



PUBLIC DISCLOSURE

June 11, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Westmoreland Federal Savings and Loan Association
Charter Number 705537

322 Main Street
Latrobe, PA 15650

Office of the Comptroller of the Currency

Corporate One Office Park, Bldg 2
4075 Monroeville Blvd, Suite 300
Monroeville, PA 15146-2529

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

The Lending Test is rated: Satisfactory.

The major factors supporting the institution's overall CRA Lending Test ratings are:

- Westmoreland Federal Savings and Loan Association's (Westmoreland) record of originating loans, as indicated by the loan-to-deposit ratio (LTD), is reasonable.
- Westmoreland originated a majority of its residential real estate loans inside its assessment area (AA).
- Westmoreland's record of originating residential real estate loans to borrowers of different income levels reflects reasonable penetration among AA geographies.
- Westmoreland's record of originating residential real estate loans to borrowers of different geographic distribution levels reflects reasonable dispersion among AA geographies.

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): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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: 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 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), 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: 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 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 that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

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 multi-state metropolitan 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 area, the institution will receive a rating for the multi-state 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 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.

Description of Institution

Westmoreland Federal Savings and Loan Association (“Westmoreland” or “the Bank”) is a federally chartered mutual institution in operation since 1952, headquartered in Latrobe, PA. There are no affiliated or related organizations within Westmoreland’s corporate structure.

Westmoreland is a full service, intrastate institution with one main office location. The main office is located at 322 Main Street, Latrobe, PA, which is in a moderate-income geography within the bank’s assessment area (AA). Westmoreland’s AA consists of all the census tracts in Westmoreland County. Westmoreland County is located within the Pittsburgh, Pennsylvania Metropolitan Statistical Area (MSA). Westmoreland offers standard business hours of 9:00AM – 4:30PM during the weekdays and also offers Saturday hours from 9:00AM – 12:00PM. Westmoreland is a member of the Freedom ATM Alliance, which offers ATM service surcharge free. During the evaluation period, the bank did not open or close any offices.

The bank’s primary lending strategy is to offer fixed-rate home mortgage lending for one-to-four family residential dwellings. Savings products offered include checking, passbook and statement savings, certificates of deposit, individual retirement accounts, vacation and Christmas club accounts, and money orders. Westmoreland also operates a utility payment center that accepts payment for fourteen businesses. Additional information is available at the bank’s website at www.westfedsav.com.

As of December 31, 2017, Westmoreland reported total assets of \$169 million. As of the same date, Westmoreland had net loans of \$69 million, total deposits of \$128 million, and tier 1 capital of \$42 million. Net loans represent 41.00 percent of total assets. Residential lending constitutes the majority of the bank’s lending operations, representing more than 99 percent of the overall loan portfolio and consists primarily of one-to-four family residential real estate loans. Westmoreland is largely funded from core deposits within the bank’s market area.

There are no legal or financial factors impeding the bank’s ability to help meet the credit needs in its AA. At the prior CRA examination dated October 5, 2012, Westmoreland was rated “Satisfactory.”

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated Westmoreland's CRA performance using the Small Bank CRA examination procedures, which reviewed the institution's record of meeting the credit needs of its AA through lending activities. The evaluation period for this review is from January 1, 2015 through December 31, 2017. As the institution's business strategy and lending products have not significantly changed since the prior evaluation, we concluded that this period was appropriately representative of the bank's performance.

This evaluation considers reportable mortgage loans pursuant to the Home Mortgage Disclosure Act of 1975 (HMDA) for the calendar years 2015, 2016, and 2017. The bank's primary loan product, based on originations during the evaluation period, is residential mortgages. Demographic information was extracted from the 2010 and 2015 Census data, and peer data was taken from 2016 and 2017 aggregate HMDA information for HMDA reporting financial institutions that reported lending activity within the AAs.

Data Integrity

In order to evaluate Westmoreland's record of originating residential mortgage loans, we analyzed loan data collected and reported by Westmoreland in accordance with the HMDA requirements. We performed a data integrity examination to ensure the reliability of the bank's HMDA loan data for 2015 and 2016. In addition, we evaluated processes employed by Westmoreland to ensure the accurate and complete reporting of HMDA data. We tested the accuracy of Westmoreland's HMDA loan data by comparing a sample of reported loans with loan file documentation. The data integrity examination indicated that Westmoreland's publicly available HMDA loan data could be relied on for this evaluation. As the institution's processes to ensure accurate and complete reporting of HMDA data did not significantly change in 2017, we relied upon a satisfactory bank internal audit to confirm the accuracy of 2017 data and deem the data reliable for use in the evaluation.

Selection of Areas for Full-Scope Review

Westmoreland has one AA located within the Pittsburgh, PA MSA. We performed a full-scope review for this AA. Refer to the table in appendix A for more information.

Ratings

The bank's overall rating of Satisfactory is based on the full-scope review of its one AA.

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 has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Conclusions with Respect to Performance Tests

LENDING TEST

The bank’s performance under the lending test is satisfactory. The loan-to-deposit ratio is reasonable and a majority of the loans are originated inside the bank’s AA. The record of lending to borrowers of different income levels reflects reasonable distribution in the AA. The geographic distribution of loans reflects reasonable distribution in the AA.

Loan-to-Deposit Ratio

Westmoreland’s loan-to-deposit (LTD) ratio is reasonable. The bank’s loan-to-deposit ratio meets the standard for satisfactory performance. The bank’s average loan-to-deposit ratio over the 12-quarter evaluation period was 54.51 percent. During the same period, the LTD ratio ranged from a quarterly low of 52.78 percent to a quarterly high of 58.07 percent. This is below the quarterly average net LTD ratio of 62.40 percent for three similarly situated institutions during the same period. However, the difference is reasonable considering the bank’s performance context. The average LTD for the other three banks ranged from 61.89 percent to 62.77 percent over the same period. Of the institutions compared, Westmoreland is the only one with a single location in Westmoreland County, thereby limiting opportunities for lending in other market areas.

Lending in Assessment Area

A majority of Westmoreland’s home mortgage loan products originated during the evaluation period were inside the AA. Westmoreland meets the standard for satisfactory performance for lending inside the AA. An analysis of the HMDA data disclosed that 74.24 percent of the total number and 67.45 percent of the total dollar amount of home mortgage loans were originated within the AA. Refer to the following table for more information:

Table 1 – Lending in AA: Westmoreland County										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Mortgages	170	74.24	59	25.76	229	23,707	67.45	11,442	32.55	35,149

Source: Westmoreland’s HMDA-reported data from 01/01/2015 – 12/31/2017.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Westmoreland's lending throughout its AA shows there is reasonable distribution to borrowers of different income levels. The distribution of home mortgage loans among borrowers of different incomes in 2017 is consistent with the distribution in 2015 and 2016.

We compared the bank’s level of lending to the percent of families by income level category and to the percent of aggregate HMDA reportable loans. Lending to low-income families is well below the percent of those borrowers in the AA. However, the bank’s lending is within a reasonable range of the aggregate HMDA Peer Group lending considering its performance context. Lending to low-income families is limited due to demographic constraints in the AA. The median housing value was \$127,408 per the 2010 census data. The median family income was \$62,376 for the AA, which means the maximum income for low-income families (as defined as less than 50.00 percent of the area median family income) is \$31,188. Therefore, low-income borrowers may have difficulty qualifying for home mortgages. Additionally, approximately 11.00 percent of the AA is below poverty level and 4.70 percent are unemployed. Peer banks display similar difficulties with lending to low-income families.

The percent of home mortgages made to moderate-income borrowers falls within a reasonable range below the percentage of aggregate lending data and the percent of those families in the AA.

Table 2 – Borrower Distribution of Residential Real Estate Loans in Westmoreland’s AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	2016 Aggregate Lending	% of Number of Loans	2016 Aggregate Lending	% of Number of Loans	2016 Aggregate Lending	% of Number of Loans	2016 Aggregate Lending	% of Number of Loans
Home Mortgages	10.66	4.55	20.63	14.55	24.32	25.45	38.50	53.64
% of AA Families	20.21		18.82		22.89		38.09	

Source: Bank HMDA reported data from January 1, 2015 to December 31, 2016, 2016 HMDA Peer Group data, and 2010 U.S. Census data. See Appendix C for tables reflecting 2017 performance.

Geographic Distribution of Loans

Westmoreland's geographic distribution of mortgage lending reflects a reasonable distribution of loans to different income tracts throughout its AA. The distribution of loans among different census tract income levels in 2017 is consistent with the distribution in 2015 and 2016.

The analysis reflects lending in most tracts and is in line with peer lending. The AA includes five low-income CTs and 21 moderate-income CTs, which total only 26 percent of the total CTs in Westmoreland County, their AA. We compared the bank’s lending in low- and moderate-income CTs to aggregate HMDA loans in those CTs, as well as to the percent of owner occupied housing units (OOHUs) in each income tract category. Low- and moderate-income tracts consist of a large number of rental and vacant units and have a lower volume of OOHUs. While the bank did not make any loans in the low-income CTs, the level is within a reasonable range below the low-income aggregate

peer lending data percentage considering the performance context. The small number of low-income CTs in the AA generates few lending opportunities as evidenced by the low aggregate lending percentages. Further, the bank's lack of a branch network limits their ability to compete well. The level of lending in moderate-income CTs is within a reasonable range below the aggregate peer lending data percentage and the percent of OOHU distribution in 2015 and 2016, and improved to above demographic comparators in 2017, despite economic constraints in the AA.

Table 3 - Geographic Distribution of Residential Real Estate Loans in Westmoreland's AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	2016 Aggregate Lending	% of Number of Loans	2016 Aggregate Lending	% of Number of Loans	2016 Aggregate Lending	% of Number of Loans	2016 Aggregate Lending	% of Number of Loans
Home Mortgages	0.82	0.00	11.92	6.36	65.83	78.18	21.43	15.45
% of AA Owner Occupied Housing	1.71		14.70		66.28		17.31	

Source: Bank HMDA reported data from January 1, 2015 to December 31, 2016, 2016 HMDA Peer Group data, and 2010 U.S. Census data. See Appendix C for tables reflecting 2017 performance.

Responses to Complaints

There were no CRA complaints received by the bank or the agency since the prior examination regarding performance in meeting the credit needs of Westmoreland's established 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”).

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/15 to 12/31/17)	
Financial Institution		Products Reviewed
Westmoreland Federal Savings & Loan Association (Westmoreland) Latrobe, PA		Residential Mortgages Loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Westmoreland County, Pennsylvania	Full-scope	The AA lies within the Pittsburgh MSA, and consists of all census tracts in Westmoreland county. See appendix B for more information.

Appendix B: Community Profiles for Full-Scope Areas

Westmoreland AA

Demographic Information for Full Scope Area: Westmoreland County					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	100	5.00	21.00	62.00	12.00
Population by Geography	365,169	2.68	16.12	64.88	16.31
Owner-Occupied Housing by Geography	116,809	1.71	14.70	66.28	17.31
Business by Geography	23,016	3.15	13.85	63.22	19.78
Farms by Geography	681	0.73	11.31	72.39	15.57
Family Distribution by Income Level	102,132	20.21	18.82	22.89	38.09
Distribution of Low and Moderate Income Families throughout AA Geographies	39,859	4.27	22.78	62.41	10.54
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		62,376 69,700 11%		Median Housing Value Unemployment Rate (December 2017 Bureau of Labor and Statistics)	127,408 4.70%

Source: 2010 U.S. Census and 2015 FFIEC updated MFI.

Westmoreland's single AA is located within the Pittsburgh, PA MSA (38300), and includes all census tracts in Westmoreland County, PA. The AA contains 100 geographies, consisting of five (5) low-income, twenty-one (21) moderate-income, sixty-two (62) middle-income, and twelve (12) upper-income census tracts. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies. Westmoreland operates one (1) full-service office within the AA. This office offers traditional deposit and loan products, and services.

According to the June 30, 2017 FDIC Summary of Deposits Market Share Report, Westmoreland was ranked 10 out of 20 institutions within their AA with 1.7 percent of total deposits. PNC Bank, NA is ranked first with 17 offices and 27.60 percent of the deposits. Other top competitors include First National Bank of Pennsylvania with 18 offices and 12.50 percent of deposits, S&T Bank with 10 offices and 12.40 percent of deposits, and First Commonwealth Bank with 15 offices and 11.43 percent of deposits.

We reviewed economic data from the Bureau of Labor Statistics (BLS), Westmoreland County website, and Moody's Analytics. According to the 2010 U.S. Census, the total population in the AA was 365,169. According to the BLS, the unemployment rate for Westmoreland County as of December 2017 was 4.70 percent. This rate is higher than the Pittsburgh MSA rate of 4.50 percent and the Pennsylvania rate of 4.40 percent, however all of these unemployment rates have continued to trend downward over recent years. According to Moody's, Pittsburgh's economy is growing, and a surge of job creation in mid-2017 helped push the unemployment rate below 5 percent for the first time since the Great Recession. Key economic drivers for the Pittsburgh area are the financial, health care, and energy sectors. These industries will spur growth and build momentum in the coming year, keeping pace with growth in Pennsylvania.

However, over the long-term, Pittsburgh's weak demographics of an aging population and worsening migration trends will counteract some of this growth.

According to the Westmoreland County website, there are several community development opportunities throughout the area, highlighted by Westmoreland County's various programs for such activities, including the Economic Growth Connection, Redevelopment Authority, Industrial Development Corporation, and Community Development Division. All of these departments and programs are dedicated to assist the community and help fund housing projects, companies considering a location in the county, building industrial parks, and revitalizing the area by supporting new business, residential, and recreational opportunities.

Major employers for Westmoreland County in the AA include the United Parcel Service, Wal-Mart, the State Government, and Westmoreland Regional Hospital. Top employment sectors include Health Care and Social Assistance at 15.70 percent, retail trade at 14.40 percent, manufacturing at 12.90 percent, and Accommodation and Food Services at 9.80 percent.

Median housing prices in the AA remain high compared to median family income. The median housing value in the AA is \$127,408. The Updated Median Family Income for 2015 is \$69,700. The high cost of housing limits the availability of affordable housing for low- and moderate-income families in the AA. Additionally, the percentage of households below the poverty level is 11.00 percent. The AA's population is comprised of 102,132 families with the following family income distribution: 20.21 percent are low-income, 18.82 percent are moderate-income, 22.89 percent are middle-income, and 38.09 percent are upper-income.

A county government community contact identified needs for affordable housing that meets modern quality of life expectations. The contact noted that the AA contains an older demographic that continues to age quickly as individuals migrate to different geographic areas. The contact noted there is limited migration of younger individuals into the area and expressed a concern that there will be a limited workforce in the near future if the trend continues. The contact noted banks in the area generally perform well regarding lending in the community to low- and moderate-income individuals; however, banks could do better advertising loan products specifically targeted to low- and moderate-income individuals.

Appendix C: Tables of Performance Data

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; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column. Tables without data are not included in this PE.

The following is a listing and brief description of the tables (*Tables below reflect 2017 performance only, unless otherwise noted*):

- Table 1. Lending Volume** (*see page 11*) - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area.

- Table 2a. Borrower Distribution of Residential Real Estate 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 3a. Geographic Distribution of Residential Real Estate 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 2a – Borrower Distribution of Residential Real Estate Loans in Westmoreland’s AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	2017 Aggregate Lending	% of Number of Loans	2017 Aggregate Lending	% of Number of Loans	2017 Aggregate Lending	% of Number of Loans	2017 Aggregate Lending	% of Number of Loans
Home Mortgages	6.10	3.75	17.55	7.50	23.78	21.25	46.56	61.25
% of AA Families	20.21		18.82		22.89		38.09	

Source: Bank HMDA reported data from January 1, 2017 to December 31, 2017, 2017 HMDA Peer Group data, and 2010 U.S. Census data.

Table 3a - Geographic Distribution of Residential Real Estate Loans in Westmoreland’s AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	2016 Aggregate Lending	% of Number of Loans	2016 Aggregate Lending	% of Number of Loans	2016 Aggregate Lending	% of Number of Loans	2016 Aggregate Lending	% of Number of Loans
Home Mortgages	2.32	0.00	14.79	17.50	44.76	57.50	37.79	25.00
% of AA Owner Occupied Housing	1.71		14.70		66.28		17.31	

Source: Bank HMDA reported data from January 1, 2017 to December 31, 2017, 2017 HMDA Peer Group data, and 2010 U.S. Census data.