Date of Evaluation: **JUNE 2, 2025**

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Name of Depository Institution: **ASIAN BANK**

Institution's Identification Number: **2785477**

Address: **111 N. 9TH STREETS**

PHILADELPHIA, PENNSYLVANIA

FEDERAL RESERVE BANK OF PHILADELPHIA
TEN INDEPENDENCE MALL
PHILADELPHIA, PENNSYLVANIA 19106

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INSTITUTION'S CRA RATING: SATISFACTORY

This institution is rated **satisfactory**.

The Lending Test is rated **outstanding**.

The Community Development Test is rated **satisfactory**.

Major factors contributing to this rating include:

- The loan-to-deposit ratio is more than reasonable given the bank's size, financial condition, and assessment area credit needs.
- A majority of loans and other lending-related activities are in the bank's assessment area.
- The distribution of borrowers reflects excellent penetration among individuals of different income levels (including low- and moderate-income individuals), and businesses of different sizes.
- The geographic distribution of loans reflects excellent dispersion throughout the bank's assessment area.
- The bank's community development performance demonstrates adequate responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services, considering the bank's capacity and the need for and availability of such opportunities in the bank's assessment areas.

SCOPE OF EXAMINATION

The performance of Asian Bank under the Community Reinvestment Act (CRA) was evaluated using the Interagency Intermediate Small Institution Examination Procedures adopted by the Board of Governors. Performance for intermediate small banks is evaluated under two tests that consider the bank's lending and community development activities. The review period for this evaluation is from January 15, 2019 through June 2, 2025. Asian Bank was rated outstanding at its previous CRA evaluation dated January 14, 2019, using the Interagency Small Institution Examination Procedures.

The lending test includes an analysis of:

- The loan-to-deposit ratio;
- The volume of loans extended inside and outside the bank's assessment area;
- The extent of lending to borrowers of different income levels, including low- and moderate-income borrowers, and businesses of different sizes, including small businesses;
- The geographic distribution of lending within the assessment area, including low- and moderate-income census tracts; and
- The bank's response to CRA-related complaints.

The loan products reviewed include:

- Home purchase, home improvement, and multifamily loans and the refinancing of such loans, collectively titled Home Mortgage Disclosure Act (HMDA) loans[1], reported by the bank in calendar years 2019, 2020, 2021, 2022, and 2023;
- A sample of 125 commercial, including 54 small business loans originated by the bank in the assessment area during calendar years 2019, 2020, 2021, 2022, and 2023.

Loan products were weighted according to loan and dollar volume. Because the bank originated more HMDA loans both by number and dollar volume than small business loans, HMDA loans were given the most weight in determining the bank's overall CRA performance. In total during the evaluation period, Asian Bank made 192 HMDA loans totaling nearly $88 million in the assessment area. Small business loans were given the second highest weight in the analysis. Because the bank is not a CRA reporter, analysis of small business loans was based on a sample of 54 small business loans totaling just under $21 million inside the assessment area.

Asian Bank was a HMDA reporter in 2019 and 2023. In 2020, 2021, and 2022, Asian Bank did not meet the required volume of HMDA loans to be a HMDA reporter. However, the bank collected its HMDA data annually, and the HMDA loans reviewed for this performance evaluation are the complete universe, as opposed to a sample of its lending. The bank's HMDA performance will be compared to the aggregate of all lenders in the bank's assessment area reporting loans pursuant to HMDA.

For purposes of evaluating the geographic distribution of loans by census tract type, census tracts are classified based on the 2015 American Community Survey (ACS) data for loans originated in 2019, 2020, and 2021, and on the basis of the 2020 U.S. Census data for loans made in 2022 and 2023[2]. The distribution of HMDA loans to borrowers of different income levels was analyzed based upon annually-adjusted median family income data for each of those years, made available by the Federal Financial Institutions Examination Council (FFIEC). All other demographic indices and statistics presented throughout this evaluation are based on the 2015 ACS data for 2019, 2020, and 2021, and updated 2020 Census data for 2022 and 2023, unless otherwise noted.

As indicated previously, Asian Bank does not report small business loans for the purposes of the CRA, and therefore, the analysis of the bank's small business lending in based on a statistical sample of 125 commercial loans originated in 2019, 2020, 2021, 2022, and 2023. For small business loans, examiners compared the bank's lending to Dun & Bradstreet data. Dun & Bradstreet collects and publishes data detailing the revenues and locations of local businesses. Because Asian Bank is not a small business reporter, it is not included in the ranking of aggregate lenders who report such loans

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[1] HMDA loans also include other purpose lines of credit, other purpose closed/exempt loans, and loans with purpose "not applicable." However, as Asian Bank did not make any of those loan types during the duration of the evaluation period, they will not be included in any analysis.

[2] In accordance with Federal Financial Institutions Examination Council policy, 2025 ACS data is used to analyze data starting in 2017 through 2021, and 2020 Census data is used to analyze data starting in 2022 and thereafter.

the Philadelphia assessment area. Consequently, the bank's performance was not directly compared to the lending of aggregate small business lenders. Conversely, aggregate lending was considered for contextual purposes only.

The community development test includes an analysis of:

- The number and amount of community development loans;
- The number and amount of qualified investments;
- The extent to which the bank provides community development services; and
- The bank's responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services.

Under the community development test, the bank's level of community development loans, qualified investments and community development services were evaluated during the entire evaluation period, from January 15, 2019 through June 2, 2025. Asian Bank's level of community development activities was considered in the context of local needs and opportunities, as well as the bank's capacity to participate in such activities.

DESCRIPTION OF INSTITUTION

Asian Bank was rated outstanding at its previous CRA evaluation dated January 14, 2019, which used the Interagency Small Institution Examination Procedures.

Asian Bank is state-chartered as a full-service commercial bank headquartered in Philadelphia, Pennsylvania. The institution offers a variety of commercial and consumer banking services, with a focus on small business lending. The bank is wholly-owned by Asian Financial Corporation, also located in Philadelphia. Asian Bank maintains three branch offices: one located in a middle-income census tract in the Chinatown section of Center City Philadelphia, one in a moderate-income census tract in Northeast Philadelphia, and the last one in an upper-income census tract in South Philadelphia[3]. All of the branches operate Monday through Friday, from 9:00 a.m. until 5:00 p.m., and are open from 9:00 a.m. until 3 p.m. on Saturdays.

Asian Bank maintains a website which offers personal and business online banking services, as well as information on branch service hours and bank products. Product brochures and disclosures are offered in both English and Chinese, and branch staff speaks multiple languages, including English, Chinese, Vietnamese, and Korean. The bank places great importance on its ability to deeply understand and service the city's Asian community.

According to the Consolidated Reports of Condition and Income (Call Report), as of December 31, 2024, Asian Bank reported just under $567 million in assets, of which $410 million, or 72%, were loans. On a dollar volume basis, commercial loans, which include commercial mortgages and commercial and industrial loans, were the most significant credit product offered by the bank and

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[3]The South Philadelphia branch was classified as a middle-income census tract using 2015 ACS data, but changed to an upper-income census tract with the 2020 Census.

comprised nearly 76% ($310 million) of the bank's loan portfolio. Residential real estate loans, which include open- and closed-end mortgages and multifamily loans, were the second largest segment of the bank's loan portfolio at $89 million, or 22%, of the bank's loan portfolio.

The composition of the bank's loan portfolio as of December 31, 2024 is presented in the following table[4].

Asian Bank		
LOANS as of 12/31/2024	**$ (000s)**	**%**
Loans Secured by Nonfarm Nonresidential properties (Commercial Mortgages)	300,341	73.2
Commercial and Industrial Loans	10,099	2.5
Secured by Farmland	0	0.0
Secured by Residential Properties (Closed-end)	64,966	15.8
Secured by Residential Properties (Open-end)	5,317	1.3
Secured by Multifamily Residential Properties	19,072	4.6
Construction & Land Development	9,687	2.4
Consumer Loans	50	<0.1
Loans to Finance Agricultural Production & Other Loans to Farmers	0	0.0
Loans to Depository Institutions	0	0.0
States and Political Subdivisions	0	0.0
Other Loans	912	0.2
Other Leases	0	0.0
TOTAL LOANS	**410,444**	**100.0**

Small Business Loans

Schedule RC-C, Part II (Loans to Small Farms and Small Businesses) of the Call Report provides data on the number and dollar amount of commercial loans that were small business loans made in original amounts of $1 million or less. This data is reported biannually, and at the time of the examination, the most recent data available was reported as of December 31, 2024. As seen in the table below, Schedule RC-C, Part II indicates that $107 million (43%) of Asian Bank's commercial loans[5] were designated as small business loans. At the previous CRA evaluation, using the June 30, 2018 Call Report, approximately $99 million of outstanding commercial loans (83%) were designated as small business loans. For the purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less, as detailed in the following table.

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[4] Source: Consolidated Reports of Condition and Income, Schedule RC-C, Part I (Loans and Leases), as of December 31, 2024.

[5] Commercial loans are comprised of loans secured by nonfarm nonresidential properties, along with commercial and industrial loans.

Asian Bank Small Business Loans		
	Amount Outstanding as of 12/31/2024 $ (000s)	%
Loans with original amounts of $100,000 or less	1,591	0.5
Loans with original amounts of $100,001 through $250,000	18,788	6.3
Loans with original amounts of $250,001 to $1 million	107,144	35.7
TOTAL SMALL BUSINESS LOANS	**127,523**	**42.5**
Loans with original amounts of more than $1,000,000	172,818	57.5
TOTAL COMMERCIAL LOANS	**300,341**	**100.0**

The bank's asset size and financial condition indicate that it can effectively meet the credit needs of its assessment areas. There are no legal or other impediments that would hamper the bank's ability to meet community credit needs.

DESCRIPTION OF ASSESSMENT AREA

For purposes of CRA, Asian Bank has designated its assessment area as Philadelphia County, which includes the city of Philadelphia. The assessment area is located within the Philadelphia Metropolitan Division (MD), which is part of the larger Philadelphia-Camden-Wilmington, PA-NJ-DEMD Metropolitan Statistical Area (Philadelphia MSA). The bank's assessment area, which has not changed since the previous CRA evaluation, complies with the requirements of the CRA, and does not arbitrarily exclude low- or moderate-income census tracts.

Examiners analyzed the demographic characteristics of the bank's assessment area as one way to measure loan demand. Demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers, or geography. Rather, demographic data provides context for the bank's performance in the assessment area where it operates. Further, bank management provided information regarding the bank's lending activities, credit demand, and competition.

To supplement economic, demographic and performance data, and to gain a better perspective on credit and community development needs in the assessment area, interviews were conducted with two community representatives during the course of the evaluation. More specifically, discussions were held with two economic development corporations, with one focused on affordable housing and commercial development, and the other focused generally on commercial development.

Both community contacts mentioned the need for additional credit to various entities throughout the assessment area, particularly for small businesses. The need was not just for real estate development, but for operating funding for these organizations. There remains a need for additional affordable housing through Philadelphia, especially for new multifamily projects. One community contact noted a need for financial literacy for small businesses, as they often need training in the technical side of running and documenting a small business. Finally, first-time home-buyer counseling is needed in the assessment area, along with funds for downpayment assistance.

2015 ACS Data

According to 2015 ACS data, the bank's assessment area included 384 census tracts. Of these tracts, 50 (13%) were designated as low-income, 130 (34%) as moderate-income, 88 (23%) as middle-income, and 103 (27%) as upper-income. The bank's assessment area also contained 13 (3%) tracts classified as unknown-income. These tracts mainly consist of the Philadelphia International Airport, the Northeast Philadelphia Airport, Fairmount Park, and the Philadelphia Navy Yard. As of the 2015 ACS update, the assessment area's population measured almost 1.6 million people, with 14% of the population living in low-income census tracts and 36% in moderate-income tracts.

2020 Census Data

According to 2020 Census data, the bank's assessment area grew by 24 census tracts to 408 census tracts in total. There were decreases in the number of low-income and moderate-income census tracts, and increases in the number of upper-income and unknown-income census tracts. The number of middle-income census tracts remained the same. As a result of the 2020 Census, there were 48 low-income census tracts (12%), 121 moderate-income census tracts (30%), 88 middle-income census tracts (just under 22%), 122 upper-income census tracts (30%), and 29 unknown-income census tracts (7%). The locations of the unknown census tracts include those from the 2015 ACS, but also include a few census tracts in northern Philadelphia. The assessment area's population increased moderately to just over 1.6 million people, with 13% of the population living in low-income census tracts and 33% living in moderate-income census tracts.

Maps of the Philadelphia assessment area, of both the 2015 ACS and 2020 Census, are available in Appendix D.

Asian Bank's CRA performance was evaluated in terms of the demographic and business context in which the bank operates. According to the Federal Deposit Insurance Corporation's Deposit Market Share Report as of June 30, 2024, 38 depository institutions operated in Philadelphia County. These institutions maintained 257 branches, holding over $72 billion in deposits in the market. Asian Bank, with its three branches, held over $344 million of those deposits, with a market share of less than 1%. Asian Bank ranked fourteenth overall, as the market was dominated by large nationwide and regional banks. Four banks held almost three-quarters of the deposit market in Philadelphia: Bank of America, N.A. (20%); Wells Fargo Bank, N.A. (19%); PNC Bank, N.A. (18%); and Citizens Bank, N.A. (17%).

As mentioned previously, Asian Bank reports home-mortgage loans pursuant to HMDA, and was compared to the aggregate of all lenders in the market that report real estate loans pursuant to HMDA. This data is reported annually. In 2019, there were 549 HMDA reporters in the assessment area, who originated or purchased a total of 41,628 HMDA loans. Asian Bank ranked one hundred and thirteenth, with less than 1% of the HMDA market. Wells Fargo Bank, N.A. led the market, with almost 9% of the market, followed by the Police and Fire Federal Credit Union (6%), and Citizens Bank, N.A. (5%).

In 2020, there were 575 HMDA reporters in Philadelphia County, who originated or purchased 52,337 home-mortgage loans. As mentioned previously, Asian was not a HMDA reporter in 2020.

As in 2019, Wells Fargo Bank, N.A. led the market with 9% market share, followed by Police and Fire Federal Credit Union (6%), and Quicken Loans, LLC (4%).

In 2021, a total of 600 HMDA reporters originated or purchased 56,258 HMDA loans in the assessment area. Asian Bank did not report HMDA loans in 2021. The Police and Fire Federal Credit Union led the market with just under 6% market share, followed by Rocket Mortgage, LLC (5%), and Wells Fargo Bank, N.A. (5%).

In 2022, 573 HMDA reporters originated or purchased 38,066 HMDA loans. Asian Bank was not a HMDA reporter in 2022, due to insufficient volume. Once again, the Police and Fire Federal Credit Union led the HMDA market with nearly 6% market share. Citizens Bank, N.A. ranked second with 5% of the HMDA market, and Rocket Mortgage, LLC ranked third with 4% market share.

Finally, in 2023, there were 506 HMDA reporters who originated or purchased 26,114 HMDA loans within the assessment area. Asian Bank tied for one hundred and fourth with less than 1% of the Philadelphia market. Data show that the Police and Fire Federal Credit Union was the largest HMDA originator in the assessment area with 7% of the market. Citizens Bank, N.A. ranked second with just under 5% of the market, and Crosscountry Mortgage, LLC ranked third, with 4% of the market.

As Asian Bank is not a CRA small business reporter due to its asset size, it is not included in the ranking of small business lenders operating in the assessment area. Therefore, information on the small business lending market share is presented for context only, instead of for direct comparison. In 2019, 137 small business reporters originated or purchased a total 26,235 small business and small farm loans in the assessment area. American Express, N.B. led the market with nearly 25% of the CRA market, followed by JP Morgan Chase Bank, N.A (12%), and Bank of America (7%).

In 2020, 205 CRA reporters originated or purchased 31,025 small business and small farm loans. American Express, N.B. once again led the market with 16% market share, followed by Citizens Bank, N.A. (8%), and Wells Fargo Bank, N.A. (7%).

In 2021, 181 CRA reporters originated or purchased 37,725 small business and small farm loans. American Express, N.B. led the market with almost 21% market share. JP Morgan Chase Bank, N.A. ranked second with almost 8%, and Bank of America, N.A. ranked third with 7% of the market.

In 2022, 133 reporters originated or purchased 35,246 small business and small farm loans in the assessment area. As in past years, American Express, N.B. led the market with 29% market share. JP Morgan Chase Bank, N.A. ranked second with 11% of the market, and Bank of America, N.A. ranked third with 8% market share.

Finally, in 2023, 120 small business lenders reported a total of 32,014 small business originations and purchases in the assessment area. American Express Bank, N.B. ranked first with 29% of the small business loan market, followed by JPMorgan Chase Bank, N.A. with almost 16%, and Bank of America, N.A. with 8% of the market.

ECONOMIC CHARACTERISTICS

As previously stated, the bank's assessment area is the county of Philadelphia, which includes the city of Philadelphia. According to the November 2024 Moody's Analytics Precis Report ("Moody's") for the entire Philadelphia MD, which is comprised of Philadelphia County and neighboring Delaware County, the area's economy is in a late expansion mode, with payrolls having expanded faster than in other large metropolitan areas in the northeast. However, this growth is starting to cool, and more of the same is expected throughout 2025.

While unemployment rates are currently below 5%, Moody's predicts it will rise to over 5% in the Philadelphia MSA in 2026. Rental properties are more affordable in the Philadelphia MD than in the state of Pennsylvania and the remainder of the country, and this trend is expected to continue, per Moody's. However, development of new multifamily units is expected to decrease in 2025, compared to 2024 and 2023. Development of single-family units is expected to increase over the same time period. Construction jobs are not a significant employer within the Philadelphia MD (less than 3% of all jobs), but these housing development trends may impact overall affordability of housing in Philadelphia.

According to Moody's strengths of the area are established educational institutions, a well-developed port and international airport, and the area serving as a center for healthcare and medical research. These "eds and meds" are the backbone of the Philadelphia economy. Weaknesses of the area include relatively low population growth, high local business taxes, and significant fiscal problems.

The largest private employers in the Philadelphia MD are the University of Pennsylvania & Health System, Thomas Jefferson University & Jefferson Health, the Children's Hospital of Pennsylvania, Temple University Health System, and Comcast Corporation. The following are the leading industries in the market: education and health services, which account for 32% of all jobs in the Philadelphia MD; professional and business services (15%); and government (13%).

Seasonally unadjusted unemployment rates for Philadelphia County, according to the U.S. Department of Labor's Bureau of Labor Statistics, are presented in the following table. Unemployment rates in Philadelphia County, the Commonwealth, and the country as whole, increased dramatically in 2020 due to the Covid pandemic, and then decreased throughout the remainder of the evaluation period. However, the unemployment rates for Philadelphia County have remained higher than the state of Pennsylvania and nation as a whole throughout the evaluation period.

Asian Bank Philadelphia, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)					
Geographical Area	**2019**	**2020**	**2021**	**2022**	**2023**
Philadelphia County	5.1%	11.4%	7.8%	4.9%	4.3%
Pennsylvania	4.3%	8.8%	5.9%	4.1%	3.7%
United States	3.7%	8.1%	5.3%	3.6%	3.6%

*Unemployment data is from the Bureau of Labor Statistics (BLS)

HOUSING

2015 ACS Data

According to the 2015 ACS data, the Philadelphia assessment area contained 670,229 housing units, of which 46% were owner-occupied, 41% were rental, and 13% were vacant. The overall owner-occupancy rate in the assessment area (46%) was below that in the Commonwealth of Pennsylvania (61%).

The distribution of owner-occupied housing throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such census tracts. According to the 2015 ACS, of the 305,884 owner-occupied housing units in the Philadelphia, PA assessment area, 10% were located in the assessment area's low-income census tracts, and 32% were in moderate-income census tracts. The majority of owner-occupied units were located in middle-income (28%) and upper-income tracts (30%).

According to the 2015 ACS, of the total existing housing units, almost 67% were single-family units, while 15% were two-to-four family units, 18% were multifamily units (five or more units), and less than 1% were mobile homes. The median age of housing stock in the assessment area was 61 years, compared to 54 years in the Commonwealth of Pennsylvania.

Data shows that the price of housing in the assessment area was more affordable than in the Commonwealth overall. The median housing value in the assessment area was $145,347, which was lower than the median housing value for the Commonwealth overall ($166,000). The median housing values in the assessment area's low- and moderate-income census tracts ($70,729 and $95,337) were significantly lower than the median housing value in middle- and upper-income census tracts ($153,164 and $242,142, respectively).

Finally, median gross rent (rent plus utilities) in the assessment area was higher than the same measure in the Commonwealth as a whole ($922 per month compared to $840, respectively). The percentage of renters paying more than 30% of their income on rent was higher in the Philadelphia assessment area than in the Commonwealth (52% and 46%, respectively). It is noted that this high percentage of renters paying more than 30% of their income on rent makes it a challenge for these individuals to save enough money for a down payment to purchase a home.

2020 Census Data

According to the 2020 Census data, the Philadelphia assessment area contained 689,121 housing units, of which 47% were owner-occupied, 42% were rental, and 11% were vacant. Again, the owner-occupancy rate in the assessment area was less than in the Commonwealth overall (47% and 62%, respectively).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for home-mortgage credit within such census tracts. According to the 2020 Census, of the 323,784 owner-occupied housing units in the assessment area, 10% were located in low-income census tracts, 30% in moderate-income census tracts, 29% were in middle-income census tracts, 30% were in upper-income census tracts, and about 1% were in unknown census tracts.

Of the total housing units in the assessment area, over 66% were single-family units, 14% were two-to-four family units, 19% were multifamily units, and less than 1% were mobile homes. The median age of housing stock in the assessment area remained 61 years old, compared to 57 years throughout the Commonwealth of Pennsylvania.

Again, data show that the cost of housing in the assessment area remains below that in the Commonwealth as a whole. More specifically, the median housing value in the assessment area was $171,623, which was lower than the median housing value for the Commonwealth overall ($187,500). Unsurprisingly, the median housing values in the low- and moderate-income census tracts ($85,510 and $116,158, respectively) were significantly lower than the median housing values in middle- and upper-income census tracts ($177,328 and $289,980, respectively).

Finally, the median gross rents in the assessment area remained higher than the rents in the Commonwealth ($1,084 per month compared to $958 per month). The percentage of renters paying more than 30% of the income on rent was also higher in the Philadelphia assessment area than compared to the entire Commonwealth (48% compared to 43%).

BORROWER INCOME DATA

2015 ACS Data

The percentages of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. According to the 2015 ACS data, of the 309,568 families in the assessment area, 31% were designated as low-income, 18% were designated as moderate-income, 16% were middle-income, and 35% were upper-income. Families living below the poverty level represented 21% of families in the assessment area, which is considerably greater than that of the Commonwealth of Pennsylvania (9%).

2020 Census Data

According to the 2020 Census, of the 330,898 families in the assessment area, 30% were designated as low-income, 17% were moderate-income, 17% were middle-income, and 36% were designated

as upper-income. Further, 18% of families in the assessment area were living below the poverty level, which was much higher than the statewide levels of 8%.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon U.S. Department of Housing and Urban Development (HUD) annually-adjusted median family income data made available by the FFIEC for the Philadelphia, PA MD. Median family incomes for 2019 through 2023 are listed in the table below, and are categorized by the dollar amounts recognized as low-, moderate, middle-, and upper-income.

Year	HUD-Adjusted Median Family Income	Low-Income (less than 50%)	Moderate-Income (50% - less than 80%)	Middle-Income (80% - less than 120%)	Upper-Income (120% or Greater)
2019	$62,800	Less than $31,400	$31,400 - $50,239	$50,240 - $75,359	$75,360 or more
2020	$71,100	Less than $35,550	$35,550 - $56,879	$56,880 - $85,319	$85,320 or more
2021	$67,500	Less than $33,750	$33,750 – 53,999	$54,000 - $80,999	$81,000 or more
2022	$75,000	Less than $37,500	$37,500 - $59,999	$60,000 - $89,999	$90,000 or more
2023	$83,100	Less than $41,550	$41,550 - $66,479	$66,480 - $99,719	$99,720 or more

GEOGRAPHIC BUSINESS DATA

The percentage of businesses located with designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. Dun & Bradstreet reports business demographics annually. According to Dun & Bradstreet data, in 2019 there were 57,313 businesses in the assessment area. Of these businesses, 10% were located in low-income census tracts, 33% were in moderate-income census tracts, 25% were in middle-income census tracts, 31% were in upper-income census tracts, and 1% were in unknown-income census tracts. Business demographics show that of the 57,313 businesses in the assessment area, 95% were small businesses with gross annual revenues of $1 million or less.

In 2020, there were 60,604 businesses in the assessment area, per Dun & Bradstreet business demographics. Of these businesses, 9% were located in low-income census tracts, 27% were in moderate-income census tracts, 21% were in middle-income census tracts, 41% were in upper-income census tracts, and 2% were in unknown-income census tracts. Of the total businesses, 93% of the businesses were classified as small businesses with gross annual revenues of $1 million or less.

In 2021, there were 62,750 businesses in the assessment area. Of these businesses, 9% were located in low-income census tracts, 28% were in moderate-income census tracts, 21% were in middle-income census tracts, 40% were in upper-income census tracts, and 2% were in unknown-income census tracts. Like the previous year, 93% of businesses were classified as small businesses.

In 2022, there were 64,009 businesses in the assessment area, per Dun & Bradstreet business demographics. Of these businesses, 9% were located in low-income census tracts, 25% were in moderate-income census tracts, 21% were in middle-income census tracts, 41% were in upper-income census tracts, and 4% were in unknown-income census tracts. Once again, 93% of the businesses were classified as small businesses.

Finally, in 2023, there were 65,940 businesses in the assessment area. Similar to the previous year, of these businesses, 9% were located in low-income census tracts, 25% were in moderate-income census tracts, 21% were in middle-income census tracts, 41% were in upper-income census tracts, and 4% were in unknown-income census tracts. 93% of the businesses were classified as small businesses with revenues of $1 million or less.

The demographics used to assess the performance context in which Asian Bank operates are detailed in the tables on the following pages.

Asian Bank Philadelphia, PA Assessment Area Assessment Area Demographics 2019								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	50	13.0	42,212	13.6	19,643	46.5	94,740	30.6
Moderate-income	130	33.9	110,550	35.7	30,051	27.2	55,003	17.8
Middle-income	88	22.9	81,080	26.2	11,221	13.8	51,224	16.5
Upper-income	103	26.8	75,168	24.3	4,102	5.5	108,601	35.1
Unknown-income	13	3.4	558	0.2	120	21.5	0	0.0
Total Assessment Area	**384**	**100.0**	**309,568**	**100.0**	**65,137**	**21.0**	**309,568**	**100.0**
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	87,496	30,730	10.0	35.1	41,162	47.0	15,604	17.8
Moderate-income	239,526	98,055	32.1	40.9	101,531	42.4	39,940	16.7
Middle-income	164,218	86,583	28.3	52.7	60,633	36.9	17,002	10.4
Upper-income	176,419	90,448	29.6	51.3	69,578	39.4	16,393	9.3
Unknown-income	2,570	68	0.0	2.6	2,262	88.0	240	9.3
Total Assessment Area	**670,229**	**305,884**	**100.0**	**45.6**	**275,166**	**41.1**	**89,179**	**13.3**
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	5,794	10.1	5,510	10.1	258	9.5	26	9.6
Moderate-income	19,147	33.4	18,345	33.8	722	26.7	80	29.5
Middle-income	14,169	24.7	13,617	25.1	495	18.3	57	21.0
Upper-income	17,745	31.0	16,501	30.3	1,138	42.1	106	39.1
Unknown-income	458	0.8	363	0.7	93	3.4	2	0.8
Total Assessment Area	**57,313**	**100.0**	**54,336**	**100.0**	**2,706**	**100.0**	**271**	**100.0**
	Percentage of Total Businesses:		**94.8**			**4.7**		**0.5**
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	8	6.9	8	7.0	0	0.0	0	0.0
Moderate-income	32	27.6	32	27.8	0	0.0	0	0.0
Middle-income	32	27.6	31	27.0	1	100.0	0	0.0
Upper-income	44	37.9	44	38.2	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**116**	**100.0**	**115**	**100.0**	**1**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**99.1**			**0.9**		**0.0**

Information based on 2015 ACS Data and 2019 Dun & Bradstreet Information

Asian Bank Philadelphia, PA Assessment Area Assessment Area Demographics 2020							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	50	13.0	42,212	13.6	19,643	46.5	94,740	30.6
Moderate-income	130	33.9	110,550	35.7	30,051	27.2	55,003	17.8
Middle-income	88	22.9	81,080	26.2	11,221	13.8	51,224	16.5
Upper-income	103	26.8	75,168	24.3	4,102	5.5	108,601	35.1
Unknown-income	13	3.4	558	0.2	120	21.5	0	0.0
Total Assessment Area	**384**	**100.0**	**309,568**	**100.0**	**65,137**	**21.0**	**309,568**	**100.0**

	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	87,496	30,730	10.0	35.1	41,162	47.0	15,604	17.8
Moderate-income	239,526	98,055	32.1	40.9	101,531	42.4	39,940	16.7
Middle-income	164,218	86,583	28.3	52.7	60,633	36.9	17,002	10.4
Upper-income	176,419	90,448	29.6	51.3	69,578	39.4	16,393	9.3
Unknown-income	2,570	68	0.0	2.6	2,262	88.0	240	9.3
Total Assessment Area	**670,229**	**305,884**	**100.0**	**45.6**	**275,166**	**41.1**	**89,179**	**13.3**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	5,429	9.0	5,052	9.0	359	8.6	18	5.9
Moderate-income	16,382	27.0	15,528	27.7	769	18.4	85	28.1
Middle-income	12,977	21.4	12,418	22.1	513	12.3	46	15.2
Upper-income	24,525	40.5	22,156	39.5	2,223	53.1	146	48.2
Unknown-income	1,291	2.1	964	1.7	319	7.6	8	2.6
Total Assessment Area	**60,604**	**100.0**	**56,118**	**100.0**	**4,183**	**100.0**	**303**	**100.0**
	Percentage of Total Businesses:		**92.6**		**6.9**			**0.5**

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	8	8.0	7	7.3	1	25.0	0	0.0
Moderate-income	20	20.0	19	19.8	1	25.0	0	0.0
Middle-income	24	24.0	22	22.9	2	50.0	0	0.0
Upper-income	45	45.0	45	46.9	0	0.0	0	0.0
Unknown-income	3	3.0	3	3.1	0	0.0	0	0.0
Total Assessment Area	**100**	**100.0**	**96**	**100.0**	**4**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**96.0**		**4.0**			**0.0**

Information based on 2015 ACS Data and 2020 Dun & Bradstreet Information

Asian Bank Philadelphia, PA Assessment Area Assessment Area Demographics 2021								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	50	13.0	42,212	13.6	19,643	46.5	94,740	30.6
Moderate-income	130	33.9	110,550	35.7	30,051	27.2	55,003	17.8
Middle-income	88	22.9	81,080	26.2	11,221	13.8	51,224	16.5
Upper-income	103	26.8	75,168	24.3	4,102	5.5	108,601	35.1
Unknown-income	13	3.4	558	0.2	120	21.5	0	0.0
Total Assessment Area	**384**	**100.0**	**309,568**	**100.0**	**65,137**	**21.0**	**309,568**	**100.0**

	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	87,496	30,730	10.0	35.1	41,162	47.0	15,604	17.8
Moderate-income	239,526	98,055	32.1	40.9	101,531	42.4	39,940	16.7
Middle-income	164,218	86,583	28.3	52.7	60,633	36.9	17,002	10.4
Upper-income	176,419	90,448	29.6	51.3	69,578	39.4	16,393	9.3
Unknown-income	2,570	68	0.0	2.6	2,262	88.0	240	9.3
Total Assessment Area	**670,229**	**305,884**	**100.0**	**45.6**	**275,166**	**41.1**	**89,179**	**13.3**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	5,732	9.1	5,367	9.2	344	8.5	21	6.5
Moderate-income	17,489	27.9	16,658	28.5	741	18.3	90	28.0
Middle-income	13,457	21.4	12,893	22.1	516	12.7	48	15.0
Upper-income	24,753	39.4	22,458	38.5	2,142	52.8	153	47.7
Unknown-income	1,319	2.2	998	1.7	312	7.7	9	2.8
Total Assessment Area	**62,750**	**100.0**	**58,374**	**100.0**	**4,055**	**100.0**	**321**	**100.0**
	Percentage of Total Businesses:		**93.0**			**6.5**		**0.5**

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	9	8.3	8	7.5	1	50.0	0	0.0
Moderate-income	21	19.3	21	19.6	0	0.0	0	0.0
Middle-income	30	27.5	29	27.1	1	50.0	0	0.0
Upper-income	46	42.2	46	43.0	0	0.0	0	0.0
Unknown-income	3	2.7	3	2.8	0	0.0	0	0.0
Total Assessment Area	**109**	**100.0**	**107**	**100.0**	**2**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**98.2**			**1.8**		**0.0**

Information based on 2015 ACS Data and 2021 Dun & Bradstreet Information

Asian Bank Philadelphia, PA Assessment Area Assessment Area Demographics 2022							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	48	11.8	43,770	13.2	17,693	40.4	99,660	30.1
Moderate-income	121	29.7	109,689	33.1	25,362	23.1	57,015	17.2
Middle-income	88	21.6	88,833	26.8	10,790	12.1	55,609	16.8
Upper-income	122	29.9	82,582	25.0	4,373	5.3	118,614	35.9
Unknown-income	29	7.0	6,024	1.8	2,966	49.2	0	0.0
Total Assessment Area	**408**	**100.0**	**330,898**	**100.0**	**61,184**	**18.5**	**330,898**	**100.0**

	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	86,025	33,341	10.3	38.8	40,189	46.7	12,495	14.5
Moderate-income	218,536	96,317	29.7	44.1	92,628	42.4	29,591	13.5
Middle-income	170,730	93,289	28.8	54.6	63,760	37.3	13,681	8.0
Upper-income	201,142	96,659	29.9	48.1	86,393	43.0	18,090	9.0
Unknown-income	12,688	4,178	1.3	32.9	6,371	50.2	2,139	16.9
Total Assessment Area	**689,121**	**323,784**	**100.0**	**47.0**	**289,341**	**42.0**	**75,996**	**11.0**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	5,870	9.2	5,575	9.3	275	6.8	20	6.1
Moderate-income	15,994	25.0	15,342	25.7	588	14.6	64	19.4
Middle-income	13,366	20.9	12,788	21.4	517	12.8	61	18.5
Upper-income	26,328	41.1	23,890	40.1	2,269	56.3	169	51.2
Unknown-income	2,451	3.8	2,052	3.5	383	9.5	16	4.8
Total Assessment Area	**64,009**	**100.0**	**59,647**	**100.0**	**4,032**	**100.0**	**330**	**100.0**
	Percentage of Total Businesses:		**93.2**		**6.3**		**0.5**	

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	6	4.8	6	4.9	0	0.0	0	0.0
Moderate-income	25	20.2	24	19.7	1	50.0	0	0.0
Middle-income	26	21.0	26	21.3	0	0.0	0	0.0
Upper-income	61	49.2	60	49.2	1	50.0	0	0.0
Unknown-income	6	4.8	6	4.9	0	0.0	0	0.0
Total Assessment Area	**124**	**100.0**	**122**	**100.0**	**2**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**98.4**		**1.6**		**0.0**	

Information based on 2020 Census Data and 2022 Dun & Bradstreet Information

Asian Bank Philadelphia, PA Assessment Area Assessment Area Demographics 2023							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	48	11.8	43,770	13.2	17,693	40.4	99,660	30.1
Moderate-income	121	29.7	109,689	33.1	25,362	23.1	57,015	17.2
Middle-income	88	21.6	88,833	26.8	10,790	12.1	55,609	16.8
Upper-income	122	29.9	82,582	25.0	4,373	5.3	118,614	35.9
Unknown-income	29	7.0	6,024	1.9	2,966	49.2	0	0.0
Total Assessment Area	**408**	**100.0**	**330,898**	**100.0**	**61,184**	**18.5**	**330,898**	**100.0**

	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	86,025	33,341	10.3	38.8	40,189	46.7	12,495	14.5
Moderate-income	218,536	96,317	29.7	44.1	92,628	42.4	29,591	13.5
Middle-income	170,730	93,289	28.8	54.6	63,760	37.3	13,681	8.0
Upper-income	201,142	96,659	29.9	48.1	86,393	43.0	18,090	9.0
Unknown-income	12,688	4,178	1.3	32.9	6,371	50.2	2,139	16.9
Total Assessment Area	**689,121**	**323,784**	**100.0**	**47.0**	**289,341**	**42.0**	**75,996**	**11.0**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	6,099	9.2	5,800	9.4	274	6.8	25	7.6
Moderate-income	16,724	25.4	16,075	26.1	585	14.6	64	19.3
Middle-income	13,748	20.8	13,165	21.4	523	13.1	60	18.1
Upper-income	26,903	40.8	24,485	39.7	2,251	56.3	167	50.5
Unknown-income	2,466	3.8	2,083	3.4	368	9.2	15	4.5
Total Assessment Area	**65,940**	**100.0**	**61,608**	**100.0**	**4,001**	**100.0**	**331**	**100.0**
	Percentage of Total Businesses:		**93.4**		**6.1**		**0.5**	

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	7	5.1	7	5.1	0	0.0	0	0.0
Moderate-income	29	21.2	29	21.3	0	0.0	0	0.0
Middle-income	27	19.7	27	19.9	0	0.0	0	0.0
Upper-income	68	49.6	67	49.3	1	100.0	0	0.0
Unknown-income	6	4.4	6	4.4	0	0.0	0	0.0
Total Assessment Area	**137**	**100.0**	**136**	**100.0**	**1**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**99.3**		**0.7**		**0.0**	

Information based on 2020 Census Data and 2023 Dun & Bradstreet Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Performance under the lending test is rated outstanding based on a review of the bank's loan-to deposit ratio, assessment area concentration, borrower and geographic distribution of loans, and response to CRA complaints, as discussed below.

Loan-to-Deposit Ratio

Asian Bank's loan-to-deposit ratio is considered more than reasonable given the bank's size, financial condition, and assessment area credit needs.

A financial institution's loan-to-deposit ratio compares the institution's aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution's lending volume relative to its capacity to lend, and is expressed as an average, derived by adding the quarterly loan-to-deposit ratios for a given period and dividing the total by the number of quarters within that period.

The following table shows Asian Bank's quarterly loan-to-deposit ratio for the 26-quarter period since the previous CRA evaluation.

Asian Bank Historical Loan-to-Deposit Ratios				
As of Date	**Net Loans ($ 000s)**	**Total Deposits ($ 000s)**	**Asian Bank LTD Ratio (%)**	**Peer LTD Ratio (%)**
12/31/2018	167,487	161,075	104.0	81.2
3/31/2019	169,576	163,249	103.9	80.1
6/30/2019	173,867	167,100	104.1	80.5
9/30/2019	177,133	176,551	100.3	80.5
12/31/2019	180,123	186,131	96.8	79.9
3/31/2020	188,481	182,850	103.1	79.2
6/30/2020	195,657	192,046	101.9	77.4
9/30/2020	196,513	209,489	93.8	76.5
12/31/2020	201,162	203,385	98.9	71.8
3/31/2021	227,817	211,836	107.5	68.3
6/30/2021	238,000	221,154	107.6	66.7
9/30/2021	247,447	265,593	93.2	69.4
12/31/2021	256,738	267,205	96.1	67.9
3/31/2022	254,098	269,617	94.2	66.5
6/30/2022	277,935	273,120	101.8	69.3
9/30/2022	306,718	267,435	114.7	71.2
12/31/2022	318,062	326,852	97.3	73.8
3/31/2023	334,496	329,291	101.6	74.5
6/30/2023	345,222	321,377	107.4	76.6
9/30/2023	350,291	320,410	109.3	77.6
12/31/2023	365,824	350,730	104.3	78.0
3/31/2024	368,121	346,211	106.3	77.8
6/30/2024	391,370	344,639	113.6	79.1
9/30/2024	393,516	388,815	101.2	78.6
12/31/2024	405,815	397,798	102.0	78.3
3/31/2025	418,918	433,746	96.6	77.4
Quarterly Loan-to-Deposit Average Since Previous Evaluation			**102.4**	**75.3**

Source: The Uniform Bank Performance Report

During the evaluation period, the bank's loan-to deposit ratio averaged 102%. This ratio is above the peer group ratio[6] of 75%, and above the bank's average ratio at the previous CRA evaluation (98%).

In absolute terms, the bank's loans grew by 150% during the evaluation period, from just over $167 million as of December 31, 2018 to $419 million as of March 31, 2025. During the same time frame, deposits grew by almost 170%, from $161 million as of December 31, 2018 to nearly $434 million as of March 31, 2025. As seen in the table, for many of the quarters reviewed, the bank's loan-to-deposit ratio was above 100%, including during the Covid pandemic, when not all banks made credit as readily available.

Assessment Area Concentration

An analysis was performed to determine the volume of loans extended inside and outside of the bank's assessment area. The analysis consisted of an evaluation of Asian Bank's HMDA loans, and the sample of small business loans. The concentration analysis indicated that a majority of Asian Banks's loans and other lending-related activities were made in the assessment area.

During the evaluation, Asian Bank made 78% of the HMDA loans by number, and 80% of HMDA loans by dollar amount in the bank's assessment area. This performance was slightly below levels at the prior CRA evaluation, when the bank made 83% of HMDA loans by number, and 86% by dollar volume within the assessment area.

Looking at the sample of small business loans, during the evaluation period, 43% of small business loans by number were extended within the bank's assessment area, while 33% of small business loans sampled by dollar amount were extended in the bank's assessment area. Small business performance was notably lower than at the previous evaluation, when 80% of loans by number, and 85% by dollar volume were made within the bank's assessment area.

The table below shows the distribution of lending inside and outside of the bank's assessment area.

Asian Bank Lending Inside and Outside the Assessment Area								
Loan Types	Inside				Outside			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase- Conventional	134	75.3	33,372	70.6	44	24.7	13,891	29.4
Home Improvement	1	100.0	325	100.0	0	0.0	0	0.0
Multifamily Housing	29	82.9	43,361	88.3	6	17.1	5,732	11.7
Refinancing	28	90.3	10,517	79.7	3	9.7	2,681	20.3
Total HMDA Related	**192**	**78.4**	**87,576**	**79.7**	**53**	**21.6**	**22,305**	**20.3**
Small Business	54	43.2	20,977	32.8	71	56.8	42,978	67.2
Total Small Business Related	**54**	**43.2**	**20,977**	**32.8**	**71**	**56.8**	**42,978**	**67.2**
TOTAL LOANS	**246**	**66.5**	**108,553**	**62.4**	**124**	**33.5**	**65,283**	**37.6**

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[6] Asian Bank's current national peer group includes insured commercial banks with assets between $300 million and $1 billion.

Borrower Distribution of Lending[7]

Given the assessment area's demographic and economic characteristics, the borrower distribution of lending, given the products offered, reflects excellent penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses of different sizes, including small businesses.

It is noted that borrower distribution is given more weight than geographic distribution in driving lending performance due to the population and demographics of the assessment area. Further, due to overall loan volumes, HMDA loans are given the most weight in determining the bank's overall borrower distribution, followed by the sample of small business loans.

Home-Mortgage Lending

Asian Bank's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is excellent. Over the evaluation period, Asian Bank originated 192 HMDA loans totaling $87.6 million in its assessment area.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjust median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area are used as proxies to estimate demand for home mortgage credit. Generally, the higher the percentage of low- and moderate-income families in the assessment area, the greater the demand for home-mortgage credit is among low- and moderate-income families and individuals within the assessment area.

As noted previously, according to 2015 ACS data, approximately 31% of the families were designated as low-income, 18% were designated as moderate-income, 16% were middle-income, and 35% were upper-income. Similarly, according to the 2020 Census data, 30% of families were designated as low-income, 17% were moderate-income, 17% were middle-income, and 36% were designated as upper-income. According to available data, just under half of the families in the assessment area (49% using 2015 ACS data, and 47% using 2020 census data) were designated as low- or moderate-income families, indicating a significant need for home-mortgage credit among this segment of the population.

The following tables compare Asian Bank's home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The first table, used to evaluate lending in 2019, 2020 and 2021, relies on 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families. The second table, used to evaluate 2022 and 2023 lending relies on 2020 Census data to estimate demand for home-mortgage credit among low- and moderate-income families. Both tables use updated HMDA data, following the requirements of Regulation C.

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[7]The information used to evaluate lending activity by Asian Bank is detailed in the <u>Loan Distribution Tables</u> contained in the Appendices.

Asian Bank Philadelphia, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level							
		Aggregate Comparison					
Income Level	% Families by Family Income (2015 ACS Data)	2019		2020		2021	
		% Asian Bank Lending	% Aggregate Lending	% Asian Bank Lending	% Aggregate Lending	% Asian Bank Lending	% Aggregate Lending
Low	30.6	38.2	6.7	39.4	5.6	19.6	5.4
Moderate	17.8	11.8	14.1	3.0	13.8	2.0	13.9
Middle	16.5	11.8	19.1	6.1	20.7	3.9	19.8
Upper	35.1	5.9	41.9	3.0	41.6	7.8	41.3
Unknown	0.0	32.3	18.2	48.5	18.3	66.7	19.6
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Asian Bank Philadelphia, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level					
		Aggregate Comparison			
Income Level	% Families by Family Income (2020 Census Data)	2022		2023	
		% Asian Bank Lending	% Aggregate Lending	% Asian Bank Lending	% Aggregate Lending
Low	30.1	19.2	7.8	13.6	7.7
Moderate	17.2	11.5	16.4	9.1	17.2
Middle	16.8	7.7	20.1	0.0	20.2
Upper	35.9	9.6	36.0	22.7	32.1
Unknown	0.0	52.0	19.7	54.6	22.8
Total	100.0	100.0	100.0	100.0	100.0

Lending to Low-Income Borrowers

For the period under review, Asian Bank's lending to low-income borrowers was excellent.

As stated above, in the 2015 ACS data, approximately 31% of the families in the assessment area were low-income. In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration that the home-mortgage credit needs of such individuals and families can be a challenge to address through conventional loan products, presenting a significant obstacle to homeownership. As such, the performance of Asian Bank in lending to low-income borrowers is particularly noteworthy.

2015 ACS Data

Asian Bank's lending in 2019 to low-income borrowers was excellent. The bank made 38% of its HMDA loans (13 loans) to low-income borrowers in its assessment area, which was greater than the aggregate of the other HMDA-reporting lenders, who made 7% of their loans to low-income borrowers. Asian Bank's lending to low-income borrower also exceeded the percentage of low-income families in the assessment area (31%), which serves as a proxy for loan demand. By product type, Asian Bank originated 59% of its home purchase loans, but none of its refinance, home improvement loans, or multifamily loans to low-income borrowers. Aggregate 2019 data show that 7% of home purchase loans, 6% of refinance loans, 9% of home improvement loans, and less than 1% of multifamily loans were made to low-income borrowers.

As explained previously, Asian Bank did not make any other purposes lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" during the evaluation period. These loans are HMDA reportable, but as the bank did not make any, they will not be considered in the borrower distribution analysis.

Asian Bank's lending in 2020 to low-income borrowers was excellent. Asian Bank originated 39% of its HMDA loans (13 loans) to low-income borrowers in its assessment area, which was substantially greater than the aggregate lending of 6%, and the proxy of 31%. The bank originated 44% of its home purchase loans, 50% of its refinance loans, and none of its home improvement or multifamily loans to low-income borrowers. In comparison, aggregate lenders made 9% of their home purchase loans, 4% of their refinance loans, 9% of their home improvement loans, and less than 1% of their multifamily loans to low-income borrowers in 2020.

The bank's lending in 2021 to low-income borrowers was excellent. Asian Bank originated 20% of its HMDA loans (10 loans) to low-income borrowers in its assessment area, which was greater than the aggregate lending of 5%, but below the proxy lending level of 31%. Even though the bank's lending was below the proxy level, home mortgage lending to low-income borrowers was particularly challenging during the pandemic, and should be commended. The bank originated 24% of its home purchase loans, 25% of its refinance loans, and none of its home improvement loans or multifamily loans to low-income borrowers. Aggregate lenders made 6% of their home purchase loans, 4% of its refinance loans, 8% of their home improvement loans, and none of their multifamily loans to low-income borrowers in 2021.

2020 Census Data

Asian Bank's lending in 2022 to low-income borrowers was excellent. Asian Bank originated 19% of its HMDA loans (10 loans) to low-income borrowers in its assessment area, which was greater than the aggregate lending level of 8%, but below the proxy lending level of 30%. As stated above, lending to low-income borrowers was a noted challenge during the pandemic. The bank originated 24% of its home purchase loans, and 17% of its refinance loans to low-income borrowers. The bank did not make any home improvement loans or multifamily loans to low-income borrowers in 2022. Aggregate lenders made 7% of their home purchase loans, 9% of their refinance loans, 9% of its home improvement loans, and none of their multifamily loans to low-income borrowers.

Finally, the bank's lending in 2023 to low-income borrowers was reasonable. Asian Bank originated 14% of its HMDA loans (three loans) to low-income borrowers in its assessment area, which, like the past few years, was above the aggregate lending level of 8%, but below the proxy lending level of 30%. By product type, the bank originated 19% of its home purchase loans to low-income borrowers. The bank did not originate any refinance loans, home improvement loans, or multifamily loans to low-income borrowers in 2023. Aggregate lenders made 7% of their home purchase loans, 9% of their refinance loans, 11% of their home purchase loans, and none of their multifamily loans to low-income borrowers.

Lending to Moderate-Income Borrowers

For the period under review, the bank's lending to moderate-income borrowers was reasonable.

2015 ACS Data

Asian Bank's lending in 2019 to moderate-income borrowers was reasonable. The bank originated 12% of HMDA loans (four loans) to moderate-income borrowers in the assessment area, which was below the aggregate level of 14%, and the proxy of 18% of moderate-income families. By product type, Asian Bank originated 9% of its home purchase loans, 25% of its refinance loans, and 14% of its multifamily loans to moderate-income borrowers. The bank did not originate any home improvement loans to moderate-income borrowers in 2019. By comparison, aggregate lending data shows that 17% of home purchase loans, 12% of refinance loans, 16% of home improvement loans, and no multifamily loans were made to moderate-income borrowers in 2019.

The bank's lending in 2020 to moderate-income borrowers was poor. Only 3% of the bank's HMDA loans (one loan) were to moderate-income borrowers in the assessment area, which was significantly below the aggregate level of 14%, and the proxy of 18% of moderate-income families. The bank's single loan to a moderate-income borrower was a home purchase loan. Aggregate lenders made 20% of home purchase loans, 10% of refinance loans, 17% of home improvement loans, and less than 1% of multifamily loans to moderate-income borrowers in 2020.

Asian Bank's lending in 2021 to moderate-income borrowers was poor. Only 2% of the bank's HMDA loans (one loan) were to moderate-income borrowers in the assessment area, which was below the aggregate of 14%, and the proxy of 18%. The bank's single loan to a moderate-income borrower in 2021 was a home purchase loan. Aggregate lending data shows that 17% of home purchase loans, 11% of refinance loans, 16% of home improvement loans, and no multifamily loans were made to moderate-income borrowers in 2021.

2020 Census Data

Asian Banks's lending in 2022 to moderate-income borrowers was reasonable. The bank originated 12% of HMDA loans (six loans) to moderate-income borrowers in the assessment area, which was below the aggregate lending level of 16%, and the proxy of 17%. Asian Bank originated 6% of its home purchase loans, and 33% of its refinance loans to moderate-income borrowers. The bank did not make any refinance loans or multifamily loans to moderate-income borrowers. It is noteworthy that 52% of the bank's HMDA loans were made to borrowers with "unknown" income, which provides some explanation for the low percentage of loans to moderate-income borrowers. These loans to borrowers with "unknown" income were made to purchase residential rental properties, which helps meet the housing demand of the assessment area. In comparison, aggregate lenders made 17% of home purchase loans, 17% of refinance loans, 18% of home improvement loans, and no multifamily loans to moderate-income borrowers in 2022.

Finally, the bank's lending in 2023 to moderate-income borrowers was reasonable. Asian Bank originated 9% of HMDA loans (two loans) to moderate-income borrowers in the assessments area, which was below the aggregate level and proxy, both of which were 17%. By product, Asian Bank originated 13% of its home purchase loans to moderate-income borrowers, but did not originate any refinance loans, home improvement loans, or multifamily loans to that income classification.

Again, it is noted that almost 55% of the bank's HMDA loans were to borrowers with an "unknown" income, which is one reason that the percentage of loans to moderate-income borrowers was lower than expected. Aggregate lenders made 18% of home purchase loans, 16% of refinance loans, 20% of home purchase loans, less than 1% of multifamily loans to moderate-income borrowers in 2023.

Small Businesses Lending

An analysis of Asian Bank's borrower distribution of small business loans reflects reasonable penetration among business customers of different sizes, including small businesses. For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less. Small business loans are further quantified to identify those loans to businesses with gross annual revenues of $1 million or less, namely small businesses.

The number of businesses operating in the Philadelphia, PA assessment area is used as a proxy to estimate demand for business credit in that assessment area. As stated above, according to Dun & Bradstreet business demographic data, in 2019 there were 57,313 businesses in the assessment area, 54,336 (95%) of which were small businesses. In 2020, there were 60,604 businesses in the assessment area, of which 56,118 (93%) were classified as small businesses. In 2021, there were 62,750 businesses in the assessment area, and like the previous year, 93% of businesses (58,374) were classified as small businesses. In 2022, there were 64,009 businesses in the assessment area, with 59,647 (93%) classified as small businesses. Finally, in 2023, there were 65,940 businesses in the assessment area, of which 61,608 (93%) were classified as small businesses.

As stated previously, because Asian Bank is not a CRA small business reporter, a sample of 54 small business loans originated by the bank during calendar years 2019 through 2023 was used to evaluate small business lending performance.

2015 ACS Data

In 2019, Asian Bank's distribution of loans to businesses reflected reasonable penetration among business customers of different sizes, including small businesses. The bank originated nine small business loans, aggregating $5.6 million within the assessment area in 2019, 78% of which were originated to small businesses. This performance was above the aggregate lending level of 46%, but below the proxy of 95%. Small business loans were further analyzed to determine the extent of loans originated in an amount of $100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses. In 2019, 11% of Asian Bank's small business loans were extended in amounts of $100 thousand or less. Aggregate data indicated that 94% of small business loans made in the assessment area were originated in an amount of $100 thousand or less. It should be noted that Asian Bank's small business lending is often tied to real estate, and real estate is not commonly available for less than $100 thousand within the bank's assessment area. Furthermore, the aggregate lenders include credit card lenders, which is not a product Asian Bank directly offers.

In 2020, Asian Bank's distribution of loans to businesses reflected reasonable penetration among business customers of different sizes, including small businesses. Asian Bank originated seven small business loans, aggregating a half a million dollars within the assessment area. Of these loans, 100% were to small businesses, which was above the aggregate lending level of 40%, and the proxy of 93%. Although the percentage of Asian Bank's lending exceeds the peer and the proxy, due to the relatively low volume of small business loans, a reasonable conclusion was assigned. Further, 86% of Asian Bank's small business loans were extended in amounts of $100 thousand or less, which was comparable to the aggregate level of 87%.

In 2021, Asian Bank's distribution of loans to businesses reflected reasonable penetration among business customers of different sizes, including small businesses. In 2021, Asian Bank originated 13 small business loans, aggregating over $1.1 million dollars within the assessment area. Of these loans, 92% were to small businesses, which was above the aggregate lending level of 44%, and comparable to the proxy of 93%. Of these loans, 85% were extended in amounts of $100 thousand or less, which was below the aggregate level of 92%.

2020 Census Data

In 2022, Asian Bank's distribution of loans to businesses reflected poor penetration among business customers of different sizes, including small businesses. Asian Bank originated 13 small business loans, totaling $9 million within the assessment area. Of these loans, only 23% were to small businesses, which was below the aggregate of 51%, and the proxy of 93%. The remainder of the loans sampled (77%) were to small businesses with "unknown" revenue. None of the small business loans were extended in amounts of $100 thousand or less, which was notably below the aggregate level of 96%. As stated previously, due to the low volumes of small business loans, and the high percentage of loans with "unknown" revenue, it is difficult to determine precisely how well the bank is meeting the credit needs of small businesses within the assessment area.

Finally, in 2023, Asian Bank's distribution of loans to businesses reflected poor penetration among business customers of different sizes, including small businesses. Asian Bank originated 12 small business loans, aggregating $4.7 million within the assessment area. Of these loans, none were to small businesses, and instead all were made to businesses with "unknown" revenue. This performance was below the aggregate level of 54%, and the proxy of 93%. Of the sample of small business loans originated by the bank, 8% of Asian Bank's small business loans were extended in amounts of $100 thousand or less, which was far below the aggregate level of 96%.

Geographic Distribution of Lending

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The overall analysis reflects excellent dispersion throughout the assessment area, including low- and moderate-income tracts. Additionally, an analysis of lending dispersion was conducted and revealed no conspicuous gaps or lapses.

As stated above, geographic distribution of lending is weighted less heavily than borrower distribution of loans, and HMDA lending is weighted more heavily than the CRA small business sample.

Home-Mortgage Lending

Asian Bank's geographic distribution of home-mortgages among geographies of different income levels, including low- and moderate-income census tracts was excellent. As previously noted, the percentage of owner-occupied housing units contained with designated census tracts is used as a proxy to estimate demand for residential mortgage credit within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the higher the demand for home-mortgage credit in the tract.

According to 2015 ACS data, 10% of the owner-occupied housing stock was located in low-income census tracts, and 32% was located in moderate-income census tracts. The majority of owner-occupied units were located in middle-income census tracts (28%), and upper-income census tracts (30%). The total percentage of housing in low- and moderate-income is smaller than the total percentage of housing in middle- and upper-income census tracts (42% to 58%), showing higher demand for housing in the latter group. The 2020 Census data shows a similar trend in housing demand. Again, 10% of owner-occupied housing was located low-income census tracts, and 30% was in moderate-income census tracts. Similar to ACS data, most owner-occupied units were located in middle-income census tracts (29%), and upper-income census tracts (30%), while the remaining 1% was located in unknown-income census tracts.

The following tables present Asian Bank's HMDA lending distribution from 2019 through 2023, in comparison to the applicable owner-occupied housing proxies, and the aggregate lending levels in the assessment area. The first table, used for lending in 2019, 2020 and 2021, relies on 2015 ACS data, while the second table, used for 2022 and 2023 lending, relies on updated 2020 Census data. Both tables contain updated HMDA data, following the requirements of Regulation C.

Asian Bank Philadelphia, PA Assessment Area Geographic Distribution of HMDA Loans							
Income Level	% Owner-Occupied Housing Units (2015 ACS Data)	Aggregate Comparison					
		2019		2020		2021	
		% Asian Bank Lending	% Aggregate Lending	% Asian Bank Lending	% Aggregate Lending	% Asian Bank Lending	% Aggregate Lending
Low	10.0	5.9	6.4	12.1	5.4	7.8	6.3
Moderate	32.1	47.1	30.5	42.4	27.0	49.0	28.2
Middle	28.3	29.4	28.2	27.3	27.5	21.6	28.1
Upper	29.6	17.6	34.8	18.2	40.0	21.6	37.4
Unknown	0.0	0.0	0.1	0.0	0.1	0.0	0.0
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0

		Aggregate Comparison			
Asian Bank Philadelphia, PA Assessment Area Geographic Distribution of HMDA Loans					
Income Level	% Owner-Occupied Housing Units (2020 Census Data)	2022		2023	
		% Asian Bank Lending	% Aggregate Lending	% Asian Bank Lending	% Aggregate Lending
Low	10.3	9.6	8.3	0.0	9.0
Moderate	29.7	21.2	28.5	27.3	30.9
Middle	28.8	40.4	26.8	31.8	26.2
Upper	29.9	26.9	34.9	36.4	32.6
Unknown	1.3	1.9	1.5	4.5	1.3
Total	100.0	100.0	100.0	100.0	100.0

Lending in Low-Income Census Tracts

Asian Bank's overall HMDA lending in low-income tracts was considered reasonable.

2015 ACS Data

Asian Bank's lending in low-income census tracts in 2019 was reasonable. Asian Bank originated 6% of its HMDA loans (two loans) in low-income census tracts in 2019, which matched the aggregate lending level, but was below the proxy of 10%. Categorized by loan product type, Asian Bank made 29% of its multifamily loans in low-income census tracts, but none of its home purchase loans, refinance loans, or home improvement loans in low-income tracts. Aggregate 2019 lending data shows that 7% of home purchase loans, 5% of refinance loans, 7% of home improvement loans, and 13% of multifamily loans were made in low-income census tracts in the assessment area. As noted earlier, the bank did not make any other purpose lines of credit, other purpose closed/exempt loans, or loans with purpose "not applicable" during the evaluation period. As a result, these loan types are not included in the geographic distribution analysis.

The bank's lending in low-income census tracts in 2020 was excellent. Asian Bank originated 12% of its HMDA loans (four loans) in low-income census tracts in 2020, which was greater than the proxy of 10%, and aggregate lending of 5%. By loan type, the bank made 8% of its home purchase loans, 25% of its refinance loans and multifamily loans, and no home improvement loans in low-income census tracts in 2020. For comparison, aggregate 2020 lending data shows that 7% of home purchase loans, 4% of refinance loans, 7% of home improvement loans, and 15% of multifamily loans were in low-income census tracts in the assessment area.

Asian Bank's lending in low-income census tracts in 2021 was reasonable. Asian Bank originated 8% of its HMDA loans (four loans) in low-income census tracts in 2021, which was greater than the aggregate lending level of 6%, but lower than the proxy of 10%. The bank made 5% of its home purchase loans, and 22% of its multifamily loans in low-income census tracts. The bank did not make any refinance loans or home improvement loans in those census tracts in 2021. Aggregate 2021 lending data shows that 8% of home purchase loans, 5% of refinance loans, 8% of home improvement loans, and 12% of multifamily loans were in low-income census tracts in the assessment area.

2020 Census Data

Asian Bank's lending in low-income census tracts in 2022 was excellent. Asian Bank originated 10% of its HMDA loans (five loans) in low-income census tracts in 2022, which matched the proxy, and was greater than the aggregate lending of 8%. The bank made 3% of its home purchase loans, 17% of its refinance loans, 29% of its multifamily loans, and no home improvement loans in low-income geographies. Aggregate 2022 lending data shows that 8% of home purchase loans, 8% of refinance loans, 7% of home improvement loans, and 15% of multifamily loans were in low-income census tracts in the assessment area.

Finally, the bank's lending in low-income census tracts in 2023 was poor. Asian Bank originated none of its HMDA loans in low-income census tracts in 2023, which was below the proxy of 10%, and the aggregate lending of 9%. The bank only made 22 HMDA loans in 2023, which made it a challenge to make loans in all areas in the banks assessment area. Aggregate 2023 lending data shows that 9% of home purchase loans, 10% of refinance loans, 8% of home improvement loans, and 15% of multifamily loans were in low-income census tracts in the assessment area.

Lending in Moderate-Income Census Tracts

Asian Bank's overall HMDA lending in moderate-income tracts was excellent.

2015 ACS Data

Asian Bank's lending in moderate-income census tracts in 2019 was excellent. Asian Bank originated 47% of its HMDA loans (16 loans) in moderate-income census tracts in 2019, which was greater than the proxy of 32%, and the aggregate lending of 31%. By product type, the bank made 50% of its home purchase loans, 75% of its refinance loans, 29% of its multifamily loans, and no home improvement loans in moderate-income census tracts. 2019 aggregate lending data shows that 33% of home purchase loans, 26% of refinance loans, 29% of home improvement loans, and 41% of multifamily loans were in moderate-income census tracts in the assessment area.

The bank's lending in moderate-income census tracts in 2020 was excellent. Asian Bank originated 42% of its HMDA loans (14 loans) in moderate-income census tracts in 2020, which was greater than the proxy of 32%, and the aggregate lending of 27%. The bank made 48% of its home purchase loans, 25% of its refinance loans and multifamily loans, and no home improvement loans in moderate-income census tracts. In comparison, 2020 aggregate lending data shows that 32% of home purchase loans, 22% of refinance loans, 27% of home improvement loans, and 35% of multifamily loans were in moderate-income census tracts in the assessment area.

As in 2019 and 2020, Asian Bank's lending in moderate-income census tracts in 2021 was excellent. Asian Bank originated 49% of its HMDA loans (25 loans) in moderate-income census tracts in 2021, which was greater than the proxy of 32%, and the aggregate lending level of 28%. The bank made 53% of its home purchase loans, 75% of its refinance loans, 22% of its multifamily loans, and no home improvement loans in moderate-income census tracts. 2021 aggregate lending shows that 31% of home purchase loans, 25% of refinance loans, 29% of home improvement loans, and 42% of multifamily loans were in moderate-income census tracts in the assessment area.

2020 Census Data

The bank's lending in moderate-income census tracts in 2022 was reasonable. Asian Bank originated 21% of its HMDA loans (11 loans) in moderate-income census tracts in 2022, which was less than the proxy of 30%, and the aggregate lending level of 29%. By product, the bank made 21% of its home purchase loans, 33% of its refinance loans, and no home improvement or multifamily loans in moderate-income census tracts. 2022 aggregate lending data shows that 28% of home purchase loans, 30% of refinance loans, 27% of home improvement loans, and 30% of multifamily loans were in moderate-income census tracts in the assessment area.

Finally, Asian Bank's lending in moderate-income census tracts in 2023 was reasonable. Asian Bank originated 27% of its HMDA loans (six loans) in moderate-income census tracts in 2023, which was less than the proxy of 30%, and aggregate lending level of 31%. The bank made 38% of its home purchase loans, but no refinance loans, home improvement loans or multifamily loans in moderate-income census tracts. In comparison, 2023 aggregate lending shows that 31% of home purchase loans, 34% of refinance loans, 29% of home improvement loans, and 29% of multifamily loans were in moderate-income census tracts in the assessment area.

Small Business Lending

The geographic distribution of Asian Bank's small business loans reflects reasonable penetration throughout the assessment area, in the context of the assessment area's demographic and economic characteristics, during the evaluation period.

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for business loans in the tract. Based on 2019 Dun & Bradstreet business demographics, 10% of businesses were located in low-income census tracts, and 33% were in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (25% and 31%, respectively), and one percent of businesses were in unknown-income census tracts. Business demographics shifted slightly in subsequent years, as detailed below.

In 2020, 9% of businesses were located in low-income census tracts, 27% in moderate-income census tracts, 21% in middle-income census tracts, 41% in upper-income census tracts, and 2% in unknown-income census tracts.

In 2021, 9% of assessment area businesses were in low-income census tracts, 28% in moderate-income census tracts, 21% in middle-income census tracts, 40% in upper-income census tracts, and 2% in unknown-income census tracts.

In 2022, 9% of businesses were in low-income census tracts, 25% in moderate-income census tracts, 21% in middle-income census tracts, 41% in upper-income census tracts, and 4% in unknown-income census tracts. Finally, the distribution of businesses in 2023 was the same as in 2022.

The tables below present the geographic distribution of Asian Bank's sample of small business loans in comparison to the applicable business proxies and the aggregate lending levels for 2019, 2020, 2021, 2022, and 2023.

		Aggregate Comparison	
Asian Bank Philadelphia, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2019 Dun & Bradstreet Data)	2019	
		% Asian Bank Lending	% Aggregate Lending
Low	10.1	11.1	8.7
Moderate	33.4	55.6	25.6
Middle	24.7	11.1	20.4
Upper	31.0	22.2	43.0
Tract Unknown	0.8	0.0	2.3
Total	**100.0**	**100.0**	**100.0**

		Aggregate Comparison	
Asian Bank Philadelphia, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2020 Dun & Bradstreet Data)	2020	
		% Asian Bank Lending	% Aggregate Lending
Low	9.0	0.0	8.6
Moderate	27.0	0.0	24.3
Middle	21.4	57.1	20.5
Upper	40.5	42.9	43.6
Tract Unknown	2.1	0.0	3.0
Total	**100.0**	**100.0**	**100.0**

		Aggregate Comparison	
Asian Bank Philadelphia, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2021 Dun & Bradstreet Data)	2021	
		% Asian Bank Lending	% Aggregate Lending
Low	9.1	7.7	8.7
Moderate	27.9	61.5	29.3
Middle	21.4	23.1	21.2
Upper	39.4	7.7	38.9
Tract Unknown	2.2	0.0	1.9
Total	**100.0**	**100.0**	**100.0**

Asian Bank Philadelphia, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2022 Dun & Bradstreet Data)	Aggregate Comparison	
		2022	
		% Asian Bank Lending	% Aggregate Lending
Low	9.2	0.0	8.4
Moderate	25.0	46.2	26.4
Middle	20.9	23.1	22.3
Upper	41.1	30.7	39.5
Tract Unknown	3.8	0.0	3.4
Total	100.0	100.0	100.0

Asian Bank Philadelphia, PA Assessment Area Geographic Distribution of Small Business Loans			
Census Tract Income Level	% Businesses by Tract Income Level (2023 Dun & Bradstreet Data)	Aggregate Comparison	
		2023	
		% Asian Bank Lending	% Aggregate Lending
Low	9.2	16.7	7.6
Moderate	25.4	33.3	25.5
Middle	20.8	8.3	22.4
Upper	40.8	33.4	41.2
Tract Unknown	3.7	8.3	3.3
Total	100.0	100.0	100.0

Lending in Low-Income Census Tracts

Overall, Asian Bank's small business lending in low-income tracts was reasonable.

2015 ACS Data

In 2019, Asian Bank's small business lending in low-income census tracts was reasonable. Loan analysis for 2019 shows that the bank originated 11% of its small business loans (one loan) in a low-income census tract within the assessment area, compared to the applicable proxy of 10% of businesses in low-income census tracts, and the aggregate lending level of 9% of small business loans by CRA small business reporters in low-income census tracts.

In 2020, Asian Bank's small business lending in low-income census tracts was poor. Of the loan sample for 2020, the bank originated no small business loans in low-income census tracts within its assessment area, compared to the proxy and the aggregate lenders, both of which were 9%.

In 2021, Asian Bank's small business lending in low-income census tracts was reasonable. 8% of Asian Bank's small business lending (one loan) was in a low-income census tract, compared to 9% for both the proxy and aggregate lenders.

2020 Census Data

In 2022, Asian Bank's small business lending in low-income census tracts was poor. Of the loan sample, no small business loans were originated in low-income census tracts in its assessment area, compared to a proxy of 9%, and aggregate lending of 8%.

In 2023, Asian Bank's small business lending in low-income census tracts was reasonable. 17% of Asian Bank's small business lending (two loans) was in low-income census tracts, compared to a proxy of 9%, and aggregate lending of 8%.

Lending in Moderate-Income Census Tracts

Asian Bank's small business lending in moderate-income tracts was reasonable. Although the bank's lending in moderate-income census tracts often exceeded both the proxy and the aggregate lender, the overall volume of the small business lending was relatively low, thereby supporting this conclusion.

2015 ACS Data

In 2019, Asian Bank's small business lending in moderate-income census tracts was reasonable. Of the 2019 small business sample, the bank made 56% of small business loans (five loans) were in moderate-income census tracts in the assessment area, compared to a proxy of 33%, and an aggregate lending level of 26%.

In 2020, Asian Bank's small business lending in moderate-income census tracts was poor. The bank did not originate any small business loans in moderate-income census tracts within the assessment area, compared to the proxy of 27%, and aggregate lending of 24%.

In 2021, Asian Bank's small business lending in moderate-income census tracts was reasonable. Of the loan sample, 62% of small business loans (eight loans) were in moderate-income census tracts in the bank's assessment area, compared to a proxy of 28%, and aggregate lending of 29%.

2020 Census Data

In 2022, Asian Bank's small business lending in moderate-income census tracts was reasonable. 46% of the bank's small business loans (six loans) were in moderate-income census tracts in the assessment area, compared to a proxy of 25%, and aggregate lending of 26%.

Finally, in 2023, Asian Bank's small business lending in moderate-income census tracts was reasonable. 33% of the bank's small business loans (four loans) were located in moderate-income census tracts, compared to a proxy of 25%, and an aggregate lending level of 26%.

Response to CRA-Related Complaints

No CRA complaints were filed with the bank or the Federal Reserve Bank of Philadelphia during the evaluation period, and therefore this component of the lending test was not evaluated.

COMMUNITY DEVELOPMENT TEST

Asian Bank's performance under the community development test is rated satisfactory. The bank's mix of community development loans, qualified investments and community development services, demonstrates adequate responsiveness to the community development needs of the Philadelphia, PA assessment area, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area. As indicated previously, community development activities were reviewed for the entire evaluation period, from January 15, 2019 through June 2, 2025. Furthermore, it is noted that this is the first evaluation for Asian Bank as an Intermediate Small Bank subject to the Community Development Lending Test.

Community Development Loans

During the period evaluated, the bank originated four qualified community development loans, totaling $15.7 million. Two of these loans totaling $15.3 million were for affordable rental housing aimed at low- and moderate-income renters within the bank's assessment area. Because the bank was responsive to, and adequately met the community development needs and opportunities in its assessment area, two additional community development loans in the broader regional area also received consideration. These two additional loans were also for affordable housing, and totaled just over $400 thousand.

Community Development Investments

Asian Bank did not make any qualified community development invests during the evaluation period. However, the bank made seven qualified community development donations, totaling just over $22 thousand in the assessment area during the evaluation period. Of the total, five donations totaling $19 thousand (nearly 87% of donations) were for community development services, and the remaining donation was for economic development, totaling $3 thousand (over 13% of donations). Donations were to various organizations, including a school where the majority of the children received free/reduced lunches, and community development corporations.

Community Development Services

Asian Bank provided community development services in its assessment area. The bank's officers and employees provided technical expertise by serving on the boards of non-profits and providing financial literacy to a variety of groups in the Philadelphia, PA assessment area. Noteworthy examples of the bank's participation with community development organizations include:

- The bank president serves on the board of a non-profit senior center that provides affordable housing for low-income minority seniors in Philadelphia.

- The bank president serves on the finance committee of the Folk Arts- Cultural Treasures charter school, where the majority of its middle-school students of receive free or reduced lunch.

- Two bank staff members provided a total of eleven financial literacy courses for area small businesses. The courses covered business management and planning skills, entrepreneurial readiness, small business banking, and other important related topics.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

Asian Bank is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices, inconsistent with helping to meet community credit needs, was identified.

CRA APPENDICES

CRA APPENDIX A: 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 or assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and its physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language.

(1) Affordable housing (including multifamily rental housing) for low- or moderate-income individuals;
(2) Community services targeted to low- or moderate-income individuals;
(3) 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 million or less; or
(4) Activities that revitalize or stabilize—
   (i) Low-or moderate-income geographies;
   (ii) Designated disaster areas; or
   (iii) 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 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.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other

family, which is further classified into male householder (a family with a male householder and no wife present) or female householder (a family with a female householder and no husband present).

Full-scope review: Performance under the lending, investment, and service tests is analyzed considering performance context, quantitative factors (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 the income of applications, the amount of loan requested, and the disposition of the application (for example, 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 refinancing of home improvement and home purchase loans.

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

Limited-scope review: Performance under the lending, investment, and service tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the 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 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

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

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

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

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

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

Rated area: A rated area is a state or 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 loans 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 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 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

<u>**CRA APPENDIX B: HMDA LOAN DISTRIBUTION TABLES**</u>

2019 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	13	59.1%	1,324	39.9%
Moderate	11	50.0%	1,316	39.7%	2	9.1%	549	16.6%
Middle	8	36.4%	1,352	40.8%	3	13.6%	782	23.6%
Upper	3	13.6%	649	19.6%	2	9.1%	217	6.5%
Unknown	0	0.0%	0	0.0%	2	9.1%	445	13.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**22**	**100.0%**	**3,317**	**100.0%**	**22**	**100.0%**	**3,317**	**100.0%**
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	75.0%	765	70.4%	1	25.0%	323	29.6%
Middle	1	25.0%	323	29.6%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	75.0%	765	70.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**1,088**	**100.0%**	**4**	**100.0%**	**1,088**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	1	100.0%	325	100.0%
Upper	1	100.0%	325	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**325**	**100.0%**	**1**	**100.0%**	**325**	**100.0%**
Multi-Family								
Low	2	28.6%	1,359	26.1%	0	0.0%	0	0.0%
Moderate	2	28.6%	1,358	26.1%	1	14.3%	200	3.8%
Middle	1	14.3%	490	9.4%	0	0.0%	0	0.0%
Upper	2	28.6%	2,000	38.4%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	6	85.7%	5,007	96.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**7**	**100.0%**	**5,207**	**100.0%**	**7**	**100.0%**	**5,207**	**100.0%**
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

CONTINUED- 2019 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	2	5.9%	1,359	13.7%	13	38.2%	1,324	13.3%
Moderate	16	47.1%	3,439	34.6%	4	11.8%	1,072	10.8%
Middle	10	29.4%	2,165	21.8%	4	11.8%	1,107	11.1%
Upper	6	17.6%	2,974	29.9%	2	5.9%	217	2.2%
Unknown	0	0.0%	0	0.0%	11	32.4%	6,217	62.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**34**	**100.0%**	**9,937**	**100.0%**	**34**	**100.0%**	**9,937**	**100.0%**

2020 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	2	8.0%	503	8.7%	11	44.0%	1,405	24.2%
Moderate	12	48.0%	1,746	30.1%	1	4.0%	203	3.5%
Middle	7	28.0%	1,636	28.2%	1	4.0%	220	3.8%
Upper	4	16.0%	1,917	33.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	12	48.0%	3,974	68.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**25**	**100.0%**	**5,801**	**100.0%**	**25**	**100.0%**	**5,801**	**100.0%**
Refinance								
Low	1	25.0%	266	22.1%	2	50.0%	416	34.6%
Moderate	1	25.0%	438	36.3%	0	0.0%	0	0.0%
Middle	1	25.0%	150	12.5%	0	0.0%	0	0.0%
Upper	1	25.0%	350	29.1%	1	25.0%	438	36.3%
Unknown	0	0.0%	0	0.0%	1	25.0%	350	29.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**1,204**	**100.0%**	**4**	**100.0%**	**1,204**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Multi-Family								
Low	1	25.0%	830	12.5%	0	0.0%	0	0.0%
Moderate	1	25.0%	3,300	49.5%	0	0.0%	0	0.0%
Middle	1	25.0%	435	6.5%	1	25.0%	435	6.5%
Upper	1	25.0%	2,100	31.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	75.0%	6,230	93.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**6,665**	**100.0%**	**4**	**100.0%**	**6,665**	**100.0%**
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

CONTINUED- 2020 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	4	12.1%	1,599	11.7%	13	39.4%	1,821	13.3%
Moderate	14	42.4%	5,484	40.1%	1	3.0%	203	1.5%
Middle	9	27.3%	2,221	16.2%	2	6.1%	655	4.8%
Upper	6	18.2%	4,367	31.9%	1	3.0%	438	3.2%
Unknown	0	0.0%	0	0.0%	16	48.5%	10,554	77.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**33**	**100.0%**	**13,670**	**100.0%**	**33**	**100.0%**	**13,670**	**100.0%**

2021 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	2	5.3%	327	2.8%	9	23.7%	1,810	15.3%
Moderate	20	52.6%	5,506	46.5%	1	2.6%	148	1.3%
Middle	7	18.4%	2,020	17.1%	2	5.3%	235	2.0%
Upper	9	23.7%	3,983	33.7%	2	5.3%	1,376	11.6%
Unknown	0	0.0%	0	0.0%	24	63.2%	8,266	69.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**38**	**100.0%**	**11,836**	**100.0%**	**38**	**100.0%**	**11,836**	**100.0%**
Refinance								
Low	0	0.0%	0	0.0%	1	25.0%	95	10.6%
Moderate	3	75.0%	805	89.4%	0	0.0%	0	0.0%
Middle	1	25.0%	95	10.6%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	75.0%	805	89.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**900**	**100.0%**	**4**	**100.0%**	**900**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Multi-Family								
Low	2	22.2%	2,670	27.2%	0	0.0%	0	0.0%
Moderate	2	22.2%	2,977	30.3%	0	0.0%	0	0.0%
Middle	3	33.3%	2,400	24.4%	0	0.0%	0	0.0%
Upper	2	22.2%	1,771	18.0%	2	22.2%	2,670	27.2%
Unknown	0	0.0%	0	0.0%	7	77.8%	7,147	72.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	9,817	100.0%	9	100.0%	9,817	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	4	7.8%	2,997	13.3%	10	19.6%	1,905	8.4%
Moderate	25	49.0%	9,287	41.2%	1	2.0%	148	0.7%
Middle	11	21.6%	4,514	20.0%	2	3.9%	235	1.0%
Upper	11	21.6%	5,755	25.5%	4	7.8%	4,046	17.9%
Unknown	0	0.0%	0	0.0%	34	66.7%	16,218	71.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**51**	**100.0%**	**22,553**	**100.0%**	**51**	**100.0%**	**22,553**	**100.0%**

2022 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	1	3.0%	179	2.0%	8	24.2%	1,432	16.2%
Moderate	7	21.2%	1,835	20.8%	2	6.1%	744	8.4%
Middle	16	48.5%	3,232	36.6%	2	6.1%	426	4.8%
Upper	9	27.3%	3,595	40.7%	3	9.1%	759	8.6%
Unknown	0	0.0%	0	0.0%	18	54.5%	5,480	62.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**33**	**100.0%**	**8,841**	**100.0%**	**33**	**100.0%**	**8,841**	**100.0%**
Refinance								
Low	2	16.7%	390	7.9%	2	16.7%	162	3.3%
Moderate	4	33.3%	1,512	30.8%	4	33.3%	870	17.7%
Middle	3	25.0%	1,434	29.2%	2	16.7%	1,000	20.3%
Upper	2	16.7%	1,130	23.0%	1	8.3%	750	15.3%
Unknown	1	8.3%	450	9.2%	3	25.0%	2,134	43.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**12**	**100.0%**	**4,916**	**100.0%**	**12**	**100.0%**	**4,916**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Multi-Family								
Low	2	28.6%	4,313	22.8%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	28.6%	12,600	66.7%	0	0.0%	0	0.0%
Upper	3	42.9%	1,965	10.4%	1	14.3%	365	1.9%
Unknown	0	0.0%	0	0.0%	6	85.7%	18,513	98.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**7**	**100.0%**	**18,878**	**100.0%**	**7**	**100.0%**	**18,878**	**100.0%**
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

CONTINUED- 2022 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	5	9.6%	4,881	15.0%	10	19.2%	1,594	4.9%
Moderate	11	21.2%	3,347	10.3%	6	11.5%	1,614	4.9%
Middle	21	40.4%	17,266	52.9%	4	7.7%	1,426	4.4%
Upper	14	26.9%	6,690	20.5%	5	9.6%	1,874	5.7%
Unknown	1	1.9%	450	1.4%	27	51.9%	26,127	80.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**52**	**100.0%**	**32,634**	**100.0%**	**52**	**100.0%**	**32,634**	**100.0%**

2023 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	3	18.8%	412	11.5%
Moderate	6	37.5%	1,257	35.1%	2	12.5%	330	9.2%
Middle	5	31.3%	1,154	32.2%	0	0.0%	0	0.0%
Upper	4	25.0%	957	26.8%	3	18.8%	875	24.5%
Unknown	1	6.3%	210	5.9%	8	50.0%	1,961	54.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**16**	**100.0%**	**3,578**	**100.0%**	**16**	**100.0%**	**3,578**	**100.0%**
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	25.0%	155	6.4%	0	0.0%	0	0.0%
Upper	3	75.0%	2,255	93.6%	1	25.0%	995	41.3%
Unknown	0	0.0%	0	0.0%	3	75.0%	1,415	58.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**2,410**	**100.0%**	**4**	**100.0%**	**2,410**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	645	23.1%	0	0.0%	0	0.0%
Upper	1	50.0%	2,150	76.9%	1	50.0%	2,150	76.9%
Unknown	0	0.0%	0	0.0%	1	50.0%	645	23.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**2**	**100.0%**	**2,795**	**100.0%**	**2**	**100.0%**	**2,795**	**100.0%**
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

CONTINUED- 2023 HMDA LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**
HMDA Totals								
Low	0	0.0%	0	0.0%	3	13.6%	412	4.7%
Moderate	6	27.3%	1,257	14.3%	2	9.1%	330	3.8%
Middle	7	31.8%	1,954	22.2%	0	0.0%	0	0.0%
Upper	8	36.4%	5,362	61.1%	5	22.7%	4,020	45.8%
Unknown	1	4.5%	210	2.4%	12	54.5%	4,021	45.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**22**	**100.0%**	**8,783**	**100.0%**	**22**	**100.0%**	**8,783**	**100.0%**

CRA APPENDIX C: SMALL BUSINESS LOAN DISTRIBUTION TABLES

2019 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	1	11.1%	285	5.1%	0	0.0%	0	0.0%
Moderate	5	55.6%	3,896	69.5%	0	0.0%	0	0.0%
Middle	1	11.1%	140	2.5%	0	0.0%	0	0.0%
Upper	2	22.2%	1,283	22.9%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**9**	**100.0%**	**5,603**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	7	77.8%	2,446	43.6%	0	0.0%	0	0.0%
Over $1 Million	2	22.2%	3,158	56.4%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**9**	**100.0%**	**5,603**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	1	11.1%	100	1.8%	0	0.0%	0	0.0%
$100,001 - $250,000	3	33.3%	483	8.6%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	3	33.3%	895	16.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	2	22.2%	4,125	73.6%	0	0.0%	0	0.0%
Total	**9**	**100.0%**	**5,603**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	1	14.3%	100	4.1%	0	0.0%	0	0.0%
$100,001 - $250,000	2	28.6%	326	13.3%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	3	42.9%	895	36.6%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	1	14.3%	1,125	46.0%	0	0.0%	0	0.0%
Total	**7**	**100.0%**	**2,446**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2020 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	4	57.1%	98	19.2%	0	0.0%	0	0.0%
Upper	3	42.9%	411	80.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**7**	**100.0%**	**508**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	7	100.0%	508	100.0%	0	0.0%	0	0.0%
Over $1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**7**	**100.0%**	**508**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	6	85.7%	192	37.7%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	1	14.3%	316	62.3%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**7**	**100.0%**	**508**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	6	85.7%	192	37.7%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	1	14.3%	316	62.3%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**7**	**100.0%**	**508**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2021 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	1	7.7%	18	1.5%	0	0.0%	0	0.0%
Moderate	8	61.5%	530	46.0%	0	0.0%	0	0.0%
Middle	3	23.1%	75	6.5%	0	0.0%	0	0.0%
Upper	1	7.7%	529	45.9%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**1,152**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	12	92.3%	769	66.8%	0	0.0%	0	0.0%
Over $1 Million	1	7.7%	382	33.2%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**1,151**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	11	84.6%	241	20.9%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	2	15.4%	911	79.1%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**1,151**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	11	91.7%	241	31.3%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	1	8.3%	529	68.7%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**12**	**100.0%**	**769**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2022 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	6	46.2%	1,821	20.2%	0	0.0%	0	0.0%
Middle	3	23.1%	910	10.1%	0	0.0%	0	0.0%
Upper	4	30.8%	6,300	69.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**9,030**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	3	23.1%	3,490	38.6%	0	0.0%	0	0.0%
Over $1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	10	76.9%	5,541	61.4%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**9,030**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$100,001 - $250,000	3	23.1%	596	6.6%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	7	53.8%	2,734	30.3%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	3	23.1%	5,700	63.1%	0	0.0%	0	0.0%
Total	**13**	**100.0%**	**9,030**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$100,001 - $250,000	1	33.3%	182	5.2%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	1	33.3%	308	8.8%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	1	33.3%	3,000	86.0%	0	0.0%	0	0.0%
Total	**3**	**100.0%**	**3,490**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2023 SMALL BUSINESS LOAN DISTRIBUTION TABLE (PHILADELPHIA, PA ASSESSMENT AREA)

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	2	16.7%	870	18.6%	0	0.0%	0	0.0%
Moderate	4	33.3%	1,475	31.5%	0	0.0%	0	0.0%
Middle	1	8.3%	280	6.0%	0	0.0%	0	0.0%
Upper	4	33.3%	1,950	41.6%	0	0.0%	0	0.0%
Unknown	1	8.3%	110	2.3%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**12**	**100.0%**	**4,685**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over $1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	12	100.0%	4,685	100.0%	0	0.0%	0	0.0%
Total	**12**	**100.0%**	**4,685**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	1	8.3%	82	1.8%	0	0.0%	0	0.0%
$100,001 - $250,000	4	33.3%	643	13.7%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	7	58.3%	3,960	84.5%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**12**	**100.0%**	**4,685**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$100,001 - $250,000	0	0.0%	0	0.0%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**

CRA APPENDIX D: ASSESSMENT AREA MAPS

PHILADELPHIA, PA ASSESSMENT AREA (2015 ACS DATA)

PHILADELPHIA, PA ASSESSMENT AREA (2020 CENSUS DATA)