

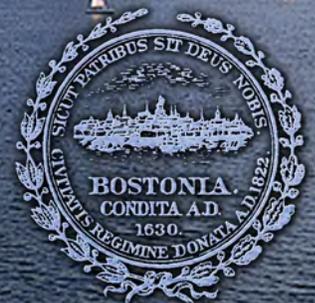


2013 Linked Deposit Banking Report to the Mayor

EXECUTIVE SUMMARY



CITY OF BOSTON





Prepared March 2015 by BankIQ

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ABOUT THIS DOCUMENT

This Executive Summary provides a brief, high-level summary of the City of Boston 2013 Linked Deposit Banking Report to the Mayor. This document contains a short introduction to the overall lending environment in Boston in 2013; a summary of the trends impacting lending and housing in Boston in 2013; and brief summary overviews of the 16 banks reviewed in detail in the full report.

This document offers only a brief précis of the 2013 Linked Deposit Banking Report. The full report provides in-depth data and analysis of the performance of Boston's banks in meeting the community's lending needs, including bank-by-bank analysis for 16 banks, an analysis of small business lending in Boston, HMDA loan information by census tract in Suffolk County, and a wealth of additional data on lending in Boston.

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About This Report

Since 1999, BankIQ has prepared the Linked Deposit Banking Report to the Mayor, which reports annually on the residential lending, small business lending, and community development practices of a group of banks eligible to provide banking services to the City of Boston.

The report was created in accordance with City of Boston Municipal Code requirements that any institution wishing to contract with the City to provide banking services or to become a city depository shall annually disclose information on its loan activity and community development participation and services.

This report is intended to assist City officials as they compare the activities and performance of banks in order to help ensure that City monies are invested in institutions that contribute positively to the Boston community.

CRA and HMDA Legislation and Reporting

For each bank covered in this report, the Linked Deposit Banking Report to the Mayor includes ratings, information, and analysis drawn from the institution's most recent CRA performance evaluation. The report also draws on recent HMDA data to provide an overview of lending rates and patterns for each of the banks covered in the report, as well as aggregate performance for all reporting financial institutions in the Boston MSA.

The Community Reinvestment Act (CRA) provides a framework for financial institutions, state and local governments, and community organizations to jointly promote banking services to all members of a community, including those in low- and moderate-income neighborhoods, consistent with safe and sound banking operations. The CRA requires that each insured depository institution's record in helping meet community credit needs be evaluated periodically and made available to the public. CRA performance evaluations report on individual institutions' success in providing credit, investments, and services that meet community needs.

The Home Mortgage Disclosure Act (HMDA) requires many financial institutions to maintain, report, and publicly disclose information about mortgage applications received and the institution's action on those applications. The Act also requires most lenders to identify the race, sex, and income of loan applicants and borrowers. The data reported under HMDA are intended to enable government entities and the public at large to determine whether financial institutions are serving the housing needs of their communities, as well as to aid in identifying possible discriminatory lending patterns.



Additional Sources

The Linked Deposit Banking Report to the Mayor supplements information drawn from CRA performance evaluations and HMDA data with additional details from banks' websites, annual reports, news releases, and other publications. The report also includes data from the FFIEC Institution Directory and the Massachusetts Office of Consumer Affairs & Business Regulation, Division of Banks.

Introduction to the Information Contained in This Report

The 2013 Linked Deposit Banking Report to the Mayor contains information on 2013 mortgage lending rates and patterns for each of the following 16 banks:

- Bank of America, N.A.
- The Bank of New York Mellon
- Blue Hills Bank
- Boston Private Bank & Trust Company
- Cathay Bank
- Century Bank and Trust Company
- Citizens Bank, N.A. (formerly RBS Citizens, N.A.)
- Commonwealth Cooperative Bank
- East Boston Savings Bank
- Eastern Bank
- First Trade Union Bank (renamed Radius Bank in 2014)
- JPMorgan Chase Bank, N.A.
- OneUnited Bank
- Santander Bank, N.A. (formerly Sovereign Bank)
- TD Bank, N.A.
- Webster Bank, N.A.

For each bank, the report presents a general overview of the bank's size, staffing, and operations, as well as detailed information on CRA ratings and related community lending, investment, service, and development activities. Each bank's profile concludes with a series of charts and graphs that provide additional details on the bank's lending activities for 2013.



Mortgage Lending Trends 2013

- After decreasing in volume every year from 2007 through 2011, mortgage lending in Boston increased in 2012 and again in 2013. Mortgage applications increased 50% from 2011 to 2013, and mortgage originations increased 57% during the same period.
- The proportion of applications originated has increased each year since 2007, from 66% in 2007 to 76% in 2013.
- Mortgage applications by minority applicants have held steady as a percentage of total applications, at around 30%.
- The origination rate for minority applicants has risen steadily from 55% in 2007 to 72% in 2013. While this percentage still trails the aggregate origination rate, the origination gap has decreased from 11 percentage points in 2007 to 4 percentage points in 2013.
- The number of low-income HMDA mortgage applications has generally remained steady, with 1200 to 1500 applications each year. Although the proportion of low-income applicants rose steadily from 2007 (3%) to 2009 (8.5%), it has been declining since then and was at 6% for 2013.
- The origination rate for low-income mortgage applications rose from 57% in 2007 to 61% in 2013, but still lags well behind the 76% aggregate origination rate.
- The 16 banks profiled in this report received 17% of the mortgage applications submitted in Boston in 2013 and made 15% of originations by number.

Small Business Lending Trends 2013

- Although the number of small business loans originated in Suffolk County declined from 16,739 in 2012 to 16,184 in 2013, small business loan dollars increased 3.9%, from \$626 million in 2012 to \$651 million in 2013.
- In 2013, 48% of small business loan dollars were originated in upper-income census tracts. The remaining loan dollars were distributed evenly across low, moderate, and middle-income tracts. This pattern is similar to 2012 lending levels.



- The 16 banks profiled in this report originated \$272 million in small business loans in Boston in 2013, totaling 42% of the total small business loan dollars originated in the area.
- The proportion of total Boston-area small business loan dollars originated by the 16 banks profiled in this report has been declining steadily since 2011, when the 16 banks together originated 53% of all small business loan dollars in Boston. In 2013, the 16 banks originated 42% of all small business loan dollars in Boston.



Bank of America, N.A.

Bank of America is a \$1.43 trillion full-service interstate bank headquartered in Charlotte, North Carolina. Bank of America services 50 million consumer and small business relationships. Community development initiatives are a major focus of the bank, particularly in its role as a developer of affordable housing.

Overall CRA Rating for Boston (2009): OUTSTANDING

Lending Test Rating for Boston: OUTSTANDING

Bank of America's lending to low- and moderate-income geographies in Boston during the CRA evaluation period was excellent, among the strongest in the bank's national footprint. The bank provided a very high level of community development lending, and is one of the country's most significant community development lenders.

Investment Test Rating for Boston: OUTSTANDING

The bank's investment activity during the review period reflected an excellent level of responsiveness to the needs of Boston's communities. The bank took a leadership role in complex community-development investments, and is one of the country's largest investors in Community Development Financial Institutions.

Service Test Rating for Boston: OUTSTANDING

During the assessment period, Bank of America's retail services showed excellent responsiveness to the banking needs of individuals of different income levels. The bank is a leader in providing community development services in Boston.

In 2013, Bank of America originated \$85.7 billion in first mortgages nationwide, including \$19.5 billion for 128,388 low- and moderate-income customers. Bank of America originated 450 home mortgage loans in Boston in 2013, including 16 low-income loans, making it one of the biggest home mortgage lenders in Boston. The bank originated 343 small business loans in 2013, totaling \$64.3 million—9.9% of total small business loan dollars in Suffolk County.

Blue Hills Bank

Blue Hills Bank is a full-service community bank headquartered in the Hyde Park neighborhood of Boston. The bank's assets total \$1.3 billion. In 2013, loans secured by one- to four-family residential properties made up 51.3% of the bank's loan portfolio.

Overall CRA Rating (2012): SATISFACTORY

Lending Test Rating: SATISFACTORY

Blue Hills Bank's overall lending volume during the CRA review period reflected adequate responsiveness to assessment-area credit needs. The bank's home mortgage lending displayed an excellent responsiveness to the needs of low- and moderate-income borrowers, but overall lending volume was low.



Investment Test Rating: OUTSTANDING

Blue Hills Bank made an excellent level of qualified community development investments and grants during the review period. The bank established the Blue Hills Bank Charitable Foundation in November 2011, formalizing its community development efforts with a \$500,000 multi-year pledge.

Service Test Rating: OUTSTANDING

The CRA evaluation found that the bank's service delivery systems were tailored to local needs, particularly those of lower-income individuals and neighborhoods. Blue Hills Bank was a leader in providing community development services during the evaluation period. The services provided by the bank increased financial literacy and met important needs in the communities the bank serves.

Blue Hills Bank originated 152 home mortgage loans in Boston in 2013, including 26 low-income loans. The bank's HMDA lending has been increasing steadily since 2009. In 2010 the bank announced a new business model focused on diversifying its lending products and increasing its lending volume. Subsequently, the bank's level of lending for one- to four-family residential properties increased from \$195 million in 2010 to \$393 million in 2013. No 2013 HMDA-reportable small business loan data was available for Blue Hills Bank.

The Bank of New York Mellon

The Bank of New York Mellon, headquartered in New York, is a state-chartered wholesale banking institution providing asset servicing, custody services, U.S. dollar clearing, and treasury operations. The bank does not extend home mortgage, small business, or consumer credit to retail customers or to the public at large.

Overall CRA Rating (2011): SATISFACTORY

The Bank of New York Mellon's most recent CRA evaluation consisted of a single community development test, and did not examine the bank's Massachusetts activities. As such, the bank's rating is provided *for reference only*.

Community Development Test Rating: SATISFACTORY

During the assessment period, The Bank of New York Mellon provided an adequate level of community development loans, as well as extensive use of qualified investments. The bank's community development activities exhibited adequate responsiveness to the assessment area's credit and community economic development needs, focusing on affordable housing.

The Bank of New York Mellon completed its exit from the consumer lending market in 2011. Thus, in 2013, the bank neither accepted applications nor made any HMDA loans in Boston. The bank continued to originate a small number of small business loans in Boston, however, making seven loans in 2013 for a total of \$3.6 million.



Boston Private Bank & Trust Company

Boston Private Bank is a \$6.25 billion wealth management and private banking company headquartered in Boston. Although established as a wealth management company, the bank has developed a strong community banking orientation and has demonstrated a positive commitment to the communities in which it operates.

Overall CRA Rating (2011): OUTSTANDING

Lending Test Rating: OUTSTANDING

During the CRA review period, Boston Private Bank achieved excellent lending penetration among customers of different income levels, demonstrating the bank's commitment to the needs of lower-income borrowers and geographies. The bank makes extensive use of innovative and flexible lending programs to help lower-income individuals achieve homeownership. Boston Private Bank takes a leadership role in community development lending.

Investment Test Rating: OUTSTANDING

Boston Private Bank had an excellent level of community development investments during the evaluation period. In addition, the bank made significant use of innovative or complex investments to support community development initiatives.

Service Test Rating: OUTSTANDING

During the assessment period, Boston Private Bank was considered a leader in community development services, with bank officers and employees highly involved in community organizations in Boston. The bank's service delivery systems, including its low-cost accounts and phone/online banking systems, are tailored to the convenience and needs of its assessment area.

In 2013 Boston Private Bank originated 250 HMDA mortgages in Boston, including 14 low-income HMDA loans. Although the bank's overall HMDA originations remained steady from 2011 to 2013, the number of low-income originations decreased by 46%. Boston Private Bank originated 201 small business loans in Boston in 2013, for a total of \$57.0 million, or 8.8% of all small business loan dollars in Boston. The bank's small business lending levels approach or exceed those of much larger national banks such as Bank of America and JPMorgan Chase Bank.

Cathay Bank

Cathay Bank is a \$10.97 billion commercial bank headquartered in Los Angeles, California. The bank primarily operates in California markets with a concentration of Chinese-American individuals and businesses, and is primarily a commercial lender. Cathay Bank operates one branch in Massachusetts; the bank's Massachusetts activities account for only a minor portion of overall activities.



Overall CRA Rating for Massachusetts (2012): SATISFACTORY

Lending Test Rating for Massachusetts: HIGH SATISFACTORY

Cathay Bank's lending levels during the CRA evaluation period reflected an overall good responsiveness to Boston's credit needs, though the bank's level of home mortgage lending in Boston was consistently low. The bank made a low level of community development loans, and made little use of innovative or flexible lending practices.

Investment Test Rating for Massachusetts: LOW SATISFACTORY

Cathay Bank had an adequate level of qualified community development investments and grants in Boston during the review period. The bank occasionally uses complex investments to support community development initiatives, including affordable housing.

Service Test Rating for Massachusetts: HIGH SATISFACTORY

Given the bank's limited presence in Massachusetts, Cathay Bank provided a high level of qualified community development services in Boston during the assessment period. A significant majority of the bank's community development services during this time focused on economic development and on providing community services to low- and moderate-income individuals.

Cathay Bank's overall HMDA lending levels in Boston have remained consistently low for the past decade. However, from 2011 to 2013, the number of HMDA loans originated increased from six to 20. During this same period, the number of low-income loans grew from two to four. Cathay Bank originated six small business loans in Boston in 2013 for a total of \$2.7 million in small business loan dollars.

Century Bank and Trust Company

Century Bank is a \$3.4 billion commercial bank headquartered in Medford, Massachusetts. Century Bank operates 26 branches in 19 Massachusetts cities and towns. From 2010 to 2013, the bank's one- to four-family residential lending portfolio increased 29.4%.

Overall CRA Rating (2011): SATISFACTORY

Lending Test Rating: HIGH SATISFACTORY

Century Bank's lending activity during the CRA assessment period reflected good responsiveness to area credit needs. Century Bank regularly surpassed the aggregate in lending to low- and moderate-income borrowers. The bank also made a relatively high level of community development loans.

Investment Test Rating: LOW SATISFACTORY

During the review period, Century Bank had an adequate level of qualified community development investments; however, the bank was rarely in a leadership position and made few investments that are not routinely provided by private investors. The bank rarely used innovative or complex investments to support community development initiatives.

Service Test Rating: HIGH SATISFACTORY

Century Bank provided a relatively high level of community development services during the evaluation period, displaying a good responsiveness to the needs of lower-income



individuals in Boston. The bank's services resulted in a better-educated community and increased awareness of community needs.

In 2013, Century Bank originated 48 HMDA loans in Boston, compared to 26 originated in 2012. The bank originated only one low-income HMDA loan in Boston in 2013, consistent with historical lending levels. Century Bank originated 76 small business loans in Boston in 2013, totaling \$11.7 million.

Commonwealth Cooperative Bank

Commonwealth Cooperative Bank is a \$171 million state-chartered cooperative bank headquartered in Boston, Massachusetts. The bank operates three branches in Boston and is primarily a residential lender.

Overall CRA Rating (2013): SATISFACTORY

During the CRA evaluation period, Commonwealth Cooperative Bank had an adequate record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods.

Lending Test Rating: NOT RATED

Investment Test Rating: NOT RATED

Service Test Rating: NOT RATED

Commonwealth Cooperative Bank's lending levels decreased steadily from 2011 to 2013. In 2013, the bank originated six HMDA loans and no low-income HMDA loans. No 2013 HMDA-reportable small business loan data was available for Commonwealth Cooperative Bank.

East Boston Savings Bank

East Boston Savings Bank is a \$2.7 billion Massachusetts-chartered bank headquartered in East Boston. In 2009, the bank acquired Mt. Washington Cooperative Bank, and it continues to operate several branches under the Mt. Washington name. Although East Boston Savings Bank has historically been primarily a residential real estate lender, in 2013, commercial lending made up 49.7% of the bank's loan portfolio.

Overall CRA Rating (2014): SATISFACTORY

Lending Test Rating: HIGH SATISFACTORY

Overall, the bank showed good responsiveness to assessment area credit needs. The bank was successful at extending home mortgage loans in both low- and moderate-income census tracts, and was a leader in making community development loans.



Investment Test Rating: SATISFACTORY

East Boston Savings Bank has an adequate level of qualified investments, although it rarely uses innovative or complex initiatives. During the review period, the bank made charitable donations through its Mt. Washington Bank and East Boston Savings Bank foundations.

Service Test Rating: HIGH SATISFACTORY

East Boston Savings Bank's delivery systems are accessible throughout its assessment area, and its record of opening and closing branches during the evaluation period improved accessibility, particularly in low- and moderate-income neighborhoods. The bank also provides a relatively high level of community development services, including financial education seminars and bank staff leadership in community development organizations.

East Boston Savings Bank originated 182 HMDA loans in Boston in 2013, but only five low-income home mortgage loans. The bank originated 58 small business loans in 2013 in Boston, totaling \$17.8 million.

Eastern Bank

Eastern Bank, founded in 1818, is the oldest and largest mutual bank in the United States. The bank has \$8.7 billion in assets and is headquartered in Boston. In November 2012, The Community Bank merged with and into Eastern Bank.

Overall CRA Rating (2011): OUTSTANDING

Lending Test Rating: HIGH SATISFACTORY

Eastern Bank consistently ranks among the top home mortgage lenders in Massachusetts, and during the CRA evaluation period the bank continued to demonstrate leadership in community development lending. The bank makes extensive use of innovative and flexible lending programs and has an excellent record of lending to lower-income individuals. Eastern Bank was Massachusetts' number-one SBA lender in 2013.

Investment Test Rating: OUTSTANDING

Eastern Bank's level of qualified investments and donations during the review period was excellent; however, investments were limited in complexity and were routinely provided by other investors.

Service Test Rating: OUTSTANDING

Eastern Bank's retail banking services during the assessment period were excellent, and included alternative services targeted toward low- and moderate-income individuals. Eastern Bank took a leadership role in providing community development services by offering numerous financial education events and seminars targeted to the needs of lower-income individuals.

In 2013, Eastern Bank originated 192 HMDA loans in Boston, a 67% increase from 2011 lending levels. The bank originated 10 low-income loans in 2013. Eastern Bank was a major small business lender in Boston in 2013, with 278 small business loans totaling \$63.2 million, or 9.7% of all small business loan dollars in Boston.



First Trade Union Bank

First Trade Union Bank is a \$668.8 million full-service bank with clients nationwide. The bank is headquartered in Boston and its deposit base is concentrated in Massachusetts, which has more than 95% of total deposits. The majority of the bank's deposits and lending are derived from its relationship with the carpenters unions that control the bank, and with trade union members. In October 2014, First Trade Union Bank changed its name to Radius Bank.

Overall CRA Rating for Massachusetts (2011): SATISFACTORY

Lending Test Rating for Massachusetts: OUTSTANDING

First Trade Union Bank's net loan-to-deposit ratio during the CRA review period was considered more than reasonable and the bank's distribution of loans in Boston reflected excellent penetration among individuals of different income levels and businesses of different sizes. The bank's performance was considered outstanding given the lack of affordable housing and high competition in Boston.

Community Development Test Rating, Massachusetts: SATISFACTORY

First Trade Union Bank's community development performance during the assessment period demonstrated adequate responsiveness to community needs through loans, investments, and services. The bank's community development investments and services were considered satisfactory.

In 2013, First Trade Union Bank originated two HMDA loans and two low-income loans in Boston. This is consistent with the bank's historical levels of HMDA lending. No 2013 HMDA-reportable small business loan data was available for First Trade Union Bank.

JPMorgan Chase Bank, N.A.

JPMorgan Chase Bank has over \$1.95 trillion in assets and is one of the largest originators and servicers of home mortgages in the country. The bank has one of the largest branch networks in the United States, though its retail presence in Massachusetts is minimal.

Overall CRA Rating (2011): SATISFACTORY

JPMorgan Chase Bank's most recent CRA review, conducted in 2011, did not evaluate the bank's activities in Massachusetts. Ratings are provided *for reference only*.

Lending Test Rating: HIGH SATISFACTORY

Investment Test Rating: OUTSTANDING

Service Test Rating: HIGH SATISFACTORY

In 2013, JPMorgan Chase Bank originated 200 HMDA loans and one low-income loan in Boston. In 2012, the bank made its first HMDA-reportable mortgage loans in Boston since it established a presence in Massachusetts in 2005. Although the bank is the nation's largest U.S. Small Business Administration (SBA) lender, its 2013 small business lending in Boston



was minimal: 46 small business loans totaling \$3.4 million, or 0.5% of total small business loan dollars.

OneUnited Bank

OneUnited Bank is a minority-owned, commercially chartered financial institution with current assets of \$612.4 million. Headquartered in Boston, the bank maintains branches in Massachusetts, Florida, and California. The bank's lending in Massachusetts and Florida has been extremely limited, however.

Overall CRA Rating for Massachusetts (2013): NEEDS TO IMPROVE

Lending Test Rating for Massachusetts: NEEDS TO IMPROVE

The CRA evaluation found that OneUnited Bank did not adequately meet the credit needs of the Massachusetts assessment area. Although 33.3% of the bank's branches are located in Massachusetts, only 6.7% of its total loans and 8.2% of total deposits are located there.

Community Development Test Rating for Massachusetts: SATISFACTORY

OneUnited Bank's overall community development performance demonstrates adequate responsiveness to community development needs in the Boston area, primarily through qualified donations and community development services with an emphasis on financial literacy. Although OneUnited Bank maintained no qualified investments in the Massachusetts assessment area during the evaluation period, the majority of its charitable donations were made in Massachusetts.

Between 2007 and 2013, OneUnited Bank originated only one HMDA loan in the Boston MSA (in 2010), and none in 2013. The bank has not originated any low-income HMDA loans in Boston since 1998. No 2013 HMDA-reportable small business loan data was available for OneUnited Bank.

Citizens Bank, N.A.

Citizens Bank (formerly RBS Citizens, N.A.) is a \$94.7 billion full-service bank headquartered in Providence, Rhode Island. The bank's primary focus is retail banking, with an emphasis on mortgage and consumer lending. Citizens Bank's largest market is the Boston-Cambridge-Quincy Multistate Metropolitan Area (MMA).

Overall CRA Rating for Boston MMA (2012): SATISFACTORY

Within the Boston MMA the CRA evaluation focused on the Boston-Quincy Metropolitan Division (MD), which is comprised of Suffolk, Norfolk, and Plymouth counties.

Lending Test Rating for Boston MMA: HIGH SATISFACTORY

Citizens Bank's lending activity in the Boston-Quincy MD during the evaluation period was excellent. The bank's distribution of home mortgage loans to low- and moderate-income geographies and borrowers was considered good, as was distribution of small business loans.



Investment Test Rating for Boston MMA: HIGH SATISFACTORY

The bank's performance in the Boston-Quincy MD during the review period was considered good. A substantial majority of the dollar volume of the bank's investment transactions was focused on affordable housing, a primary credit need in the area. The bank also makes charitable grants to Boston organizations working on community revitalization.

Service Test Rating for Boston MMA: OUTSTANDING

Citizens Bank's performance in the Boston-Quincy MD during the CRA assessment period was considered excellent. The bank's service delivery systems were accessible to geographies and individuals of different income levels, and the bank provided an excellent level of community development services.

Citizens Bank originated 467 HMDA loans in Boston in 2013, including 37 low-income HMDA loans. The bank's level of HMDA lending declined somewhat from 2011 to 2013. Citizens Bank has historically been among the top SBA lenders in Massachusetts. In 2013 the bank originated 825 small business loans in Boston, totaling \$29.5 million. This represents 4.5% of total small business loan dollars in Boston.

Santander Bank, N.A.

Santander Bank is a \$74.3 billion federally-chartered retail and commercial bank, one of the 25 largest retail banks in the United States. Many of the bank's loan products are designed to improve access to credit for low- and moderate-income borrowers. Santander Bank's main corporate offices are in Boston. In 2012, the bank converted from a thrift to a national bank, and in 2013 it changed its name from Sovereign Bank to Santander Bank.

Overall CRA Rating (2010): OUTSTANDING

Lending Test Rating: OUTSTANDING

Santander Bank extended a large volume of HMDA loans in Boston during the CRA evaluation period. The bank was very successful in extending credit to lower-income borrowers in Boston. The bank used and developed a variety of innovative and flexible lending products targeted to those residents and businesses most in need. Santander Bank's commitment to community development lending in Boston during the period under review was strong.

Investment Test Rating: HIGH SATISFACTORY

Santander Bank originated a high level of community development loans in Boston during the assessment period. Santander Bank also extended a substantial level of charitable donations for community development activities.

Service Test Rating: OUTSTANDING

Santander Bank provided a high level of community development services in Boston during the review period. The bank is actively involved in community development activities and provides financial and technical assistance to a number of community development organizations in Boston.

In 2013, Santander Bank originated 583 HMDA-reportable loans in Boston, including 52 low-income HMDA loans. The bank saw a 70% increase in HMDA lending levels from 2011



to 2012. In 2013, overall HMDA lending stayed level, while low-income loans decreased. No 2013 HMDA-reportable small business loan data was available for Santander Bank.

TD Bank, N.A.

TD Bank is a \$217.6 billion national bank, one of the 10 largest banks in the U.S. The bank is wholly owned by the Toronto-Dominion Bank of Canada, one of the largest financial services companies in North America. The bank operates over 1,300 retail branches in 15 states and the District of Columbia.

Overall CRA Rating for Boston MSA (2011): OUTSTANDING

Lending Test Rating for Boston MSA: OUTSTANDING

TD Bank's lending performance during the CRA review period was excellent. The bank's overall level of lending activity was excellent, combined with good borrower distribution and good geographic distribution for all products. The bank's level of community development lending was considered excellent.

Investment Test Rating for Boston MSA: OUTSTANDING

TD Bank's overall investment performance during the assessment period was excellent. The bank's performance was consistently excellent throughout its assessment areas based on volume of investments and on meeting the needs of the community. The bank's volume of qualified investments was also excellent.

Service Test Rating for Boston MSA: HIGH SATISFACTORY

During the evaluation period, TD Bank provided a good level of community development services in Boston. The bank's community development services met a broad range of identified needs in Boston, including housing education and social services for low- and moderate-income families.

In 2013, TD Bank originated 188 HMDA loans in Boston, an increase from 2011 lending levels. The bank originated a low number of low-income HMDA loans: five loans in 2013. TD Bank originated 202 small business loans in 2013 for a total of \$16.1 million in small business loan dollars.

Webster Bank, N.A.

Webster Bank is a midsize interstate bank with \$20.8 billion in assets. Headquartered in Waterbury, Connecticut, the bank has 11 branches in Massachusetts, representing 7.0% of its total branch network. The majority of the bank's business in the state takes place in the Boston-Quincy Metropolitan Division (MD), which accounts for 91.5% of total deposits in Massachusetts.



Overall CRA Rating for Massachusetts (2014): SATISFACTORY

Lending Test Rating for Massachusetts: HIGH SATISFACTORY

Webster Bank's Boston-area lending during the CRA review period was considered good. The bank's high-level performance in originating home mortgage loans and small business loans was commensurate with its limited presence in the state. The bank's Boston-area lending was especially strong considering the significant competition in the area.

Investment Test Rating for Massachusetts: OUTSTANDING

The bank's Investment Test performance in the Boston MD was considered excellent. Investments made during the CRA evaluation period support affordable housing. The bank's grants and donations during this time focused on affordable housing, economic development, community services for low- and moderate-income individuals, and community revitalization and stabilization efforts.

Service Test Rating for Massachusetts: HIGH SATISFACTORY

Webster Bank's branch distribution in the assessment area was considered good in light of the bank's rather limited presence in the area. Branches were accessible to geographies and individuals of different income levels. The bank's performance in providing community development services in the Boston assessment area was considered adequate.

Webster Bank's HMDA lending in Boston nearly doubled from 2011 to 2013, from 37 loans in 2011 to 73 loans in 2013. The bank's low-income lending remained minimal, with four loans in 2013. The bank originated seven small business loans in Boston in 2013, totaling \$2.2 million.



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BankIQ prepared this document for the City of Boston.

With over twenty years' Government Banking experience, BankIQ is an independent, woman-owned and operated business. BankIQ specializes in collecting, analyzing, preparing, and documenting Financial Services information for the Public Sector.

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