PUBLIC DISCLOSURE

July 15, 2024

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Dime Community Bank
RSSD No. 23504

898 Veterans Memorial Hwy
Hauppauge, NY 11788

Federal Reserve Bank of New York

33 Liberty Street
New York, NY 10045

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S CRA RATING: OUTSTANDING

The following table indicates the performance level of Dime Community Bank (Dime or the bank) with respect to the Lending, Investment, and Service Tests.

PERFORMANCE TEST			
PERFORMANCE	**RATINGS**		
	Lending Test*	**Investment Test**	**Service Test**
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
* The Lending Test is weighted more heavily than the Investment and Service Tests in determining the overall rating.			

SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS

The major factors supporting the institution's rating include:

LENDING TEST

- Lending levels reflected good responsiveness to assessment area credit needs.

- A substantial majority of loans were made in the bank's assessment area.

- The geographic distribution of loans reflected good penetration throughout the assessment area.

- The distribution of borrowers reflected, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and among business customers of different sizes.

- The bank exhibited a good record of serving the credit needs of the most economically disadvantaged area of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.

- The bank was a leader in making community development loans.

- The bank used innovative and/or flexible lending practices in order to serve assessment area credit needs.

INVESTMENT TEST

- The bank had an excellent level of qualified community development investments and grants, and often in a leadership position, particularly those that are not routinely provided by private investors.

- The bank exhibited excellent responsiveness to credit and community development needs.

- The bank occasionally used innovative and/or complex investments to support community development initiatives.

SERVICE TEST

- Delivery systems were readily accessible to all portions the bank's assessment area.

- To the extent changes were made, the bank's opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in low- and moderate-income (LMI) geographies and/or to LMI individuals.

- Services, including business hours, were tailored to the convenience and needs of the assessment area, particularly to LMI geographies and/or individuals.

- The bank was a leader in providing community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Dime, headquartered in Hauppauge, New York (NY) is a state member, full-service commercial community bank serving the Long Island and New York City markets, with total assets of $13.6 billion as of December 31, 2023. Dime is wholly-owned by Dime Community Bancshares, a publicly traded one bank holding company. Dime has 60 locations, including 59 branches, one of which, is co-located with a loan production office (LPO) and a stand-alone LPO location. The Long Island market (Nassau and Suffolk Counties) has 38 branches and an LPO, and the New York City market (Bronx, Kings, New York, Richmond, and Queens Counties) has 21 branches. The bank operates 70 automated teller machines (ATMs), of which 59 are branch-based ATMs and 11 are off-site (non-deposit taking) ATMs. During the evaluation period, the bank expanded into Staten Island with a limited purpose branch and opened an additional limited purpose branch in Manhattan. The bank also consolidated eight branches and an LPO and relocated one branch and an LPO.

Dime primarily offers commercial and residential real estate lending products. Commercial product offerings include commercial and industrial loans and commercial real estate. Retail product offerings include residential real estate loans, including fixed and variable rate mortgages, home equity lines of credit, consumer loans, and construction loans.

Based on the December 31, 2023, Federal Financial Institutions Examination Council's (FFIEC) Consolidated Report of Condition and Income (Call Report), Dime's loan portfolio by dollar volume primarily consisted of nonfarm nonresidential secured and multifamily loans, as summarized in the following table.

Loan Portfolio		
Loan Type	**$(000's)**	**%**
1-4 Family Residential Real Estate	$850,044	7.9
Construction, Land Development, and Other Land Loans	$163,081	1.5
Multifamily (5 or more units) Residential Real Estate	$4,017,175	37.3
Home Equity Lines of Credit	$43,269	0.4
Consumer	$4,176	<0.1
Commercial & Industrial	$841,911	7.8
Nonfarm Nonresidential Secured	$4,630,734	43.0
Other	$226,606	2.1
Total Loans	**$10,776,996**	**100.0**
Source: Call Report as of December 31, 2023		

Based on the bank's December 31, 2023, Uniform Bank Performance Report (UBPR), Dime's deposit portfolio by dollar volume primarily comprised of money market and demand accounts, savings, and time deposits as summarized in the following table.

Deposit Portfolio		
Deposit Type	**$(000's)**	**%**
Demand Deposits	$3,060,128	26.7
All NOW and ATS	$433,292	3.8
Money Market Deposits	$3,125,996	27.3
Other Savings Deposits	$2,335,491	20.4
Time Deposits at or below Insurance Level	$1,334,886	11.6
Time Deposits Over Insurance Level	$272,796	2.4
Brokered Deposits	$898,707	7.8
Total Deposits	**$11,461,296**	**100.0**
Source UBPR as of December 31, 2023		

Previous Performance Evaluation

The Federal Reserve Bank of New York assigned a rating of Outstanding at the previous CRA Performance Evaluation dated January 17, 2022, using the FFIEC's Interagency Large Institution CRA Examination Procedures. The Lending Test was rated Outstanding, the Investment Test was rated High Satisfactory, and the Service Test was rated Outstanding.

DESCRIPTION OF ASSESSMENT AREA

Dime delineated one assessment area for Community Reinvestment Act (CRA) purposes. The bank's assessment area was within MSA 35620 (New York-Newark-Jersey City, NY-NJ-PA) and was comprised of two contiguous Metropolitan Divisions (MD): MD 35004 (Nassau County-Suffolk County, NY), and a portion of MD 35614 (New York-Jersey City-White Plains, NY-NJ). The bank's assessment area included the entire MD 35004 (Nassau County-Suffolk County, NY), which was comprised of Nassau and Suffolk Counties, NY. Within MD 35614 (New York-Jersey City-White Plains, NY-NJ), the bank's assessment area included five counties: Bronx, Kings, New York, Queens, and Richmond Counties, NY, and excluded Bergen, Hudson, and Passaic Counties in New Jersey, and Putnam, Rockland, and Westchester Counties in NY. The bank expanded its assessment area to include Richmond County in June 2023.

Dime's assessment area was in compliance with the requirements of Section 228.41 of Regulation BB. A map illustrating the bank's assessment area is in Appendix A. There were no financial or legal factors that would prevent the bank from fulfilling its responsibilities under the CRA.

SCOPE OF EVALUATION

Procedures

Dime's CRA performance was evaluated using the FFIEC's Interagency Large Institution CRA Examination Procedures. These procedures consist of the Lending, Investment, and Service tests. The evaluation considered the CRA performance context, including the bank's asset size, financial condition, market competition, assessment area demographics, and credit and community development needs.

Products

During this evaluation, loans reportable under the Home Mortgage Disclosure Act (HMDA), as well as small business loans reported on CRA Loan Registers, were analyzed as these loan types represented the bank's major product lines based on a review of bank records, business strategy, and loan portfolio

composition. For the Lending Test, HMDA-reportable loans included home purchase, refinance, and multifamily loans. The CRA-reportable loans included small business in amounts of $1.0 million or less and small farm loans in amounts of $500,000 or less. When evaluating the bank's performance under the Lending Test, examiners placed greater weight on small business loans over HMDA-reportable loans, based on the volume of loans originated. Home improvement loans and small farm loans were excluded from the Geographic and Borrower analysis because there was insufficient volume to conduct a meaningful analysis.

Examiners verified the integrity of HMDA and CRA data reported for the years 2021, 2022, and 2023. Examiners also analyzed community development loans, investments, and services. Multifamily loans considered in the retail lending test were also considered in the evaluation of community development lending.

The bank originated a large volume of Small Business Administration (SBA) Paycheck Protection Program (PPP) loans. The SBA PPP was established by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) of 2020 and designed to provide direct capital for small businesses adversely affected by the COVID-19 pandemic and to keep workers on small business payrolls. For this evaluation, PPP loans less than or equal to $1.0 million that were reported on or after January 1, 2021 on the small business loan register were considered in this CRA evaluation.

Evaluation Period

Examiners reviewed the bank's HMDA and CRA data between January 1, 2021 through December 31, 2023. The evaluation of the bank's community development loans, qualified investments, philanthropic grants, and community development services included all qualified activities from January 1, 2022 through December 31, 2023. The investment test included investments and grants made during the evaluation period and the current book value of any qualified investments outstanding from the prior evaluation.

Lending Analysis

Under the Lending Test, borrower and geographic loan distribution analyses included only lending activity inside the assessment area. The bank's HMDA lending was compared to the 2015 American Community Survey (2015 ACS) demographic data for 2021, and to the U.S. Department of Commerce Bureau of the Census 2020 (2020 U.S. Census) for 2022 and 2023. The bank's record of small business lending was compared to Dun & Bradstreet (D&B) demographic data. Aggregate HMDA and small business lending data for 2021, 2022, and 2023 was also used. Aggregate lenders included all lenders required to report HMDA-reportable and CRA small business lending data within the assessment area. For retail services, Dime's branch distribution analysis was conducted using data as of December 31, 2023.

To evaluate the geographic distribution, the proportion of home purchase and home refinance loan originations located in LMI geographies was compared to the proportion of owner-occupied housing units located in LMI geographies. For multifamily loans, the analysis compared the proportion of loan originations located in LMI geographies with the proportion of rental properties located in LMI geographies. The small business loans analysis compared the proportion of loan originations located in LMI geographies with the proportion of businesses located in LMI geographies, based on D&B data. Performance in LMI geographies were analyzed separately. The lending analysis also considered lending opportunities in LMI census tracts as indicated by demographic data and aggregate lending patterns.

To analyze the distribution of home mortgage lending by borrower profile, the proportion of originations to LMI borrowers was compared to the proportion of LMI families residing in the assessment areas. Median family income (MFI) estimates from the FFIEC were used to categorize borrower income. For

small business lending, the analysis normally compares the proportion of loans to businesses with GAR of $1.0 million or less, based on D&B data, to the proportion of all such businesses located in the assessment area. Multifamily loans are not included within the borrower profile analysis because borrower income is not reported for these loans.

Community Development Activity Analysis

Community development activities were reviewed to determine whether activities had community development as a primary purpose. In addition, pursuant to CA Letter 21-5: CRA Consideration for Activities in Response to the Coronavirus, qualified community development activities supporting community needs related to the COVID-19 pandemic located outside of the assessment area were also given consideration. The eligibility of a loan, investment, or service as a community development activity was based on demographic information at the time the community development activity was undertaken. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to understand the volume of activity impacting a particular assessment area, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted using annualized metrics to gauge the relative performance of the institution in a particular assessment area.

PERFORMANCE CONTEXT

The following demographic and economic information were used to describe the assessment area and to evaluate the context in which Dime operated. The information was obtained from publicly available sources, including the 2015 ACS, 2020 U.S. Census, U.S. Department of Labor's Bureau of Labor Statistics (BLS), D&B, FFIEC, and U.S. Department of Housing and Urban Development (HUD).

Demographic Characteristics

According to the 2020 U.S. Census, the population of this assessment area was 11,725,884. The assessment area consisted of 2,998 census tracts, of which 300 or 10.0% were low-income, 691 or 23.0% were moderate-income, 1,093 or 36.5% were middle-income, 748 or 24.9% were upper-income, and 166 or 5.5% were of unknown-income.

Income Characteristics

Based on the 2020 U.S. Census, the assessment area had 2,610,075 families, of which 27.2% were low-income and 11.3% were below the poverty level, 16.5% were moderate-income, 17.8% were middle-income, and 38.5% were upper-income.

The table below depicts the FFIEC MFIs for the assessment area for 2015 and 2020.

Median Family Income Change			
Area	**2015 MFI**	**2020 MFI**	**Percent Change**
Assessment Area	$77,918	$89,157	14.4
Bronx County, NY	$42,083	$49,624	17.9
Kings County, NY	$58,789	$71,985	22.4
Nassau County, NY	$125,277	$139,459	11.3
New York County, NY	$97,557	$114,659	17.5
Queens County, NY	$70,444	$81,193	15.3
Richmond County, NY	$93,730	$102,502	9.4
Suffolk County, NY	$112,079	$123,117	9.8
MD 35004 (Nassau County-Suffolk County, NY)	$118,209	$130,301	10.2
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	$73,814	$85,483	15.8
State of NY	$78,570	$87,270	11.1
Source: 2015 ACS; 2020 U.S. Census; MFIs have been inflation-adjusted and are expressed in 2020 dollars.			

Housing Characteristics

Based on the 2020 U.S. Census data, the assessment area had 4,569,637 housing units, of which 39.8% were owner-occupied, 50.8% were rental, and 9.5% were vacant. Of the total housing units, 11.7% were located in low-income census tracts, 22.9% in moderate-income census tracts, 34.6% in middle-income census tracts, 29.7% in upper-income census tracts, and 1.1% in unknown-income census tracts. In low-income census tracts, 8.8% of housing units were owner-occupied, 85.4% were rental units, and 5.8% were vacant. In moderate-income census tracts, 28.3% of housing units were owner-occupied, 63.1% were rental units, and 8.6% were vacant. This data suggested that there was a greater opportunity to rent than to own housing units in LMI geographies in this assessment area, which may have limited opportunities for lenders to originate home mortgage loans in these geographies.

The median age of housing stock in this assessment area was 61 years old, with 43.6% of the stock built before 1950. The median age of housing stock was 61 years in both low- and in moderate-income census tracts. The median housing value in this assessment area was $546,425 with an affordability ratio of 14.0. The median gross rent in the assessment area was $1,518 per month.

The table below depicts the housing characteristics in the assessment area.

Housing Characteristics			
Area	**2020 Median Housing Value**	**2020 Affordability Ratio**	**2020 Median Gross Rent**
Assessment Area	$546,425	14.0	$1,518
Bronx County	$427,900	9.8	$1,247
Kings County	$734,800	8.7	$1,483
Nassau County	$524,400	22.9	$1,831
New York County	$1,024,500	8.8	$1,787
Queens County	$575,600	12.5	$1,629
Richmond County	$546,100	15.6	$1,379
Suffolk County	$413,900	25.5	$1,810
MD 35004 (Nassau County-Suffolk County, NY)	$463,098	24.1	$1,819
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	$553,158	13.3	$1,486
State of NY	$325,000	21.9	$1,315
Source: 2015 ACS; 2020 U.S. Census			

Housing Cost Burden

Housing costs were relatively expensive in this assessment area, which indicated that affordable housing for LMI individuals and families continued to be a challenge. According to HUD's data, within the assessment area, 47.6% of all rental households had rental costs that exceeded 30.0% of their incomes, 76.3% of low-income rental households had rental costs that exceeded 30.0% of their income, and 46.3% of moderate-income rental households had rental costs that exceeded 30.0% of their income.

According to HUD's data, within this assessment area, 32.4% of homeowners had housing costs that exceeded 30.0% of their incomes, 75.7% of low-income homeowners had housing costs that exceeded 30.0% of their income, and 50.9% of moderate-income homeowners had housing costs that exceeded 30.0% of their income.

Additional housing cost data is provided in the following table.

Housing Cost Burden*						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	76.3%	46.3%	47.6%	75.7%	50.9%	32.4%
Bronx County, NY	76.5%	33.1%	54.8%	64.5%	44.6%	33.8%
Kings County, NY	76.7%	45.2%	48.1%	76.0%	51.0%	35.4%
Nassau County, NY	74.7%	53.7%	48.5%	81.4%	57.8%	32.4%
New York County, NY	71.5%	50.7%	41.0%	59.5%	44.9%	20.4%
Queens County, NY	81.0%	53.0%	48.1%	73.5%	47.2%	35.0%
Richmond County, NY	73.6%	43.7%	47.0%	79.2%	50.4%	32.7%
Suffolk County, NY	77.8%	55.4%	51.8%	80.7%	54.2%	32.8%
MD 35004 (Nassau County-Suffolk County, NY)	76.4%	54.6%	50.2%	81.0%	55.8%	32.6%
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	76.6%	45.0%	47.1%	75.8%	51.7%	32.0%
State of NY	76.1%	41.4%	46.6%	70.0%	40.4%	25.6%

Cost Burden is housing cost that equals 30.0% or more of household income.
Source: HUD, 2016-2020 Comprehensive Housing Affordability Strategy

Labor, Employment, and Economic Characteristics

According to D&B data, there were 540,726 businesses operating in this assessment area in 2023, of which 6.1% were located in low-income census tracts and 17.1% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 91.0% were small businesses with GAR of $1.0 million or less, of which 6.3% were located in low-income census tracts and 17.5% were located in moderate-income census tracts.

The assessment area is highly competitive for financial services. According to the June 30, 2023, FDIC Summary of Deposit Report, 110 institutions operated 2,138 offices within the assessment area. Dime ranked 18th with approximately $10.5 billion in deposits, which represented 0.5% of the deposit market share. Competitors included large financial institutions such as JPMorgan Chase, N.A., Goldman Sachs Bank USA, The Bank of New York Mellon, Bank of America, N.A., and Citibank, N.A., which captured 73.2% of deposit market share.

According to the BLS, unemployment rates in the assessment area and NY State improved from 2021 to 2022 and the assessment area unemployment rates were similar to NY State unemployment figures. The COVID-19 pandemic contributed to the high unemployment rates in 2020 and 2021, within the assessment area and in the state of NY. The unemployment rates are provided in the subsequent table.

Unemployment Rates			
Area	**2021**	**2022**	**2023**
Assessment Area	8.6%	5.0%	4.7%
Bronx County, NY	13.9%	7.9%	6.8%
Kings County, NY	10.4%	5.9%	5.5%
Nassau County, NY	4.5%	2.9%	3.1%
New York County, NY	7.8%	4.6%	4.6%
Queens County, NY	9.9%	5.3%	4.6%
Richmond County, NY	9.0%	5.6%	4.9%
Suffolk County, NY	4.6%	3.2%	3.4%
MD 35004 (Nassau County-Suffolk County, NY)	4.6%	3.1%	3.3%
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	8.9%	5.1%	4.8%
State of New York	7.1%	4.3%	4.2%
Source: BLS Local Area Unemployment Statistics			

Additional demographic data for this assessment area is provided in the following table.

Assessment Area Demographics Table - 2023								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	300	10.0	310,863	11.9	101,824	32.8	711,017	27.2
Moderate-income	691	23.0	618,957	23.7	96,026	15.5	429,422	16.5
Middle-income	1,093	36.5	991,286	38.0	66,595	6.7	464,804	17.8
Upper-income	748	24.9	667,718	25.6	25,267	3.8	1,004,832	38.5
Unknown-income	166	5.5	21,251	0.8	4,607	21.7	0	0
Total Assessment Area	**2,998**	**100.0**	**2,610,075**	**100.0**	**294,319**	**11.3**	**2,610,075**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	533,680	46,882	2.6	8.8	455,711	85.4	31,087	5.8
Moderate-income	1,048,505	296,292	16.3	28.3	661,932	63.1	90,281	8.6
Middle-income	1,579,667	835,461	46.0	52.9	610,098	38.6	134,108	8.5
Upper-income	1,357,545	627,813	34.6	46.2	559,103	41.2	170,629	12.6
Unknown-income	50,240	10,573	0.6	21.0	33,460	66.6	6,207	12.4
Total Assessment Area	**4,569,637**	**1,817,021**	**100.0**	**39.8**	**2,320,304**	**50.8**	**432,312**	**9.5**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	33,032	6.1	30,880	6.3	1,957	4.4	195	4.5
Moderate-income	92,333	17.1	85,923	17.5	5,795	13.0	615	14.1
Middle-income	179,152	33.1	166,799	33.9	10,991	24.7	1,362	31.1
Upper-income	213,481	39.5	190,278	38.7	21,234	47.7	1,969	45.0
Unknown-income	22,728	4.2	17,960	3.7	4,536	10.2	232	5.3
Total Assessment Area	**540,726**	**100.0**	**491,840**	**100.0**	**44,513**	**100.0**	**4,373**	**100.0**
	Percentage of Total Businesses:		**91.0**		**8.2**		**.8**	
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	95	6.1	90	6.0	5	11.9	0	0
Moderate-income	294	19.0	286	19.0	8	19.0	0	0
Middle-income	535	34.5	520	34.5	14	33.3	1	100.0
Upper-income	574	37.0	563	37.3	11	26.2	0	0
Unknown-income	53	3.4	49	3.2	4	9.5	0	0
Total Assessment Area	**1,551**	**100.0**	**1,508**	**100.0**	**42**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:		**97.2**		**2.7**		**0.1**	

Source: 2023 FFIEC Census Data; 2023 D&B

Community Contacts

To understand community development and credit needs, examiners reviewed recent community contact interviews with representatives within this assessment area. The contacts had expertise in their respective fields and were familiar with the economic, social, and demographic characteristics and community development opportunities in the assessment area. Information obtained from these interviews helped establish a context for the communities in which Dime operated.

A recent community contact interview, from an economic development organization located in the Bronx, was considered for this evaluation. The contact identified a need for more brick-and-mortar branches and direct banking in the assessment area. The contact indicated that areas of Bronx County were underbanked and that there were few branch locations available for business owners. The contact explained that there was an opportunity for banks to support businesses by providing financing for equipment acquisition, working capital, and real estate needs. The contact also identified the need for financial education to assist start-ups and small businesses.

Examiners also considered an interview conducted with a representative from a community development organization located in Kings County. The contact provided information regarding local economic and demographic conditions, and information on affordable housing and economic development needs within this assessment area. The contact stressed the need for more affordable housing as families were spending a majority of their income on rent. The contact also noted that the high cost of housing in Kings County was a barrier to home ownership for LMI families. The contact also indicated that there were opportunities for banks to offer more flexible homeownership programs Furthermore, the contact mentioned that many small businesses closed during the COVID-19 pandemic, and the area had not fully financially recovered.

Considering information from the community contacts, bank management, and demographic and economic data, examiners determined that affordable housing represented one of the primary community development need in this assessment area, and affordable and flexible home mortgage products also represented a primary credit need. Small business financing, especially important during and post-pandemic, was also an acute credit need, as well as the need for financial education for residents and area small businesses.

CONCLUSION WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Dime's overall performance under the Lending Test is rated Outstanding.

Lending Activity

Dime's lending levels reflected good responsiveness to assessment area credit needs.

As shown in the subsequent table, the bank made 5,374 HMDA and CRA-reportable loans totaling approximately $3.7 billion. This lending activity represented an overall annual performance over 36 months of 1,791 loans totaling $1.2 billion. Annualized performance decreased 14.4% by number and increased 82.4% by dollar, when compared to the bank's previous evaluation's annualized performance of 2,091 loans and $657.8 million. The decrease in lending activity by number was largely attributed to the origination of PPP loans during the previous evaluation period. Specifically, the bank originated a total of 4,408 PPP loans in the prior period of 2020, and originated 2,750 PPP loans in 2021 for the current evaluation. Dime's overall lending is summarized in the following table.

Summary of Lending Activity January 1, 2021 to December 31, 2023				
Loan Type	#	%	$(000's)	%
Home Purchase	572	10.6	$342,194	9.3
Multifamily Housing	330	6.1	$2,152,456	58.4
Refinance	294	5.5	$209,454	5.7
Home Improvement	1	<0.1	$1,196	<0.1
Total HMDA	**1,197**	**22.3**	**$2,705,300**	**73.4**
Total Small Business	**4,175**	**77.7**	**$979,327**	**26.6**
Total Small Farm	**2**	**<0.0**	**$374**	**<0.1**
TOTAL LOANS	**5,374**	**100.0**	**$3,685,001**	**100.0**

Source: HMDA- and CRA-reported data

Assessment Area Concentration

Dime originated a substantial majority of loans within its assessment area. The bank displayed a stronger performance in small business lending, by number, with 95.2% of such loans extended within the assessment area. The overall performance by number of total loans within the assessment area was 90.6%.

The bank's lending inside and outside this assessment area is summarized in the table below.

Lending Inside and Outside the Assessment Area January 1, 2021 to December 31, 2023								
	Inside				Outside			
Loan Type	#	%	$(000's)	%	#	%	$(000's)	%
Home Purchase	351	61.4	$219,857	64.2	221	38.6	$122,337	35.8
Multifamily Housing	314	95.2	$1,996,115	92.7	16	4.8	$156,341	7.3
Refinance	226	76.9	$161,602	77.2	68	23.1	$47,852	22.8
Home Improvement	1	100.0	$1,196	100.0	0	0	0	0
Total HMDA	**892**	**74.5**	**2,378,770**	**87.9%**	**305**	**25.5%**	**326,530**	**12.1**
Total Small Business	**3,976**	**95.2**	**$926,054**	**94.6**	**199**	**4.8**	**$53,273**	**5.4**
Total Small Farm	**2**	**100.0**	**$374**	**0**	**0**	**0**	**0**	**0**
TOTAL LOANS	**4,870**	**90.6**	**3,305,198**	**89.7**	**504**	**9.4**	**379,803**	**10.3**

Source: HMDA- and CRA-reported data

Geographic Distribution of Loans

Dime's geographic distribution of loans reflected good penetration throughout the assessment area. Lending penetration in LMI tracts was adequate for home purchase, good for refinance, good for multifamily, and good for small business.

Gap Analysis

Dime demonstrated a low-level of dispersion in LMI tracts in this assessment area. Overall, performance declined throughout the evaluation period. However, this can be attributed to factors that included the high cost of housing and the high degree of competition for financial services and loans in this assessment area. Since 2021, the top five lenders' market share increased. For example, these large national institutions

captured, 66.3%, 76.8%, and 81.5%, of the small business market share for 2021, 2022, and 2023, respectively. Similar results were identified for the home mortgage market. The top five lenders captured 31.9%, 28.5%, and 35.6%, of the home mortgage market share for 2021, 2022, and 2023, respectively.

The bank's lending gap analysis in this assessment area is summarized in the table below.

Lending Gap Analysis January 1, 2021 to December 31, 2023			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration**
2021			
Low	298	240	19.5%
Moderate	658	477	27.5%
Middle	965	583	39.6%
Upper	670	371	44.6%
Income Unknown	73	65	11.0%
2022			
Low	297	251	15.5%
Moderate	678	563	17.0%
Middle	1,051	824	21.6%
Upper	687	508	26.1%
Income Unknown	159	146	8.2%
2023			
Low	300	284	5.3%
Moderate	691	623	9.8%
Middle	1,093	930	14.9%
Upper	748	592	20.9%
Income Unknown	166	153	7.8%

Home Purchase Loans

The geographic distribution of home purchase loans reflected adequate penetration throughout the assessment area.

In 2023, the bank made 2.1% by number and 2.2% by dollar of home purchase loans in low-income census tracts. Home purchase lending performance in low-income census tracts was slightly below the 2.6% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 3.0% by number and 2.5% by dollar in low-income census tracts. The bank did not originate any home purchase loans in low-income census tracts in 2022 and 2021.

In 2023, the bank made 9.6% of home purchase loans by number and 7.7% by dollar in moderate-income census tracts. The bank's home purchase lending performance was below the 16.3% of owner-occupied housing units located in moderate-income census tracts and was below the aggregate, which made 17.5% by number and 14.0% by dollar of home purchase loans in moderate-income census tracts. The bank's performance in 2023 was comparable to its performance in 2022 and exceeded its performance in 2021.

Home Refinance Loans

The geographic distribution of refinance loans reflected good penetration throughout the assessment area primarily based on the bank's performance in 2021 and 2022 within moderate-income census tracts.

In 2023, the bank did not make any refinance loans in low-income census tracts. The bank's refinance lending performance in low-income census tracts was significantly below the 2.6% of owner-occupied housing units located in low-income census tracts and significantly below the aggregate, which made 3.2% by number and 3.3% by dollar of refinance loans in low-income census tracts. The bank's performance in 2022 and 2021 exceeded 2023 performance but was still below area demographics and aggregate performance. However, given the level of competition and limited opportunities to lend in low-income census tracts, the bank's performance is considered adequate.

In 2023, the bank made 10.0% by number and 13.5% by dollar of refinance loans in moderate-income census tracts. Dime's refinance lending performance in moderate-income census tracts was below the 16.3% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 17.8% by number and 14.4% by dollar of refinance loans in moderate-income census tracts. The bank's performance in 2022 and 2021 exceeded 2023 performance and was above both area demographics and aggregate performance, supporting good penetration within moderate-income census tracts.

Multifamily Loans

The geographic distribution of multifamily loans reflected good penetration throughout the assessment area.

In 2023, the bank made 12.5% by number and 23.7% by dollar of multifamily loans in low-income census tracts. The bank's multifamily lending performance in low-income census tracts was below the 19.3% of multifamily housing units located in low-income census tracts and slightly below the aggregate, which made 15.2% by number and 19.1% by dollar of multifamily loans in low-income census tracts. The bank's performance in 2022 and 2021 was comparable to 2023 performance.

In 2023, the bank made 15.6% by number and 3.9% by dollar of multifamily loans in moderate-income census tracts. Dime's multifamily lending performance in moderate-income census tracts was below the 24.6% of multifamily housing units located in moderate-income census tracts and below the aggregate, which made 28.1% by number and 24.5% by dollar of multifamily loans in moderate-income census tracts. The bank's performance in 2022 and 2021 was above 2023 performance and was similar to aggregate performance, supporting good penetration.

Small Business Loans

The geographic distribution of small business loans reflected good penetration throughout the assessment area.

In 2023, the bank made 2.9% by number and 3.2% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was significantly below the 6.1% of businesses located in low-income census tracts and significantly below the aggregate, which made 7.6% by number and 7.0% by dollar of small business loans in low-income census tracts. The bank's performance in 2022 was above 2023 performance and exceeded both area demographics and aggregate performance. The bank's 2021 performance was comparable to 2023 performance. The bank's performance in 2023 and 2021 was mitigated by the high level of competition for small business loans in low-income census tracts.

In 2023, the bank made 24.1% by number and 20.3% by dollar of small business loans in moderate-income

census tracts. Dime's small business lending performance in moderate-income census tracts was above the 17.1% of businesses located in moderate-income census tracts and above the aggregate, which made 19.3% by number and 17.8% by dollar of small business loans in moderate-income census tracts. The bank's performance in 2022 and 2021 was comparable to 2023 performance, further supporting good penetration.

Borrower Profile

The distribution of borrowers reflected, given the product lines offered by the bank, adequate penetration among retail customers of different income levels and among business customers of different sizes. Overall, home mortgage lending to LMI borrowers was adequate and lending to businesses with GAR of $1.0 million or less was also adequate.

Home Purchase Loans

The distribution of borrowers reflected, given the product lines offered, adequate penetration among LMI customers for home purchase lending.

In 2023, the bank made 1.6% by number and 0.5% by dollar to low-income borrowers and was significantly below the 27.2% of low-income families in the assessment area. Performance was comparable to aggregate lending, which made 2.3% by number and 0.9% by dollar to low-income families. As noted in the performance context section, housing costs were relatively expensive in the assessment area, which may help explain the significant gap between aggregate lending performance and the percentage of low-income families in the assessment area. Specifically, 76.3% of low-income rental households had rental costs that exceeded 30.0% of their income. This data suggests it would be difficult for these families to qualify for a home purchase loan or support a monthly mortgage payment, especially considering the area's median housing value of $546,425. The bank's performance in 2023 was comparable to its performance in 2022 and exceeded its performance in 2021.

In 2023, the bank's lending to moderate-income borrowers was 3.2% by number and 1.4% by dollar, which was significantly below the aggregate performance of 11.4% by number, significantly below the aggregate of 5.9% by dollar, and significantly below the 16.5% moderate-income families in the assessment area. The bank's performance in 2022 to moderate-income borrowers was 9.6% by number and 5.0% by dollar, which was below the aggregate performance of 15.3% by number, below the aggregate's 8.4% by dollar, and below the 16.6% moderate-income families in the assessment area. The bank's performance in 2022 was adequate and comparable to its performance in 2021.

Home Refinance Loans

The distribution of borrowers reflected, given the product lines offered, poor penetration among low-income customers and adequate penetration among moderate-income customers for refinance lending.

In 2023, the bank did not make any loans to low-income borrowers. This was significantly below the aggregate lending data, at 6.4% by number and 2.1% by dollar. The bank's performance was significantly below the 27.2% of low-income families in the assessment area. The bank originated one loan to low-income borrowers in 2022, and five loans in 2021.

In 2023, the bank's lending to moderate-income borrowers, at 20.0% by number and 10.3% by dollar, was significantly above the aggregate lending data at 13.2% by number, significantly a bove 5.0% by dollar, and above the 16.5% moderate-income families in the assessment area. The bank's performance in 2022 and 2021 was significantly below 2023 performance, reflecting adequate performance.

Small Business Loans

The distribution of borrowers reflected, given the product lines offered, adequate penetration among customers for small business lending.

In 2023, the bank originated 14.7% of loans by number and 5.9% by dollar to businesses with GAR of $1.0 million or less. The bank's lending to small businesses was significantly below the aggregate lending data, at 53.3% by number and 32.7% by dollar. In addition performance was significantly below the 91.0% percentage of businesses in the assessment area with GAR of $1.0 million or less. The bank's performance in 2022 and 2021 was above 2023 performance, while still below demographic data and aggregate performance. The bank also originated 20.4%, 47.4% and 55.5% of loans to assessment area businesses in amounts of $100,000 or less, in 2023, 2022 and 2021, respectively. These smaller loans are typically considered more responsive to the credit needs of very small businesses, supporting adequate performance.

While 2021 performance was less than demographic data and aggregate performance, it was adequate given the large volume of PPP loans the bank made in 2021. During the COVID-19 pandemic, the primary need for businesses in the assessment area was immediate financing. Notably, lenders were not required to collect business revenue information for PPP loans. A significant portion of the bank's small business loans did not include revenue information, which limited the ability to assess the borrower distribution of small business loans. Of the 2,750 PPP loans made in 2021, 2,679 of these PPP loans were originated in amounts of $1.0 million or less and did not include revenue information. When excluding the loans without revenue data, the bank made 42.5% of loans by number to businesses with GAR of $1.0 million or less in 2021. This supports adequate performance and ability to originate small business loans as a direct means to address a significant credit need identified during the pandemic.

Responsiveness to Credit Needs of Highly Economically Disadvantaged Geographies and to Low-Income Persons and Small Business

The bank exhibited a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices. The bank responded quickly to the needs small businesses faced during the COVID-19 pandemic by originating a large number of PPP loans in 2021. During this time, the primary need for businesses in this assessment area was PPP funding. The bank's high level of community development activity and innovative and flexible products, which were primarily targeted to improving access to affordable housing, also supported good performance.

Community Development Lending Activity

Dime was a leader in making community development loans. The bank originated 123 qualified community development loans totaling $642.5 million during the evaluation period. Community development loans primarily supported efforts to support affordable housing, a need expressed by a community contact and also evident through demographic information. Of this total dollar amount of community development loans, 51.3% financed affordable housing, 19.1% benefited community services, 12.5% promoted economic development, and 17.2% supported the revitalization and stabilization of LMI geographies.

This lending level represented an annualized performance over 24 months of approximately $321.2 million. Compared to the previous evaluation when the bank had an annualized performance totaling $300.2 million, this represented a 7.0% increase by dollar volume in performance. When compared to four other similar institutions operating within the assessment area, Dime's annualized community development loans ranked first based on average assets and deposits.

Community Development Lending January 1, 2022 to December 31, 2023										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000's)	#	$(000's)	#	$(000's)	#	$(000's)	#	$(000's)
2022	59	283,967	10	12,930	23	50,561	7	61,500	99	408,958
2023	10	45,300	6	109,513	6	29,776	2	48,925	24	233,514
Total	69	329,267	16	122,443	29	80,337	9	110,425	123	642,472
Source: Bank data										

The following are examples of community development loans that benefited this assessment area.

- In 2022, the bank provided a $19.5 million loan for the acquisition of an apartment building located in Suffolk County. The 92-unit apartment building had rents below the HUD Fair Market Rent for Suffolk County and 43 units were qualified under the NY Section 8 Housing Choice Voucher Program. The loan supported the need for affordable housing in the assessment area.

- In 2023, the bank provided a $28.0 million loan to a non-profit organization to purchase a hotel and repurpose it into a homeless shelter. The location contained 94 rooms and provided temporary shelter to homeless individuals and families who were seeking asylum. The organization also provided health and educational services to the individuals seeking shelter. This loan supported community services to LMI individuals in NY County.

Innovative and/or Flexible Lending Practices

Dime used innovative and/or flexible lending practices in order to serve assessment area credit needs. The following are examples that supported the bank's responsiveness to specific community needs.

- **First-Time Home Buyer Program**: This program provided lower rates for income-eligible borrowers buying homes within this assessment area. The bank originated 11 loans under this program totaling $5.0 million.

- **Dime's Lender Credit for LMI Borrowers:** Dime provided lender credits of up to $5,500 to income-eligible borrowers buying homes within this assessment area. The bank issued 7 credits totaling $38,500.

- **State of NY Mortgage Agency's Low Interest Rate Mortgage Program**: This program provided qualified LMI, first-time homebuyers with low down payment mortgage financing on 1-4 family dwellings at fixed rates that were below the prevailing conventional rates. This program allowed for closing cost assistance from a local housing organization and had underwriting criteria that was more flexible than traditional mortgage loans. The bank originated 13 loans under this program totaling $2.9 million.

- **Fannie Mae's HomeReady Mortgage**: This program offered low down payments and non-traditional flexible underwriting criteria for creditworthy low-income borrowers. The bank originated 6 loans under this program totaling $1.1 million.

- **Homebuyer Dream Grant (HDP):** The HDP provided grants down payment and closing cost assistance to low-income first-time homebuyers. Through participation in this program, 8 Dime

borrowers received $48,100 in closing cost grants.

- **SBA 7a and 504:** Guaranteed loans that provided small business financing through more flexible terms than traditional business loans. Dime is a SBA Preferred Lender and participates in the SBA 7(a) and 504 programs. The bank originated 102 loans under these programs totaling $137.4 million.

INVESTMENT TEST

Dime's overall performance under the Investment Test was rated Outstanding.

Investment and Grant Activity

Dime had an excellent level of qualified community development investments and grants, often in a leadership position, particularly those that are not routinely provided by private investors. During the current evaluation period, the bank had 215 qualified community development investments and grants, totaling $223.4 million. This investment activity included 17 new investments totaling $72.8 million, 58 outstanding prior period investments totaling $149.1 million, and 140 grants totaling $1.5 million. This represented an overall annualized performance over 24 months of approximately $112.5 million. Annualized performance increased 162.9% when compared to the bank's prior CRA evaluation's annualized over 42 months total of $42.8 million. When compared to four other similarly-sized institutions operating within the assessment area, Dime's annualized community development investments ranked first based on average assets and deposits. While a majority of the dollar volume was attributed to outstanding balances of prior period investments, Dime also ranked first based on new investment activity by dollar during the evaluation period, further supporting excellent performance.

Community development investments and grants primarily supported efforts to address affordable housing, a need previously expressed by a community contact and evidenced by the high cost of housing detailed in the demographic data. Of the total dollar amount of community development investments and grants, 95.6% financed affordable housing, 2.3% benefited community services, 2.1% promoted economic development, and less than 0.1% supported the revitalization and stabilization of LMI geographies. The subsequent table illustrates the community development investment and grant activities by year and purpose.

	Qualified Investments and Grants January 1, 2022 to December 31, 2023									
Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	$(000's)	#	$(000's)	#	$(000's)	#	$(000's)	#	$(000's)
Prior Period	52	140,248	2	4,495	4	4,370	0	0	58	149,113
2022	10	50,460	0	0	0	0	0	0	10	50,460
2023	7	22,376	0	0	0	0	0	0	7	22,376
Total Investments	**69**	**213,084**	**2**	**4,495**	**4**	**4,370**	**0**	**0**	**75**	**221,949**
Total Grants	**47**	**508**	**57**	**569**	**29**	**247**	**7**	**168**	**140**	**1,492**
Grand Total	**116**	**213,592**	**59**	**5,064**	**33**	**4,617**	**7**	**168**	**215**	**223,441**
Source: Bank data										

The following are examples of community development investments and grants that benefited this

assessment area:

- In 2022, the bank made a $10.0 million investment in a 94-unit multifamily property located in an affordable cooperative housing community in New York City. All 94 units were affordable with rents below HUD'S Fair Market Rent for New York County.

- During the evaluation period, the bank made 2 donations totaling $50,000 to nonprofit small business lenders that provided small business owners access to capital and financial education. These donations supported economic development within this assessment area.

Responsiveness to Credit and Community Development Needs

Dime exhibited excellent responsiveness to credit and community economic development needs. The bank's qualified investments included numerous multifamily housing projects that promoted affordable housing efforts, which demonstrated responsiveness to needs within this assessment area.

Community Development Initiatives

The bank occasionally used innovative and/or complex investments to support community development initiatives. Dime's investments primarily supported the creation and preservation of affordable housing for LMI individuals throughout this assessment area, a need expressed by a community contact. However, while responsive, a majority of these investments were comprised of mortgage-backed securities, which are not considered particularly innovative or complex.

SERVICE TEST

Dime's overall Service Test performance was rated Outstanding.

Accessibility of Delivery Systems

Delivery systems were readily accessible to all portions of the bank's assessment area. The bank operated 59 branch locations and 70 ATMs. Of the total branches, 1 (1.7%) was in a low-income census tract and 12 (20.3%) were in moderate-income census tracts. While Dime's dispersion of branches and ATMs reflected a low number in low-income census tracts, the bank's dispersion was similar to the percentage of moderate-income families and moderate-income census tracts. Additionally, 21 branches that were located in middle- and upper-income census tracts were directly adjacent to LMI census tracts, thereby improving accessibility to LMI individuals.

Branch and ATM Distribution by Tract Income Level December 31, 2023								
Tract Income Level	Census Tracts		Families		Branches		ATMs	
	#	%	#	%	#	%	#	%
Low	300	10.0	310,863	11.9	1	1.7	1	1.4
Moderate	691	23.0	618,957	23.7	12	20.3	16	22.9
Middle	1,093	36.5	991,286	38.0	28	47.5	36	51.4
Upper	748	24.9	667,718	25.6	17	28.8	16	22.9
Unknown	166	5.5	21,251	0.8	1	1.7	1	1.4
Total	**2,998**	**100.0**	**2,610,075**	**100.0**	**59**	**100.0**	**70**	**100.0**

Source: Bank data; 2020 U.S. Census

In addition to the physical access to branches and ATMs, the bank offered alternative delivery systems that improved accessibility for its products and services for all geographies, including LMI areas. These delivery systems included online banking, mobile banking, and telephone banking.

Changes in Branch Locations

To the extent changes have been made, the bank's record of opening and closing of branches did not adversely affect the accessibility of delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank consolidated eight branches and an LPO, opened two branches, and relocated a branch and an LPO. Of the eight consolidated branches, only one, the Borough Park branch, was located in a LMI tract and was consolidated into the Bensonhurst branch in Brooklyn. While the Bensonhurst branch was located in an upper-income census tract, it was in close proximity to the former Borough Park location and directly adjacent to a moderate-income census tract.

Reasonableness of Business Hours and Services

Services, including business hours, were tailored to the convenience and needs of this assessment area, particularly LMI geographies and/or LMI individuals. Dime's loan and deposit products were offered at all branches throughout this assessment area. Core branch hours were weekdays from 8:30 A.M. to 4:00 P.M. Of the 59 branch locations, 40 locations (67.8%) had extended hours and 35 branches (59.3%) had weekend hours. Of the 13 branches in LMI census tracts, 10 (76.9%) had extended hours and 10 (76.9%) had weekend hours. In addition to its branches and ATMs, Dime maintained a full-service website, which offered customers online deposit and resident and commercial loan products. Deposit products included checking, savings, money market, and certificate of deposit accounts. Furthermore, the bank offered a no minimum balance checking account with no overdraft fees. Dime also offered Interest on Lawyers Trust accounts, with the earned interest donated to charitable foundations that provide civil legal services to low- and moderate-income individuals. During the evaluation period, Dime's participation in this program generated $56,000 in donations to charitable foundations.

Community Development Services

Dime was a leader in providing community development services. The bank conducted 212 qualified community service events, which represented an annualized performance over 24 months of 106 services. The bank's qualified community development services consisted of a wide variety of events related to financial education and technical assistance.

The bank's community development services by year and purpose are summarized in the table below.

Community Development Services January 1, 2022 to December 31, 2023					
Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2022	34	60	6	0	**100**
2023	21	78	13	0	**112**
Total	**55**	**138**	**19**	**0**	212
Source: Bank data					

The following are examples of community development services that benefited this assessment area.

- In 2023, bank employees conducted a Homebuyer Workshop, which provided education to low-income families in Queens County. The workshop was presented in partnership with a community development organization that provided access to affordable housing and counseling to underserved individuals.

- In 2023, Dime employees shared technical knowledge with start-up and new small business owners to prepare them to launch or grow their businesses. Dime employees served as coaches for these small businesses located in the New York City area.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Dime was in compliance with the substantive provisions or the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices was identified as being inconsistent with helping to meet the credit needs of the assessment area.

APPENDIX A- ASSESSMENT AREA MAP

Dime Community Bank
MSA 35620 (NY-Newark-JC, NY-NJ-PA)
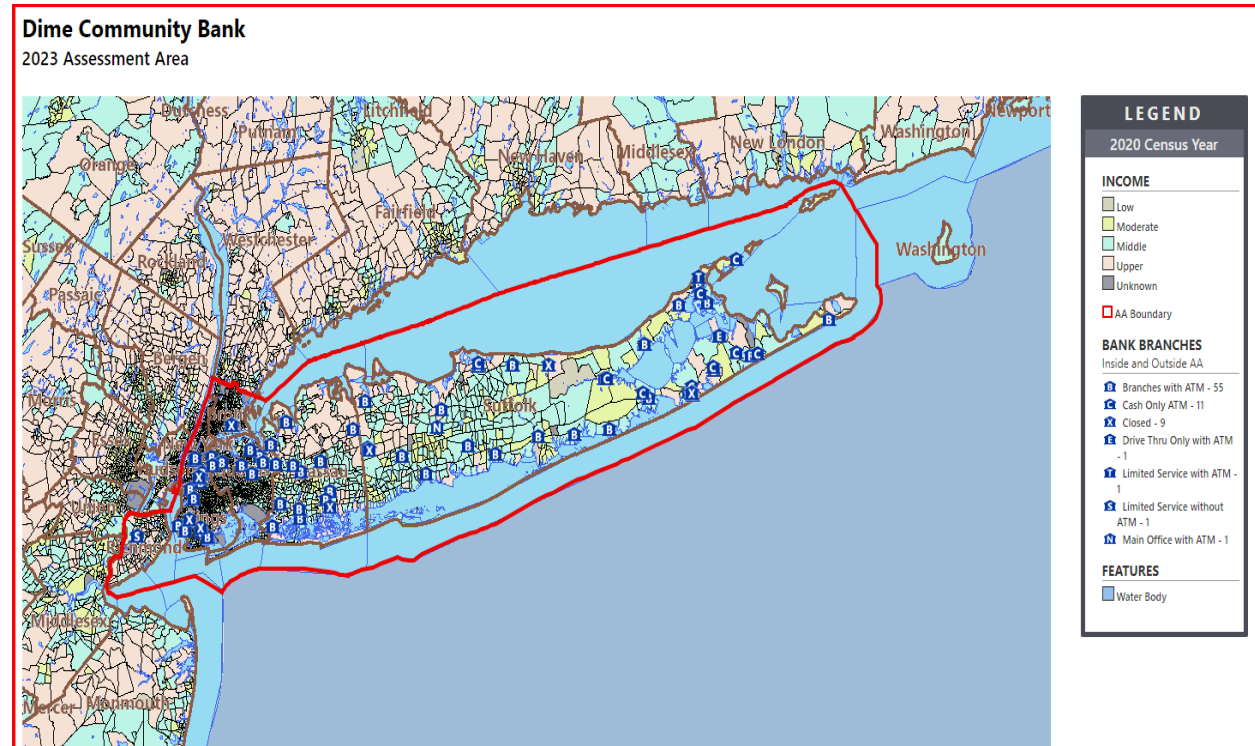
APPENDIX B - HMDA & SMALL BUSINESS DISTRIBUTION REPORTS

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Assessment Area: MSA 35620 (NY-Newark-JC, NY-NJ-PA)							
Geographic Income Level	**Bank And Aggregate Loans**						**Owner Occupied Units %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
Home Purchase Loans							
Low	0	0	3.0	0	0	2.6	2.7
Moderate	3	6.3	16.7	1,083	3.6	13.9	16.1
Middle	23	47.9	44.4	11,401	38.2	37.0	46.5
Upper	22	45.8	35.6	17,366	58.2	46.4	34.6
Unknown	0	0	0.2	0	0	0.1	0.2
Total	48	100.0	100.0	29,850	100.0	100.0	100.0
Refinance Loans							
Low	2	1.5	3.0	810	0.9	3.3	2.7
Moderate	23	17.6	15.6	12,900	15.1	14.2	16.1
Middle	57	43.5	48.2	28,195	33.0	40.4	46.5
Upper	49	37.4	33.0	43,620	51.0	42.0	34.6
Unknown	0	0	0.1	0	0	0.1	0.2
Total	131	100.0	100.0	85,525	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0	2.0	0	0	2.4	2.7
Moderate	0	0	12.0	0	0	11.7	16.1
Middle	0	0	52.6	0	0	43.7	46.5
Upper	1	100.0	33.4	1,196	100.0	42.2	34.6
Unknown	0	0	0.1	0	0	0.1	0.2
Total	1	100.0	100.0	1,196	100.0	100.0	100.0
Multifamily Loans							**Multi-family Units %**
Low	10	10.0	15.6	53,163	9.4	16.9	19.4
Moderate	34	34.0	34.5	190,005	33.5	33.9	26.9
Middle	18	18.0	19.3	124,360	21.9	19.8	18.9
Upper	38	38.0	30.5	200,400	35.3	29.3	34.4
Unknown	0	0	0.1	0	0	0.1	0.4
Total	100	100.0	100.0	567,928	100.0	100.0	100.0
Total Home Mortgage Loans							**Owner Occupied Units %**
Low	12	4.3	3.2	53,973	7.9	5.0	2.7
Moderate	60	21.4	16.2	203,988	29.8	16.8	16.1
Middle	98	35.0	46.4	163,956	24.0	35.7	46.5
Upper	110	39.3	34.1	262,582	38.4	42.3	34.6
Unknown	0	0	0.1	0	0	0.1	0.2
Total	280	100.0	100.0	684,499	100.0	100.0	100.0
Source: 2021 FFIEC Census Data; 2015 ACS							

	Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography **Assessment Area: MSA 35620 (NY-Newark-JC, NY-NJ-PA)**												
	Bank And Aggregate Loans By Year												**Owner Occupied Units %**
Geographic Income Level	**2022**						**2023**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000's)	$%	$%	#	#%	#%	$(000's)	$%	$%	
Home Purchase Loans													
Low	0	0	3.1	0	0	2.6	4	2.1	3.0	2,541	2.2	2.5	2.6
Moderate	13	11.3	17.6	5,813	7.9	14.0	18	9.6	17.5	8,928	7.7	14.0	16.3
Middle	50	43.5	44.6	28,060	38.2	36.7	49	26.1	43.2	26,027	22.3	35.3	46.0
Upper	50	43.5	34.0	36,896	50.2	45.7	114	60.6	35.6	76,856	65.9	47.4	34.6
Unknown	2	1.7	0.8	2,695	3.7	0.9	3	1.6	0.7	2,191	1.9	0.8	0.6
Total	115	100.0	100.0	73,464	100.0	100.0	188	100.0	100.0	116,543	100.0	100.0	100.0
Refinance Loans													
Low	1	1.3	3.0	600	0.9	2.9	0		3.2	0	0	3.3	2.6
Moderate	15	20.0	17.2	9,778	15.4	14.2	2	10.0	17.8	1,670	13.5	14.4	16.3
Middle	24	32.0	47.8	18,049	28.3	38.0	11	55.0	44.5	5,899	47.6	31.4	46.0
Upper	34	45.3	31.2	33,558	52.7	44.1	7	35.0	34.0	4,823	38.9	50.3	34.6
Unknown	1	1.3	0.8	1,700	2.7	0.8	0	0	0.6	0	0	0.7	0.6
Total	75	100.0	100.0	63,685	100.0	100.0	20	100.0	100.0	12,392	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0	1.6	0	0	1.7	0	0	1.9	0	0	2.2	2.6
Moderate	0	0	13.0	0	0	12.6	0	0	13.6	0	0	14.1	16.3
Middle	0	0	52.0	0	0	42.8	0	0	51.4	0	0	40.7	46.0
Upper	0	0	32.8	0	0	42.1	0	0	32.6	0	0	42.1	34.6
Unknown	0	0	0.5	0	0	0.7	0	0	0.6	0	0	0.9	0.6
Total	0	0	100.0	0	0	100.0	0	0	100.0	0	0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	20	11.0	14.0	113,330	9.7	12.0	4	12.5	15.2	62,045	23.7	19.1	19.3
Moderate	50	27.5	27.5	379,340	32.5	26.7	5	15.6	28.1	10,280	3.9	24.5	24.6
Middle	37	20.3	22.6	230,155	19.7	19.8	11	34.4	23.6	75,027	28.6	21.7	20.7
Upper	69	37.9	33.8	420,968	36.1	39.9	11	34.4	31.6	54,967	21.0	33.6	33.9
Unknown	6	3.3	2.0	22,325	1.9	1.6	1	3.1	1.4	59,750	22.8	1.1	1.5
Total	182	100.0	100.0	1,166,118	100.0	100.0	32	100.0	100.0	262,069	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	21	5.6	3.2	113,930	8.7	4.8	8	3.3	3.1	64,586	16.5	5.2	2.6
Moderate	78	21.0	17.2	394,931	30.3	16.6	25	10.4	16.9	20,878	5.3	15.2	16.3
Middle	111	29.8	45.7	276,264	21.2	32.7	71	29.6	43.4	106,953	27.4	31.3	46.0
Upper	153	41.1	33.1	491,422	37.7	44.8	132	55.0	35.9	136,646	34.9	47.3	34.6
Unknown	9	2.4	0.8	26,720	2.1	1.1	4	1.7	0.7	61,941	15.8	0.9	0.6
Total	372	100.0	100.0	1,303,267	100.0	100.0	240	100.0	100.0	391,004	100.0	100.0	100.0

Source: 2023 FFIEC Census Data; 2020 U.S. Census

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000's)	$%	$%	
Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Assessment Area: MSA 35620 (NY-Newark-JC, NY-NJ-PA)							
Home Purchase Loans							
Low	0	0	2.6	0	0	1.2	28.3
Moderate	5	10.4	14.5	841	2.8	8.2	16.5
Middle	10	20.8	21.8	3,970	13.3	15.2	17.6
Upper	26	54.2	47.6	17,370	58.2	61.1	37.6
Unknown	7	14.6	13.5	7,669	25.7	14.3	0.0
Total	48	100.0	100.0	29,850	100.0	100.0	100.0
Refinance Loans							
Low	5	3.8	3.5	1,255	1.5	1.9	28.3
Moderate	9	6.9	14.1	2,774	3.2	8.5	16.5
Middle	23	17.6	23.9	7,835	9.2	17.7	17.6
Upper	76	58.0	48.0	57,913	67.7	58.6	37.6
Unknown	18	13.7	10.6	15,748	18.4	13.3	0
Total	131	100.0	100.0	85,525	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0	3.8	0	0	2.3	28.3
Moderate	0	0	12.9	0	0	7.7	16.5
Middle	0	0	25.2	0	0	17.4	17.6
Upper	0	0	55.7	0	0	65.8	37.6
Unknown	1	100.0	2.3	1,196	100.0	6.8	0
Total	1	100.0	100.0	1,196	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	5	2.8	3.2	1,255	1.1	1.6	28.3
Moderate	14	7.8	14.0	3,615	3.1	8.2	16.5
Middle	33	18.3	22.8	11,805	10.1	16.1	17.6
Upper	102	56.7	47.9	75,283	64.6	59.8	37.6
Unknown	26	14.4	12.1	24,613	21.1	14.4	0
Total	180	100.0	100.0	116,571	100.0	100.0	100.0

Source: 2021 FFIEC Census Data; 2015 ACS

Multifamily loans are not included in the borrower distribution analysis.

												Families by Family Income %
Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level **Assessment Area: MSA 35620 (NY-Newark-JC, NY-NJ-PA)**												
	Bank And Aggregate Loans By Year											
Borrower Income Level	**2022**					**2023**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000's)	$%	$%	#	#%	#%	$(000's)	$%	$%	%
Home Purchase Loans												
Low	5	4.3	3.2	747	1.0	1.3	3	1.6	2.3	549	0.5	0.9	27.2
Moderate	11	9.6	15.3	3,650	5.0	8.4	6	3.2	11.4	1,610	1.4	5.9	16.5
Middle	11	9.6	21.5	3,926	5.3	14.9	20	10.6	18.9	8,000	6.9	12.4	17.8
Upper	78	67.8	45.5	55,702	75.8	59.4	145	77.1	40.6	98,426	84.5	47.6	38.5
Unknown	10	8.7	14.5	9,439	12.8	16.0	14	7.4	26.8	7,958	6.8	33.2	0
Total	115	100.0	100.0	73,464	100.0	100.0	188	100.0	100.0	116,543	100.0	100.0	100.0
Refinance Loans												
Low	1	1.3	6.9	180	0.3	3.1	0	0	6.4	0	0	2.1	27.2
Moderate	2	2.7	18.0	645	1.0	9.3	4	20.0	13.2	1,273	10.3	5.0	16.5
Middle	8	10.7	22.6	3,371	5.3	14.2	2	10.0	17.2	1,433	11.6	8.0	17.8
Upper	47	62.7	41.4	39,108	61.4	55.0	7	35.0	30.2	6,260	50.5	28.2	38.5
Unknown	17	22.7	11.3	20,381	32.0	18.3	7	35.0	33.0	3,426	27.6	56.6	0
Total	75	100.0	100.0	63,685	100.0	100.0	20	100.0	100.0	12,392	100.0	100.0	100.0
Home Improvement Loans												
Low	0	0	5.3	0	0	3.0	0	0	5.7	0	0	2.5	27.2
Moderate	0	0	15.5	0	0	9.1	0	0	15.5	0	0	7.6	16.5
Middle	0	0	26.9	0	0	19.2	0	0	25.4	0	0	15.5	17.8
Upper	0	0	50.9	0	0	64.0	0	0	48.6	0	0	57.1	38.5
Unknown	0	0	1.4	0	0	4.7	0	0	4.7	0	0	17.3	0
Total	0	0	100.0	0	0	100.0	0	0	100.0	0	0	100.0	100.0
Total Home Mortgage Loans												
Low	6	3.2	4.7	927	0.7	1.9	3	1.4	3.6	549	0.4	1.2	27.2
Moderate	13	6.8	16.0	4,295	3.1	8.4	10	4.8	12.0	2,883	2.2	5.4	16.5
Middle	19	10.0	22.1	7,297	5.3	14.2	22	10.6	18.7	9,433	7.3	10.7	17.8
Upper	125	65.8	44.6	94,810	69.1	58.3	152	73.1	38.2	104,686	81.2	41.6	38.5
Unknown	27	14.2	12.6	29,820	21.7	17.1	21	10.1	27.6	11,384	8.8	41.1	0
Total	190	100.0	100.0	137,149	100.0	100.0	208	100.0	100.0	128,935	100.0	100.0	100.0

Source: 2023 FFIEC Census Data; 2020 U.S. Census

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2021 Small Business Lending By Income Level of Geography						
Assessment Area: MSA 35620 (NY-Newark-JC, NY-NJ-PA)						
Geographic Income Level	**Bank And Aggregate Loans**					**Total Businesses %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000's)	$%	$%	
Low	92	3.0	7.1	14,056	2.5	5.6	6.3
Moderate	678	22.1	20.0	129,516	22.9	16.5	18.4
Middle	1,436	46.8	32.9	269,128	47.5	29.5	32.5
Upper	836	27.3	38.0	148,052	26.1	44.8	40.7
Unknown	25	0.8	1.9	5,568	1.0	3.5	2.1
Tract-Unk	0	0	0.2	0	0	0.1	
Total	3,067	100.0	100.0	566,320	100.0	100.0	100.0

Source: 2021 FFIEC Census Data; 2021 D&B; 2015 ACS

Distribution of 2021 Small Business Lending By Revenue Size of Businesses						
Assessment Area: MSA 35620 (NY-Newark-JC, NY-NJ-PA)						
	Bank And Aggregate Loans					**Total Businesses %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000's)	$%	$%	
By Revenue							
$1 Million or Less	251	8.2	36.0	44,057	7.8	17.4	90.6
Over $1 Million	340	11.1		146,510	25.9		8.6
Revenue Unknown	2,476	80.7		375,753	66.3		0.8
Total	3,067	100.0		566,320	100.0		100.0
By Loan Size							
$100,000 or Less	1,701	55.5	92.5	79,676	14.1	40.2	
$100,001 - $250,000	644	21.0	4.5	106,478	18.8	19.3	
$250,001 - $1 Million	722	23.5	3.0	380,166	67.1	40.5	
Total	3,067	100.0	100.0	566,320	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	197	78.5		15,744	35.7		
$100,001 - $250,000	13	5.2		2,300	5.2		
$250,001 - $1 Million	41	16.3		26,013	59.0		
Total	251	100.0		44,057	100.0		

Source: 2021 FFIEC Census Data; 2021 D&B; 2015 ACS

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography Assessment Area: MSA 35620 (NY-Newark-JC, NY-NJ-PA)												
Geographic Income Level	**Bank And Aggregate Loans By Year**											**Total Businesses %**
	2022						**2023**					
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
Low	43	7.7	7.2	14,938	7.6	6.9	10	2.9	7.6	5,264	3.2	7.0	6.1
Moderate	109	19.4	19.2	33,389	17.0	17.7	84	24.1	19.3	33,049	20.3	17.8	17.1
Middle	289	51.5	34.0	103,490	52.6	30.8	179	51.4	33.7	83,890	51.4	30.9	33.1
Upper	106	18.9	35.8	40,161	20.4	38.8	65	18.7	36.0	35,098	21.5	38.5	39.5
Unknown	14	2.5	3.6	4,655	2.4	5.8	10	2.9	3.3	5,800	3.6	5.7	4.2
Tract-Unk	0	0	0.2	0	0	0.1	0	0	0.2	0	0	0.1	
Total	561	100.0	100.0	196,633	100.0	100.0	348	100.0	100.0	163,101	100.0	100.0	100.0

Source: 2023 FFIEC Census Data; 2023 D&B; 2020 U.S. Census

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses Assessment Area: MSA 35620 (NY-Newark-JC, NY-NJ-PA)												
	Bank And Aggregate Loans By Year											**Total Businesses %**
	2022						**2023**					
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
By Revenue												
$1 Million or Less	181	32.3	48.9	31,511	16.0	31.0	51	14.7	53.3	9,569	5.9	32.7	91.0
Over $1 Million	350	62.4		147,911	75.2		266	76.4		132,344	81.1		8.2
Revenue Unknown	30	5.3		17,211	8.8		31	8.9		21,188	13.0		0.8
Total	561	100.0		196,633	100.0		348	100.0		163,101	100.0		100.0
By Loan Size												
$100,000 or Less	266	47.4	95.7	20,597	10.5	50.7	71	20.4	96.1	5,163	3.2	53.6	
$100,001 - $250,000	43	7.7	2.7	9,332	4.7	16.4	56	16.1	2.5	12,105	7.4	16.7	
$250,001 - $1 Million	252	44.9	1.6	166,704	84.8	32.9	221	63.5	1.4	145,833	89.4	29.7	
Total	561	100.0	100.0	196,633	100.0	100.0	348	100.0	100.0	163,101	100.0	100.0	
By Loan Size and Revenues $1 Million or less												
$100,000 or Less	138	76.2		9,140	29.0		33	64.7		1,917	20.0		
$100,001 - $250,000	9	5.0		1,776	5.6		7	13.7		1,330	13.9		
$250,001 - $1 Million	34	18.8		20,595	65.4		11	21.6		6,322	66.1		
Total	181	100.0		31,511	100.0		51	100.0		9,569	100.0		

Source: 2023 FFIEC Census Data; 2023 D&B; 2020 U.S. Census

APPENDIX C – GLOSSARY

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 metropolitan area/assessment area.

Census tract: A small, relatively permanent statistical subdivision of a county or statistically equivalent entity delineated for data presentation purposes by a local group of census data users or the geographic staff of a regional census center in accordance with Census Bureau guidelines. Designed to be relatively homogeneous units with respect to population characteristics, economic status, and living conditions at the time they are established, census tracts generally contain between 1,000 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries are delineated with the intention of being stable over many decades, so they generally follow relatively permanent visible features. However, they may follow governmental unit boundaries and other invisible features in some instances; the boundary of a state or county (or statistically equivalent entity) is always a census tract boundary.

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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1.0 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-
1.   Low-or moderate-income geographies;
2.   Designated disaster areas; or
3.   Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
     a. Rates of poverty, unemployment, and population loss; or
     b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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.

Distressed or Underserved Non-Metropolitan Middle-Income Area: A middle-income, non-metropolitan geography that is distressed due to economic factors, such as unemployment levels, poverty, or population loss, or is underserved based on population size, density, and dispersion.

Family: A family is a group of two or more people related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and

total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancings of home improvement and home purchase loans.

Household: A household consists of all the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household. The count of households excludes group quarters.

Limited-scope review: Performance is analyzed using only quantitative factors.

Low-income: Individual income that is less than 50% of the area median income, or a median family income that is less than 50%, 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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

Middle-income: Individual income that is at least 80% and less than 120% of the area median income, or a median family income that is at least 80% and less than 120%, in the case of a geography.

Moderate-income: Individual income that is at least 50% and less than 80% of the area median income, or a median family income that is at least 50% and less than 80%, 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 the CRA evaluation. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Small loan(s) to business(es): A loan included in 'loan to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of $1.0 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial 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.

Upper-income: Individual income that is more than 120% of the area median income, or a median family income that is more than 120%, in the case of a geography.