Dollar (USD) payment processing for its Head Office and affiliated branches. Metrobank is the leading provider of trade finance in the Philippines.

Metrobank NY was incorporated principally to provide financial services to the Filipino-Asian community. The branch was established and organized in response to the growing financial needs of the expanding Filipino population of the New York metropolitan area. The branch has limited lending authority without Head Office approval. Management must get approval from Head Office on loans exceeding the branch’s lending authority.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. The branch received a “Satisfactory” rating on its prior performance evaluation issued by the OCC as of March 31, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses Metrobank NY's record of meeting the credit needs for the communities in which it operates. We evaluated the branch under the small bank performance criteria, which included a Lending Test.

The Lending Test evaluates an institution's record of helping meet the credit needs of its AA through its lending activities. The evaluation period for the lending test covers the bank's performance between January 1, 2017 through December 31, 2019. We evaluated lending from 2017 through 2019 using the 2010 U.S. Census data.

Based on our review of the number and dollar amount of loans originated during the evaluation period, we determined that business loans are Metrobank NY's primary loan product. Therefore, we based our conclusions regarding Metrobank NY's lending performance solely on loans to businesses. We did not include farms in the total numbers of businesses used as comparators for evaluating lending performance because lending activities consist primarily of trade finance. The bank did not originate a significant volume of new loans during the evaluation period. The lending during the evaluation period includes loans to existing borrowers that were renewed during the evaluation period. Due to the limited lending activity, we included all the loans renewed during the evaluation period to assess the bank's performance.

We utilized other supporting information in this performance evaluation, including information from the 2015 American Community Survey (ACS) data, 2020 Dun & Bradstreet (D&B) data, FDIC deposit market share data, and information from governmental websites regarding the characteristics and economy of the AA. We also considered information from a community contact to help assess the needs of the AA and the opportunities for financial institutions to lend and provide services within that area.

Selection of Areas for Full-Scope Review

Metrobank has one AA in the state of New York and a full-scope review was performed for that AA. Metrobank NY's designated AA includes all of Kings (Brooklyn), Queens, New York (Manhattan), and Bronx counties. Kings, Queens, Manhattan and the Bronx are four of the five boroughs of New York City. The bank's AA is part of the larger New York-Jersey City-White Plains-NY, NJ Metropolitan Division (New York MD 35614). The New York Metropolitan Division (MD) is one of four MDs of the New York-Newark-Jersey City, NY-NJ-PA Metropolitan Statistical Area (MSA 35620).

Ratings

Metrobank's overall rating is based on performance within its AA. In reaching our conclusion, we weighed information from the following performance criteria when analyzing business loans: the LTD ratio, lending in the AA, lending to businesses of different sizes, and the geographic distribution of business loans.

Discriminatory or Other Illegal Credit Practices Review

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

CRA rating for the State of New York¹: Needs to Improve

The Lending Test is rated: Needs to Improve

The major factors that support this rating include:

- The distribution of commercial loans to businesses of different sizes is poor.
- The geographic distribution of commercial loans reflects poor dispersion throughout the AA
- Metrobank did not receive any CRA related complaints during the evaluation period.

Description of Institution's Operations in New York

Metrobank NY branch is federally licensed by the OCC and insured by the FDIC. Metrobank operates a single branch within its AA, which is located within New York County of the bank's AA. The branch reported \$34.93 million in assets and \$9.95 million in deposits as of December 31, 2019. Total loans and leases were \$2.03 million during the same period. Metrobank was incorporated principally to provide financial services to the Filipino-Asian community within the New York metropolitan area.

Metrobank has one AA within New York state and a full-scope review was performed for this AA. The NY designated AA includes all of Kings (Brooklyn), Queens, New York (Manhattan), and Bronx counties. Metrobank's AA is part of the larger New York-Jersey City-White Plains-NY, NJ Metropolitan Division (New York MD 35614). The AA comprises 285 low-income tracts (14 percent), 562 moderate-income tracts (27 percent), 614 middle-income tracts (30 percent), and 533 upper-income tracts (26 percent). Additionally, the AA includes 63 census tracts (3 percent) without an assigned income classification.

New York City is the largest and one of the most densely populated cities in the United States, with a population of approximately 8.6 million individuals. According to Moody's Analytics, the New York MD includes some of the largest financial institutions and health care systems in the global market. The top five employers are three health care entities: Montefiore Health System, Mount Sinai Health System, and New York-Presbyterian Healthcare System; and two financial institutions: JP Morgan Chase & Co. and Bank of America. The branch operates in a highly competitive environment.

Several financial institutions, including money center banks, mortgage banks, brokers, and other branches, agencies, and offices of foreign institutions, exist in New York City and northern New Jersey. Therefore, Metrobank NY faces significant competition in the New York MD from much larger market participants capable of offering a wider array of products. As of the June 30, 2019 FDIC Deposit

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Market Share Report, Metrobank NY had \$10.18 million in deposits, representing less than 0.01 percent of the total deposits in their market. The Head Office maintains its presence in New York City primarily to meet the financial needs of the existing Filipino population and businesses in the New York area through assistance with trade finance or working capital to support the import of goods from Asia.

Moody's Analytics reports that the economy of the entire MSA is grinding to a halt in the second half of 2019. Payrolls have plateaued since the beginning of 2019, while the falling unemployment rate reflects a shrinking labor force. Total employment in the New York MD increased from 6.88 million in 2016 to 7.21 million in 2019, a gain of 330,000 jobs. The finance sector has slowed most dramatically in 2019 while consumer industries began to falter as well. Although the rate of financial services job losses will slow, the ongoing trade war, an inverted yield curve for much of 2019, and less accommodative monetary policy serve as obstacles for banks in the AA. While banks' bottom lines have recovered since December 2018, the state comptroller reports that the pool for Wall Street bonuses is down slightly, following a disappointing 2018. The migration of support positions to lower-cost areas continues with no sign of abating. The housing market remains at a standstill, with both single-family and condo prices moving sideways or lower and multifamily building well below its mid-decade peak. Commercial real estate faces obstacles as net absorption has gone negative in Manhattan. Retail faces difficulties as major retail centers have suffered from store closures for years due to rising rents and falling demand. While demand for hotels remains robust, a sizable pipeline of new projects, competition from Airbnb, and a potential decline in visitors from China due to trade tensions and a strong dollar all present threats to the industry.

We considered the community contact information from the community development tour done by the OCC on August 21, 2019 with various community-based organizations serving NYC led by the Association for Neighborhood & Housing Development (ANHD). ANHD is a coalition of community organizations across NYC. It uses research, advocacy and grassroots organizing to support its member organizations to build equity and justice in their neighborhoods and city-wide. The community contact identified that residents need affordable mortgages with down payment assistance and home improvement loans to help people purchase and remain in their homes. Additionally, the lack of bank branches was pointed out in the area by the participating organizations. The organizations stressed the importance for more branches and affordable banking products to open bank accounts, build credit, finance car or home, start a business or obtain an education.

Table A – Demographic Information of the Assessment Area						
Assessment Area: New York-Jersey City-White Plains–NY, NJ Metropolitan Division (MD) (35614)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,057	14	27	30	26	3
Population by Geography	7,954,262	18	30	26	25	1
Housing Units by Geography	3,244,089	16	27	25	32	< 1
Owner-Occupied Units by Geography	877,350	4	18	34	44	< 1
Occupied Rental Units by Geography	2,070,401	21	32	21	25	1
Vacant Units by Geography	296,338	11	24	22	42	1
Businesses by Geography	794,884	9	21	21	46	3
Farms by Geography	3,114	6	17	22	53	2

Family Distribution by Income Level	1,742,525	18	30	27	25	< 1
Household Distribution by Income Level	2,947,751	16	28	25	31	< 1
Median Family Income MSA - New York-Newark-Jersey City, NY-NJ-PA Metropolitan Statistical Area		\$81,800	Median Housing Value			\$541,839
			Median Gross Rent			\$1,347
			Families Below Poverty Level			20 Percent
<i>Source: 2015 ACS Census and 2020 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>						

Scope of Evaluation in New York

We performed a full-scope review of Metrobank's only AA, New York-Jersey City-White Plains-NY, NJ Metropolitan Division (MD) (35614). The lending test for the branch's primary product of commercial loans covers the period January 1, 2017 through December 31, 2019. As Metrobank did not originate and/or purchase any Home Mortgage Disclosure Act (HMDA) reportable loans, we based our lending-related conclusions on all the commercial loans originated during the evaluation period.

LENDING TEST

The bank's performance under the Lending Test in New York is rated Needs to Improve.

Distribution of Loans by Income Level of the Geography

The bank exhibits poor geographic distribution of loans in the State.

Small Loans to Businesses

Refer to Table 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.

The percentage of small loans to businesses made in low- and moderate-income geographies of the AA is significantly lower than the percentage of businesses within these geographies. Metrobank did not originate any loans to small businesses in the low- and moderate-income geographies of the AA. The branch has largely made renewals of loans to the same few borrowers year after year.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans to businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Refer to Table R in appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The bank's lending to small businesses is lower than the percentage of small businesses in AA1. During the evaluation period, majority of the commercial loans made by Metrobank bank, were to business within reported annual revenues of greater than \$1 million. Based on the 2020 Dunn and Bradstreet data, 91 percent of the businesses in the bank's AA were classified as small businesses with reported annual revenues of \$1 million or less. Business loans to small businesses (businesses with revenues of \$1 million or less) represent three percent of all loans to small businesses.

Responses to Complaints

Metrobank did not receive any complaints related to performance in meeting the AA's credit needs during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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:	January 1, 2017 to December 31, 2019	
Bank Products Reviewed:	Small Business Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
New York		
New York-Jersey City-White Plains– NY, NJ Metropolitan Division (MD) (35614)	Full Scope	Assessment Area consists of New York County, Kings County, Queens County, and Bronx County.

Appendix B: Summary of MMSA and State Ratings

RATINGS – Metropolitan Bank and Trust Company	
Overall Bank:	Lending Test Rating
Metropolitan Bank and Trust Company	Needs to Improve
State:	
New York	Needs to Improve

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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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 are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/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 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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																	2017-2019		
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	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
NY MD (35614)	33	15,817	100	9	0	-	21	0	-	21	99	-	46	1	-	3	0	-	
Total	33	15,817	100	9	0	-	21	0	-	21	99	-	46	1	-	3	0	-	

Source: 2020 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-2019	
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		
NY MD (35614)	33	15,817	100	-	91	3	-	4	97	5	0		
Total	33	15,817	100	-	91	3	-	4	97	5	0		

Source: 2020 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0

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