

#### **PUBLIC DISCLOSURE**

Date of Evaluation:	<b>DECEMBER 5, 2022</b>	

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Name of Depository Institution:	UNIVEST BANK AND TRUST Co.
Institution's Identification Numbe	er: <u>354310</u>
Address:	14 MAIN STREET
	SOUDERTON, PENNSYLVANIA

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

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

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### INSTITUTION'S CRA RATING

### **INSTITUTION'S CRA RATING: SATISFACTORY**

The following table indicates the performance level of Univest Bank & Trust Company (Univest) with respect to the lending, investment, and service tests.

#### PERFORMANCE TEST RATINGS TABLE

DEDEODMANCE LEVELS	Univest Bank & Trust Co.  PERFORMANCE TESTS						
PERFORMANCE LEVELS							
	Lending Test*	Lending Test* Investment Test Service Test					
Outstanding	Х						
High Satisfactory		X					
Low Satisfactory			X				
Needs to Improve							
Substantial Noncompliance							

<sup>\*</sup>Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

#### **SUMMARY OF MAJOR FACTORS SUPPORTING RATING**

Major factors contributing to this rating include:

- A substantial majority of the bank's loans are made in its assessment area;
- The distribution of borrowers reflects good penetration among retail customers of different income levels and business customers of different sizes;
- The geographic distribution of loans reflects good penetration throughout the assessment area;
- The bank is a leader in making community development loans;
- The bank has made a significant level of qualified community development investments and grants; and
- The bank's delivery systems are reasonably accessible.

### **INSTITUTION**

#### **DESCRIPTION OF INSTITUTION**

Univest was rated satisfactory at its previous CRA evaluation dated January 13, 2020, which used the Interagency Large Institution CRA Examination Procedures.

Univest is a state-chartered, full-service commercial bank headquartered in Souderton, Montgomery County, Pennsylvania. The institution offers a variety of commercial and consumer banking services through 37 branch offices located in Berks, Bucks, Chester, Cumberland, Lancaster, Lehigh, Montgomery, Northampton, Philadelphia and York counties in Pennsylvania, and in Cape May County, New Jersey. Of the bank's branches, one is located in a low-income census tract (3%), and seven are located in moderate-income census tracts (19%). Eighteen branches are located in middle-income tracts (49%), and the remaining 11 are located in upper-income tracts (30%).

Additionally, the bank maintains two loan production offices (LPOs), one in Philadelphia County, PA, and the other in Burlington County, NJ, and three limited-service facility (LSF) locations in Bucks, Lancaster and Lehigh counties, in Pennsylvania. Finally, the bank operates 14 retirement community financial service centers (mobile banking services) located in Bucks, Montgomery, and Philadelphia counties, in Pennsylvania. None of the LPO or LSF locations are located in low-or moderate-income census tracts. Of Univest's retirement community service centers, all are located within the bank's Philadelphia, PA assessment area. None are located in low-income census tracts, while three are situated within moderate-income tracts.

The bank is a wholly-owned subsidiary of Univest Financial Corporation, a financial holding company that as of September 30, 2022, held over \$6.9 billion in assets, and was also located in Souderton, Pennsylvania. Univest offers investment and wealth management, fiduciary and trust services, equipment leasing, and insurance services to individuals, businesses and non-profits through its non-bank subsidiaries: Girard Advisory Services, LLC, Girard Benefits Group, LLC, Girard Pension Services, LLC, Univest Capital, Inc., Univest Insurance, LLC, and Girard Investment Services, LLC.

The table below details the locations of Univest's full-service branches and other locations as of the CRA evaluation date.

Univest Bank and Trust Co. Locations						
Assessment Area	Counties	State	Number of Branches			
Full-Service Branches						
Philadelphia, PA Assessment Area	Bucks, Chester Delaware, Montgomery and Philadelphia	Pennsylvania	26			
Allentown, PA Assessment Area	Lehigh and Northampton	Pennsylvania	2			
Lancaster, PA Assessment Area	Lancaster	Pennsylvania	5			
Reading, PA Assessment Area	Berks	Pennsylvania	1			
Ocean City, NJ Assessment Area	Cape May	New Jersey	1			
Harrisburg-Carlisle, PA Assessment Area	Cumberland and Dauphin	Pennsylvania	1			
York-Hanover, PA Assessment Area	York	Pennsylvania	1			
Total Full-Service Branches			37			
LPOs <sup>1</sup> /LSFs <sup>2</sup>						
Philadelphia, PA Assessment Area	Center City Philadelphia LPO: Philadelphia	Pennsylvania	1			
Camden, NJ Metropolitan Division	Moorestown, NJ LPO: Burlington	New Jersey	1			
Philadelphia, PA Assessment Area	Bucks Regional Center LSF: Bucks	Pennsylvania	1			
Lancaster, PA Assessment Area	Lancaster Regional Center LSF: Lancaster	Pennsylvania	1			
Allentown, PA Assessment Area	Lehigh Valley Regional Center LSF: Pennsylvania		1			
Total LPOs/LSFs			5			
Retirement Community Financial Service Centers <sup>3</sup>						
Philadelphia, PA Assessment Area	Bucks, Montgomery and Philadelphia	Pennsylvania	14			
Total Retirement Community Financial Service Centers			14			

According to the Consolidated Reports of Condition and Income (Call Report), as of September 30, 2022, Univest reported just under \$6.9 billion in assets, of which nearly \$5.9 billion, or 85% were loans.

On a dollar volume basis, commercial loans (comprised of commercial mortgages and commercial and industrial loans) represent the largest segment of the bank's loan portfolio at just under \$3 billion, or 51% of total loans. Residential loans (which include closed-end and open-end loans secured by residential properties, and multifamily loans) represent the second largest segment of the bank's loan portfolio at almost \$1.6 billion, or 27%. The bank's loans secured by farmland and agricultural loans represent the next largest segment of the bank's loan portfolio at \$559 million, or nearly 10%.

The composition of the bank's loan portfolio as of September 30, 2022 is presented in the table below.

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<sup>&</sup>lt;sup>1</sup>The LPOs provide desk space for bank lending sales personnel with limited support staff.

<sup>&</sup>lt;sup>2</sup>Services provided at LSFs include commercial lending sales, mortgage lending sales, and investment and insurance sales with limited support staff.

<sup>&</sup>lt;sup>3</sup>Banking is conducted by mobile banking staff during specified hours of the week. Services provided include the ability to complete deposit and check cashing transactions, perform account opening requests, and accept loan requests.

Univest Bank and Trust Co.					
LOANS as of 09/30/2022	\$ (000s)	%			
Loans Secured by Nonfarm Nonresidential Properties (Commercial Mortgages)	2,016,520	34.4			
Commercial and Industrial Loans	961,344	16.4			
Secured by Farmland	536,985	9.2			
Secured by Residential Properties (Closed-end)	1,113,127	19.0			
Secured by Residential Properties (Open-end)	198,533	3.4			
Secured by Multifamily Residential Properties	268,686	4.6			
Construction & Land Development	329,916	5.6			
Consumer Loans	26,638	0.5			
Loans to Finance Agricultural Production & Other Loans to Farmers	22,033	0.4			
States and Political Subdivisions	187,442	3.2			
Other Loans	1,052	<0.1			
Other Leases	196,070	3.3			
TOTAL LOANS	5,858,346	100.0			

#### **Small Business Loans**

Schedule RC-C, Part II (Loans to Small Businesses and Small Farms) of the Call Report, as of September 30, 2022, indicates that nearly \$405 million (just under 14%) of the bank's outstanding commercial loans<sup>4</sup> were designated as small business loans. At the previous CRA evaluation, Univest's outstanding commercial loan volume was \$2.1 billion, of which nearly \$406 million (19%) was designated as small business loans. For 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.

Univest Bank and Trust Co.					
Small Business Loans					
	Amount Outstanding as of 09/30/2022 \$ (000s)	%			
Loans with original amounts of \$100,000 or less	28,269	0.9%			
Loans with original amounts of \$100,001 through \$250,000	49,570	1.7%			
Loans with original amounts of \$250,001 to \$1 million	326,790	11.0%			
TOTAL SMALL BUSINESS LOANS	404,629	13.6%			
Loans with original amounts of more than \$1,000,000	2,573,235	86.4%			
TOTAL COMMERCIAL LOANS	2,977,864	100.0%			

#### **Small Farm Loans**

Schedule RC-C, Part II of the Call Report, as of September 30, 2022, also indicates that \$143 million or nearly 26% of the bank's outstanding farm loans (\$559 million) were designated as small farm loans. At the previous evaluation, Univest's outstanding farm loan volume was \$287 million, of which \$117 million (41%) was designated as small farm loans.

<sup>&</sup>lt;sup>4</sup>Commercial loans are comprised of loans secured by nonfarm, nonresidential properties, along with commercial and industrial loans.

For purposes of this evaluation, a small farm loan is defined as a loan with an origination amount of \$500 thousand or less which is secured by farmland, used to finance agricultural production, or other loans to farmers, as detailed in the table below.

Univest reported \$143 million in small farm loans outstanding as of the September 30, 2022 Call Report. This represents an increase in small farm loans from the bank's previous CRA evaluation, when small farm loans totaled \$117 million. The vast majority of the bank's farm loan activity can be allocated to the Lancaster, PA assessment area where 85% of the bank's farm loans by number, and 84% by dollar volume were originated, followed by the Philadelphia, PA assessment area where 8% of loans by number, and 10% by dollar volume were originated. Small farm loans were evaluated only in these two assessment areas, as volumes in other areas were too low to yield meaningful conclusions.

Univest Bank and Trust Co. Small Farm Loans					
	Amount Outstanding as of 09/30/2022 \$ (000s)	%			
Loans with original amounts of \$100,000 or less	15,280	2.7%			
Loans with original amounts of \$100,001 through \$250,000	33,742	6.1%			
Loans with original amounts of \$250,001 to \$500,000	94,410	16.9%			
TOTAL SMALL FARM LOANS	143,432	25.7%			
Loans with original amounts of more than \$500,000	415,586	74.3%			
TOTAL FARM LOANS	559,018	100.0%			

The bank's asset size and financial condition indicate that it has the ability to 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.

Univest was rated satisfactory at its previous CRA evaluation performed by the Federal Reserve Bank of Philadelphia dated January 13, 2020. The previous examination was performed using the Interagency Large Institution CRA Examination Procedures adopted by the Board of Governors of the Federal Reserve System (Board of Governors).

#### **DESCRIPTION OF ASSESSMENT AREAS**

For purposes of CRA, Univest has designated seven assessment areas, which are detailed below in the order of the weight assigned in determining the bank's overall CRA rating:

1. The Philadelphia, PA assessment area, which consists of two Metropolitan Divisions (MDs): the Montgomery-Bucks-Chester County, PA MD, which consists of Montgomery, Bucks and Chester counties; and the Philadelphia PA, MD, which consists of Delaware and Philadelphia counties. Both MDs are part of the larger Philadelphia-Camden-Wilmington PA-NJ-DE-MD Metropolitan Statistical Area (MSA).

- 2. The Lancaster, PA assessment area, which consists of Lancaster County, PA, and is coterminous with the Lancaster, PA MSA.
- 3. The Allentown, PA assessment area, which consists of Lehigh and Northampton, PA Counties, located in the larger Allentown-Bethlehem-Easton, PA-NJ MSA.
- 4. The Reading, PA assessment area, which consists of Berks County, PA, and is coterminous with the Reading, PA MSA.
- 5. The Ocean City, NJ assessment area, which consists of Cape May County, NJ, and is coterminous with the Ocean City, NJ MSA.
- 6. The York, PA assessment area, which consists of York County, PA, and is coterminous with the York-Hanover, PA MSA.
- 7. The Harrisburg, PA assessment area, which consists of Cumberland and Dauphin, PA Counties, located in the larger Harrisburg-Carlisle, PA MSA.

The bank's assessment areas were determined to comply with the requirements of the CRA, and do not arbitrarily exclude low-or moderate-income census tracts.

The bank's assessment area has changed since the last examination, with the addition of the York, PA and Harrisburg, PA assessment areas. The bank established one branch location in each of the new assessment areas in early 2021. However, due to the recency of these additions, neither assessment area was evaluated as a part of this CRA examination. Performance in both assessment areas will be evaluated at the next CRA examination.

In addition, since the start of the current examination, the bank added two new assessment areas: Pittsburgh, PA assessment area: Pittsburgh MSA - comprised of Allegheny, Armstrong, Beaver, Butler, Fayette, Westmoreland and Washington Counties; and Baltimore, MD assessment area: Baltimore-Columbia-Towson, MD MSA - comprised of Ann Arundel, Baltimore City, Baltimore County, Carroll, Harford, Howard and Queen Anne's Counties.

Two branch locations have been established in each of the new assessment areas in 2023. Due to the recency of these additions, neither assessment area was evaluated as part of this CRA examination. Performance in each of the bank's new assessment areas will be evaluated at the next CRA examination.

#### **SCOPE OF EXAMINATION**

The current evaluation of Univest's CRA performance covers the period from January 14, 2020, through December 5, 2022, and was conducted using the Interagency Large Institution CRA Examination Procedures adopted by the Board of Governors.

Under the lending test, loan products evaluated included:

- Home purchase, home improvement, and multifamily loans and the refinancing of such loans, open-end lines of credit, closed-end mortgage loans, and loans with purpose "not applicable," collectively titled Home Mortgage Disclosure Act (HMDA) loans, reported by the bank in calendar years 2019, 2020, and 2021<sup>5</sup>;
- Small business loans reported by the bank pursuant to the CRA for calendar years 2019, 2020, and 2021;
- Small farm loans reported by the bank, pursuant to the CRA for calendar years 2019, 2020, and 2021; and
- Other loans that qualified as community development loans during the entire evaluation period from January 14, 2020, through December 5, 2022.

Because the bank originated more HMDA loans, by both number and dollar volume, than small business and small farm loans, HMDA loans were generally given the most weight in determining Univest's overall rating, followed by small business loans, and then small farm loans. In total, within the bank's assessment areas, the bank originated 8,101 HMDA loans totaling almost \$2.1 billion, 7,018 CRA small business loans totaling \$1.2 billion, and 1,659 small farm loans totaling \$248 million within its assessment areas. Though HMDA loans were weighted more heavily than small business and small farm loans in most assessment areas, there was one exception. In the Lancaster, PA assessment area where small farm lending is quite prevalent, HMDA and small farm loans were weighted equally, as their number and dollar volumes were comparable. Additional details on these weighting decisions are contained in the assessment area discussions.

Univest's HMDA, small business loans, and small farm loans were compared to the aggregate of all lenders in the bank's assessment areas that report home-mortgage loans pursuant to HMDA, and small business and small farm loans pursuant to CRA. These data are reported annually.

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<sup>&</sup>lt;sup>5</sup>On January 18, 2018, the Consumer Financial Protection Bureau's (CFPB) amendments to Regulation C became effective. See 80 FR 66128 (Oct. 28, 2015) (1) the types of institutions that are subject to Regulation C (covered institutions); (2) the types of transactions that are subject to Regulation C (covered loans); (3) the types of data that institutions are required to collect, record and report pursuant to Regulation C; and (4) the corresponding processes for reporting and disclosing HMDA data.) The Board of Governors, along with other agencies, amended their regulations implementing the CRA to conform with the CFPB regulation changes. Of note, changes include the "home-mortgage loan" definition in the CRA regulations to mean a "closed-end mortgage loan" or an "open-end line of credit," as those terms are defined in, and that are not excluded transactions under, amended Regulation C. As a result, home improvement loans that are not secured by a dwelling, which were previously required to be reported under Regulation C, are no longer reportable transactions; Home equity lines of credit (HELOCs) secured by a dwelling, which were previously reported at the option of the financial institution under Regulation C, are now covered transactions under HMDA; Also, "home equity loan" was deleted from the CRA definition of "consumer loan" because home equity loans are now included within the CRA definition of "home-mortgage loan." Finally, the CFPB amended the HMDA reporting thresholds. Institutions must report closed-end, dwelling-secured loans if they originate at least 25 in each of the two preceding calendar years, and must report open-end, dwelling-secured lines of credits if they originated at least 200 in each of the two preceding calendar years.

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

For purposes of evaluating the geographic distribution of loans by census tract type, census tracts were classified on the basis of the 2015 American Community Survey (ACS) for loans originated in 2019, 2020 and 2021<sup>6</sup>. The distribution of HMDA loans to borrowers of different income levels was 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 2015 ACS data in 2019, 2020, and 2021, unless otherwise noted.

For small business and small farm loans, examiners used annual Dun & Bradstreet data for comparison in the applicable years. Dun & Bradstreet collects and publishes this self-reported data detailing the revenues and locations of local businesses and farms.

To supplement economic, demographic and performance data, and to gain a better perspective on community credit needs, interviews were conducted with eight community representatives during the course of the evaluation. Discussions were held with three community contacts focused on affordable housing, two involved in economic development, and three community action agencies within the bank's assessment areas. More information about the contacts and the community development and credit needs identified by the contacts is available in the discussions of each assessment area.

For purposes of assessing the bank's overall CRA performance, greatest weight was given to the bank's performance in the Commonwealth of Pennsylvania. In reaching the statewide conclusions within the Commonwealth of Pennsylvania, greatest weight was given to the bank's performance in the Philadelphia, PA assessment area, followed by performance in the Lancaster, PA, Allentown, PA, and Reading, PA assessment areas, as detailed below.

The majority of the bank's operations and lending were in the Philadelphia, PA assessment area, and as a result, this assessment area was given the greatest weight in determining the CRA rating for the Commonwealth of Pennsylvania. Twenty-six of the bank's 37 branches (70%) were located in this assessment area, and these branches generated 89% of the bank's total deposits. From a loan perspective, 71% of the bank's total loans by number and 68% by dollar volume were made within the Philadelphia, PA assessment area. A full-scope review was conducted in the Philadelphia, PA assessment area.

<sup>&</sup>lt;sup>6</sup>In accordance with FFIEC policy, 2015 ACS data is used to analyze data starting in 2017 and thereafter.

The Lancaster, PA assessment area was evaluated using limited-scope review procedures, where performance was compared with that in the full-scope areas in the state to determine if it exceeded, was consistent with, or was below the performance in the full-scope areas. Though a limited-scope review was performed, the second greatest amount of weight was assigned to this assessment area in determining the bank's CRA rating in the Commonwealth, due to the relative importance of the assessment area to the bank's overall operations. During the evaluation period, the bank operated five branches (14%) within the assessment area, and these branches generated 8% of deposits. From a loan standpoint, 20% of total loans by number and 18% by dollar volume were made within the Lancaster, PA assessment area.

The Allentown, PA assessment area was evaluated using full-scope review procedures. Though full-scope procedures were used to evaluate performance in this assessment area, it was given the third highest weight in determining performance in Pennsylvania, given the bank's limited operations in the assessment area. During the evaluation period, the bank operated two branches (5%) within the assessment area, and these branches generated nearly only 1% of deposits. From a loan standpoint, approximately 5% of loans by number and by dollar volume were made within the Allentown, PA assessment area.

The Reading, PA assessment area received a limited-scope review, and was given the least weight in determining performance in the Commonwealth of Pennsylvania. Univest operated one branch (less than 3%) within the assessment area, and this branch generated less than 1% of total deposits. From a loan standpoint, less than 2% of loans by number and dollar volume were made in the Reading, PA assessment area.

Finally, the least amount of weight in determining the overall CRA rating was assigned to performance in the State of New Jersey. In reaching the statewide conclusions for the State of New Jersey, performance was based solely on performance in the Ocean City, NJ assessment area, the bank's only assessment area in the state. Univest operated one branch (less than 3%) in the Ocean City, NJ assessment area, which generated 1% of total deposits, 1% of loans by number, and 3% total loans by dollar volume. The assessment area was reviewed using full-scope review procedures.

As explained previously, the bank's assessment area has changed since the last CRA evaluation, with the addition of the York, PA, and the Harrisburg, PA assessment areas in 2021 and the addition of the Pittsburgh, PA and Baltimore, MD assessment areas in 2023. Due to the recency of these additions, these assessment areas were not evaluated as part of this CRA examination. Performance in each of the bank's new assessment areas will be evaluated at the next CRA examination. However, due to the newness of these assessment areas, not enough time has not passed to meaningfully assess activity in these assessment areas during the current evaluation. Both assessment areas will be reviewed at the next regularly scheduled CRA evaluation.

#### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

#### LENDING TEST

Performance under the lending test is rated outstanding. The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Concentration of lending within assessment areas, including HMDA, small business, and small farm lending;
- Borrower distribution of loans, including the distribution of loans to low- and moderateincome borrowers, and businesses and farms of different sizes, including small businesses and small farms:
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses and small farms;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

#### **Lending Activity**

Overall, Univest's lending levels reflect good responsiveness to the credit needs of its assessment areas in Pennsylvania and New Jersey.

As of September 30, 2022, Univest reported total net loans of \$5.8 billion, or nearly 84% of the bank's total assets. This percentage exceeds the same measure for the bank's peer group<sup>7</sup>, for which total loans represented 67% of total assets. At the previous evaluation conducted as of January 13, 2020, total net loans measured \$4.1 billion and represented 81% of total assets.

The bank's loan-to-deposit ratio averaged 95% over the 13-quarter period ending September 30, 2022, while the peer ratio averaged 80% over the same time frame.

The table below depicts the bank's HMDA, small business and small farm lending activity during the evaluation period.

<sup>&</sup>lt;sup>'</sup>Univest's Uniform Bank Performance Report peer group includes insured commercial banks having assets between \$3 billion and \$10 billion.

Univest Bank and Trust Co. Summary of Lending Activity						
Loan Types	#	%	\$ (000s)	%		
Home Improvement	1,088	5.9%	91,206	2.3%		
Home Purchase	3,399	18.5%	927,022	23.6%		
Multifamily Housing	214	1.2%	215,119	5.5%		
Refinancing	4,088	22.3%	1,117,417	28.4%		
Other Purpose Closed-End	27	0.1%	1,170	0.0%		
Other Purpose LOC	272	1.5%	22,168	0.6%		
Total HMDA related	9,088	49.5%	2,374,102	60.4%		
Total Small Business related	7,533	41.1%	1,297,016	33.0%		
Total Small Farm related	1,728	9.4%	262,182	6.7%		
TOTAL LOANS	18,349	100.0%	3,933,300	100.0%		

#### **Assessment Area Concentration**

An analysis was performed to determine the volume of loans extended inside and outside of the bank's assessment areas. The analysis consisted of an evaluation of Univest's HMDA loans, small business loans, and small farm loans. The assessment area concentration analysis indicated that a substantial majority of loans were made in the bank's assessment areas.

More specifically, during the evaluation period, Univest made 89% of HMDA loans by number, and 87% by dollar amount, in the bank's assessment areas. This percentage of lending was a slight decrease from the previous evaluation, where 91% of the bank's HMDA loans by number, and 89% by dollar amount, were made inside the bank's assessment areas.

With respect to small business loans, 93% of small business loans by number, and 90% by dollar amount, were extended in the bank's assessment areas. Likewise, these levels represent a slight decrease from the previous evaluation when 94% of small business loans by number, and 92% by dollar amount, were made within the bank's assessment areas.

Finally, with respect to small farm loans, 96% of small farm loans by number, and 95% by dollar amount, were extended in the bank's assessment areas. These levels represent an increase from the previous evaluation when 90% of small farm loans by number, and 86% by dollar amount, were made within the bank's assessment areas.

Overall, 91% of the bank's loans by number, and 89% by dollar amount, were made within the assessment areas. This performance is very similar to the performance at the previous CRA evaluation, when 92% of loans by number, and 89% of loans by dollar volume, were made within the bank's assessment areas.

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

Loan Types	Inside			Outside				
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
Home Improvement	1,030	94.7	86,453	94.8	58	5.3	4,754	5.2
Home Purchase – Conventional	2,620	84.6	709,663	82.8	477	15.4	147,437	17.2
Home Purchase - FHA	237	87.1	53,327	88.4	35	12.9	7,010	11.6
Home Purchase - VA	27	90.0	8,949	93.4	3	10.0	637	6.6
Multifamily Housing	200	93.5	192,264	89.4	14	6.5	22,855	10.6
Other Purpose Closed-End	27	100.0	1,170	100.0	0	0.0	0	0.0
Other Purpose LOC	263	96.7	21,251	95.9	9	3.3	917	4.1
Refinancing	3,697	90.4	989,502	88.6	391	9.6	127,915	11.4
Total HMDA related	8,101	89.1	2,062,577	86.9	987	10.9	311,524	13.1
Total Small Business related	7,018	93.2	1,172,188	90.4	515	6.8	124,828	9.6
Total Small Farm related	1,659	96.0	248,208	94.7	69	4.0	13,974	5.3
TOTAL LOANS	16,778	91.4	3,482,973	88.6	1,571	8.6	450,326	11.4

#### **Borrower and Geographic Distribution of Lending**

#### **Home Mortgage Lending**

Overall, the bank's distribution of HMDA loans among borrowers of different income levels, including low- and moderate-income borrowers, is excellent, primarily due to good performance in the Pennsylvania assessment areas, which drove overall CRA performance. More specifically, borrower distribution was excellent in the Philadelphia, PA, assessment area, and good in the Allentown, PA assessment area. Performance in the limited-scope Lancaster, PA and Reading, PA assessment areas was consistent with performance in the full-scope Commonwealth of Pennsylvania assessment areas. In the full-scope Ocean City, NJ assessment area, performance was poor.

The geographic distribution of HMDA loans reflects good penetration throughout the bank's assessment areas, including in low- and moderate-income census tracts, driven largely by performance in the Pennsylvania assessment areas. Performance in the full-scope Philadelphia, PA, and Allentown, PA assessment areas was good. Performance in the limited-scope Lancaster, PA and Reading, PA assessment areas was consistent with performance in the full-scope Commonwealth of Pennsylvania assessment areas. Finally, performance in the full-scope Ocean City, NJ assessment area was good.

#### **Small Business Lending**

Overall, the borrower distribution of small business loans reflects adequate penetration throughout the bank's assessment areas, primarily due to the performance in the Philadelphia, PA assessment area. Performance was poor in the full-scope Pennsylvania assessment areas. Performance was adequate in the full-scope Philadelphia, PA and Allentown, PA assessment areas. in the limited-scope Lancaster, PA assessment area exceeded performance in the full-scope assessment areas, while performance in the Reading, PA assessment area was below performance in the full-scope assessment areas. Due to low loan volumes, small business loans were not evaluated in the Ocean City, NJ assessment area.

The geographic distribution of small business loans reflects good penetration throughout the bank's assessment areas. Performance was good in the full-scope Philadelphia, PA assessment area, and excellent in the full-scope Allentown, PA assessment area. Performance in the limited-scope Lancaster, PA, and Reading, PA assessment areas was below performance in the full-scope Pennsylvania assessment areas. Geographic distribution of small business loans was not analyzed in the full-scope Ocean City, NJ assessment area, due to low loan volume.

#### **Small Farm Lending**

Overall, the borrower distribution of small farm loans reflects good penetration throughout the bank's assessment areas, due to excellent performance in the Philadelphia, PA assessment area and good performance in the limited-scope Lancaster, PA assessment area. Due to low loan volume, small farm loan performance was not analyzed in the Allentown, PA, Reading, PA, or Ocean City, NJ assessment areas.

The geographic distribution of small farm loans reflects excellent penetration throughout the bank's assessment areas. As discussed previously, small farm loans were analyzed in the Philadelphia, PA and Lancaster, PA assessment areas. Performance was excellent in the full-scope Philadelphia, PA assessment area. The geographic distribution of small farm loans was not analyzed in the Lancaster, PA assessment area, due to the demographics of the assessment area. As mentioned earlier, small farm loan performance was not analyzed in the full-scope Allentown, PA, limited-scope, Reading, PA, or full-scope Ocean City, NJ assessment areas due to low or no loan volume in these assessment areas.

### **Responsiveness to Credit Needs**

Overall, Univest exhibits an excellent record of serving the credit needs of low- and moderate-income individuals, and small businesses and small farms. The two primary needs expressed by community contacts were affordable housing and related funding needs and support for first-time homebuyers, and workforce development initiatives.

The bank's retail HMDA lending record shows that home-mortgage loans are being made throughout the assessment areas. It is noteworthy that Univest has taken a lead role in supporting affordable housing initiatives in the assessment area, as the participating lender in the Philadelphia Neighborhood Home Preservation's Restore, Repair, Renew (RRR) program, sponsored jointly by the city of Philadelphia and the Philadelphia Redevelopment Authority. Additionally, Univest addresses revitalization needs through participation in a lending consortium that provides financing for community development projects within its assessment areas. Finally, Univest utilizes other forms of innovative and flexible lending products, as well as community development loans to assist low- and moderate-income borrowers, and small businesses and small farms, as discussed below.

More detail on the bank's responsiveness to credit needs can be found within individual assessment area discussions.

#### **Innovative and Flexible Lending Practices**

In an effort to address the credit needs of low- and moderate-income borrowers, Univest makes extensive use of innovative and flexible lending programs in servicing credit needs in its assessment areas. Univest participates in loan programs for first-time homebuyers through the Federal Housing Administration's (FHA) loan program, the U.S. Department of Veteran's Affairs (VA) loan program, the U.S. Department of Agriculture's (USDA) Rural Development loan program, the Federal National Mortgage Association (Fannie Mae) loan program, the Federal Home Loan Corporation (Freddie Mac) Home Possible program, the Pennsylvania Housing Finance Agency (PHFA) loan program, and the RRR program. Finally, the bank makes grants under the Federal Home Loan Bank (FHLB) of Pittsburgh's First Front Door program. Under this program, FHLB of Pittsburgh matches a qualified homebuyer's contribution for down payment and closing costs, up to a maximum of \$5,000.

In total during the evaluation period, within the bank's five assessment areas, Univest made 254 FHA loans totaling \$58.8 million, 42 VA loans totaling \$13.1 million, 15 USDA loans totaling \$3.5 million, 70 Fannie Mae loans totaling \$14.9 million, four Freddie Mac loans totaling almost \$765 thousand, 125 PHFA loans totaling \$29.1 million, 83 RRR loans totaling nearly \$1.8 million, and 51 First Front Door grants totaling \$253 thousand.

Similarly, to address the credit needs of small businesses in its assessment areas, Univest participates in Small Business Administration (SBA) loan programs, and is a preferred SBA Express Lender. In total, during the evaluation period, Univest made 22 SBA loans totaling \$12.9 million throughout its assessment areas. Further, the bank offers small business loans and lines of credit up to \$100,000 through its proprietary small business loan product, Univest Business Banking Express Loan (UBBX). In total, during the evaluation period, Univest made 433 loans, totaling \$24.0 million.

All special program loans are discussed in more detail by assessment area throughout this Performance Evaluation.

#### **Community Development Lending Activities**

Univest is a leader in making community development loans. During the evaluation period, the bank originated 80 community development loans totaling \$128.3 million within its assessment areas. The number of community development loans and the dollar amount of those loans increased since the previous evaluation period, when the bank made 49 community development loans totaling \$73.8 million.

By dollar amount of community development loans, the bank's lending was highest in the Philadelphia, PA assessment area (nearly \$80.2 million, or 63%), followed by the Allentown, PA assessment area (\$32.4 million, or 25%), the Lancaster, PA assessment area (almost \$9.4 million, or 7%), the Reading, PA assessment area (nearly \$3.9 million, or 3%), and the Ocean City, NJ assessment area (just under \$2.5 million, or less than 2%).

By purpose, 24% of community development loan dollars within the bank's assessment area were for affordable housing activities for low- and moderate-income individuals, 7% provided community development services for low- and moderate-income individuals, 3% provided economic development through the financing of small businesses or farms, and 66% were for activities that revitalized or stabilized low- or moderate-income geographies within the bank's assessment areas.

In addition to community development loans made within its assessment areas, Univest made 20 community development loans totaling \$13.6 million in the greater statewide area, including loans in the York, PA and Harrisburg, PA assessment areas, which the bank added in 2021, but were too new to evaluate at this CRA examination. Because the bank adequately met the community development needs within the evaluated assessment areas, these community development loans also receive consideration.

The bank's lending test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

#### **INVESTMENT TEST**

Performance under the investment test is rated high satisfactory. The investment test was rated high satisfactory in the Philadelphia, PA, and Allentown, PA full-scope assessment areas. Performance in the limited-scope Lancaster, PA assessment area and Reading, PA assessment area was consistent with performance in the full-scope areas in the Commonwealth of Pennsylvania. Finally, the investment test was rated low satisfactory in the Ocean City, NJ full-scope assessment area.

Overall, Univest has a significant level of qualified investments and donations, which exhibit good responsiveness to community development needs. Qualified investments and donations in the bank's assessment areas totaled \$34 million, and have increased significantly from nearly \$23 million at the previous examination.

The majority of investment dollars were made in the Philadelphia, PA assessment area (\$12.9 million or 38%), followed by the Lancaster, PA assessment area (\$7.3 million or 22%), the Allentown, PA assessment area (\$6.6 million or 19%), the Reading, PA assessment area (\$5.3 million or almost 16%), and the Ocean City, NJ assessment area (\$1.9 million or almost 6%) of total investments.

Of the assessment area investments and donations, 93% supported affordable housing for low- and moderate-income individuals, 5% supported community services targeted to low- and moderate-income individuals, just under 2% supported economic development, and less than 1% supported revitalization/stabilization efforts within the assessment areas.

Finally, Univest made a total of nearly \$8.4 million in investments and donations in the broader statewide area, including the York, PA and Harrisburg, PA assessment areas, which the bank added to its assessment areas in 2021, but which were not evaluated at this examination, due to the limited amount of time that the bank operated in these areas. Because the bank adequately met the community development needs of its assessment areas, these donations also receive consideration.

Univest exhibits good responsiveness to the credit and community development needs of its assessment areas. The vast majority of the bank's qualified investments and donations supported affordable housing, a primary need noted by community contacts. Finally, Univest makes significant use of innovative and/or complex investments to support community development initiatives when opportunities exist.

The bank's investment test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

#### **SERVICE TEST**

Performance under the service test is rated low satisfactory.

The service test was rated low satisfactory in the Philadelphia, PA assessment area and high satisfactory in the Allentown, PA full-scope assessment area. Performance in the limited-scope Lancaster, PA and Reading, PA assessment areas was consistent with performance in the full-scope areas in Pennsylvania. In the Ocean City, NJ assessment area, the service test was rated low satisfactory.

Branch delivery systems, as well as alternative delivery systems such as automated teller machines (ATMs), telephone banking, and online banking, are reasonably accessible to all portions of the bank's geographies and individuals of different income levels in its assessment areas. As noted previously, Univest provides retail services through 36 branches in the Commonwealth of Pennsylvania (97%), and one branch (3%) in the Ocean City, NJ assessment area.

By assessment area, branch locations are as follows: 26 branches (70%) are located in the bank's Philadelphia, PA assessment area; five branches (14%) are located in the Lancaster, PA assessment area; two branches (5%) are located in the Allentown, PA assessment area; one branch (3%) is located in the Reading, PA assessment area, and one branch (3%) is located in the Ocean City, NJ assessment area.<sup>8</sup>

Univest's record of opening and closing branches has adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income individuals or areas. Since the previous evaluation, the bank has opened a total of four branches. More specifically, in December 2020, the bank opened a branch in an upper-income area in Berks County (Reading, PA assessment area); in January 2021, a branch was opened in a middle-income tract in York County (York, PA assessment area); in April 2021, a branch was opened in a middle-income tract in Cumberland County (Harrisburg, PA assessment area); and in June 2021, the bank opened a branch in an upper-income tract in Philadelphia County (Philadelphia, PA assessment area).

Further, during the evaluation period, seven branches were closed in the Philadelphia, PA assessment area. Of the seven, one was located in a low-income tract, two were located in moderate-income tracts, two in middle-income tracts, and two in upper-income tracts.

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<sup>&</sup>lt;sup>8</sup>While the scope of the examination covers January 14, 2020 to December 5, 2022 for community development lending activities, retail banking activities are considered through the conclusion of the examination.

Overall, banking services do not vary in a way that inconveniences the institution's constituents, particularly low- and moderate-income consumers in the bank's assessment areas. Generally, hours of operation are reasonable, with the majority of the bank's branches offering extended business hours at least once a week. All branches contain ATMs, and though there is some variation in the presence of drive-up facilities and the offering of Saturday morning hours, the majority of branches offer these services. Differences are discussed in more detail by assessment area.

Finally, Univest provides a relatively high level of community development services in its assessment areas. More specifically, the bank provides a relatively high level of community development services in the full-scope Philadelphia, PA, and Allentown, PA assessment areas. Performance in the limited-scope Lancaster, PA, and Reading, PA assessment areas was consistent with performance in the full-scope Pennsylvania assessment areas. In the full-scope Ocean City, NJ assessment area, the bank provides few, if any community development services in the assessment area.

The bank's service test performance is discussed in more detail by assessment area throughout this Performance Evaluation.

#### FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

Univest 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.

### COMMONWEALTH OF PENNSYLVANIA

#### STATE RATING

Performance Test	Performance Level
Lending	Outstanding
Investment	High Satisfactory
Service	Low Satisfactory
Overall	Satisfactory

#### SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to the rating include the following:

- The distribution of borrowers, given the product lines offered by the bank, reflects good penetration among retail customers, and good penetration among businesses and farms of different sizes;
- The geographic distribution of loans reflects good penetration throughout the Commonwealth of Pennsylvania assessment areas;
- The bank makes extensive use of innovative and/or flexible lending practices;
- The bank is a leader in making CD loans in the Commonwealth of Pennsylvania assessment areas:
- The bank has a significant level of qualified community development investments and grants in the Commonwealth of Pennsylvania;
- The bank exhibits excellent responsiveness to credit and community development needs; and
- The bank provides a relatively high level of community development services.

#### **SCOPE OF EXAMINATION**

Univest's CRA performance in the Commonwealth of Pennsylvania was evaluated for the period from January 14, 2020 through December 5, 2022. The lending, investment, and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans, small business loans, small farm loans, and other loans that qualified as community development loans.

As mentioned previously, examiners completed a full-scope review for the Philadelphia, PA assessment area, as the majority of the bank's operations are in this assessment area, including branches, as well as deposit and lending production.

Examiners also conducted a full-scope review of the Allentown, PA assessment area. Though the Lancaster, PA assessment area had a greater proportion of operations, and was therefore weighted more heavily in determining the statewide rating, a full-scope review was performed in the Allentown, PA assessment area. During the last two performance evaluations, this assessment area was subject to a limited-scope review.

Further, examiners noted that the Allentown, PA assessment area has a larger proportion of lowand moderate-income census tracts when compared to the other two Pennsylvania assessment areas, as well as a larger population, second only to the Philadelphia, PA assessment area in the Commonwealth.

Examiners conducted a limited-scope review in the Lancaster, PA assessment area. From an operations standpoint, the second greatest amount of loans, branches and deposits were from this assessment area. However, because it was reviewed as a full-scope assessment area at the last performance evaluation, a limited-scope review was conducted at this evaluation.

Finally, examiners conducted a limited-scope review in the Reading, PA assessment area. During the last performance evaluation, this assessment area was subject to a limited-scope review. During this evaluation period, Univest established its first branch location in the assessment area.

As mentioned previously, for purposes of assessing Univest's overall CRA performance, more weight was given to the performance in the Commonwealth of Pennsylvania than the State of New Jersey.

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

In the Commonwealth of Pennsylvania, the majority of the bank's business was conducted in the Philadelphia, PA assessment area, and thus it was given the most weight in determining the overall CRA rating in Pennsylvania and was evaluated using full-scope review procedures. In total, 26 of the bank's 37 branches (70%) were located in the Philadelphia, PA assessment area. Similarly, 89% of the bank's deposits were held in the assessment area, while from a loan perspective, 71% of the loans by number, and 68% of loans by dollar volume were made within the Philadelphia, PA assessment area.

The Lancaster, PA assessment area was given the second highest weight in determining the overall state rating in Pennsylvania. This assessment area was evaluated using limited-scope review procedures, as discussed previously. During the evaluation period, Univest operated five branches in the assessment area (14%), and these branches generated 8% of the bank's total deposits. From a loan standpoint, 20% of the bank's loans by number, and 18% by dollar volume were made in the Lancaster, PA assessment area.

The Allentown, PA assessment area was assigned the third greatest weight in determining the state rating, and was evaluated using full-scope review procedures, as indicated previously. Univest operated two branches in the Allentown, PA assessment area (5%), which generated less than 2% of the bank's total deposits. Approximately 5% of loans by number and by dollar volume, were made in the Allentown, PA assessment area.

Finally, the Reading, PA assessment area was given the least amount of weight in determining the overall state rating in Pennsylvania. As indicated previously, it was evaluated using limited-scope review procedures. During the evaluation period, Univest operated one branch in the assessment area (less than 3%), which generated less than 1% of the bank's total deposits. From a lending perspective, just under 2% of the bank's loans by number and by dollar volume were made in the Reading, PA assessment area.

#### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

#### LENDING TEST

Overall, the lending test was determined to be outstanding in the Commonwealth of Pennsylvania, driven by performance in the Philadelphia, PA assessment area, where the majority of the bank's operations are located. The lending test was rated outstanding in the full-scope Philadelphia, PA assessment area, and high satisfactory in the full-scope Allentown, PA assessment area. Using limited-scope review procedures, lending test performance in the Lancaster, PA assessment area was consistent with the performance in the full-scope assessment areas, while performance in the Reading, PA assessment area was below that in the full-scope assessment areas. Primary drivers of the overall lending test rating were the borrower and geographic distribution of loans, the bank's use of innovative and/or flexible lending products, and community development lending. It is noted that borrower distribution was weighted more heavily than geographic distribution, given the demographics of the Pennsylvania assessment areas. More detail on lending test components is provided in the discussions of each Pennsylvania assessment area.

#### **INVESTMENT TEST**

Overall, the investment test was determined to be high satisfactory in the Commonwealth of Pennsylvania. The investment test was rated high satisfactory in the Philadelphia, PA, and in the Allentown, PA assessment areas. In both the Lancaster, PA, and Reading, PA assessment areas, performance was consistent with that of the full-scope assessment areas. The investment test rating was driven by the amount of qualified investments and donations, with additional consideration given to the responsiveness, innovativeness, and complexity of such investments. More detail on the investment test components is provided in the discussions of each Pennsylvania assessment area.

#### SERVICE TEST

Overall, the service test was determined to be low satisfactory in the Commonwealth of Pennsylvania. The service test was rated low satisfactory in the Philadelphia, PA assessment area, and high satisfactory in the Allentown, PA assessment area. In both the Lancaster, PA and Reading, PA assessment areas, performance was consistent with that in the full-scope review Pennsylvania assessment areas. The service test was influenced by retail service aspects, particularly the accessibility of delivery systems and reasonableness of hours and services in serving assessment area needs, as well as the level of community development services provided by the bank in the Commonwealth. More detail on the service test components is provided in the discussions of each Pennsylvania assessment area.

# PHILADELPHIA, PA ASSESSMENT AREA FULL-SCOPE REVIEW

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

#### **Description of Assessment Area**

Univest's Philadelphia, PA assessment area consists of the Montgomery-Bucks-Chester County, PA MD, which consists of these three counties in Pennsylvania, and the Philadelphia, PA MD, which consists of Delaware and Philadelphia counties in Pennsylvania. These two MDs are two of the four MDs that comprise the larger Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA. The assessment area is situated in southeastern Pennsylvania, and had a population of over four million as of the 2015 ACS.

For the purposes of assessing Univest's CRA performance in the Commonwealth of Pennsylvania, and overall, the greatest weight was given to the performance in the Philadelphia, PA assessment area. Of the bank's total loans, 71% by number, and 68% by dollar volume can be attributed to this assessment area. Further, the bank operated 26 of its 37 branches in this assessment area (70% of total branches), which held over \$5 billion, or 89% of the bank's total deposits. Additionally, the bank operates one LPO in Center City Philadelphia, and one LSF in Doylestown, Bucks County. Both are located in upper-income census tracts. Finally, within the Philadelphia, PA assessment area, the bank operates 14 retirement community service centers, three in moderate-income tracts, nine in middle-income tracts, and two in upper-income tracts.

Univest's CRA performance was evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS data, the Philadelphia, PA assessment area consisted of 998 census tracts. Of these 998 tracts, 72 were designated as low-income (7%), 252 were moderate-income (25%), 330 were middle-income (33%), 327 were upper-income (33%) and 17 were unknown-income census tracts (2%).

Of the 72 low-income tracts, 50 were located in Philadelphia County (69%), 10 were in Montgomery County (14%), five were in Chester County (7%), four were in Bucks County (6%), and three were in Delaware County (4%). In total, 7% of the assessment area's population resided in low-income census tracts as of the 2015 ACS.

Of the 252 moderate-income tracts, 130 were located in Philadelphia County (52%), 39 were in Montgomery County (15%), 36 were in Bucks County (14%), 24 were in Chester County (10%), and 23 were in Delaware County (9%). In total, 25% of the assessment area's population resided in moderate-income census tracts as of the 2015 ACS.

A map of the Philadelphia, PA assessment area at the 2015 ACS update is available in Appendix F.

According to the FDIC's Deposit Market Share Report as of June 30, 2022, there were 70 depository institutions operating in the Philadelphia, PA assessment area. These institutions maintained a total of 1,010 branches holding \$171.5 billion in deposits. Univest ranked ninth, with \$5.0 billion, or 3% of the retail deposit market. Wells Fargo Bank, N.A. ranked first, holding 17% of the market, followed by PNC Bank, N.A., with 14% of the market, and TD Bank, N.A., with nearly 13% of the deposit market.

Univest reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. According to the 2019 data, there were 747 HMDA reporters in the assessment area who originated or purchased 139,469 loans in the Philadelphia, PA assessment area. Univest ranked twenty-first with 1% of the HMDA market. Wells Fargo Bank, N.A. ranked first with 10% of the HMDA market, followed by Citizens Bank, N.A. (6%), and Police & Fire Federal Credit Union(4%).

According to 2020 data, there were 802 HMDA reporters in the assessment area who originated or purchased 202,403 loans in the Philadelphia, PA assessment area. Univest ranked twenty-fourth with 1% of the HMDA market. Wells Fargo Bank, N.A. ranked first with 9% of the HMDA market, followed by Quicken Loans, LLC (5%), and Citizens Bank, N.A. (4%).

Finally, according to 2021 data, there were 822 HMDA reporters in the assessment area who originated or purchased 211,272 loans in the Philadelphia, PA assessment area. Univest ranked twenty-fourth with 1% of the HMDA market. Rocket Mortgage, LLC ranked first with 6% of the HMDA market, followed by Wells Fargo Bank, N.A. (6%), and Citizens Bank, N.A. (5%).

Similarly, the institution reports its small business loans pursuant to the CRA, and was compared to the aggregate of all small business and small farm lenders operating in the assessment area. This data is also reported annually. According to 2019 data, there were 199 CRA reporters in the Philadelphia, PA assessment area, who originated or purchased 97,393 small business and small farm loans in the assessment area. Univest ranked sixteenth in the market, with 1% of CRA loans. American Express, NB led the market, with 25% market share, followed by JPMorgan Chase Bank, N.A. with 12% of the market, and Wells Fargo Bank, N.A. ranked third, with 7% of the market.

According to 2020 data, there were 288 CRA reporters in the assessment area, who originated or purchased 115,033 CRA loans. Univest ranked ninth, holding nearly 3% market share. American Express, NB led the market, with 16% market share, followed by Wells Fargo Bank, N.A. (8%), and TD Bank, N.A. (7%).

Finally, according to 2021 data, there were 266 CRA reporters, who originated or purchased 125,367 small business and small farm loans in the assessment area. Univest ranked nineteenth, with just over 1% market share. American Express, NB led the market, with 21% market share, followed by JPMorgan Chase Bank, N.A. (8%), and Wells Fargo Bank, N.A. (6%).

Since CRA data reporting includes small business loans issued under corporate credit card arrangements, some of the top reporters in the assessment area are national credit card originators and regional banks. This was the case in all three years evaluated. For instance, in 2021, American Express, NB, JP Morgan Chase Bank, N.A., Wells Fargo Bank, N.A., Bank of America, N.A., and Capital One Bank USA, N.A. were the top five small business and small farm reporters, collectively holding 45% of the CRA market share in this assessment area.

To supplement economic, demographic, and performance data, interviews were conducted with two local community organizations, which provided perspective on credit and community development needs of the Philadelphia, PA assessment area. One interview was held with an agency focused on providing services, programs, and opportunities for advancement to veterans and their families, and the other was with an agency that focused on economic development.

Each contact identified affordable housing as a major concern in the assessment area, due to rising rents and housing prices, and an aging housing stock. Further, job growth and workforce development initiatives were mentioned as acute needs, particularly with area veterans. Finally, community contacts noted a need for community services targeted to low- and moderate-income individuals, given the sizable low- and moderate-income population in the assessment area. Contacts indicated that credit needs in the assessment area include both affordable housing and small business credit.

#### **Economic Characteristics**

As indicated above, Univest's Philadelphia, PA assessment area consists of the Montgomery-Bucks-Chester County, PA MD, and the Philadelphia, PA MD, which consists of Delaware and Philadelphia Counties. The Philadelphia, PA assessment area is located in the Delaware Valley region of southeastern Pennsylvania, within the larger Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA. Philadelphia is the largest city in Pennsylvania, and the fifth largest city in the nation, with a population of nearly 1.6 million according to 2015 ACS data.

According to the May 2022 Moody's Analytics Precis report for the entire Philadelphia MSA, Philadelphia's economy is in a recovery stage. However, the recovery in Philadelphia is one of the weakest among metro areas with two million or more residents. It is noteworthy that office-based work time in Philadelphia remains further from its pre-recession peak than in any other large metro area in the Northeast. For workers, Philadelphia's city wage tax can be more easily avoided by remote work. Further, an acceleration in the outflow of residents at the start of the pandemic has persisted into 2022, shrinking Philadelphia's tax base and decreasing necessary spending on public services and education. Healthcare and education employment are bright spots in the greater Philadelphia economy, and will drive expansion in the future, according to the Precis report.

According to Moody's, strengths of the area include the fact that the city has a concentration of well-regarded, world-class educational institutions, and is a center for healthcare and medical research. Additionally, Philadelphia has a well-developed shipping port, and a recognized international airport. On the other hand, weaknesses include relatively anemic population growth, prohibitive business taxes that push firms to suburbs or other nearby states, and significant fiscal problems.

The education and health services industry represents the largest employment sector in Philadelphia, contributing almost 32% of total jobs. Other leading industries include professional and business services (15%), followed closely by government (14%). Leisure and hospitality services, and retail trade (both 8%) have not yet recovered to pre-pandemic levels in the region.

According to Moody's top employers in the Philadelphia, PA MSA include University of Pennsylvania Health System, Thomas Jefferson University/TJU Health System, Inc., Children's Hospital of Philadelphia, Comcast, and Drexel University.

Economic highlights for each of the counties in the assessment area follow.

#### **Montgomery County**

Montgomery County is located adjacent to and northwest of the city and county of Philadelphia, and is located between Bucks and Chester counties, to the northeast and southwest, respectively. Montgomery County is geographically diverse, ranging from farms and open land in the extreme north of the county, to densely populated suburban neighborhoods in the southern and central portions of the county. The county seat and largest city is Norristown.

As of the 2015 ACS data, Montgomery County had a population of 812,970 residents, making it the second most-populous county in the assessment area. The median family income in the county was \$100,138 as of the 2015 ACS update, making it the second highest in the assessment area after Chester County. Montgomery County is a suburb of Philadelphia; and like Philadelphia, is also a major employment center. Montgomery County is home to several large business parks in Blue Bell, Lansdale, Fort Washington, Horsham, and King of Prussia, which attract thousands of workers from all over the region.

The Pennsylvania Department of Labor and Industry reports that as of the third quarter of 2022, leading employers in the county include pharmaceutical and health companies such as Merck Sharp & Dohme Corp., SmithKline Beecham Corp., Abington Memorial Hospital, Main Line Hospitals, Inc., Albert Einstein Medical Center, and State Government. Montgomery County is also home to a number of colleges and universities, including Arcadia University, Bryn Mawr College, Haverford College, Gwynedd Mercy University, Montgomery County Community College and Pennsylvania State University-Abington Campus.

#### **Bucks County**

Bucks County had a population of 626,583 residents as of the 2015 ACS, making it the third most-populous county in the assessment area. The county shares a border with Montgomery County, which is located to the southwest, the State of New Jersey to the east (across the Delaware River), and Northampton and Lehigh Counties in the Lehigh Valley to the north. Bucks County's median family income of \$94,953 is the third highest in the assessment area. The county seat is Doylestown.

Tourism is an important asset to Buck County's economy. Given its proximity to the Delaware River, Bucks County boasts natural scenery, farmland, colonial history and proximity to major urban areas, including Philadelphia, New York City, Allentown and Reading, which draws visitors. The county is also home to popular destinations that sends visitors flocking to major shopping and leisure destinations such as farmers markets, Peddlers Village, Doylestown, New Hope, and Sesame Place.

According to the Pennsylvania Department of Labor and Industry, leading employers include Giant Food Stores LLC, Doylestown Hospital, Central Bucks School District, Bucks County, and Northtec, LLC. Bucks County is home to Bucks County Community College, Delaware Valley University and La Salle University – Bucks County Center.

#### Chester County

Chester County is adjacent to Montgomery County to the northeast, Delaware County to the east, and New Castle County, Delaware and Cecil County, Maryland to the southeast and southwest, respectively.

Using 2015 ACS data, the population in Chester County was 509,797, making it the least densely populated county in the assessment area. The county is the wealthiest of the counties in the Philadelphia, PA assessment area with a median family income of \$105,571. Eastern Chester County is home to many communities that comprise part of the affluent "Main Line" western suburbs outside of Philadelphia, while part of its southernmost portion is considered suburban Wilmington, along with the southwest Delaware County. The county seat is the Borough of West Chester.

Watersheds that serve Chester County include the Octoraro, the Brandywine, and Chester creeks, and the Schuylkill River, yielding a topography consisting of rolling hills and valleys with fertile soil. Because of its proximity to Philadelphia, Chester County has seen large waves of development, however agriculture is still a major part of the county's economy. Mushroom growing is a specialty in the southern portion of the county, and the number of horse farms is increasing in the county.

According to the Pennsylvania Department of Labor and Industry, leading employers include The Vanguard Group Inc., The Chester County Hospital, QVC Network, Inc., the County of Chester, and Main Line Hospitals, Inc. Chester County is home to Cheyney University of Pennsylvania, Lincoln University, West Chester University of Pennsylvania, and Immaculata University.

#### Philadelphia County

Philadelphia County is the smallest of the counties in the bank's assessment area by size, though it is the largest by population, with over 1.5 million residents. Philadelphia County is Pennsylvania's second-smallest county in Pennsylvania by land area. It is located along the lower Delaware and Schuylkill Rivers, d the county seat is the city of Philadelphia. Philadelphia county's median family income measured \$46,864, which was by far the lowest median family income in the assessment area.

According to the Pennsylvania Department of Labor and Industry, major employers in the city and county (excluding federal and city government) include the University of Pennsylvania, the School District of Philadelphia, The Children's Hospital of Philadelphia, Temple University, Thomas Jefferson University Hospital, and Comcast Cablevision Corporation, and Southeastern PA Transportation Authority (SEPTA).

Philadelphia County is home to many large and prominent universities, including Drexel University, Temple University, The University of Pennsylvania, Thomas Jefferson University, and St. Joseph's University, among others.

#### **Delaware County**

Delaware County had a population of 561,683 residents as of the 2015 ACS update, making it the fourth most populous county in the assessment area, and the third-smallest county in Pennsylvania by land volume. The county's median family income of \$82,906 was the second lowest of the counties in the assessment area. Delaware County is located directly west of the city-county of Philadelphia, and borders Chester County to the west, and the state of Delaware to the south. Its county seat is Media, and the county is home to Ridley Creek State Park (a state protected area), and two national protected areas (First State National Historical Park and John Heinz National Wildlife Refuge).

According to the Pennsylvania Department of Labor and Industry, major employers in the county include The Boeing Company, United Parcel Service, Inc., Villanova University, Delaware County, and Wawa, Inc. Colleges and universities located in Delaware County include Haverford College, Swarthmore College, Valley Forge Military Academy, Villanova University, and Widener University, among others.

Seasonally unadjusted unemployment rates for each county in the assessment area, according to the U.S. Department of Labor, Bureau of Labor Statistics, are presented in the following table. During the evaluation period, seasonally unadjusted unemployment rates throughout the Philadelphia, PA assessment area reflected economic conditions, increasing when economic conditions declined, and starting to decrease during the economy's recovery in 2021. In general, unemployment rates in all three years were highest in Philadelphia County, and surpassed both statewide and national levels. Unemployment rates were lowest in Chester County in all years.

Univest Bank and Trust Co. Philadelphia, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)					
Location	% 2019 Annual	% 2020 Annual	% 2021 Annual		
Bucks County, PA	3.9	8.3	5.3		
Chester County, PA	3.3	6.4	4.2		
Delaware County, PA	4.2	9.2	6.3		
Montgomery County, PA	3.6	7.6	5.0		
Philadelphia County, PA	5.7	12.4	9.2		
Montgomery-Bucks-Chester, PA MD	3.6	7.5	4.9		
Philadelphia, PA MD	5.2	11.5	8.3		
Commonwealth of Pennsylvania	4.5	9.1	6.3		
United States	3.7	8.1	5.3		

#### **Housing**

According to 2015 ACS data, the Philadelphia, PA assessment area contained nearly 1.7 million housing units, 60% of which were owner-occupied, 31% of which were rental units, and 9% of which were vacant. The overall occupancy rate in the assessment area (60%) was comparable to that in the Commonwealth of Pennsylvania (61%).

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 tracts. According to 2015 ACS data, 4% of owner-occupied housing was located in low-income tracts, and 20% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (both measuring 38%).

Of the total existing housing units, 73% were single-family units, 10% were two-to-four family units, 16% were multifamily units (five families or more), and 1% were mobile homes. The median age of the housing stock was 61 years, making it older than that in the Commonwealth of Pennsylvania, where the median age of housing was 54 years, indicating a potential need for home improvement loans for rehabilitation of the assessment area's housing stock. This need was anecdotally confirmed through community contacts.

Data show that the price of housing in the assessment area is more expensive than in the Commonwealth overall. According to 2015 ACS data, the median housing value in the Philadelphia, PA assessment area was \$244,580, which is appreciably higher than the median housing value in the Commonwealth of Pennsylvania (\$166,000). Data show a disparity between housing values in low- and moderate-income tracts compared to those in middle-and upper-income tracts. The median housing value in low-income tracts was \$80,582, and this increased to \$141,730 in moderate-income tracts. These values were significantly lower than median housing values in middle- and upper-income tracts (\$248,505 and \$336,140, respectively). Finally, in the assessment area, less than 15% of the total owner-occupied housing units were valued at less than \$100 thousand, compared to the Commonwealth, where 26% of owner-occupied housing units were valued at less than \$100 thousand.

Finally, median gross rent (rent plus utilities) was more expensive in the assessment area than in Pennsylvania. Median gross rent in the Philadelphia, PA assessment area was \$1,005, which was well above the median gross rent in Pennsylvania of \$840. Within the Philadelphia, PA assessment area, over half of renters spent more than 30% of their income on rent, which is a higher figure than in Pennsylvania as a whole (46%).

#### **Borrower Income Data**

The percentage of low- and moderate-income families are used as proxies to estimate demand for home-mortgage lending in the assessment area. The 2015 ACS shows that there were 954,348 families in the assessment area. Of the total families in the assessment area, over 22% were designated as low-income, 17% were designated as moderate-income, 19% were middle-income, and 41% were upper-income.

In the assessment area, 10% of families were living below the poverty level, compared to 9% in the Commonwealth overall.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon the U.S. Department of Housing and Urban Development (HUD) annually-adjusted median family income data made available by the FFIEC.

Median family incomes for the assessment area are listed in the following table for each of the years covered by the evaluation, and are categorized by the dollar amounts recognized as low-, moderate-, middle- and upper-income.

Metropolitan Division	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)
Mont-Bucks- Chester, PA MD	2019	\$110,100	Less than \$55,050	\$55,050 - \$88,079	\$88,080 - \$132,119	\$132,120 or more
Mont-Bucks- Chester, PA MD	2020	\$118,000	Less than \$59,000	\$59,000 - \$94,399	\$94,400 - \$141,599	\$141,600 or more
Mont-Bucks- Chester, PA MD	2021	\$116,300	Less than \$58,150	\$58,150 - \$93,039	\$93,040 - \$139,559	\$139,560 or more
Metropolitan Division	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)
Philadelphia, PA MD	2019	\$62,800	Less than \$31,400	\$31,400 - \$50,239	\$50,240 - \$75,359	\$75,360 or more
Philadelphia, PA MD	2020	\$71,100	Less than \$35,550	\$35,550 - \$56,879	\$56,880 - \$85,319	\$85,320 or more
Philadelphia, PA MD	2021	\$67,500	Less than \$33,750	\$33,750 - \$53,990	\$54,000 - \$80,999	\$81,000 or more

#### Geographic Business and Farm Data

The percentage of businesses located within 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 203,640 businesses in the Philadelphia, PA assessment area. Of these businesses, 4% of businesses were located in low-income tracts, and 18% were located in moderate-income tracts. The vast majority of businesses were located in middle-income census tracts (36%) and upper-income census tracts (42%). Business demographic data also revealed that of the 203,640 businesses in the assessment area, 91% were small businesses with gross annual revenues of \$1 million or less.

Similarly, the percentage of farms within designated census tracts is used as a proxy to estimate demand for farm credit within such tracts. According to 2019 Dun & Bradstreet data, there were 1,375 farms located in the assessment area, and of these, 1% of farms were located in low-income census tracts, and nearly 15% were in moderate-income census tracts (almost 51%). The majority of farms were located in middle-income census tracts, and 34% were located in upper-income tracts. Demographic data also revealed that of the 1,375 farms in the assessment area, 95% were small farms with gross annual revenues of \$1 million or less.

In 2020, there were 207,036 businesses in the assessment area. Of these, 4% were located in low-income tracts, 18% were located in moderate-income tracts, 36% were located in middle-income tracts, 41% were located in upper-income tracts, and almost 1% were located in unknown-income tracts. Of the 207,036 businesses in the assessment area, 91% were small businesses with gross revenues of \$1 million or less.

Dun & Bradstreet data reveals that in 2020 1,370 farms were located in the Philadelphia, PA assessment area. Of these, 1% of farms were located in the assessment area's low-income census tracts, and 14% of farms were located in moderate-income census tracts. The majority of farms were located in middle-income census tracts (51%), with the remaining 34% of farms located in upper-income census tracts. Demographic data also revealed that of the 1,370 farms in the assessment area, almost 95% were small farms with gross annual revenues of \$1 million or less.

Finally, according to 2021 Dun & Bradstreet data, there were 208,615 businesses in the assessment area. Of these, 4% were located in low-income tracts, 18% were located in moderate-income tracts, 36% were located in middle-income tracts, 41% were located in upper-income tracts, and the remaining 1% were located in unknown-income tracts. Of the 208,615 businesses in the assessment area, 91% were small businesses with gross revenues of \$1 million or less.

Similarly, Dun & Bradstreet data reveals that in 2021 of the 1,371 farms in the assessment area, 1% of farms were located in the assessment area's low-income census tracts, and 14% of farms were located in moderate-income census tracts. The majority of farms were located in middle-income census tracts (over 51%), with the remaining 33% of farms located in upper-income census tracts. Demographic data also revealed that of the 1,371 farms in the assessment area, 94% were small farms with gross annual revenues of \$1 million or less.

Assessment area demographics used to evaluate Univest's CRA performance in the Philadelphia, PA assessment area in 2019, 2020 and 2021 are detailed in the tables on the following pages.

		Philade	vest Bank and Iphia, PA Asse sment Area De 2019	ssment A					
Income Categories	Tract Distribution		Families Tract Inc	•	Families • Level as % by T	of Families	Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	72	7.2	59,099	6.2	23,765	40.2	214,075	22.4	
Moderate-income	252	25.3	218,050	22.8	39,959	18.3	163,947	17.2	
Middle-income	330	33.1	347,709	36.4	22,511	6.5	184,500	19.3	
Upper-income	327	32.8	328,927	34.5	10,812	3.3	391,826	41.1	
Unknown-income	17	1.6	563	0.1	120	21.3	0	0.0	
Total Assessment Area	998	100.0	954,348	100.0	97,167	10.2	954,348	100.0	
	Housing	•		Housi	ng Types by	Tract			
	Units by	О	wner-Occupie	d	Rer	ntal	Vacar	nt	
	Tract	#	%	%	#	%	#	%	
Low-income	120,815	39,971	4.0	33.1	61,227	50.7	19,617	16.2	
Moderate-income	425,882	197,622	20.0	46.4	171,862	40.4	56,398	13.2	
Middle-income	567,990	375,633	37.9	66.1	154,956	27.3	37,401	6.6	
Upper-income	543,769	377,010	38.1	69.3	132,000	24.3	34,759	6.4	
Unknown-income	2,575	68	0.0	2.6	2,267	88.0	240	9.3	
Total Assessment Area	1,661,031	990,304	100.0	59.6	522,312	31.4	148,415	8.9	
		inesses	<u> </u>	Busines	sses by Tract	& Revenue S	ize		
	Total Businesses by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low-income	8,314	4.1	7,562	4.1	700	4.1	52	3.1	
Moderate-income	35,856	17.6	32,822	17.7	2,743	16.1	291	17.6	
Middle-income	73,431	36.1	66,488	36.0	6,354	37.2	589	35.6	
Upper-income	84,686	41.6	77,037	41.7	6,934	40.6	715	43.2	
Unknown-income	1,353	0.6	1.007	0.5	338	2.0	8	0.5	
Total Assessment Area	203,640	100.0	184,916	100.0	17,069	100.0	1,655	100.0	
		e of Total I	Businesses:	90.8	,	8.4	,	0.8	
					s by Tract &		<u> </u>		
		Total Farms by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%	
Low-income	18	1.3	17	1.3	1	1.4	0	0.0	
Moderate-income	199	14.5	188	14.5	11	14.9	0	0.0	
Middle-income	694	50.5	653	50.2	41	55.4	0	0.0	
Upper-income	461	33.5	440	33.8	21	28.3	0	0.0	
Unknown-income	3	0.2	3	0.2	0	0.0	0	0.0	
Total Assessment Area	1,375	100.0	1,301	100.0	74	100.0	0	0.0	
	<u> </u>	tage of Tot	•	94.6		5.4		0.0	

2015 ACS Data and 2019 D&B Information

		Philadel	phia, PA As	nd Trust Co. ssessment Ar Demographic 20				
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	72	7.2	59,099	6.2	23,765	40.2	214,075	22.4
Moderate-income	252	25.3	218,050	22.8	39,959	18.3	163,947	17.2
Middle-income	330	33.1	347,709	36.4	22,511	6.5	184,500	19.3
Upper-income	327	32.8	328,927	34.5	10,812	3.3	391,826	41.1
Unknown-income	17	1.6	563	0.1	120	21.3	0	0.0
Total Assessment Area	998	100.0	954,348	100.0	97,167	10.2	954,348	100.0
	Housing			Housin	g Types by Tra	ct		
	Units by	Ow	ner-Occupi	ied	Renta	ı	Vaca	nt
	Tract	#	%	%	#	%	#	%
Low-income	120,815	39,971	4.0	33.1	61,227	50.7	19,617	16.2
Moderate-income	425,882	197,622	20.0	46.4	171,862	40.4	56,398	13.2
Middle-income	567,990	375,633	37.9	66.1	154,956	27.3	37,401	6.6
Upper-income	543,769	377,010	38.1	69.3	132,000	24.3	34,759	6.4
Unknown-income	2,575	68	0.0	2.6	2,267	88.0	240	9.3
Total Assessment Area	1,661,031	990,304	100.0	59.6	522,312	31.4	148,415	8.9
		Businesses by Tract & Revenue Size						
	Total Businesses by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	8,549	4.1	7,823	4.1	681	4.1	45	2.8
Moderate-income	36,870	17.8	33,873	17.9	2,688	16.1	309	18.9
Middle-income	74,714	36.1	67,952	36.0	6,180	37.1	582	35.6
Upper-income	85,536	41.3	78,082	41.4	6,763	40.7	691	42.3
Unknown-income	1,367	0.7	1,019	0.6	340	2.0	8	0.4
Total Assessment Area	207,036	100.0	188,749	100.0	16,652	100.0	1,635	100.0
	Percentage	of Total Bus	sinesses:	91.2		8.0		0.8
		_		Farm	s by Tract & Re	venue Siz	е	
	Total Fa		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	14	1.0	13	1.0	1	1.3	0	0.0
Moderate-income	193	14.1	180	13.9	13	17.3	0	0.0
Middle-income	698	50.9	655	50.6	43	57.3	0	0.0
Upper-income	462	33.7	444	34.3	18	24.0	0	0.0
Unknown-income	3	0.3	3	0.2	0	0.0	0	0.0
Total Assessment Area	1,370	100.0	1,295	100.0	75	100.0	0	0.0
	1	age of Total F		94.5		5.5		0.0

2015 ACS Data and 2020 D&B Information

		Univest B hiladelphia, Assessment		ment Are					
Income Categories	Trac Distribu	Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income			
_	#	%	#	%	#	%	#	%	
Low-income	72	7.2	59,099	6.2	23,765	40.2	214,075	22.4	
Moderate-income	252	25.3	218,050	22.8	39,959	18.3	163,947	17.2	
Middle-income	330	33.1	347,709	36.4	22,511	6.5	184,500	19.3	
Upper-income	327	32.8	328,927	34.5	10,812	3.3	391,826	41.1	
Unknown-income	17	1.6	563	0.1	120	21.3	0	0.0	
Total Assessment Area	998	100.0	954,348	100.0	97,167	10.2	954,348	100.0	
	Housing			Hou	sing Types by T	ract			
	Units by	Own	er-Occupie	d	Renta	al	Vacant		
	Tract	#	%	%	#	%	#	%	
Low-income	120,815	39,971	4.0	33.1	61,227	50.7	19,617	16.2	
Moderate-income	425,882	197,622	20.0	46.4	171,862	40.4	56,398	13.2	
Middle-income	567,990	375,633	37.9	66.1	154,956	27.3	37,401	6.6	
Upper-income	543,769	377,010	38.1	69.3	132,000	24.3	34,759	6.4	
Unknown-income	2,575	68	0.0	2.6	2,267	88.0	240	9.3	
Total Assessment Area	1,661,031	990,304	100.0	59.6	522,312	31.4	148,415	8.9	
		_	•	Busi	nesses by Tract	& Revenue	Size		
		Total Businesses by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%	
Low-income	8,897	4.3	8,189	4.3	658	4.1	50	2.9	
Moderate-income	38,017	18.2	35,105	18.4	2,589	16.0	323	18.8	
Middle-income	74,939	35.9	68,275	35.8	6,047	37.3	617	36.0	
Upper-income	85,370	40.9	78,064	40.9	6,591	40.5	715	41.7	
Unknown-income	1,392	0.7	1,049	0.6	333	2.1	10	0.6	
Total Assessment Area	208,615	100.0	190,682	100.0	16,218	100.0	1,715	100.0	
	Percentage of	of Total Bus	inesses:	91.4		7.8		0.8	
		_		Fa	rms by Tract &	Revenue Size			
	Total Farr Trac		Less Tha \$1 Mill	-	Over S Millio	Revenue Not Reported			
	#	%	#	%	#	%	#	%	
Low-income	16	1.2	15	1.2	1	1.3	0	0.0	
Moderate-income	192	14.0	180	13.9	12	15.0	0	0.0	
Middle-income	703	51.3	660	51.1	43	53.8	0	0.0	
Upper-income	457	33.3	433	33.5	24	30.0	0	0.0	
Unknown-income	3	0.2	3	0.2	0	0.0	0	0.0	
Total Assessment Area	1,371	100.0	1,291	100.0	80	100.0	0	0.0	
	Percentac	e of Total F	arms:	94.2		5.8		0.0	

2015 ACS Data and 2021 D&B Information

#### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

#### LENDING TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderateincome borrowers and businesses and farms of different sizes including small businesses and small farms:
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Performance under the lending test is rated outstanding in the Philadelphia, PA assessment area.

#### **Lending Activity**

Univest's lending levels in the Philadelphia, PA assessment area reflect excellent responsiveness to the assessment area's credit needs. During the evaluation period, lending activity in the Philadelphia, PA assessment area represented 71% of the bank's overall lending by number of loans, and 68% by dollar volume. During the evaluation period, Univest made 6,024 HMDA loans totaling nearly \$1.5 billion, 5,751 small business loans totaling \$878 million, and 139 small farm loans totaling \$23 million in the Philadelphia, PA assessment area.

#### **Borrower Distribution of Loans**

Given the assessment area's demographics and economic characteristics, the borrower distribution of lending reflects, given the product lines offered, good penetration among individuals of different income levels, including low- and moderate-income individuals, and businesses and farms of different sizes, including small businesses and small farms.

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

#### **Home-Mortgage Lending**

Univest's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is excellent.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted 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 percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, over 22% of assessment area families were low-income, 17% were moderate-income, 19% were middle-income, and 41% were upper income. According to 2015 ACS data, 39% of families were designated as low- or moderate-income families, which indicates a notable need for home-mortgage credit among this segment of the population.

The following table compares Univest's home-mortgage lending to aggregate home-mortgage lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The table relies on 2015 ACS data along with updated HMDA data, following the requirements of Regulation C.

Univest Bank and Trust Co. Philadelphia, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level												
% Aggregate Comparison												
Income	Families by	20	19	20	20	2021						
Level	Family Income (2015 ACS Data)	% Univest's Lending	% Aggregate Lending	% Univest's Lending	% Aggregate Lending	% Univest's Lending	% Aggregate Lending					
Low	22.4	13.4	7.8	10.0	6.8	9.5	7.0					
Moderate	17.2	19.0	16.9	21.4	17.2	19.7	16.9					
Middle	19.3	21.5	21.4	22.8	22.4	22.8	21.3					
Upper	41.1	37.9	39.8	38.9	39.2	39.2	39.2					
Unknown	0.0	8.2	14.1	6.9	14.4	8.8	15.6					
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0					

#### Lending to Low-Income Borrowers

For the period under review, Univest's lending to low-income borrowers was good.

In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a down payment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities.

Univest's lending in 2019 to low-income borrowers was good. In total, 13% of the bank's 1,487 HMDA loans (199 loans) were originated to low-income borrowers, trailing the proxy of 22%, but exceeding the aggregate lending to low-income borrowers of 8%. By loan category, Univest originated 13% of its home purchase loans (77 loans), 13% of its refinance loans (65 loans), 13% of its home improvement loans (37 loans), , and no multifamily loans or loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 9% of home purchase loans, 7% of refinance loans, 8% of home improvement loans, and less than 1% of multifamily loans, , and no loans with purpose "not applicable" to low-income borrowers in 2019.

Univest's lending in 2020 to low-income borrowers was good. In total, 11% of the bank's 2,262 HMDA loans (247 loans) were originated to low-income borrowers, trailing the proxy of 22%, and exceeding the aggregate lending to low-income borrowers of 7%. By loan category, Univest originated 11% of its home purchase loans (73 loans), 10% of its refinance loans (123 loans), 17% of its home improvement loans (44 loans), and no multifamily loans or loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 10% of home purchase loans, 5% of refinance loans, 8% of home improvement loans, less than 1% of multifamily loans, and no loans with purpose "not applicable" to low-income borrowers in 2020.

Univest's lending in 2021 to low-income borrowers was good. In total, 10% of the bank's 2,275 HMDA loans (216 loans) were originated to low-income borrowers, trailing the proxy of 22%, and exceeding the aggregate lending to low-income borrowers of 7%. By loan category, Univest originated 10% of its home purchase loans (71 loans), 9% of its refinance loans (96 loans), 12% of its home improvement loans (42 loans), and no multifamily loans or loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 8% of home purchase loans, 6% of refinance loans, 7% of home improvement loans, less than 1% multifamily loans, and loans with purpose "not applicable" to low-income borrowers in 2021.

#### Lending to Moderate-Income Borrowers

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

Univest's lending in 2019 to moderate-income borrowers was excellent. Of the bank's 1,487 HMDA loans, 19% (283 loans) were originated to moderate-income borrowers, exceeding the proxy and the aggregate lending to moderate-income borrowers, both of which were 17%. By loan category, Univest originated 21% of its home purchase loans (122 loans), 17% of its refinance loans (86 loans), 19% of its home improvement loans (54 loans), and no multifamily loans, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 20% of home purchase loans, 15% of refinance loans, 16% of home improvement loans, and less than 1% of multifamily loans, and loans with purpose "not applicable" to moderate-income borrowers in 2019.

Univest's lending in 2020 to moderate-income borrowers was excellent. Of the bank's 2,262 HMDA loans, 21% (484 loans) were originated to moderate-income borrowers, again, exceeding both the proxy and the aggregate lending to moderate-income borrowers of 17%.

By loan category, Univest originated 24% of its home purchase loans (156 loans), 19% of its refinance loans (232 loans), 28% of its home improvement loans (74 loans), and no multifamily loans or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 22% of home purchase loans, 15% of refinance loans, 17% of home improvement loans, and less than 1% of multifamily loans, and loans with purpose "not applicable" to moderate-income borrowers in 2020.

Univest's lending in 2021 to moderate-income borrowers was excellent. Of the bank's 2,275 HMDA loans, 20% (448 loans) were originated to moderate-income borrowers, exceeding the proxy and the aggregate lending to moderate-income borrowers of 17%. By loan category, Univest originated 22% of its home purchase loans (161 loans), 18% of its refinance loans (204 loans), 19% of its home improvement loans (66 loans), and no multifamily loans, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 19% of home purchase loans, 16% of refinance loans, 16% of home improvement loans, and less than 1% of multifamily loans, loans with purpose "not applicable" to moderate-income borrowers in 2021.

### **Small Business Lending**

An analysis of Univest's borrower distribution of small business loans reflects adequate 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 the assessment area. According to Dun & Bradstreet business data, there were 203,640 businesses operating in the assessment area in 2019, with 91% designated as small businesses. According to 2020 Dun and Bradstreet business data, there were 207,036 businesses operating in the assessment area in 2020, with 91% designated as small businesses. Finally, according to 2021 Dun & Bradstreet business data, there were 208,615 businesses operating in the assessment area in 2021, with 91% designated as small businesses.

In 2019, the bank's borrower distribution of small business loans was poor. In 2019, Univest originated 1,024 small business loans in the assessment area, aggregating \$184 million. Of these loans 27% were originated to small businesses (280 loans). This performance was below the aggregate lending level of 46% to small business, and below the proxy of 91%.

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<sup>&</sup>lt;sup>9</sup>Univest's proprietary small business loan product, Univest Business Banking Express Loan (UBBX) provides small business loans and lines of credit up to \$100 thousand. Revenue is not required on the application and therefore a very small percentage of applications are received with revenue information reported. As a result, the bank's performance in small business originations and small business loans extended in amounts of \$100 thousand or less appears to lag in performance compared to peers.

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, 59% of Univest's small business loans were extended in amounts of \$100 thousand or less (601 loans). Aggregate data indicates that 93% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

In 2020, the bank's borrower distribution of small business loans was adequate, given contextual factors <sup>10</sup>. In 2020, Univest originated 2,987 small business loans within the assessment area, aggregating almost \$418 million. Of these loans, 10% were originated to small businesses (301 loans). This performance was below the aggregate lending level of 40% to small businesses, and below the proxy of 91%.

Further, in 2020, 66% of Univest's small business loans were extended in amounts of \$100 thousand or less (1,962 loans). Aggregate data indicates that 86% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Finally, in 2021, the bank's borrower distribution of small business loans was adequate, given contextual factors<sup>11</sup>. In 2021, Univest originated 1,740 small business loans within the assessment area, aggregating \$276 million within the assessment area. Of these loans, 12% were originated to small businesses (203 loans). This performance was below the aggregate lending level of 44% to small businesses, and below the proxy of 91%.

In 2021, 62% of Univest's small business loans were extended in amounts of \$100 thousand or less (1,076 loans). Aggregate data indicates that 91% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

### **Small Farm Lending**

An analysis of Univest's distribution of loans to farms reflects excellent penetration among farm customers of different sizes, including small farms. For purposes of this evaluation, small farm loans are defined as loans that have origination amounts of \$500 thousand or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

<sup>&</sup>lt;sup>10</sup>Notably, in 2020, 78% of small business loans in the assessment area were originated to businesses of unknown income (2,319 loans). This is attributable to the bank's participation in the Small Business Administration's (SBA) Paycheck Protection Program (PPP). In April 2020, the PPP was established by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), and implemented by the SBA (Federal Register 13 CFR Part 120). The PPP program provides small businesses with funds to pay up to eight weeks of payroll costs including benefits. Funds can also be used to pay interest on mortgages, rent, and utilities. Under this program, institutions were not required to collect revenue information. For context, on the entire Univest 2020 CRA LAR, 54% of the reported loans were either UBBX or PPP loans which were reported without revenue (2319 loans).

<sup>&</sup>lt;sup>11</sup>In 2021, 64% of small business loans in the assessment area were originated to businesses of unknown income (1,118 loans). Again, this is attributable to the bank's proprietary small business loan product and participation in the SBA's PPP.

The number of farms operating in the Philadelphia, PA assessment area is used as a proxy to estimate demand for farm credit in the assessment area. According to Dun & Bradstreet farm data, 1,375 farms were operating in the assessment area in 2019, with 95% designated as small farms reporting revenues of \$1 million or less. In 2020, 1,370 farms were operating in the assessment area, with just under 95% designated as small farms. Finally, according to 2021 Dun & Bradstreet farm data, there were 1,371 farms operating in the assessment area in 2021, with 94% designated as small farms.

In 2019, the bank's borrower distribution of small farm loans was excellent. In 2019, Univest originated 45 small farm loans in the assessment area, aggregating just over \$6 million. Of these loans, 98% (44 loans) were originated to small farms. The bank's performance exceeded both the aggregate lending level of 66% and the proxy of 95%.

Small farm 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 farms, and thus added weight is given to such loans in determining whether an institution is meeting the credit needs of small farms. In 2019, 53% of Univest's small farm loans were extended in amounts of \$100 thousand or less (24 loans). Aggregate data indicates that 78% of small farm loans made in the assessment area were originated in an amount of \$100 thousand or less.

In 2020, the bank's borrower distribution of small farms was excellent. In 2020 Univest originated 43 small farm loans in the assessment area, aggregating \$7 million. Of these loans, 100% were originated to small farms. The bank's performance exceeded both the aggregate lending level of 61% and the proxy of 95%.

Further, in 2020, 51% of Univest's small farm loans were extended in amounts of \$100 thousand or less (22 loans). Aggregate data indicates that 64% of small farm loans made in the assessment area were originated in an amount of \$100 thousand or less.

Finally, in 2021, the bank's borrower distribution of small farm loans was excellent. In 2021, Univest originated 51 small farm loans within the assessment area, aggregating \$10 million. Of these loans, 96% were originated to small farms (49 loans). This performance exceeded the aggregate lending level of 65% to small farms, and the proxy of 94%.

In 2021, 43% of Univest's small farm loans were extended in amounts of \$100 thousand or less (22 loans). Aggregate data indicates that 76% of small farm loans made in the assessment area were originated in an amount of \$100 thousand or less.

### **Geographic Distribution of Loans**

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. Overall, the geographic distribution of loans reflects good penetration throughout the Philadelphia, PA assessment area, including in low- and moderate-income census tracts. Once again, it is noted that HMDA loans were given the most weight in determining this conclusion, given their higher volume by number and dollar amount, followed by small business loans, and then small farm loans.

### **Home-Mortgage Lending**

Univest's distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts is good. As noted earlier, the percentage of owner-occupied housing units contained within 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 greater the demand for home-mortgage credit is in the tract.

According to 2015 ACS data, 4% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 20% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle-income tracts (38%), and upper-income tracts (38%).

The following table presents Univest's geographic distribution of HMDA loans from 2019 to 2021, in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area. The table relies on 2015 ACS data, along with updated HMDA data, following the requirements of Regulation C.

	Univest Bank and Trust Co. Philadelphia, PA Assessment Area Geographic Distribution of HMDA Loans									
Census	%			Aggregate (	Comparison					
Tract	Owner-	20	19	20	20	20	21			
Income Level	Occupied Units (2015 ACS Data)	% Univest's Lending	% Aggregate Lending	% Univest's Lending	% Aggregate Lending	% Univest's Lending	% Aggregate Lending			
Low	4.0	3.4	2.9	2.6	2.2	2.9	2.6			
Moderate	20.0	21.2	19.0	15.3	16.2	18.8	17.4			
Middle	37.9	49.4	38.2	49.6	38.3	46.3	38.6			
Upper	38.1	26.0	39.9	32.5	43.3	32.0	41.4			
Unknown	0.0	0.0	0.0 0.0 0.0 0.0 0.0 0.0							
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0			

### Lending in Low-Income Census Tracts

For the period under review, Univest's overall HMDA lending in low-income tracts was considered good.

Univest's HMDA lending in low-income census tracts in 2019 was good. Of the 1,487 HMDA loans originated by Univest in 2019, just over 3% (50 loans) were made in low-income tracts. This performance met the aggregate lending level of 3% and trailed the proxy of 4%. By loan category, Univest originated 3% of its home purchase loans (20 loans), 3% of its refinance loans (14 loans), 5% of its home improvement loans (13 loans), 11% of its multifamily loans (three loans), and no loans with purpose "not applicable" in low-income tracts in the assessment area. In comparison, aggregate lenders made 3% of home purchase loans, 2% of refinance loans, 2% of home improvement loans, 13% of multifamily loans, and 7% of loans with purpose "not applicable" in low-income tracts in the assessment area in 2019.

Univest's HMDA lending in low-income census tracts in 2020 was good. In total, just below 3% of the bank's 2,262 HMDA loans (58 loans) were originated in low-income tracts, trailing the proxy of 4%, and exceeding the aggregate lending in low-income tracts of 2%. By loan category, Univest originated 3% of its home purchase loans (17 loans), 2% of its refinance loans (22 loans), 5% of its home improvement loans (14 loans), 42% of its multifamily loans (five loans), and no loans with purpose "not applicable" in low-income tracts in the assessment area. In comparison, aggregate lenders made 3% of home purchase loans, 1% of refinance loans, 3% of home improvement loans, 15% of multifamily loans, and 5% of loans with purpose "not applicable" in low-income tracts in the assessment area in 2020.

Univest's lending in 2021 in low-income census tracts was good. In total, 3% of the bank's 2,275 HMDA loans (65 loans) were originated in low-income tracts in the assessment area, trailing the proxy of 4%, and matching the aggregate lending in low-income tracts of 3%. By loan category, Univest originated 3% of its home purchase loans (19 loans), 2% of its refinance loans (20 loans), 7% of its home improvement loans (25 loans), 3% of its multifamily loans (one loan), and no loans with purpose "not applicable" in low-income census tracts in the assessment area. In comparison, aggregate lenders made 4% of home purchase loans, 2% of refinance loans, 3% of home improvement loans, 14% of multifamily loans, and 5% of loans with purpose "not applicable" in low-income tracts in the assessment area in 2021.

### Lending in Moderate-Income Census Tracts

For the period under review, the bank's HMDA lending in moderate-income tracts was considered good.

Univest's lending in moderate-income census tracts in 2019 was excellent. Of Univest's 1,487 HMDA loans originated in the assessment area, 21% (315 loans) were made in moderate-income census tracts. The bank's lending just exceeded both the proxy of 20% and the aggregate lending level of 19%. By product type, the bank made 25% of its home purchase loans (142 loans), 15% of its refinance loans (77 loans), 21% of its home improvement loans (58 loans), 41% of its multifamily loans (11 loans), and no loans with purpose "not applicable" in moderate-income census tracts in the assessment area. In comparison, aggregate lenders made 21% of home purchase loans, 16% of refinance loans, 16% of home improvement loans, 38% of multifamily loans, and 33% of loans with purpose "not applicable" in moderate-income tracts in the assessment area in 2019.

Univest's lending in moderate-income census tracts in 2020 was good. Of Univest's 2,262 HMDA loans originated in the assessment area in 2020, 15% (347 loans) were made in moderate-income census tracts. The bank's lending was below both the proxy of 20% and the aggregate lending level of 16%. By product type, the bank made 18% of its home purchase loans (115 loans), 13% of its refinance loans (159 loans), 24% of its home improvement loans (63 loans), 25% of its multifamily loans (three loans), and no loans with purpose "not applicable" in moderate-income census tracts in the assessment area. In comparison, aggregate lenders made 21% of home purchase loans, 13% of refinance loans, 15% of home improvement loans, 34% of multifamily loans, and 32% of loans with purpose "not applicable" in moderate-income tracts in the assessment area in 2020.

Finally, Univest's lending in moderate-income census tracts in 2021 was good. Of Univest's 2,275 HMDA loans originated in the assessment area in 2021, 19% (427 loans) were made in moderate-income census tracts. The bank's lending was just below the proxy of 20% and exceeded the aggregate lending level of 17%. By product type, the bank made 23% of its home purchase loans (167 loans), 15% of its refinance loans (173 loans), 20% of its home improvement loans (69 loans), 38% of its multifamily loans (12 loans), and no loans with purpose "not applicable" in moderate-income census tracts in the assessment area. In comparison, aggregate lenders made 21% of home purchase loans, 15% of refinance loans, 15% of home improvement loans, 39% of multifamily loans, and 36% of loans with purpose "not applicable" in moderate-income tracts in the assessment area in 2021.

### **Small Business Lending**

The geographic distribution of Univest's small business loans reflects good 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 small business loans in the tract. According to Dun & Bradstreet data in 2019, there were 203,640 businesses in the assessment area. Of these businesses, 4% were located in low-income tracts, and 18% were located in moderate-income tracts. The vast majority of businesses were located in middle-income census tracts (36%) and upper-income census tracts (42%). Very little variation was noted in the geographic distribution of businesses in subsequent years. More specifically, in 2020, there were 207,036 businesses in the assessment area. Of these businesses, 4% were located in low-income tracts, and 18% were located in moderate-income tracts. Again, the majority of businesses were located in middle-income tracts (36%), and in upper-income tracts (41%). Finally, in 2021, the assessment area had 208,615 businesses. Once again, 4% of businesses were located in low-income tracts, and 18% were located in moderate-income tracts. As in past years, the majority of businesses were located in middle-income tracts (36%), and in upper-income tracts (41%).

The tables below present Univest's small business geographic distribution, in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the years evaluated.

Univest Bank and Trust Co. Philadelphia, PA Assessment Area Geographic Distribution of Small Business Loans							
	%	Aggregate (	Comparison				
Census Tract Income Level	Businesses by Tract	2019					
	Income Level (2015 ACS Data)	% Univest's Lending	% Aggregate Lending				
Low	4.1	1.3	3.7				
Moderate	17.6	17.7	17.2				
Middle	36.1	52.2	35.9				
Upper	41.6	28.6	41.6				
Unknown	0.6	0.2	1.6				
Total	100.0	100.0	100.0				

Univest Bank and Trust Co. Philadelphia, PA Assessment Area Geographic Distribution of Small Business Loans						
	%	Aggregate (	Comparison			
Census Tract Income Level	Businesses by Tract	2020				
Concac Tract modine 2010.	Income Level (2015 ACS Data)	% Univest's Lending	% Aggregate Lending			
Low	4.1	2.1	3.7			
Moderate	17.8	15.8	16.5			
Middle	36.1	51.5	36.2			
Upper	41.3	30.3	42.7			
Unknown	0.7	0.3	0.9			
Total	100.0	100.0	100.0			

Univest Bank and Trust Co.									
	Philadelphia, PA Assessment Area								
	Geographic Distribution	of Small Business Loans							
	%	Aggregate (	Comparison						
Census Tract Income Level	Businesses by Tract	2021							
	Income Level (2015 ACS Data)	% Univest's Lending	% Aggregate Lending						
Low	4.3	1.6	4.0						
Moderate	18.2	18.4	18.4						
Middle	35.9	51.6	36.4						
Upper	40.9	28.0	40.1						
Unknown	0.7	0.4	1.1						
Total	100.0	100.0	100.0						

#### Lending in Low-Income Census Tracts

For the period under review, Univest's small business lending in low-income tracts was adequate.

In 2019, the geographic distribution of the bank's small business lending in low-income census tracts was poor. Univest originated 1% of its small business loans (13 loans) in the assessment area's low-income census tracts. The bank's lending level was below the applicable loan demand proxy of 4%, and the 2019 aggregate small business lending level of 4%.

In 2020, the geographic distribution of the bank's small business lending in low-income census tracts was adequate. Univest originated 2% of its small business loans (64 loans) in the assessment area's low-income census tracts. The bank's lending level was below the 2020 aggregate small business lending level, and proxy, both of which were 4%.

Finally, in 2021, the geographic distribution of the bank's small business lending in low-income census tracts was adequate. Univest originated 2% of its small business loans (28 loans) in the assessment area's low-income census tracts. The bank's lending level was again below the applicable business loan demand proxy of 4% and aggregate small business lending level of 4%.

### Lending in Moderate-Income Census Tracts

For the period under review, Univest's small business lending in moderate-income tracts was good.

In 2019, the geographic distribution of the bank's small business lending in moderate-income census tracts was good. Univest originated 18% of its 1,024 small business loans (181 loans) in the assessment area's moderate-income census tracts. The bank's lending level matched the applicable business loan demand proxy of 18%, and exceeded the aggregate small business lending level of 17%.

In 2020, the geographic distribution of the bank's small business lending in moderate-income census tracts was good. Univest originated 16% of its 2,987 small business loans (472 loans) in the assessment area's moderate-income census tracts. The bank's lending level was below the applicable business loan demand proxy of 18%, and just under the aggregate small business lending level of 17%.

Finally, in 2021, the geographic distribution of the bank's small business lending in moderate-income census tracts was good. Univest originated 18% of its 1,740 small business loans (320 loans) in the assessment area's moderate-income census tracts. The bank's lending level matched both the applicable business loan demand proxy, and the aggregate small business lending level, both of which were 18%.

### **Small Farm Lending**

The geographic distribution of Univest's small farm loans reflects excellent 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 farms in the assessment area by census tract type is used as a proxy for small farm loan demand. Generally, the greater the number of farms located in a tract, the greater the demand for small farm credit in the tract. According to 2019 Dun & Bradstreet data, there were 1,375 farms in the assessment area. Of these farms, 1% were located in low-income census tracts, and nearly 15% were located in moderate-income tracts. The vast majority of farms were located in middle-income census tracts (51%), and upper-income tracts (34%). In 2020, there were 1,370 farms in the assessment area. Of these farms, 1% were located in low-income census tracts, and 14% were located in moderate-income tracts. Again, the majority of farms were located in middle-income tracts (51%), with the remaining 34% located in upper-income census tracts. In 2021, the assessment area had 1,371 farms. Of these farms 1% were located in low-income census tracts, with 14% of farms located in moderate-income census tracts. Again, the vast majority of farms were located in middle-income census tracts (over 51%), and upper-income census tracts (over 33%).

The tables below present Univest's small farm geographic distribution, in comparison to the applicable farm proxy and aggregate lending levels in the assessment area for the years evaluated.

Univest Bank and Trust Co. Philadelphia, PA Assessment Area Geographic Distribution of Small Farm Loans							
	Aggregate Comparison						
Census Tract Income Level	% Farms by Tract Income Level	2019					
	(2015 ACS Data)	% Univest's Lending	% Aggregate Lending				
Low	1.3	0.0	0.2				
Moderate	14.5	57.8	26.3				
Middle	50.5	42.2	47.1				
Upper	33.5	0.0	22.8				
Unknown	0.2	0.0	3.6				
Total	100.0	100.0	100.0				

Univest Bank and Trust Co. Philadelphia, PA Assessment Area Geographic Distribution of Small Farm Loans							
	0/	Aggregate	Comparison				
Census Tract Income Level	% Farms by Tract Income Level	2020					
	(2015 ACS Data)	% Univest's Lending	% Aggregate Lending				
Low	1.0	0.0	1.5				
Moderate	14.1	46.5	29.3				
Middle	50.9	53.5	46.0				
Upper	33.7	0.0	23.2				
Unknown	0.3	0.0	0.0				
Total	100.0	100.0	100.0				

Univest Bank and Trust Co. Philadelphia, PA Assessment Area Geographic Distribution of Small Farm Loans							
	Aggregate Comparison						
Census Tract Income Level	% Farms by Tract Income Level	2021					
Concac Tract modine 2010.	(2015 ACS Data)	% Univest's Lending	% Aggregate Lending				
Low	1.2	0.0	1.1				
Moderate	14.0	56.9	25.1				
Middle	51.3	41.1	51.1				
Upper	33.3	2.0	21.3				
Unknown	0.2	0.0	1.4				
Total	100.0	100.0	100.0				

### Lending in Low-Income Census Tracts

Geographic distribution of small farm loans in low-income census tracts was not analyzed due to the demographics of the assessment area. As mentioned previously, only 1% of small farms were located in low-income census tracts in 2019, 2020 and 2021. Given the demographics of the assessment area, analysis of lending in low-income census tracts would not yield meaningful conclusions.

### Lending in Moderate-Income Census Tracts

For the period under review, Univest's small farm lending in moderate-income tracts was excellent.

In 2019, the geographic distribution of the bank's small farm lending in moderate-income census tracts was excellent. Of the 45 small farm loans made in 2019, Univest originated 58% (26 loans) in the assessment area's moderate-income census tracts. The bank's lending level exceeded the applicable farm loan demand proxy of 15%, and the aggregate small farm lending level of 26%.

In 2020, the geographic distribution of the bank's small farm lending in moderate-income census tracts was again, excellent. Of the bank's 43 small farm loans in 2020, Univest originated 47% (20 loans) in the assessment area's moderate-income census tracts. The bank's lending level exceeded both the applicable farm loan demand proxy of 14%, and the aggregate small farm lending level of 29%.

Similarly, in 2021, the geographic distribution of the bank's small farm lending in moderate-income census tracts was excellent. Of the bank's 51 small farm loans, Univest originated 57% (29 loans) in the assessment area's moderate-income census tracts. The bank's lending level exceeded the applicable farm loan demand proxy of 14%, and the aggregate small farm lending level of 25%.

### **Responsiveness to Credit Needs**

Univest exhibits an excellent record of servicing the credit needs of low- and moderate-income individuals and areas and very small businesses and farms, consistent with safe and sound banking practices. As mentioned previously, the primary community development needs mentioned by community contacts were affordable housing, a variety of community services for low- and moderate-income individuals, workforce development, and small business lending.

In addition to responsiveness through its retail HMDA, small business, and small farm lending, Univest has addressed these needs through the use of flexible lending programs, as well as community development loans. Both are discussed in more detail below.

### **Innovative and/or Flexible Lending Practices**

Univest makes extensive use of innovative and/or flexible lending practices in serving the Philadelphia, PA assessment area credit needs. Through a number of different programs, the bank made home-mortgage loans to low- and moderate-income borrowers, and small business loans during the evaluation period.

Often, the home-mortgage credit needs of low- and moderate-income individuals and families can be addressed more effectively by alternative mortgage products. In an effort to address the credit needs of such borrowers in the Philadelphia, PA assessment area, Univest participates in programs for first-time homebuyers through a variety of government agencies, including: the FHA, the VA, the USDA RHS, Fannie Mae and Freddie Mac.

Additionally, the bank participates in specialized lending and grant programs with the PHFA, through the RRR program, which is a partnership between the City of Philadelphia and the Philadelphia Redevelopment Authority, and through the FHLB Pittsburgh's FFD grant program. Through these programs, the bank makes home-mortgage loans to low- and moderate-income borrowers in conjunction with grants and forgivable loans. The programs have income parameters that effectively restrict them to low- and moderate-income borrowers.

During the evaluation period, Univest originated 175 FHA loans totaling \$43.5 million, 30 VA loans totaling \$9.6 million, 10 RHS loans totaling \$2.6 million, 65 Fannie Mae loans totaling \$13.9 million, and two Freddie Mac loans totaling \$384 thousand. In addition, Univest made 101 PHFA loans totaling \$24.3 million, and 46 FHLB of Pittsburgh FFD grants totaling over \$228 thousand to first-time homebuyers in the assessment area during the current exam period. Nearly all of the grants made were in the amount of \$5,000 to each first-time homebuyer.

It is noteworthy that Univest has taken a lead role in support of affordable housing initiatives in the Philadelphia, PA assessment area, as the primary participating lender in the RRR. Under the program, Philadelphia homeowners have access to low-interest loans with which to invest in their properties. During the evaluation period, Univest made 83 RRR loans totaling \$1.8 million.

Similarly, the credit needs of small businesses can often be addressed more effectively by alternative products. In an effort to address the credit needs of small businesses in its assessment area, Univest participates in SBA loan programs, and is a preferred SBA Express Lender. During the evaluation period, Univest made 18 SBA loans totaling \$7.8 million in the Philadelphia, PA assessment area.

Finally, Univest offers its own proprietary small business loan product package, the Univest Business Banking Express (UBBX), formerly known as its Main Street Banking program. The UBBX program provides small business owners the opportunity to package products and services, which saves them money, and simplifies the product selection process. During the evaluation period, Univest made 418 UBBX loans totaling \$23.2 million in the Philadelphia, PA assessment area.

### **Community Development Lending**

Univest is a leader in making community development loans in the Philadelphia, PA assessment area. During the period evaluated, which included the timeframe between January 14, 2020, through December 5, 2022, the bank made 37 community development loans in the assessment area, totaling \$80 million. Of the bank's total community development lending by dollar volume, almost 63% was within the Philadelphia, PA assessment area.

Univest's community development lending increased from the previous evaluation, when 30 new loans totaling \$35.9 million were reported.

Of the bank's 37 community development loans, 22 loans totaling \$15.4 million (19%) supported affordable housing initiatives for low- and moderate-income individuals. One loan totaling almost \$9 million (11%) supported community services to low- and moderate-income individuals and areas. Two loans totaling \$4.4 million (6%) supported economic development through the financing of small businesses and small farms, and 12 loans totaling \$51.4 million (64%), supported revitalization and/or stabilization efforts.

Finally, the bank's participation in the Paycheck Protection Program during the COVID-19 pandemic was particularly responsive to revitalization and stabilization efforts for businesses to be able to retain employees in low- and moderate-income census tracts. Univest made a total of 3,075 PPP loans in the assessment area totaling \$502.9 million, with four loans totaling \$6.9 million counted as CD loans.

The following table includes the bank's community development loans in the Philadelphia, PA assessment area, broken out by community development purposes.

	Univest Bank and Trust Co. Community Development Lending Philadelphia, PA Assessment Area									
Activity	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
Year	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
2020	6	3.7	1	9.0	0	0	1	2.3	8	15.0
2021	10	2.4	0	0	0	0	3	4.6	13	7.0
2022	6	9.3	0	0	2	4.4	8	44.5	16	58.2
TOTAL	22	15.4	1	9.0	2	4.4	12	51.4	37	80.2

#### **INVESTMENT TEST**

The investment test evaluates a financial institution's level of qualified investments that serve lowor moderate-income areas or individuals, together with the responsiveness, innovativeness, and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment, deposit, membership share, or grant, including a donation or in-kind contribution of property that has as its primary purpose, community development.

Performance under the investment test is assessed as high satisfactory.

### **Volume of Investment and Grant Activity**

Univest has a significant level of qualified community development investments and grants occasionally in a leadership position. Qualified investments and donations for the Philadelphia, PA assessment area totaled over \$12.9 million, which is an increase from the investment level of \$10.8 million at the prior evaluation. Of the bank's overall investments within its assessment areas, 38% were within the Philadelphia, PA assessment area.

The vast majority of qualified investments supported affordable housing for low- and moderate-income borrowers via maturing investments in mortgage-backed securities totaling over \$10.9 million (almost 97%). This total is comprised of 65 home-mortgage loans in 15 investments to low- and moderate-income individuals and/or geographies. Ten of the fifteen mortgage-backed security investments were recognized in the previous evaluation and remained outstanding. The remaining \$380 thousand in qualified investments supported economic development through two investments in Small Business Investment Companies (SBICs).

In addition to the qualified investments discussed above, the bank also made 247 donations totaling \$1.5 million to local organizations that routinely provide community development services in the assessment area. Of the total dollar amount, \$102 thousand (7%) supported affordable housing, just under \$1.3 million (84%) went to organizations that provided community services to low- and moderate-income individuals, \$135 thousand (9%) supported economic development, and \$10 thousand (less than 1%) supported revitalization and stabilization efforts in the assessment area.

Finally, Univest made in-kind donations to a local non-profit organization totaling \$83 thousand that provides affordable housing in the assessment area.

The following table presents the investment and grant activity for the Philadelphia, PA assessment area.

	Univest Bank & Trust Co. Philadelphia, PA Assessment Area Qualified Investments										
<b>OD</b>		Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
Category	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	
Qualified Investments	15	10,956	0	0	2	380	0	0	17	11,336	
Donations	19	102	190	1,262	31	135	7	10	247	1,509	
In-Kind Donations	3	83	0	0	0	0	0	0	3	83	
TOTAL	37	11,141	190	1,262	33	515	7	10	267	12,928	

### Responsiveness to Credit and Community Development Needs

Univest exhibits good responsiveness to credit and community development needs of the assessment area. As mentioned previously, the level of qualified investments and grants increased since the prior evaluation. Further, as noted in the table above, the vast majority of the bank's qualified investments and donations supported affordable housing in the assessment area, a pronounced community need as indicated through community contact interviews.

### **Community Development Initiatives**

Univest makes significant use of innovative and/or complex investments to support community development initiatives. In the Philadelphia, PA assessment area, the bank provided an in-kind donation of residential housing to a local organization that provides affordable housing benefiting low- and moderate-income individuals in the community. In addition, the bank participated in a small business investment company (SBIC) project supporting economic development. Finally, the vast majority of qualified investment dollars were invested in mortgage-backed securities, which are more complex than simple donations.

### **SERVICE TEST**

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- the accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- the impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- the reasonableness of business hours and services in meeting assessment area needs; and
- the extent to which an institution provides community development services.

Performance under the service test is assessed as low satisfactory in the assessment area.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. During the review period, Univest operated 26 full-service branches in the Philadelphia, PA assessment area (70% of all branches). Using the 2015 ACS data, one branch (4%) was located in a low-income census tract, five (19%) were located in moderate-income census tracts, twelve (46%) were located in middle-income areas, and eight branches (31%) were located in an upper-income tract.

The following table details the locations of the bank's branches with comparison to 2015 ACS population demographics, and shows that branches are proximate to areas where the majority of the population resides.

Univest Bank and Trust Co. Philadelphia, PA Assessment Area Retail Branch Distribution 2015 ACS Data									
Census Tract Type	Census Tract Type Number of Branches Percent of Branches Population Percent of Population								
Low	1	3.8	290,440	7.1					
Moderate	5	19.2	1,009,619	24.8					
Middle	12	46.2	1,413,391	34.8					
Upper	8	30.8	1,336,223	32.9					
Unknown Income	0	0.0	16,432	0.4					
Totals	26	100.0	4,066,105	100.0					

ATMs are available at all branch locations, which provides electronic access to banking services. In addition, Univest participates in the Allpoint ATM network, which provides access to surcharge free ATMs nationwide. To supplement traditional banking services, Univest provides alternative delivery systems that include online banking services, telephone banking services and a smart phone mobile banking application that includes mobile deposit capture capabilities for retail and small business customers. Customers are able to pay bills, open accounts, and apply for loans using the bank's online website at <a href="https://www.univest.net">https://www.univest.net</a>.

#### **Changes in Branch Locations**

Univest's record of opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly to low- or moderate-income census tracts or individuals.

Within the Philadelphia, PA assessment area, seven branches have been closed since the previous evaluation, and one branch was opened<sup>12</sup>. Of the seven branch closures, two were located in moderate-income census tracts, two were in middle-income geographies, and two were located in upper-income census tracts. The opened branch was in an upper-income census tract. During the open examination period, Univest closed a seventh branch within the Philadelphia, PA assessment area, which was located in a low-income census tract.

#### Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. As mentioned above, all of Univest's branches in the assessment area include ATMs. Additionally, of the 26 branches in the assessment area, 20 (77%) have drive-through facilities. All branches in the assessment area operate Monday through Friday, with most offices offering extended hours on Thursday and/or Friday. All but three branches offer limited Saturday hours Two branch offices operate with lobby hours "by appointment only".

<sup>&</sup>lt;sup>12</sup>Details of the seven branch closures and one branch opening are as follows: The bank closed two branches in moderate-income census tracts, the Perkasie branch, located at 545 Constitution Avenue, Perkasie, PA 18944, and the Schwenksville branch, located at 415 Main Street, Schwenksville, PA 19473, on June 25, 2021 and January 29, 2021, respectively. In addition, the bank closed two branches in middle-income census tracts, which included the Doylestown branch, located at 191 W. State Street, Doylestown, PA 18901, and the Willow Grove branch, located at 1 Fitzwatertown Rd, Willow Grove, PA 19090, on June 25, 2021 and January 29, 2021, respectively. Further, the bank closed one branch in a low-income census tract, the Bensalem branch, located at 2645 Street Rd. Bensalem, PA 19020, two branches in upper-income census tracts, the Chestnut Hill branch, located at 23 W. Highland Avenue, Philadelphia, PA 19118, and the Plumsteadville branch, located at 5829 Easton Road, Doylestown, PA 18902, both on June 25, 2021. The bank opened the Doylestown branch in an upper-income tract, located at 1980 South Easton Road, Doylestown, PA 18901 on June 25, 2021.

<sup>&</sup>lt;sup>13</sup>Drive-through facilities are not available at the Doylestown (upper-income), Fairmount (moderate-income), Mt. Airy (upper-income), South Philadelphia (moderate-income), and University City (moderate-income) branches due to limitations in the physical locations. Drive-through facilities are not offered at the Souderton Branch (middle-income), as a drive-through ATM is available instead.

<sup>&</sup>lt;sup>14</sup>Saturday hours are not offered at the West Chester (moderate-income), Souderton (middle-income), and Doylestown (upper-income) branches.

<sup>&</sup>lt;sup>15</sup>The Souderton and Warminster branch lobbies are available to bank customers by appointment only. Both locations are located in middle-income census tracts.

### **Bank Products**

Univest offers deposit products that provide greater access to banking services for low- and moderate-income customers. The bank offers two free checking accounts for consumers, which feature no minimum monthly balance requirement, no monthly service fee and no paper statement fee. One of the free checking products offers no non-Univest ATM fees, while the other provides for no overdraft item fees if the account overdraft total is within daily threshold limits.

The bank also offers a low-cost small business checking account for small businesses with limited transaction activity. The account charges no monthly service fee and has no minimum monthly balance requirement. Further, this account offers 200 free transaction items processed through the account, with transactions above the monthly maximum incurring a \$.50 per item charge. This account allows very small businesses access to banking services that meet their needs.

### **Community Development Services**

Univest provides a relatively high level of community development services in this assessment area.

Over the evaluation period, numerous bank officers and employees provided qualified community development services, serving in various capacities on boards and committees, and providing technical assistance to community and economic development organizations. Some notable examples included:

- An employee serves on the board of the Keystone Opportunity Center, whose mission is to help low- and moderate-income individuals by offering an array of community services that educate, encourage and empower them to become self-sufficient.
- An employee serves on the board of The Enterprise Center, whose mission is to support small businesses and minority entrepreneurs through transformative economic development initiatives.
- An employee serves as a committee member for Manna on Main Street, which provides a food pantry and related community services for low- and moderate-income individuals in the region.
- An employee serves as a board member for the Friends Association for Care and Protection of Children, which provides programs for shelter and other community services for the homeless of Chester County.
- An employee serves as a board member on the Philadelphia Accelerator Fund, a non-profit loan fund which provides affordable housing for historically underserved groups, working with minority developers.

Additionally, the bank participates as an intermediary for the FHLB Pittsburgh's "Home4Good Initiative." Home4Good is a flexible grant program that supports projects, programs, and activities that lead to stable housing for those who are homeless or at risk of becoming homeless. In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to the FHLB of Pittsburgh, on their behalf.

Finally, Univest took steps throughout the pandemic to address the needs of customers impacted by the COVID-19 global pandemic. The bank waived overdraft fees on all business and personal accounts renewable in 30-day periods, and waived early redemption fees for certificates of deposit (CD), and individual retirement account (IRA) withdrawals on a renewable basis during the pandemic.

# ALLENTOWN, PA ASSESSMENT AREA FULL-SCOPE REVIEW

### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

### **Description of Assessment Area**

Univest's Allentown, PA assessment area consists of Lehigh and Northampton counties, which are part of the larger Allentown-Bethlehem-Easton, PA-NJ MSA. Lehigh and Northampton counties combine to form what is referred to as the Lehigh Valley region of eastern Pennsylvania. As of the 2015 ACS Data, the Allentown, PA assessment area had a population of 656,372 residents, making it the second most highly populated assessment area of Univest's footprint, following the Philadelphia, PA assessment area.

For the purposes of assessing Univest's CRA performance in the Commonwealth of Pennsylvania, the third highest weight was given to the performance in the Allentown, PA assessment area, following the Philadelphia, PA and Lancaster, PA assessment areas. Of the bank's total loans, 5% by number, and 5% by dollar volume can be attributed to this assessment area. Further, the bank operated only two branches in the assessment area (5% of total branches), which held \$80 million, or 1% of total deposits. Additionally, the bank operates one LSF, located in an upper-income census tract in Allentown. Though the Allentown, PA assessment area was not weighted as heavily as other assessment areas in the Commonwealth, a full-scope review was conducted, as the previous CRA evaluation included a limited-scope review of this assessment area.

Univest's CRA performance was evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS data, the Allentown, PA assessment area consisted of 144 census tracts. Of these 144 tracts, 15 were designated as low-income (just over 10%), 28 were moderate-income (over 19%), 62 were middle-income (43%), and 39 were upper-income (27%).

Of the 15 low-income tracts, 11 were located in Lehigh County, near the city of Allentown (73%), and four were in Northampton County, near the cities of Bethlehem and Easton (27%). In total, 9% of the assessment area's population resided in low-income census tracts as of the 2015 ACS.

Of the 28 moderate-income tracts, 14 were located in Lehigh County, near the city of Allentown (50%), and 14 were in Northampton County, near the cities of Bethlehem and Easton (50%). In total, 20% of the assessment area's population resided in moderate-income census tracts as of the 2015 ACS.

A map of the Allentown, PA assessment area at the 2015 ACS update is available in Appendix F.

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<sup>&</sup>lt;sup>16</sup>In addition to Lehigh and Northampton counties, the Allentown-Bethlehem-Easton, PA-NJ MSA also includes Carbon County, in Pennsylvania, and Warren County, in New Jersey.

According to the FDIC's Deposit Market Share Report as of June 30, 2022, there were 24 depository institutions operating in the Allentown, PA assessment area. These institutions maintained a total of 159 branches holding \$18.9 billion in deposits. Univest, with two branches in the assessment area, ranked twenty-second, with \$80 million, or less than 1% of the deposit market. Wells Fargo Bank, N.A. held the largest share of deposits with 22% of the market, followed by Truist Bank and Fulton Bank, N.A., with 13% and 9% of the market, respectively.

Univest reports home-mortgage loans pursuant to HMDA and was compared to all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. According to the 2019 data, there were 461 HMDA reporters in the assessment area who originated or purchased 22,146 loans in the Allentown, PA assessment area. Univest ranked forty-sixth with less than 1% of the HMDA market. Wells Fargo Bank, N.A. ranked first with 10% of the HMDA market, followed by Quicken Loans, LLC with 4%, and Caliber Home Loans, Inc. with just under 4% of the HMDA market.

According to 2020 data, there were 515 HMDA reporters in the assessment area who originated or purchased 29,655 loans in the Allentown, PA assessment area. Univest ranked forty-first with less than 1% of the HMDA market. Wells Fargo Bank, N.A. ranked first with almost 9% of the HMDA market, followed by Quicken Loans, LLC with 7%, and Caliber Home Loans, Inc. with nearly 4% of the HMDA market.

Finally, according to 2021 data, there were 556 HMDA reporters in the assessment area who originated or purchased 32,903 loans in the Allentown, PA assessment area. Univest ranked thirty-ninth with less than 1% of the HMDA market. Rocket Mortgage, LLC ranked first with nearly 8% of the HMDA market, followed by Wells Fargo Bank, N.A. with 7% market share, and CrossCountry Mortgage Inc. with nearly 4% of the HMDA market.

Similarly, the institution reports its small business loans pursuant to the CRA, and was compared to the aggregate of all lenders operating in the assessment area. This data is also reported annually. According to 2019 data, there were 116 CRA small business reporters in the Allentown, PA assessment area, who originated or purchased 13,769 small business and small farm loans in the assessment area. Univest ranked twenty-sixth in the market, with less than 1% of CRA loans. American Express NB led the market, with 18% market share, followed by JPMorgan Chase Bank, N.A. with 12% of the market, and Wells Fargo Bank, N.A. with nearly 9% of the market.

According to 2020 data, there were 152 CRA reporters in the assessment area, who originated or purchased 15,526 CRA loans. Univest ranked twenty-seventh, holding nearly 1% market share. American Express, NB led the market, with 12% market share, followed by Wells Fargo Bank, N.A. with 10%, and PNC Bank, N.A. with 6% of the market.

Finally, according to 2021 data, there were 145 CRA reporters, who originated or purchased 16,998 small business and small farm loans in the assessment area. Univest ranked thirtieth, with less than 1% market share. American Express, NB led the market, with 16% market share, followed by Wells Fargo Bank, N.A. with 8%, and JPMorgan Chase Bank, N.A. with 7% of the market.

To supplement economic, demographic, and performance data, interviews were conducted with two local community organizations, which provided perspective on credit needs of the Allentown, PA assessment area. One interview was held with an agency focused on providing affordable housing to residents and their families in the assessment area, and the other was with a community action agency focused on promoting sound housing and community development.

Each contact identified affordable housing as a major concern in the assessment area, as well as a need for better funding for home rehabilitation/weatherization programs, given the age and general disrepair of the housing stock. Community contacts further noted a need for supportive efforts to provide financial literacy and budgeting training to assist first-time homebuyers. Finally, an interviewee identified the need for dedicated community development activities to assist residents struggling with food insecurity.

### **Economic Characteristics**

As indicated above, Univest's Allentown, PA assessment area consists of Lehigh and Northampton counties, which are part of the larger Allentown-Bethlehem-Easton, PA-NJ MSA.

According to the Moody's Analytics May 2022 Precis report, the Allentown-Bethlehem-Easton, PA MSA is in recovery mode. The COVID-19 Pandemic adversely impacted jobs in the area, but the MSA is recovering solidly according to Moody's. The MSA is one of two in Pennsylvania that are closer to a full jobs recovery than the United States, in terms of manufacturing and transportation job growth. Though labor force growth is slow in the MSA, it compares favorably with the state and the rest of the Northeast. As a result, Moody's Analytics predicts that the Allentown-Bethlehem-Easton, PA MSA will enter the expansion phase of the business cycle well ahead of Pennsylvania and the Northeast.

Strengths noted in the May 2022 Moody's Precis report include the MSA's proximity to the more expensive Philadelphia and New York City metro areas, downtown revitalization projects, which spur investments and hiring, below-average employment volatility, and positive net migration into the area. On the other hand, weaknesses include an aging infrastructure, weak local government finances, and an aging population.

In the MSA, the largest employment sector is education and health services, accounting for nearly 21% of jobs. Other significant industries include professional and business services (13%), manufacturing (almost 11%), retail trade (nearly 11%), government (10%), and transportation/utilities (10%). The largest private employers in the MSA include Lehigh Valley Health Network, St. Luke's University Health Network, Sands Bethworks Gaming, LLC, and Giant Food Stores.

Economic highlights for each of the counties in the assessment area follow.

### **Lehigh County**

Lehigh County is adjacent to several of the counties included in Univest's overall assessment area. More specifically, Berks County is to the west, Bucks County is southeast, Montgomery County is to the south, and Northampton County is northeast. The county seat and largest city in the county is Allentown, which is the third-largest city in Pennsylvania, after Philadelphia and Pittsburgh.

As of the 2015 ACS Data, Lehigh County had a population of 356,756 residents, making it the most-populous county in the Allentown, PA assessment area. The median family income in the county was \$68,605. Allentown is a major economic center for Lehigh County. The county is home to the Lehigh Valley International Airport, and boasts a number of cultural/entertainment attractions such as the Lehigh Valley Zoo; Coca-Cola Park, home of the Iron Pigs, the Triple-A affiliate of the Philadelphia Phillies; The Great Allentown Fair, one of the nation's largest and longest running city fairs; Dorney Park and Wildwater Kingdom, one of the largest amusement and water parks on the east coast; along with a variety of golf courses and parks and recreational facilities.

Leading employers include the Lehigh Valley Hospital Center, Saint Luke's Hospital, Amazon.com Services, Inc., Lehigh Valley Physician Group, and Mack Trucks Inc. Further, Lehigh County is home to a number of colleges and universities, including Cedar Crest College, Muhlenberg College, DeSales University, and Penn State University (Lehigh Valley).

### Northampton County

Northampton County had a population of 299,616 residents using 2015 ACS Data. The county's median family income was \$73,571, making it the highest in the Allentown, PA assessment area. Northampton County borders Lehigh County to the west, Carbon County and the Poconos to the north, and is separated from the State of New Jersey by the Delaware River, to the east. The county seat of Northampton County is the city of Easton.

Though the county historically had an industrial focus, being home to Bethlehem Steel, one of the world's largest steel manufacturers prior to its closure in 2003, tourism currently plays a major role in the county's economy, particularly in the cities of Easton and Bethlehem. Visitors come to experience the lodging variety of the region's inns, hotels, motels and bed and breakfasts, while specialty retail shopping venues are a draw for neighboring New York and New Jersey. In addition, Bethlehem is home to the Wind Creek Bethlehem Casino & Resort, and the annual "Musikfest-America's Music Festival," while Easton is home to a number of cultural and children's museums, and the Crayola Experience.

Colleges and universities located in Northampton County include Lafayette College, Lehigh University, Moravian University and Northampton County Area Community College. Major employers in the county include Wal-Mart Associates, Inc., United Parcel Service, Inc., Lehigh University, Northampton County and Bethlehem Area School District.

Seasonally unadjusted unemployment rates for the counties in the assessment area, according to the U.S. Department of Labor, Bureau of Labor Statistics, are presented in the following table. During the evaluation period, seasonally unadjusted unemployment rates throughout the Allentown, PA assessment area reflected economic conditions, increasing when economic conditions declined, and starting to decrease during the economy's recovery in 2021.

Univest Bank and Trust Co. Allentown, PA Assessment Area Unemployment Rates (Annual, Not Seasonally Adjusted)								
Location								
Lehigh County, PA	4.6	9.6	6.8					
Northampton County, PA	4.6	8.9	5.9					
Allentown-Bethlehem-Easton, PA MSA	4.5	9.2	6.3					
Commonwealth of Pennsylvania	4.5	9.1	6.3					
United States	3.7	8.1	5.3					

#### **Housing**

According to 2015 ACS data, the Allentown, PA assessment area contained 264,310 housing units, 64% of which were owner-occupied, 29% of which were rental units, and 7% of which were vacant. The overall occupancy rate in the assessment area (64%) was slightly higher than in the Commonwealth of Pennsylvania (61%).

The distribution of owner-occupied housing units throughout the assessment area is used as a proxy to estimate demand for residential mortgage lending within such tracts. According to 2015 ACS data, of the 170,252 owner-occupied housing units in the Allentown, PA assessment area, 3% were located in low-income tracts, and 14% were located in moderate-income tracts. The majority of owner-occupied housing units were located in middle-income tracts (44%) and upper-income tracts (39%).

Of the total existing housing units, 76% were single-family units, 9% were two-to-four family units, 12% were multifamily units (five families or more), and 2% were mobile homes. The median age of the housing stock was 55 years, making it comparable to the housing stock in the Commonwealth of Pennsylvania (54 years).

Data shows that the price of housing in the assessment area was more expensive than in the Commonwealth overall. The 2015 ACS Data indicates that the median housing value in the Allentown, PA assessment area was \$198,300, which is higher than the median housing value in Pennsylvania (\$166,000). Further, data shows a disparity between housing values in low- and moderate-income tracts compared to those in middle-and upper-income tracts. More specifically, the median housing value in low-income tracts was \$94,587, and this increased to \$132,122 in moderate-income tracts. These values were significantly lower than median housing values in middle- and upper-income tracts (186,720 and \$260,409, respectively). In the assessment area, less than 13% of the total owner-occupied housing units were valued at less than \$100 thousand, compared to the Commonwealth, where 26% of owner-occupied housing units were valued at less than \$100 thousand.

Finally, median gross rent (rent plus utilities) in the assessment area was more expensive in the assessment area than in Pennsylvania. According to 2015 ACS data, median gross rent in the Allentown, PA assessment area was \$940, which was more than the median gross rent in Pennsylvania of \$840. Within the Allentown, PA assessment area, 51% of renters spent more than 30% of their income on rent, which is a higher figure than in Pennsylvania as a whole (46%).

#### **Borrower Income Data**

The percentage of low- and moderate-income families in an assessment area are used as proxies to estimate demand for home-mortgage lending. The 2015 ACS shows that there were 168,272 families in the assessment area. Of the total families in the assessment area, 21% were low-income, 18% were moderate-income, 21% were middle-income, and 40% were upper-income. In the assessment area, 8% of families were living below the poverty level, compared to 9% in the Commonwealth overall.

For the purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon HUD annually-adjusted median family income data made available by the FFIEC. Median family incomes for the assessment area are listed in the following table for each of the years covered by the evaluation, 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	\$80,200	Less than \$40,100	\$40,100 - \$64,159	\$64,160 - \$96,239	\$96,240 or more	
2020	\$80,400	Less than \$40,200	\$40,200 - \$64,319	\$64,320 - \$96,479	\$96,480 or more	
2021	\$84,900	Less than \$42,450	\$42,450 - \$67,919	\$67,920 - \$101,879	\$101,880 or more	

#### **Geographic Business Data**

The percentage of businesses located within 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 2019 business data provided by Dun & Bradstreet, in 2019, there were 30,256 businesses in the Allentown, PA assessment area. Of these businesses, 7% were located in low-income tracts, and 17% were located in moderate-income tracts. The vast majority of businesses were located in middle-income census tracts (40%) and upper-income census tracts (36%). Business demographic data also revealed that of the 30,256 businesses in the assessment area, 91% were small businesses with gross annual revenues of \$1 million or less.

In 2020, there were 28,455 businesses in the assessment area. Similar to 2019 demographics, almost 7% of businesses were located in low-income tracts, nearly 17% were located in moderate-income tracts, 40% were located in middle-income tracts, and 37% were located in upper-income tracts. Of the 28,455 businesses in the assessment area, 91% were small businesses with gross revenues of \$1 million or less.

Finally, according to 2021 Dun & Bradstreet data, there were 27,961 businesses in the assessment area. Of these, 7% were located in low-income tracts, 17% were located in moderate-income tracts, 39% were located in middle-income tracts, and 37% were located in upper-income tracts. Of the 27,961 businesses in the assessment area, 91% were small businesses with gross revenues of \$1 million or less.

Assessment area demographics used to evaluate Univest's CRA performance in the Allentown, PA assessment area in 2019, 2020 and 2021 are detailed in the tables on the following pages.

		Allentown,	Bank and T , PA Assess nt Area Dem 2019	ment Area					
Income Categories					I LEVELAS % OT		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	15	10.4	12,417	7.4	4,458	35.9	35,200	20.9	
Moderate-income	28	19.4	29,071	17.3	4,841	16.7	30,288	18.0	
Middle-income	62	43.1	68,484	40.7	3,245	4.7	35,643	21.2	
Upper-income	39	27.1	58,300	34.6	1,465	2.7	67,141	39.9	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	144	100.0	168,272	100.0	14,009	8.3	168,272	100.0	
	Housing			Housing	g Types by Ti	ract			
	Units by	Ow	ner-Occupie	ed	Ren	tal	Vaca	int	
	Tract	#	%	%	#	%	#	%	
Low-income	22,890	5,691	3.3	24.9	13,825	60.4	3,374	14.7	
Moderate-income	51,176	23,505	13.8	45.9	23,390	45.7	4,281	8.4	
Middle-income	108,733	74,314	43.6	68.3	28,334	26.1	6,085	5.6	
Upper-income	81,511	66,742	39.3	81.9	11,086	13.6	3,683	4.5	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	264,310	170,252	100.0	64.4	76,635	29.0	17,423	6.6	
	Total Busin	Total Businesses by		Businesses by Tract & Revenue Size					
	Tra	-	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low-income	2,042	6.7	1,839	6.7	186	7.8	17	5.3	
Moderate-income	5,020	16.6	4,515	16.4	461	19.4	44	13.6	
Middle-income	12,202	40.3	11,169	40.5	887	37.3	146	45.2	
Upper-income	10,992	36.4	10,033	36.4	843	35.5	116	35.9	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	30,256	100.0	27,556	100.0	2,377	100.0	323	100.0	
	Percentage	of Total Bu	sinesses:	91.1		7.9		1.1	
	Total Fa	rmo by		Farm	s by Tract &	Revenue Siz	ze		
	Tra		Less Th \$1 Mi		Over Milli		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low-income	2	0.5	2	0.5	0	0.0	0	0.0	
Moderate-income	18	4.8	18	4.9	0	0.0	0	0.0	
Middle-income	192	51.3	191	51.6	1	25.0	0	0.0	
Upper-income	162	43.4	159	43.0	3	75.0	0	0.0	
Unknown-income	0	0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	374	100.0	370	100.0	4	100.0	0	0.0	
<del></del>	Percenta	age of Total I	Farms:	98.9		1.1		0.0	

2015 ACS Data and 2019 D&B Information

		Allentown, F	ank and Trus PA Assessmont Area Demog 2020	ent Area					
Income Categories	Trac Distribu		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	15	10.4	12,417	7.4	4,458	35.9	35,200	20.9	
Moderate-income	28	19.4	29,071	17.3	4,841	16.7	30,288	18.0	
Middle-income	62	43.1	68,484	40.7	3,245	4.7	35,643	21.2	
Upper-income	39	27.1	58,300	34.6	1,465	2.5	67,141	39.9	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	144	100.0	168,272	100.0	14,009	8.3	168,272	100.0	
	Housing			Housing	Types by Tr	act			
	Units by	Owr	er-Occupied		Ren	tal	Vaca	ant	
	Tract	#	%	%	#	%	#	%	
Low-income	22,890	5,69	3.3	24.9	13,825	60.4	3,374	14.7	
Moderate-income	51,176	23,50	)5 13.8	45.9	23,390	45.7	4,281	8.4	
Middle-income	108,733	74,31	4 43.6	68.3	28,334	26.3	6,085	5.6	
Upper-income	81,511	66,74	2 39.3	81.9	11,086	13.6	3,683	4.5	
Unknown-income	0		0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	264,310	170,25	100.0	64.4	76,635	29.0	17,423	6.6	
			Businesses by Tract & Revenue Size						
	Total Busin Trac	-	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low-income	1,914	6.7	1,716	6.6	179	7.9	19	6.3	
Moderate-income	4,717	16.6	4,246	16.4	430	18.9	41	13.5	
Middle-income	11,279	39.6	10,292	39.8	841	37.0	146	48.0	
Upper-income	10,545	37.1	9,626	37.2	821	36.2	98	32.2	
Unknown-income	0	0.0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	28,455	100.0	25,880	100.0	2,271	100.0	304	100.0	
	Percentage	e of Total Busi	nesses:	91.0		8.0		1.1	
				Farms	by Tract &	Revenue S	ize		
	Total Far Trac	•	Less Tha \$1 Mill		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low-income	2	0.6	2	0.6	0	0.0	0	0.0	
Moderate-income	15	4.2	15	4.3	0	0.0	0	0.0	
Middle-income	186	52.7	184	52.9	2	40.0	0	0.0	
Upper-income	150	42.5	147	42.2	3	60.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	353	100.0	348	100.0	5	100.0	0	0.0	
	Percent	age of Total Fa	arms:	98.6		1.4		0.0	

2015 ACS Data and 2020 D&B Information

		Allentown,	Bank and Trus PA Assessment Area Demog	ent Area					
Income Categories	Trac Distrib		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	15	10.4	12,417	7.4	4,458	35.9	35,200	20.9	
Moderate-income	28	19.4	29,071	17.3	4,841	16.7	30,288	18.0	
Middle-income	62	43.1	68,484	40.7	3,245	4.7	35,643	21.2	
Upper-income	39	27.1	58,300	34.6	1,465	2.7	67,141	39.9	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	144	100.0	168,272	100.0	14,009	8.3	168,272	100.0	
	Housing			Housing	Types by Tr	act			
	Units by	Ow	ner-Occupied		Rental		Vac	ant	
	Tract	#	%	%	#	%	#	%	
Low-income	22,890	5,691	3.3	24.9	13,825	60.4	3,374	14.7	
Moderate-income	51,176	23,505	13.8	45.9	23,390	45.7	4,281	8.4	
Middle-income	108,733	74,314	43.6	68.3	28,334	26.3	6,085	5.6	
Upper-income	81,511	66,742	39.3	81.9	11,086	13.6	3,683	4.5	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	264,310	170,252	100.0	64.4	76,635	29.0	17,423	6.6	
				Business	Businesses by Tract & Revenue Size				
	Total Busin Trac	· · · - ·				•	Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low-income	1,930	6.9	1,731	6.8	180	8.1	19	6.0	
Moderate-income	4,630	16.6	4,158	16.4	427	19.1	45	14.2	
Middle-income	10,986	39.3	10,023	39.4	819	36.7	144	45.6	
Upper-income	10,415	37.2	9,502	37.4	805	36.1	108	34.2	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	27,961	100.0	25,414	100.0	2,231	100.0	316	100.0	
	Percentag	e of Total Bu	sinesses:	90.9		8.0		1.1	
	Total Far	ms by			by Tract &				
	Trac		Less Tha \$1 Milli		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low-income	2	0.6	2	0.6	0	0.0	0	0.0	
Moderate-income	15	4.4	15	4.4	0	0.0	0	0.0	
Middle-income	175	50.9	174	51.3	1	20.0	0	0.0	
Upper-income	152	44.1	148	43.7	4	80.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	344	100.0	339	100.0	5	100.0	0	0.0	
	Percent	age of Total I	Farme:	98.5		1.5		0.0	

2015 ACS Data and 2021 D&B Information

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers and businesses of all sizes, including small businesses<sup>17</sup>;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts<sup>18</sup>;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Performance under the lending test is rated high satisfactory in Allentown, PA assessment area.

### **Lending Activity**

Univest's lending levels in the Allentown, PA assessment area reflect adequate responsiveness to the assessment area's credit needs. During the evaluation period, lending activity in the Allentown, PA assessment area represented 5% of the bank's overall lending by number of loans, and 5% by dollar volume. During the evaluation period, Univest made 458 HMDA loans totaling \$102 million, and 291 small business loans totaling \$83 million in the Allentown, PA assessment area.

### **Borrower Distribution of Loans**

Given the assessment area's demographics and economic characteristics, the borrower distribution of lending, given the product lines offered, reflects good 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 this assessment area in driving lending performance. Further, due to overall loan volumes in the Allentown, PA assessment area, HMDA loans are given more weight in determining the bank's overall borrower distribution of loans, followed by small business loans.

<sup>&</sup>lt;sup>17</sup>Borrower distribution of small farm loans is not included in the analysis for the Allentown, PA assessment area due to low loan volume.

<sup>&</sup>lt;sup>18</sup>Geographic distribution of small farm loans is not included in the analysis for the Allentown, PA assessment area due to low loan volume.

### **Home-Mortgage Lending**

Univest's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers is good.

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

As noted previously, according to the 2015 ACS data, 21% of assessment area families were low-income, 18% were moderate-income, 21% were middle-income, and 40% were upper-income. According to 2015 ACS data, 39% of families were designated as low- or moderate-income families, which indicates a notable need for home-mortgage credit among this segment of the population.

The following table compares Univest'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 table relies on 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families, along with updated HMDA data, following the requirements of Regulation C.

Univest Bank and Trust Co. Allentown, PA Assessment Area Distribution of HMDA Loans by Borrower Income Level									
	Aggregate Comparison								
	% Families by	2019		2020		2021			
Family Income	Family Income	%	%	%	%	%	%		
	(2015 ACS Data)	Univest's Lending	Aggregate Lending	Univest's Lending	Aggregate Lending	Univest's Lending	Aggregate Lending		
Low	20.9	5.2	8.6	8.4	6.0	12.4	7.6		
Moderate	18.0	14.4	20.0	18.0	16.6	20.1	18.6		
Middle	21.2	21.6	21.4	28.7	20.8	19.1	22.1		
Upper	39.9	52.6	34.0	40.1	39.2	44.8	35.0		
Unknown	0.0	6.2	16.0	4.8	17.4	3.6	16.7		
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0		

### Lending to Low-Income Borrowers

For the period under review, Univest's lending to low-income borrowers was good.

In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a down payment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities.

Univest's lending in 2019 to low-income borrowers was adequate. In total, 5% of the bank's 97 HMDA loans (five loans) were originated to low-income borrowers, trailing the proxy of 21%, and the aggregate lending to low-income borrowers of almost 9%. By loan type, Univest originated 7% of its home purchase loans (four loans), and 3% of its refinance loans (one loan), and no home improvement, multifamily or loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 10% of home purchase loans, 7% of refinance loans, 7% of home improvement loans, 1% of multifamily loans, and 1% of loans with purpose "not applicable" to low-income borrowers in 2019.

Univest's HMDA lending in 2020 to low-income borrowers was good. In total, 8% of the bank's 167 HMDA loans (14 loans) were originated to low-income borrowers, trailing the proxy of 21%, but exceeding the aggregate lending to low-income borrowers of 6%. By loan category, Univest originated 15% of its home purchase loans (11 loans), 4% of its refinance loans (three loans), and no home improvement, multifamily or loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 10% of home purchase loans, 4% of refinance loans, 6% of home improvement loans, and no multifamily loans, or loans with purpose "not applicable" to low-income borrowers in 2020.

Univest's lending in 2021 to low-income borrowers was good. In total, 12% of the bank's 194 HMDA loans (24 loans) were originated to low-income borrowers, trailing the proxy of 21%, but exceeding the aggregate lending to low-income borrowers of 8%. By loan type, Univest originated 16% of its home purchase loans (16 loans), 7% of its refinance loans (six loans), 13% of its home-improvement loans (one loan), and no multifamily loans, or loans with purpose "not applicable" to low-income borrowers. In comparison, aggregate lenders made 10% of home purchase loans, 6% of refinance loans, 7% of home improvement loans, no multifamily loans, and less than 1% of loans with purpose "not applicable" to low-income borrowers in 2021.

#### Lending to Moderate-Income Borrowers

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

Univest's HMDA lending in 2019 to moderate-income borrowers was adequate. Of the bank's 97 HMDA loans, 14% (14 loans) were originated to moderate-income borrowers, trailing the proxy of 18%, and the aggregate lending to moderate-income borrowers of 20%. By loan type, Univest originated 17% of its home purchase loans (nine loans), 10% of its refinance loans (three loans), 22% of its home improvement loans (two loans), and no multifamily or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 24% of home purchase loans, 16% of refinance loans, 17% of home improvement loans, no multifamily loans, and just under 1% of loan purpose "not applicable" loans to moderate-income borrowers in 2019.

Univest's lending in 2020 to moderate-income borrowers was good. In total, 18% of the bank's 167 HMDA loans (30 loans) were originated to moderate-income borrowers, matching the proxy of 18%, and exceeding the aggregate lending to moderate-income borrowers of 17%. By loan category, Univest originated 24% of its home purchase loans (18 loans), 13% of its refinance loans (10 loans), 10% of its home improvement loans (one loan), and no multifamily loans, or loans with purpose "not applicable" to moderate-income borrowers.

In comparison, aggregate lenders made 24% of home purchase loans, 13% of refinance loans, 15% of home improvement loans, 1% of multifamily loans, and less than 1% of loans with purpose "not applicable" to moderate-income borrowers in 2020.

Univest's HMDA lending in 2021 to moderate-income borrowers was excellent. Of the bank's 194 HMDA loans, 20% (39 loans) were originated to moderate-income borrowers, exceeding both the proxy of 18%, and the aggregate lending to moderate-income borrowers of 19%. By loan category, Univest originated 23% of its home purchase loans (23 loans), 19% of its refinance loans (15 loans), and no home improvement loans, multifamily loans, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 23% of home purchase loans, 17% of refinance loans, 14% of home improvement loans, and no multifamily loans, or loans with purpose "not applicable" to moderate-income borrowers in 2021.

### **Small Business Lending**

An analysis of Univest's borrower distribution of small business loans reflects adequate 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 Allentown, PA assessment area is used as a proxy to estimate demand for business credit in the assessment area. According to Dun & Bradstreet business data in 2019, there were 30,256 businesses operating in the assessment area in 2019, with 91% designated as small businesses. According to 2020 Dun and Bradstreet business data, there were 28,455 businesses operating in the assessment area in 2020, with 91% designated as small businesses. Finally, according to 2021 Dun & Bradstreet business data, there were 27,961 businesses operating in the assessment area in 2021, with 91% designated as small businesses.

In 2019, the bank's borrower distribution of small business loans was poor. In 2019, Univest originated 72 small business loans in the assessment area, aggregating nearly \$21 million. Of these loans, only 18% were originated to small businesses (13 loans). This performance was below the aggregate lending level of 48% to small business, and below the proxy of 91%. <sup>19</sup>

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, 50% of Univest's small business loans were extended in amounts of \$100 thousand or less (36 loans). Aggregate data indicates that 93% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

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<sup>&</sup>lt;sup>19</sup>Univest's proprietary small business loan product, Univest Business Banking Express Loan (UBBX) provides small business loans and lines of credit up to \$100,000. Revenue is not required on the application and therefore a very small percentage of applications are received with revenue information reported. As a result, the bank's performance in small business originations and small business loans extended in amounts of \$100 thousand or less appears to lag in performance compared to peers.

In 2020, the bank's borrower distribution of small business loans was adequate, given performance context factors<sup>20</sup>. In 2020, Univest originated 131 small business loans within the assessment area, aggregating \$38 million. Of these loans, 17% were originated to small businesses (22 loans). This performance was below the aggregate lending level of 42% to small businesses, and below the proxy of 91%.

Further, in 2020, 41% of Univest's small business loans were extended in amounts of \$100 thousand or less (53 loans). Aggregate data indicates that 87% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

Finally, in 2021, the bank's borrower distribution of small business loans was adequate, given performance context factors<sup>21</sup>. In 2021, Univest originated 88 small business loans within the assessment area, aggregating \$25 million within the assessment area. Of these loans, 13% were originated to small businesses (11 loans). This performance was below the aggregate lending level of 48% to small businesses, and below the proxy of 91%.

In 2021, 44% of Univest's small business loans were extended in amounts of \$100 thousand or less (39 loans). Aggregate data indicates that 91% of small business loans made in the assessment area were originated in an amount of \$100 thousand or less.

### **Geographic Distribution of Loans**

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. Overall, the geographic distribution of loans reflects good penetration throughout the Allentown, PA assessment area, including in low- and moderate-income census tracts. Once again, it is noted that HMDA loans were given greater weight in determining this conclusion, given their higher volume by number and dollar amount, followed by small business loans. Further, given the demographics of the assessment area, more weight was given to lending in moderate-income census tracts.

#### **Home-Mortgage Lending**

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Univest's distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts is good. As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit is in the tract.

<sup>&</sup>lt;sup>20</sup>Notably, in 2020, 62% of small business loans in the assessment area were originated to businesses of unknown income (81 loans). This is attributable to the bank's participation in the Small Business Administration's (SBA) Paycheck Protection Program (PPP). In April 2020, the PPP was established by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), and implemented by the SBA (Federal Register 13 CFR Part 120). The PPP program provides small businesses with funds to pay up to eight weeks of payroll costs including benefits. Funds can also be used to pay interest on mortgages, rent, and utilities. Under this program, institutions were not required to collect revenue information. For context, on the entire Univest 2020 CRA LAR, 2% of the reported loans were either UBBX or PPP loans which were reported without revenue (81loans).

<sup>&</sup>lt;sup>21</sup>In 2021, 59% of small business loans in the assessment area were originated to businesses of unknown income (52 loans). Again, this is attributable to the bank's proprietary small business loan product and participation in the SBA's PPP.

According to 2015 ACS data, 3% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 14% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle-income tracts (44%), and upper-income tracts (39%).

The following table presents Univest's geographic distribution of HMDA loans from 2019 to 2021, in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area. The tables used for lending in all three years rely on 2015 ACS data, along with updated HMDA data, following the requirements of Regulation C.

Univest Bank and Trust Co. Allentown, PA Assessment Area Geographic Distribution of HMDA Loans								
	Aggregate Comparison							
Census Tract	%	2019		2020		2021		
Income Level	Owner-Occupied Units (2015 ACS Data)	% Univest's Lending	% Aggregate Lending	% Univest's Lending	% Aggregate Lending	% Univest's Lending	% Aggregate Lending	
Low	3.3	3.1	4.6	4.2	3.7	3.6	3.8	
Moderate	13.8	6.2	15.0	11.4	12.4	14.4	14.3	
Middle	43.6	34.0	41.1	34.1	40.4	43.8	41.1	
Upper	39.3	56.7	39.3	50.3	43.5	38.2	40.8	
Unknown	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0	

### Lending in Low-Income Census Tracts

For the period under review, Univest's overall HMDA lending in low-income tracts was considered good.

Univest's HMDA lending in low-income census tracts in 2019 was good. Of the 97 HMDA loans originated by Univest in 2019, 3% (three loans) were made in low-income tracts. This performance was below the aggregate lending level of 5%, but matched the proxy of 3%. By loan category, Univest originated 2% of its home purchase loans (one loan), 11% of its home improvement loans (one loan), 100% of its multifamily loans (one loan), and no refinance loans, or loans with purpose "not applicable" in low-income tracts in the assessment area. In comparison, aggregate lenders made 6% of home purchase loans, 3% of refinance loans, 2% of home improvement loans, 25% of multifamily loans, and 11% of loans with purpose "not applicable" in low-income tracts in the assessment area in 2019.

Univest's lending in low-income census tracts in 2020 was good. In total, 4% of the bank's 167 HMDA loans (seven loans) were originated in low-income tracts. The bank's performance exceeded the proxy of 3%, and matched the aggregate lending in low-income tracts of 4%. By loan type, Univest originated 8% of its home purchase loans (six loans), 1% of its refinance loans (one loan), and none of its home improvement, multifamily, or loans with purpose "not applicable" in low-income tracts in the assessment area. In comparison, aggregate lenders made 6% of home purchase loans, 2% of refinance loans, 2% of home improvement loans, 30% of multifamily loans, and 7% of loans with purpose "not applicable" in low-income tracts in the assessment area in 2020.

Univest's lending in low-income census tracts in 2021 was good. In total, 4% of the bank's 194 HMDA loans (seven loans) were originated in low-income tracts. Again, this performance exceeded the proxy of 3%, and matched aggregate lending in low-income tracts of 4%. By loan type, Univest originated 6% of its home purchase loans (six loans), 13% of its home improvement loans (one loan), and no refinance, multifamily, or loans with purpose "not applicable" in low-income tracts in the assessment area. In comparison, aggregate lenders made 6% of home purchase loans, 2% of refinance loans, 2% of home improvement loans, 29% of multifamily loans, and 7% of loans with purpose "not applicable" in low-income tracts in the assessment area in 2021.

### Lending in Moderate-Income Census Tracts

For the period under review, the bank's HMDA lending in moderate-income tracts was considered good.

Univest's lending in moderate-income census tracts in 2019 was poor. Of Univest's 97 HMDA loans originated in the assessment area in 2019, 6% (six loans) were made in moderate-income census tracts. The bank's lending trailed both the proxy of 14% and the aggregate lending level of 15%. By product type, the bank made 7% of its home purchase loans (four loans), 3% of its refinance loans (one loan), 11% of its home improvement loans (one loan), and no multifamily loans, or loans with purpose "not applicable" in moderate-income census tracts in the assessment area. In comparison, aggregate lenders made 18% of home purchase loans, 10% of refinance loans, 10% of home improvement loans, 25% of multifamily loans, and 26% of loans with purpose "not applicable" in moderate-income tracts in the assessment area in 2019.

Univest's lending in moderate-income census tracts in 2020 was good. Of Univest's 167 HMDA loans originated in the assessment area in 2020, 11% (19 loans) were made in moderate-income census tracts. The bank's lending was below the proxy of 14% and slightly below the aggregate lending level of 12%. By product type, the bank made 18% of its home purchase loans (13 loans), 5% of its refinance loans (four loans), 10% of its home improvement loans (one loan), and no multifamily loans, or loans with purpose "not applicable" in moderate-income census tracts in the assessment area. In comparison, aggregate lenders made 17% of home purchase loans, 8% of refinance loans, 10% of home improvement loans, 32% of multifamily loans, and 26% of loans with purpose "not applicable" in moderate-income tracts in the assessment area in 2020.

Finally, Univest's lending in moderate-income census tracts in 2021 was good. Of Univest's 194 HMDA loans originated in the assessment area in 2021, 14% (28 loans) were made in moderate-income census tracts. The bank's lending matched the proxy and aggregate lending level, both of which were 14%. By product type, the bank made 20% of its home purchase loans (20 loans), 9% of its refinance loans (seven loans), and no home improvement loans, multifamily loans, or loans with purpose "not applicable" in moderate-income census tracts in the assessment area. In comparison, aggregate lenders made 19% of home purchase loans, 11% of refinance loans, 10% of home improvement loans, 34% of multifamily loans, and 29% of loans with purpose "not applicable" in moderate-income tracts in the assessment area in 2021.

### **Small Business Lending**

The geographic distribution of Univest's small business loans reflects excellent 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 small business loans in the tract. According to Dun & Bradstreet data in 2019, there were 30,256 businesses in the assessment area. Of these businesses, 7% were located in low-income tracts, and 17% were located in moderate-income tracts. The vast majority of businesses were located in middle-income census tracts (40%) and upper-income census tracts (36%). In 2020, there were 28,455 businesses in the assessment area. Of these businesses, 7% were located in low-income tracts, and 17% were located in moderate-income tracts. Again, the majority of businesses were located in middle-income tracts (almost 40%), and upper-income tracts (37%). Finally, in 2021, the assessment area had 27,961 businesses, with 7% of businesses located in low-income tracts, and 17% located in moderate-income tracts. As in past years, the majority of businesses were located in middle-income tracts (39%), and upper-income tracts (37%).

The tables below present Univest's small business geographic distribution, in comparison to the applicable business proxy and aggregate lending levels in the assessment area for the years evaluated.

Univest Bank and Trust Co. Allentown, PA Assessment Area Geographic Distribution of Small Business Loans								
% Aggregate Comparison								
Census Tract Income Level	Businesses by Tract	2019						
	Income Level (2015 ACS Data)	%	%					
	(2015 ACS Data)	Univest's Lending	Aggregate Lending					
Low	6.7	5.6	6.1					
Moderate	16.6	16.7	15.7					
Middle	40.3	20.8	39.3					
Upper	36.4	56.9	37.9					
Unknown	0.0	0.0 1.0						
Total	100.0	100.0	100.0					

Univest Bank and Trust Co. Allentown, PA Assessment Area Geographic Distribution of Small Business Loans								
	% Aggregate Comparison							
Census Tract Income Level	Businesses by Tract	2020						
	Income Level (2015 ACS Data)	% Univest's Lending	% Aggregate Lending					
Low	6.7	10.7	6.1					
Moderate	16.6	15.3	16.1					
Middle	39.6	30.5	39.5					
Upper	37.1	43.5	37.9					
Unknown	0.0	0.0						
Total	100.0	100.0	100.0					

Univest Bank and Trust Co. Allentown, PA Assessment Area Geographic Distribution of Small Business Loans									
	%	Aggregate (	Comparison						
Census Tract Income Level	Businesses by Tract	20	21						
	Income Level (2015 ACS Data)	%	%						
	(2015 ACS Data)	Univest's Lending	Aggregate Lending						
Low	6.9	11.4	6.1						
Moderate	16.6	20.5	16.5						
Middle	39.3	26.1	38.9						
Upper	37.2	42.0	38.0						
Unknown	0.0	0.0	0.5						
Total	100.0	100.0	100.0						

### Lending in Low-Income Census Tracts

For the period under review, Univest's small business lending in low-income tracts was excellent.

In 2019, the geographic distribution of the bank's small business lending in low-income census tracts was good. Univest originated just under 6% of its small business loans (four loans) in the assessment area's low-income census tracts. The bank's lending level was slightly below the applicable loan demand proxy of 7%, and matched the 2019 aggregate small business lending level of 6%.

In 2020, the geographic distribution of the bank's small business lending in low-income census tracts was excellent. Univest originated 11% of its small business loans (14 loans) in the assessment area's low-income census tracts. The bank's lending level exceeded proxy of 7% and the 2020 aggregate small business lending level of 6%.

Finally, in 2021, the geographic distribution of the bank's small business lending in low-income census tracts was excellent. Univest originated 11% of its small business loans (10 loans) in the assessment area's low-income census tracts. The bank's lending again exceeded the proxy of 7% and the 2021 aggregate small business lending level of 6%.

### Lending in Moderate-Income Census Tracts

For the period under review, Univest's small business lending in moderate-income tracts was good.

In 2019, the geographic distribution of the bank's small business lending in moderate-income census tracts was good. Univest originated 17% of its small business loans (12 loans) in the assessment area's moderate-income census tracts. The bank's lending level matched the applicable business loan demand proxy of 17%, and just exceeded the aggregate small business lending level of 16%.

In 2020, the geographic distribution of the bank's small business lending in moderate-income census tracts was again, good. Univest originated 15% of its small business loans (20 loans) in the assessment area's moderate-income census tracts. The bank's lending level was below the proxy of 17%, and the aggregate small business lending level of 16%.

In 2021, the geographic distribution of the bank's small business lending in moderate-income census tracts was excellent. Univest originated 21% of its small business loans (18 loans) in the assessment area's moderate-income census tracts. The bank's lending level exceeded both the proxy, and the aggregate small business lending level, both of which were of 17%.

### **Responsiveness to Credit Needs**

Univest exhibits a good record of servicing the credit needs of low- and moderate-income borrowers and very small businesses, consistent with safe and sound banking practices. As mentioned previously, the primary community development needs mentioned by community contacts were affordable housing, community services for to combat food insecurity, financial literacy training for first-time homebuyers and home rehabilitation/weatherization programs.

In addition to responsiveness through its retail HMDA and small business lending, Univest has addressed these needs through the use of flexible lending programs, as well as community development loans. Both are discussed in more detail below.

### **Innovative and/or Flexible Lending Practices**

Univest makes use of innovative and/or flexible lending practices in serving the Allentown, PA assessment area credit needs. Through a number of different programs, the bank made homemortgage loans to low- and moderate-income borrowers, and small businesses during the evaluation period.

Often, the home-mortgage credit needs of low- and moderate-income individuals and families can be addressed more effectively by alternative mortgage products. In an effort to address the credit needs of such borrowers in the Allentown, PA assessment area, Univest participates in programs for first-time homebuyers through a variety of government agencies, including: the FHA, the VA, the USDA RHS, Fannie Mae and Freddie Mac. Additionally, the bank participates in specialized lending and grant programs with the PHFA and through FHLB Pittsburgh's FFD grant program. Through these programs, the bank makes home-mortgage loans to low- and moderate-income borrowers in conjunction with grants and forgivable loans. The programs have income parameters that effectively restrict them to low- and moderate-income borrowers.

During the evaluation period, Univest originated 48 FHA loans totaling \$9.7 million, five VA loans totaling \$1.2 million, two RHS loans totaling \$348 thousand, four Fannie Mae loans totaling \$823 thousand, and two Freddie Mac loans totaling \$381 thousand.

In addition, Univest made 17 PHFA loans totaling \$3.4 million, and four FHLB of Pittsburgh FFD grants totaling \$20 thousand in the assessment area during the current exam period. The grants made were in the amount of \$5,000 to each first-time homebuyer.

Similarly, the credit needs of small businesses can often be addressed more effectively by alternative products. In an effort to address the credit needs of small businesses in its assessment area, Univest participates in SBA loan programs, and is a preferred SBA Express Lender. During the evaluation period, no SBA loans were originated in the Allentown, PA assessment area. This represents a decrease from the previous evaluation when 14 loans and \$1.3 million were reported.

Finally, Univest offers its own proprietary small business loan product, UBBX, formerly known as its Main Street Banking program. The UBBX program provides small business owners the opportunity to package products and services, which saves them money, and simplifies the product selection process. During the evaluation period, Univest made eight UBBX loans totaling \$478 thousand in the Allentown, PA assessment area.

### **Community Development Lending**

Univest makes a relatively high level of community development loans in the Allentown, PA assessment area. During the period evaluated, which included the timeframe between January 14, 2020, through December 5, 2022, the bank made 12 community development loans in the assessment area, totaling \$32.5 million. Of the bank's total community development lending by dollar volume, 25% was within the Allentown, PA assessment area.

Univest's community development lending increased from the previous evaluation, when five new loans totaling \$25.4 million were reported.

Of the bank's 12 community development loans, four loans totaling \$1.6 million (5%) supported affordable housing initiatives for low- and moderate-income individuals. Two loans totaling \$265 thousand (just under 1%) supported community services to low- and moderate-income individuals and areas, and the remaining six loans totaling \$30.6 million (94%) supported revitalization and/or stabilization efforts in the assessment area.

Finally, the bank's participation in the Paycheck Protection Program during the COVID-19 pandemic was particularly responsive to revitalization and stabilization efforts for businesses to be able to retain employees in low- and moderate-income census tracts. Univest made a total of 129 PPP loans in the assessment area totaling \$42.2 million, with two loans totaling \$2.3 million counted as CD loans.

The following table includes the bank's community development loans in the Allentown, PA assessment area, broken out by community development purposes.

	Univest Bank and Trust Co. Community Development Lending Allentown, PA Assessment Area												
Activity Affordable Housing Community Economic Revitalize or Stabilize Totals									otals				
Year	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)			
2020	0	0	1	222	0	0	3	8.0	4	8.2			
2021	1	1,000	1	1 43		0	3	22.6	5	23.7			
2022	3	623	0	0	0	0	0	0		623			
TOTAL	4	1,6	2	265	0	0	6	30.6	12	32.5			

#### **INVESTMENT TEST**

The investment test evaluates a financial institution's level of qualified investments that serve lowor moderate-income areas or individuals, together with the responsiveness, innovativeness and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment, deposit, membership share, or grant, including a donation or in-kind contribution of property, that has as its primary purpose, community development.

Performance under the investment test is assessed as high satisfactory.

### **Volume of Investment and Grant Activity**

Univest has a significant level of qualified community development investments and grants in this assessment area. Qualified investments and donations for the Allentown, PA assessment area totaled \$6.6 million, which is an increase from the investment level of \$5.2 million at the prior evaluation. Of the bank's overall investments, 19% were within the Allentown, PA assessment area.

The entirety of the bank's qualified investments supported affordable housing for low- and moderate-income borrowers via maturing investments in mortgage-backed securities totaling \$6.1 million. This total is comprised of 35 home-mortgage loans in 14 investments to low- and moderate-income individuals and/or geographies. Six of the 14 mortgage-backed security investments were recognized in the previous evaluation and remained outstanding.

In addition to the qualified investments discussed above, the bank also made 64 donations totaling \$474 thousand to local organizations that routinely provide community development services in the assessment area. Of the total dollar amount, \$162 thousand (34%) supported affordable housing, nearly \$299 thousand (63%) went to organizations that provided community services to low- and moderate-income individuals, and \$13 thousand (3%) supported economic development efforts in the assessment area.

The following table presents the investment and grant activity for the Allentown, PA assessment area.

	Univest Bank & Trust Co. Allentown, PA Assessment Area Qualified Investments													
CD Category Affordable Community Economic Revitalize or Stabilize Total										otals				
#		\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)				
Qualified Investments	14	6,125	0	0	0	0	0	0	14	6,125				
Donations	8	162	53	299	3	13	0	0	64	474				
In-Kind Donations	0	0	0	0	0	0	0	0	0	0				
TOTAL	22	6,287	53	299	3	13	0	0	78	6,599				

### Responsiveness to Credit and Community Development Needs

Univest exhibits good responsiveness to credit and community development needs of the assessment area. As mentioned previously, the level of qualified investments and grants increased since the prior evaluation. Further, as noted in the table above, the vast majority of the bank's investments supported affordable housing in the assessment area, a pronounced community need as indicated through community contact interviews.

#### **Community Development Initiatives**

Univest makes occasional use of innovative and/or complex investments to support community development initiatives. In the Allentown, PA assessment area, the vast majority of investment dollars (93%) consisted of mortgage-backed securities investments, which are more complex than simple donations.

#### **SERVICE TEST**

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- the accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- the impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- the reasonableness of business hours and services in meeting assessment area needs; and
- the extent to which an institution provides community development services.

Performance under the service test is assessed as high satisfactory in the assessment area.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment areas. During the review period, Univest operated two full-service branches in the Allentown, PA assessment area (5% of all branches). Using the 2015 ACS data, one branch (50%) was located in a moderate-income census tract, and the other branch (50%) was located in an upper-income tract.

The following table details the locations of the bank's branches with comparison to 2015 ACS population demographics.

	Univest Bank and Trust Co. Allentown, PA Assessment Area Retail Branch Distribution 2015 ACS Data											
Census Tract Type Number of Branches Percent of Branches Population Percent of Population												
Low	0 0.0 59,180 9.											
Moderate	1	50.0	130,237	19.8								
Middle	0	0.0	255,834	39.0								
Upper	1	50.0	211,121	32.2								
Unknown Income	0	0.0	0	0.0								
Totals	2	100.0	656,372	100.0								

ATMs are available at each branch location, which provides electronic access to banking services. In addition, Univest participates in Allpoint ATM network, which provides access to surcharge free ATMs nationwide. To supplement traditional banking services, Univest provides alternative delivery systems that include online banking services, telephone banking services and a smart phone mobile banking application that includes mobile deposit capture capabilities for retail and small business customers. Customers are able to pay bills, open accounts, and apply for loans using the bank's online website at <a href="https://www.univest.net">https://www.univest.net</a>.

### **Changes in Branch Locations**

Univest did not open or close any branches within the Allentown, PA assessment area during the evaluation period, and therefore this component of the service test was not considered in this assessment area.

### Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals. As mentioned above, each of Univest's branches in the assessment area include ATMs. Additionally, one of the two branches in the assessment area has a drive-through facility.<sup>22</sup> Both branches operate Monday through Friday, with extended hours on Thursday and Friday. Further, both branches offer limited Saturday hours, with branches operating from 9:00 a.m. – 1:00 p.m.

#### **Bank Products**

Univest offers deposit products that provide greater access to banking services for low- and moderate-income customers. The bank offers two free checking accounts for consumers, which feature no minimum monthly balance requirement, no monthly service fee and no paper statement fee. One of the free checking products offers no non-Univest ATM fees, while the other provides for no overdraft item fees if the account overdraft total is within daily threshold limits.

<sup>&</sup>lt;sup>22</sup>Drive-through facilities are not available at the Bethlehem branch in Northampton County due to limitations in the physical location.

The bank also offers a low-cost small business checking account for small businesses with limited transaction activity. The account charges no monthly service fee and has no minimum monthly balance requirement. Further, this account offers 200 free transaction items processed through the account, with transactions above the monthly maximum incurring a \$.50 per item charge. This account allows very small businesses access to banking services that meet their needs.

### **Community Development Services**

Univest provides a relatively high level of community development services in the Allentown, PA assessment area.

Over the evaluation period, numerous bank officers and employees provided qualified community development services, serving in various capacities on boards and committees, and providing technical assistance to community and economic development organizations. Some notable examples included:

- An employee serves on the board of the Boys & Girls Club of Allentown, an organization which provides a variety of community services to at-risk children in the Lehigh Valley, the vast majority of which qualify for free- or reduced-price lunches at school<sup>23</sup>.
- An employee serves on the board of the Community Action Lehigh Valley, an anti-poverty community action organization, which offers a variety of community development programs including a food bank, affordable housing, housing counseling and home rehabilitation services, small business start-up programs, and neighborhood revitalization projects.
- An employee serves on the board of Habitat for Humanity of the Lehigh Valley, whose mission is to provide affordable housing to low-income families in the Lehigh Valley.
- An employee serves as the Treasurer and board member of Workforce Board Lehigh Valley, a non-profit which partners with area businesses to provide workforce training and development to Lehigh Valley workers, particularly those who are low- and moderateincome individuals.
- An employee serves on the board of the Nehemiah Wall, a not-for-profit which provides transitional housing and community services to low- and moderate-income women and children in the Lehigh Valley.
- An employee serves on the board of ProJeCt of Easton, a non-profit that provides free community services to low-income at-risk Lehigh Valley residents, including literacy, GED and ESL courses, school-based mentoring, a food pantry, and emergency housing, among other offerings.

Additionally, the bank participates as an intermediary for the FHLB Pittsburgh's "Home4Good Initiative." Home4Good is a flexible grant program that supports projects, programs, and activities that lead to stable housing for those who are homeless or at risk of becoming homeless. In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to the FHLB of Pittsburgh, on their behalf.

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<sup>&</sup>lt;sup>23</sup>According to the 2022 Annual Report, 95% of students served by the Boys and Girls Club qualify for free- or reduced-price lunches at school, qualifying them as low- or moderate-income students.

Finally, Univest took steps throughout the pandemic to address the needs of customers impacted by the COVID-19 global pandemic. The bank waived overdraft fees on all business and personal accounts renewable in 30-day periods, and waived early redemption fees for certificates of deposit (CD), and individual retirement account (IRA) withdrawals on a renewable basis during the pandemic.

# LANCASTER, PA ASSESSMENT AREA / LIMITED-SCOPE REVIEW

A limited-scope review of the bank's performance in the Lancaster, PA assessment area was conducted. For the purposes of assessing Univest's performance in the Commonwealth of Pennsylvania, the Lancaster, PA assessment area was given the second highest weight, behind the Philadelphia, PA assessment area, given the bank's volume of loans, deposits and operations in this assessment area. More specifically, during the evaluation period, lending activity in the Lancaster, PA assessment area represented 20% of the bank's overall lending by number and 18% by dollar amount. The assessment area's five branches (14% of total branches) held \$467 million in deposits, or eight percent of the bank's total deposits as of June 30, 2022. Univest also operates one limited-service facility in the Lancaster, PA assessment area. Though this assessment area was given the second greatest weight in determining the statewide rating, it was evaluated using limited-scope review procedures, as a full-scope review was conducted at the previous CRA evaluation.

The bank's performance in the Lancaster, PA assessment area is consistent with its performance in the full-scope review assessment areas, as seen in the table below. The facts and data reviewed, including performance and demographic information, are presented in the tables located in the Appendices accompanying this report. Conclusions regarding performance are as follows:

ASSESSMENT AREA	LENDING TEST	INVESTMENT TEST	SERVICE TEST
Lancaster, PA Assessment Area	Consistent	Consistent	Below

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

The bank's Lancaster, PA assessment area consists of the entirety of Lancaster County, which comprises the Lancaster, PA MSA.

According to 2015 ACS Data, the Lancaster, PA assessment area consisted of 98 census tracts. Of these 98 tracts, six were designated as low-income (6%), 14 were moderate-income (14%), 67 were middle-income (over 68%), and 11 were upper-income (11%). All six low-income tracts and eight of the moderate-income tracts were located in the city of Lancaster, the largest urban center in the assessment area. ACS data indicated that the assessment area had a population of 530,216.

A map of the Lancaster, PA assessment area using 2015 ACS data is available in Appendix F.

Univest's performance was evaluated in terms of the demographic and business context in which the bank operates. According to the FDIC's Deposit Market Share Report as of June 30, 2022, there were 24 depository institutions operating in the Lancaster, PA assessment area. These institutions maintained a total of 156 branches holding \$16.1 billion in deposits. Univest, with five branches in the assessment area, ranked tenth, with \$467 million, or nearly 3% of the deposit market. Fulton Bank, N.A. held the largest share of deposits with 24% of the market, followed by Truist Bank, with 17% of the market, and PNC Bank, N.A. with 12% market share.

Similarly, Univest was a relatively minor player in the HMDA market, holding less than 2% of the market in all three years evaluated. In 2019, a total of 404 HMDA reporters originated or purchased a total of 17,218 HMDA loans. Univest ranked fifteenth in the HMDA market with less than 2% market share. Fulton Bank, N.A. led the market with just under 9% of HMDA loans, followed by Wells Fargo Bank, N.A. (7%), and Members 1<sup>st</sup> Federal Credit Union (7%).

In 2020, 447 HMDA reporters originated or purchased a total of 22,610 HMDA loans. Univest ranked sixteenth, with less than 2% of the HMDA market. Once again, Fulton Bank, N.A. led the market (7%), followed by Wells Fargo Bank, N.A. (6%), and Quicken Loans, LLC (just under 6%).

Finally, in 2021, 483 HMDA reporters originated or purchased a total of 24,693 HMDA loans. Univest ranked nineteenth, with less than 2% of the market. Rocket Mortgage, LLC led the market with 7% of loans, followed by Fulton Bank, N.A. (7%), and Wells Fargo Bank, N.A. (5%).

With regard to small business and small farm lending, in 2019, a total of 105 CRA data reporters originated or purchased 12,817 CRA loans in the Lancaster, PA assessment area. Univest ranked seventh, with nearly 6% market share. JP Morgan Chase Bank, N.A. led the market with 13% market share, followed by American Express, NB (11%) and U.S. Bank, N.A. (9%).

In 2020, 136 CRA reporters originated or purchased 14,328 small business and small farm loans in the assessment area. Univest ranked sixth with nearly 6% of the market. Fulton Bank, N.A. ranked first with 10%, followed by Truist Bank (9%), and American Express, NB (8%).

Finally, in 2021, a total of 140 CRA reporters originated or purchased 14,694 loans in the assessment area. Univest ranked seventh, with 5% of the market. American Express, NB ranked first with 11% market share, followed by U.S. Bank, N.A. (9%) and JP Morgan Chase Bank N.A. (8%).

According to Moody's May 2022 Precis report, the Lancaster, PA MSA's economy is in recovery mode, though the labor market has slowed as the result of slowdowns in the healthcare, leisure and hospitality, and private sectors. Per Moody's Analytics, leading industries in the assessment area include education and health services (18%), manufacturing (15%), retail trade (12%), and professional and business services (11%). The top employers are Lancaster General Hospital, Giant Food Stores, LLC and Eurofins Lancaster Laboratories, Inc.

An interview was conducted with a community development representative to provide perspective on the credit and community development needs in the Lancaster, PA assessment area. This information is supplemented with demographic and economic data pertinent to the assessment area. The contact, who represented a community action agency, identified workforce development and transportation as key community development needs in the assessment area, and pointed to post-COVID difficulties on workforce return, such as childcare, education, healthcare and transportation. The contact noted that many manufacturing jobs are located in suburban and rural areas, so transportation to these areas is vital in maintaining this strong employment base. Finally, the contact noted the rising costs of food and housing, indicating needs for community services and affordable housing.

Tables showing the assessment area demographics of Lancaster, PA assessment area in 2019, 2020, and 2021 are contained on the following pages.

		Lancaste	st Bank and Tru er, PA Assessm ent Area Demo 2019	ent Area				
Income Categories		act bution	Families Tract Inc	•	Level a	< Poverty as % of by Tract	Families by Family Income	
<b>_</b>	#	%	#	%	#	%	#	%
Low-income	6	6.1	4,407	3.2	1,708	38.8	25,060	18.3
Moderate-income	14	14.3	12,532	9.1	1,781	14.2	26,380	19.2
Middle-income	67	68.4	102,889	75.0	6,108	5.9	31,628	23.1
Upper-income	11	11.2	17,305	12.7	397	2.3	54,065	39.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	98	100.0	137,133	100.0	9,994	7.3	137,133	100.0
	Housing			Housing 1	Types by Tra	act		
	Units by	Ov	vner-Occupied		Rei	ntal	Vaca	ant
	Tract	#	%	%	#	%	#	%
Low-income	8,182	2,13	1 1.6	26.0	5,218	63.8	833	10.2
Moderate-income	23,282	11,893	8.8	51.1	9,716	41.7	1,673	7.2
Middle-income	148,916	102,334	4 76.1	68.7	40,099	26.9	6,483	4.4
Upper-income	25,207	18,190	13.5	72.2	5,749	22.8	1,268	5.0
Unknown-income	0	(	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	205,587	134,548	100.0	65.4	60,782	29.6	10,257	5.0
	Total Rusi	nossos by		Business	es by Tract	& Revenue \$	Size	
		Hact		Less Than or = \$1 Million		r \$1 lion	Revenue No Reported	
	#	%	#	%	#	%	#	%
Low-income	984	4.0	883	4.0	92	4.2	9	3.5
Moderate-income	2,678	11.0	2,359	10.7	295	13.5	24	9.4
Middle-income	17,961	73.5	16,200	73.6	1,567	71.5	194	76.4
Upper-income	2,821	11.5	2,556	11.7	238	10.8	27	10.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	24,444	100.0	21,998	100.0	2,192	100.0	254	100.0
	Percenta	ige of Total B	usinesses:	90.0		9.0		1.0
	Total Fa	arms by				Revenue Siz		
	Tra	act	Less Thar \$1 Milli	on	Mill	r \$1 lion	Revenu Repo	rted
	#	%	#	%	#	%	#	%
Low-income	2	0.2	2	0.2	0	0.0	0	0.0
Moderate-income	5	0.5	5	0.5	0	0.0	0	0.0
Middle-income	940	89.7	904	89.5	36	94.7	0	0.0
Upper-income	101	9.6	99	9.8	2	5.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,048	100.0	1,010	100.0	38	100.0	0	0.0
	Porco	ntage of Total	Farme	96.4		3.6		0.0

2015 ACS Data and 2019 D&B Information

		Lancaste	st Bank and Tr er, PA Assessr eent Area Dem 2020	ment Area				
Income Categories		ract ibution	Familie Tract In		Families < Level as Families b	% of	Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	6.1	4,407	3.2	1,708	38.8	25,060	18.3
Moderate-income	14	14.3	12,532	9.1	1,781	14.2	26,380	19.2
Middle-income	67	68.4	102,889	75.0	6,108	5.7	31,628	23.1
Upper-income	11	11.2	17,305	12.6	397	2.3	54,065	39.4
Unknown-income	0	0.0	0	0.1	0	0.0	0	0.0
Total Assessment Area	98	100.0	137,133	100.0	9,994	7.3	137,133	100.0
	Housing			Housing T	ypes by Trac	t		
	Units by	Ov	vner-Occupied		Rent	Vaca	ant	
	Tract	#	%	%	#	%	#	%
Low-income	8,182	2,131	1.6	26.0	5,218	63.8	833	10.2
Moderate-income	23,282	11,893	8.8	51.1	9,716	41.7	1,673	7.2
Middle-income	148,916	102,334	76.1	68.7	40,099	26.7	6,483	4.4
Upper-income	25,207	18,190	13.5	72.2	5,749	22.8	1,268	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	205,587	134,548	100.0	65.4	60,782	29.6	10,257	5.0
			•	Business	es by Tract &	Revenue S	Size	
		inesses by act	tesses by Less Than or =			Over \$1 Million		
	#	%	#	%	#	%	#	%
Low-income	991	4.0	894	4.0	88	4.1	9	3.5
Moderate-income	2,713	10.9	2,402	10.7	287	13.4	24	9.3
Middle-income	18,267	73.5	16,541	73.7	1,531	71.5	195	75.6
Upper-income	2,879	11.6	2,614	11.6	235	11.0	30	11.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	24,850	100.0	22,451	100.0	2,141	100.0	258	100.0
	Percenta	age of Total B	usinesses:	90.3		8.6		1.0
				Farms	by Tract & Re	venue Size	9	
		arms by ract	Less Tha \$1 Mil		Over Millio		Revenu Repo	
	#	%	#	%	#	%	#	%
Low-income	2	0.2	2	0.2	0	0.0	0	0.0
Moderate-income	6	0.6	6	0.6	0	0.0	0	0.0
Middle-income	936	90.1	903	90.0	33	94.3	0	0.0
Upper-income	94	9.1	92	9.2	2	5.7	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,038	100.0	1,003	100.0	35	100.0	0	0.0
	Perce	ntage of Tota	l Farms:	96.6		3.4		0.0

2015 ACS Data and 2020 D&B Information

		Lancaster,	Bank and T PA Assess nt Area Dem 2021	ment Area						
Income Categories		ract ibution	Famili Tract I		Families < Level a Families	s % of	Families by Family Income			
	#	%	#	%	#	%	#	%		
Low-income	6	6.1	4,407	3.2	1,708	38.8	25,060	18.3		
Moderate-income	14	14.3	12,532	9.1	1,781	14.2	26,380	19.2		
Middle-income	67	68.4	102,889	75.0	6,108	5.9	31,628	23.1		
Upper-income	11	11.2	17,305	12.7	397	2.3	54,065	39.4		
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0		
Total Assessment Area	98	100.0	137,133	100.0	9,994	7.3	137,133	100.0		
	Housing			Housing	Types by T	ract				
	Units by	Owi	ner-Occupie	d	Ren	Rental Vacant				
	Tract	#	%	%	#	%	#	%		
Low-income	8,182	2,131	1.6	26.0	5,218	63.8	833	10.2		
Moderate-income	23,282	11,893	8.8	51.1	9,716	41.7	1,673	7.2		
Middle-income	148,916	102,334	76.1	68.7	40,099	26.7	6,483	4.4		
Upper-income	25,207	18,190	13.5	72.2	5,749	22.8	1,268	5.0		
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0		
Total Assessment Area	205,587	134,548	100.0	65.4	60,782	29.6	10,257	5.0		
				Busines	ses by Trac	t & Revenu	ıe Size			
		Total Businesses by Tract		Less Than or = \$1 Million		r \$1 ion	Revenu Repoi			
	#	%	#	%	#	%	#	%		
Low-income	968	3.9	877	3.9	83	3.9	8	3.0		
Moderate-income	2,684	10.8	2,374	10.6	283	13.4	27	10.0		
Middle-income	18,268	73.6	16,555	73.8	1,508	71.4	205	75.9		
Upper-income	2,887	11.7	2,620	11.7	237	11.3	30	11.1		
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0		
Total Assessment Area	24,807	100.0	22,426	100.0	2,111	100.0	270	100.0		
	Percentaç	ge of Total Bu	sinesses:	90.4		8.5		1.1		
				Farm	s by Tract 8	Revenue	Size			
		arms by ract	Less Th		Over Milli	•	Revenu Repoi			
	#	%	#	%	#	%	#	%		
Low-income	2	0.2	2	0.2	0	0.0	0	0.0		
Moderate-income	7	0.7	7	0.7	0	0.0	0	0.0		
Middle-income	933	90.7	899	90.5	34	94.4	0	0.0		
Upper-income	87	8.4	85	8.6	2	5.6	0	0.0		
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0		
Total Assessment Area	1,029	100.0	993	100.0	36	100.0	0	0.0		
	Percen	tage of Total	Farms:	96.5		3.5		0.0		

2015 ACS Data and 2021 D&B Information

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in the Lancaster, PA assessment area is consistent with the institution's lending, investment, and service performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

### **LENDING TEST**

The bank's lending in this assessment area is consistent with the bank's lending in the full-scope assessment areas in the Commonwealth of Pennsylvania. Due to the number and dollar volume of loans in the Lancaster, PA assessment area, home-mortgage loans and small farm loans were weighted equally, followed by small business lending. By number the bank made more small farm loans, but by dollar amount, HMDA lending exceeded small farm lending.

### **Borrower and Geographic Distribution of Loans**

### **Home Mortgage Lending**

During 2019, Univest originated 317 HMDA loans aggregating \$66.1 million. The bank's lending to low-income borrowers (10%) exceeded the level of aggregate lending to low-income borrowers (7%), and was below the proxy of 18%. On the other hand, the bank's lending to moderate-income borrowers (34%) exceeded both aggregate lending to moderate-income borrowers (21%), and proxy (19%). With respect to the geographic distribution of HMDA loans, the bank made 3% of its loans in low-income tracts, exceeding both aggregate lending levels (2%) and proxy (2%). In moderate-income tracts, the bank's lending (7%) was below both the aggregate lending levels (11%) and proxy (9%).

During 2020, Univest originated 364 HMDA loans aggregating \$85.9 million. The bank's lending to low-income borrowers (7%) exceeded aggregate lending (5%), but trailed proxy (18%). The bank's lending to moderate-income borrowers (38%) exceeded both aggregate lending (20%) and proxy (19%). The bank's geographic distribution of HMDA loans in low-income tracts (5%), exceeded both aggregate lending levels (2%) and proxy (2%). In moderate-income tracts, the bank's lending (9%) matched both aggregate lending levels and proxy, both of which measures 9%.

Finally, during 2021, Univest originated 365 HMDA loans aggregating \$90.8 million. The bank's lending to low-income borrowers (9%) exceeded aggregate lending (7%), but trailed proxy (18%). The bank's lending to moderate-income borrowers (21%) matched the aggregate lending (21%), and exceeded proxy (19%). Univest's geographic distribution of HMDA loans in low-income tracts (4%) exceeded aggregate lending and proxy, both of which measured 2%. The bank's geographic distribution of HMDA loans in moderate-income tracts (10%) matched aggregate lending levels (10%), and exceeded proxy (9%).

### **Small Farm Lending**

Due to the demographics of the assessment area, the geographic distribution of small farm loans was not analyzed in the Lancaster, PA assessment area. In all three years covered in the evaluation, less than 1% of small farm loans were located in low-income census tracts, and less than 1% were located in moderate-income tracts. Due to these demographics, a geographic distribution of small farm loans would not prove to be meaningful.

In 2019, Univest originated 493 small farm loans aggregating \$65.4 million. Of these loans, 97% were originated to small farms, which exceeded aggregate lending of 84% to small farms by all lenders in the assessment area, and exceeded the proxy of 96%.

In 2020, Univest originated 431 small farm loans aggregating \$71.4 million. Of these loans, 95% were originated to small farms, which again, exceeded aggregate lending of 83% to small farms by all lenders in the assessment area, but trailed proxy (97%).

Finally, in 2021, Univest originated 485 small farm loans aggregating \$72.0 million. Of these loans, 95% were originated to small farms, which again, exceeded aggregate lending of 81% to small farms by all lenders in the assessment area, but was below the proxy (97%).

### **Small Business Lending**

During 2019, Univest originated 219 small business loans, aggregating \$49.1 million. Of these loans, 69% were originated to small businesses, which exceeded aggregate lending of 48% to small businesses by all lenders in the assessment area, and was below the proxy of 90%. With respect to the geographic distribution of small business loans, the bank made 2% of its loans in low-income tracts, and was below both aggregate lending (3%) and proxy (4%). Similarly, in moderate-income tracts, the bank's lending (1%) was below both aggregate lending (10%) and proxy (11%).

During 2020, Univest originated 351 small business loans, aggregating \$67.8 million. Of these loans, 39% were originated to small businesses, which was below aggregate lending (47%) and the proxy of 90%. From a geographic perspective, the bank's distribution of small business loans in low-income tracts (1%), was below proxy and aggregate lending, both of which were 4%. In moderate-income tracts, the bank's lending (6%) was again below proxy and aggregate lending, both at 11%.

Finally, during 2021, Univest originated 261 small business loans, aggregating \$54.4 million. Of these loans, 50% were originated to small businesses, which matched aggregate lending (50%), but was below the proxy of 90%. From a geographic perspective, the bank's distribution of small business loans in low-income tracts (1%), was below the aggregate lending and the proxy, both at 4%. In moderate-income tracts, the bank's lending (2%) was also below the aggregate lending level (10%) and proxy (11%).

### Innovative and/or Flexible Lending Practices and Community Development Lending

As discussed previously, Univest offers alternative mortgage products using a variety of different programs, and also offers small business loans through the SBA. Within the Lancaster, PA assessment area, Univest made three FHA loans totaling \$764 thousand, two VA loans totaling \$620 thousand, one RHS loan totaling \$253 thousand, and two PHFA loans totaling \$467 thousand. This represents an increase from the prior evaluation of five loans totaling \$1.0 million. In addition, Univest made three SBA loans totaling nearly \$4.9 million and seven loans totaling \$325 thousand through the bank's UBBX product.

Finally, during the period evaluated, the bank made 21 community development loans totaling \$9.4 million. The bank's community development lending increased from the prior evaluation, when Univest made nine community development loans totaling \$8.5 million in the Lancaster, PA assessment area. Of the total dollar amount, 97% supported affordable housing initiatives (\$9.1 million, and 3% supported revitalization/stabilization efforts in the assessment area (\$280 thousand). Of the bank's total community development lending by dollar amount, 7% was within the Lancaster, PA assessment area.

The following table includes the bank's community development lending in the limited-scope Lancaster, PA assessment area, by community development purpose.

	Univest Bank and Trust Co. Lancaster, PA Assessment Area Community Development Lending											
Activity Affordable Housing Community Economic Revitalize or Services Development Stabilize Totals									Totals			
Year	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)		
2020	6	1,441	0	0	0	0	0	0	6	1,441		
2021	5	2,362	0	0	0	0	0	0	5	2,362		
2022	22 9 5,290 0 0 0 0 1 280 10 5,570											
TOTAL	20	9,093	0	0	0	0	1	280	21	9,373		

#### **INVESTMENT TEST**

The bank's investment performance in this assessment area is consistent with the bank's investment performance in the full-scope assessment areas in the Commonwealth of Pennsylvania. Qualified investments and donations in the Lancaster, PA assessment area totaled \$7.3 million. This represents an increase from \$3.9 million at the previous evaluation. Of the bank's total investments, almost 22% were made within the Lancaster, PA assessment area.

Univest made 16 qualified investments totaling almost \$7.1 million in the Lancaster, PA assessment area. All 16 of the investments supported activities focused on affordable housing (37 loans), a need noted by the community contact interviewed in conjunction with the evaluation.

In addition to the qualified investments, Univest made 37 donations totaling \$247 thousand in the Lancaster, PA assessment area. The donations supported activities focused on affordable housing (25%), community services targeting low- and moderate-income individuals (70%), and economic development (almost 6%).

The following table presents investment and donation activity for the Lancaster, PA assessment area.

	Univest Bank & Trust Co.  Lancaster, PA Assessment Area  Qualified Investments												
Affordable Community Economic Revitalize or Housing Services Development Stabilize Totals										otals			
CD Category	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)			
Qualified Investments	16	7,062	0	0	0	0	0	0	16	7,062			
Donations	4	61	27	173	6	14	0	0	37	248			
In-Kind Donations	0	0	0	0	0	0	0	0	0	0			
TOTAL	20	7,123	27	173	6	14	0	0	53	7,310			

### **SERVICE TEST**

The bank's service performance in the Lancaster, PA assessment area is consistent with the bank's service test performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

The bank operated five branches in the assessment area (14% of the bank's total branches). None of the bank's branches in the assessment area were located in low- or moderate-income census tracts. Four branches were located in middle-income tracts (80%), and one was located in an upper-income census tract (20%). Additionally, Univest operated one LSF in the assessment area, which was located in a middle-income tract. All branches in the Lancaster, PA assessment area offer full-service ATMs, and all but one provides drive-through services<sup>24</sup>. All branches have standard hours, similar to those offered in other assessment areas, with extended hours offered at least one day a week. Finally, all branches offer limited banking hours on Saturday, from 9:00 a.m. – 12:00 p.m. Retail services offered through the five branches in the assessment area were consistent with those offered in the full-scope assessment areas.

In addition to retail services, a handful of bank officers and employees conducted community development services by participating as board and committee members for economic development and community service agencies. Finally, consistent with other assessment areas, the bank participates as an intermediary for the FHLB of Pittsburgh's "Home4Good Initiative." In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to FHLB of Pittsburgh, on their behalf.

<sup>&</sup>lt;sup>24</sup>Drive-through facilities are not available at the Georgetown branch due to limitations in the physical location. The Georgetown branch is located in a middle-income census tract.

# READING, PA ASSESSMENT AREA / LIMITED-SCOPE REVIEW

A limited-scope review of the bank's performance in the Reading, PA assessment area was conducted. For the purposes of assessing Univest's performance in the Commonwealth of Pennsylvania, the Reading, PA assessment area was given the least weight, given the bank's volume of loans, deposits and operations in this assessment area. More specifically, during the evaluation period, lending activity in the Reading, PA assessment area represented less than 2% of the bank's overall lending, both by number and by dollar amount. The assessment area's single branch location, which was established on December 14, 2020 (3% of total branches) held \$1.6 million in deposits, or less than one percent of the bank's total deposits as of June 30, 2022.

The bank's performance in the Reading, PA assessment area is below its performance in the full-scope review assessment areas, as seen in the table below. The facts and data reviewed, including performance and demographic information, are presented in the tables located in the Appendices accompanying this report. Conclusions regarding performance are as follows:

ASSESSMENT AREA	LENDING TEST	INVESTMENT TEST	SERVICE TEST
Reading, PA Assessment Area	Below	Consistent	Below

### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

The bank's Reading, PA assessment area consists of the entirety of Berks County, which comprises the Reading, PA MSA.

According to 2015 ACS Data, the Reading, PA assessment area consisted of 90 census tracts. Of these 90 tracts, 19 were designated as low-income (21%), seven were moderate-income (8%), 48 were middle-income (53%), and 16 were upper-income (18%). All of the low- and moderate-income census tracts were located in and around the city of Reading, PA the largest urban center in the assessment area. ACS data indicated that the assessment area had a population of 413,965.

A map of the Reading, PA assessment area using 2015 ACS data is available in Appendix F.

Univest's performance was evaluated in terms of the demographic and business context in which the bank operates. According to the FDIC's Deposit Market Share Report as of June 30, 2022, there were 17 depository institutions operating in the Reading, PA assessment area. These institutions maintained a total of 98 branches holding \$22.1 billion in deposits. Univest, with one branch in the assessment area, ranked seventeenth, with \$1.6 million, or less than 1% of the deposit market. Customers Bank held the largest share of deposits with 36% of the market, followed by Santander Bank, N.A. with 24% of the market, and Wells Fargo, N.A. with just under 10% market share.

Similarly, Univest was a relatively minor player in the HMDA market, holding less than 1% of the market in 2019, 2020 and 2021. In 2019, a total of 382 HMDA reporters originated or purchased a total of 13,085 HMDA loans. Univest tied for fifty-sixth in the HMDA market with less than 1% market share. Wells Fargo Bank, N.A., led the market with 9% of HMDA loans, followed by Mortgage America, Inc. (6%), and Fulton Bank, N.A. (4%).

In 2020, 416 HMDA reporters originated or purchased a total of 16,678 HMDA loans. Univest ranked forty-fifth, with less than 1% of the HMDA market. Wells Fargo Bank, N.A., led the market (9%), followed by Mortgage America, Inc. (6%), and Quicken Loans, LLC (nearly 6%).

Finally, in 2021, 448 HMDA reporters originated or purchased a total of 18,551 HMDA loans. Univest ranked thirty-first, with less than 1% of the market. Rocket Mortgage led the market with 7% of loans, followed by Wells Fargo Bank, N.A. (almost 7%), and, Mortgage America, Inc. (5%).

With regard to small business and small farm lending, in 2019, a total of 90 CRA data reporters originated or purchased 7,528 CRA loans in the Reading, PA assessment area. Univest tied for fortieth, with less than 1% market share. American Express, NB led the market with 15% market share, followed by JP Morgan Chase Bank, N.A. (12%) and U.S. Bank, N.A. (8%).

In 2020, 121 CRA reporters originated or purchased 8,722 small business and small farm loans in the assessment area. Univest tied for thirty-second with less than 1% of the market. American Express, NB ranked first with 9%, followed by VIST Bank (9%), and Truist Bank (8%).

Finally, in 2021, a total of 124 CRA reporters originated or purchased 9,496 loans in the assessment area. Univest tied for thirty-fifth, with less than 1% of the market. American Express, NB ranked first with 12% market share, followed by VIST Bank, (8%) and U.S. Bank, N.A. (7%).

According to Moody's May 2022 Precis report, the Reading, PA MSA's economy is in recovery mode. The Reading economy is underperforming due to a weakening labor market, particularly in the healthcare and professional/business services sectors. Per Moody's Analytics, leading industries in the assessment area include education and health services (18%), manufacturing (17%), professional and business services (13%), and government (12%). The top employers are East Penn Manufacturing Co., Inc., Tower Health, and St. Joseph Medical Center.

An interview was conducted with a community development representative to provide perspective on the credit and community development needs of the Reading, PA assessment area. This information is supplemented with demographic and economic data pertinent to the assessment area. The contact, a representative from a housing organization, indicated that Reading is a transient city, and that the large Latino population is not being adequately served, and is largely neglected by the business and banking communities. According to the contact, there is a need for funding for programs for first-time homebuyers, as well as supportive financial literacy education and budgeting programming in the Reading, PA assessment area.

Tables showing the assessment area demographics of the Reading, PA assessment area in 2019, 2020, and 2021 are contained on the following pages.

	_	Readin	st Bank and <sup>-</sup> g, PA Assess nent Area Dei 2019	ment Area					
Income Categories		act bution	Familie Tract Inc	-	Families d Level a Families	s % of	Families by Family Income		
Ü	#	%	#	%	#	%	#	%	
Low-income	19	21.1	14,145	13.3	5,931	41.9	22,665	21.4	
Moderate-income	7	7.8	4,853	4.6	1,100	22.7	18,178	17.1	
Middle-income	48	53.3	60,604	57.2	3,092	5.1	22,651	21.4	
Upper-income	16	17.8	26,396	24.9	743	2.8	42,504	40.1	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	90	100.0	105,998	100.0	10,866	10.3	105,998	100.0	
	Housing			Housin	g Types by	Tract			
	Units by	Owi	ner-Occupied	ied Rental Vacant					
	Tract	#	%	%	#	%	#	%	
Low-income	26,174	7,843	7.1	30.0	14,304	54.6	4,027	15.4	
Moderate-income	8,763	4,500	4.1	51.4	3,335	38.1	928	10.6	
Middle-income	92,461	67,388	61.1	72.9	19,995	21.6	5,078	5.5	
Upper-income	37,455	30,492	27.7	81.4	5,455	14.6	1,508	4.0	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	164,853	110,223	100.0	66.9	43,089	26.1	11,541	7.0	
	Tatal David			Busine	sses by Tra	ct & Revenu	ie Size		
		Total Businesses by Tract		n or = lion	Ove Mill		Revenue Report		
	#	%	#	%	#	%	#	%	
Low-income	1,539	9.2	1,380	9.2	146	10.0	13	5.5	
Moderate-income	871	5.2	774	5.1	89	6.1	8	3.4	
Middle-income	9,834	58.7	8,778	58.3	901	61.5	155	65.1	
Upper-income	4,514	26.9	4,123	27.4	329	22.4	62	26.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	16,758	100.0	15,055	100.0	1,465	100.0	238	100.0	
	Percentag	ge of Total Bu	sinesses:	89.8		8.7		1.4	
	Total			Farr	ns by Tract	& Revenue S	Size		
		arms by act	Less Tha \$1 Mill		Ove Mill	*	Revenue Report		
	#	%	#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	1	0.2	1	0.2	0	0.0	0	0.0	
Middle-income	449	80.3	437	80.3	12	80.0	0	0.0	
Upper-income	109	19.5	106	19.5	3	20.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	559	100.0	544	100.0	15	100.0	0	0.0	
	Percen	tage of Total	Farms:	97.3		2.7		0.0	

2015 ACS Data and 2019 D&B Information

		Reading,	Bank and Trus PA Assessment Area Demog 2020	nt Area					
Income Categories	Tra Distrib		Families Tract Inco	•	Families < Level as Families b	s % of	Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	19	21.1	14,145	13.3	5,931	41.9	22,665	21.4	
Moderate-income	7	7.8	4,853	4.6	1,100	22.7	18,178	17.1	
Middle-income	48	53.3	60,604	57.2	3,092	5.1	22,651	21.4	
Upper-income	16	17.8	26,396	24.9	743	2.8	42,504	40.1	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	90	100.0	105,998	100.0	10,866	10.3	105,998	100.0	
	Housing			Housing	Types by Tr	act			
	Units by	Ow	ner-Occupied		Rent	al	Vaca	nt	
	Tract	#	%	%	#	%	#	%	
Low-income	26,174	7,843	7.1	30.0	14,304	54.6	4,027	15.4	
Moderate-income	8,763	4,500	4.1	51.4	3,335	38.1	928	10.6	
Middle-income	92,461	67,388	61.1	72.9	19,995	21.6	5,078	5.5	
Upper-income	37,455	30,492	27.7	81.4	5,455	14.6	1,508	4.0	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	164,853	110,223	100.0	66.9	43,089	26.1	11,541	7.0	
	Total Busin	nossos by	Businesses by Tract & Revenue Size						
	Tra		Less Than \$1 Millio	-	Over Millio	*	Revenu Repor		
	#	%	#	%	#	%	#	%	
Low-income	1,553	9.3	1,391	9.2	147	10.3	15	6.2	
Moderate-income	874	5.2	779	5.2	87	6.1	8	3.3	
Middle-income	9,762	58.4	8,724	57.9	879	61.6	159	65.7	
Upper-income	4,541	27.1	4,167	27.7	314	22.0	60	24.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	16,730	100.0	15,061	100.0	1,427	100.0	242	100.0	
	Percenta	ge of Total B	usinesses:	90.0		8.5		1.4	
	Total Fa	rme hv		Farms	s by Tract & F	Revenue Siz	ze		
	Tra		Less Than \$1 Millio		Over Millio		Revenu Repor		
	#	%	#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate-income	1	0.2	1	0.2	0	0.0	0	0.0	
Middle-income	432	79.4	420	79.4	12	80.0	0	0.0	
Upper-income	111	20.4	108	20.4	3	20.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	544	100.0	529	100.0	15	100.0	0	0.0	
	Percer	ntage of Tota	l Farms:	97.2	· · · · · · · · · · · · · · · · · · ·	2.8		0.0	

2015 ACS Data and 2020 D&B Information

	,	Univest B Reading, P Assessment		ent Area				
Income Categories		Tract Distribution			Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	19	21.1	14,145	13.3	5,931	41.9	22,665	21.4
Moderate-income	7	7.8	4,853	4.6	1,100	22.7	18,178	17.1
Middle-income	48	53.3	60,604	57.2	3,092	5.1	22,651	21.4
Upper-income	16	17.8	26,396	24.9	743	2.8	42,504	40.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	90	100.0	105,998	100.0	10,866	10.3	105,998	100.0
	Housing			Hous	sing Types b	y Tract		
	Units by	Own	er-Occupie	d	Ren	tal	Vaca	nt
	Tract	#	%	%	#	%	#	%
Low-income	26,174	7,843	7.1	30.0	14,304	54.6	4,027	15.4
Moderate-income	8,763	4,500	4.1	51.4	3,335	38.1	928	10.6
Middle-income	92,461	67,388	61.1	72.9	19,995	21.6	5,078	5.5
Upper-income	37,455	30,492	27.7	81.4	5,455	14.6	1,508	4.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	164,853	110,223	100.0	66.9	43,089	26.1	11,541	7.0
	Total Busins	aaaa bu		Busir	nesses by Tr	act & Reve	nue Size	
		Total Businesses by Tract		Less Than or = \$1 Million		* \$1 on	Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,557	9.3	1,398	9.3	143	10.3	16	6.4
Moderate-income	868	5.2	774	5.1	86	6.2	8	3.2
Middle-income	9,732	58.3	8,712	57.9	854	61.6	166	66.1
Upper-income	4,531	27.2	4,167	27.7	303	21.9	61	24.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	16,688	100.0	15,051	100.0	1,386	100.0	251	100.0
	Percentage of	of Total Bus	inesses:	90.2		8.3		1.5
	Total Farr	ma hv		Fa	rms by Tract	& Revenue	e Size	
	Trac		Less Tha \$1 Mill		Over Milli		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1	0.2	1	0.2	0	0.0	0	0.0
Middle-income	423	79.8	410	79.8	13	81.3	0	0.0
Upper-income	106	20.0	103	20.0	3	18.7	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	530	100.0	514	100.0	16	100.0	0	0.0
	Percentag	ge of Total F	arms:	97.0		3.0		0.0

2015 ACS Data and 2021 D&B Information

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The bank's performance in the Reading, PA assessment area is below the institution's lending, investment, and service performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

### **LENDING TEST**

The bank's lending in the Reading, PA assessment area is below the bank's lending in the full-scope assessment areas in the Commonwealth of Pennsylvania. Due to the number and dollar volume of loans in the Reading, PA assessment area, home-mortgage loans were weighted heaviest, followed by small business lending. Small farm loans were not included in the lending test analysis in the Reading, PA assessment area, due to the low volume of such loans during the evaluation time period. In total, only 10 small farm loans were made in the assessment area between 2019 and 2021.

### **Borrower and Geographic Distribution of Loans**

### **Home Mortgage Lending**

During 2019, Univest originated 38 HMDA loans aggregating \$7.1 million. The bank's lending to low-income borrowers (5%) was below the level of aggregate lending to low-income borrowers (10%), and the proxy of 21%. Similarly, the bank's lending to moderate-income borrowers (13%) was below both aggregate lending to moderate-income borrowers (21%), and proxy (17%). With respect to the geographic distribution of HMDA loans, the bank made 3% of its loans in low-income tracts, below both aggregate lending levels (6%) and proxy (7%). In moderate-income tracts, none of the bank's HMDA loans were originated in the assessment area's moderate-income tracts, while both the aggregate lending level and proxy measured 4%.

During 2020, Univest originated 68 HMDA loans aggregating \$13.7 million. The bank's lending to low-income borrowers (3%) trailed aggregate lending (8%), and proxy (21%). The bank's lending to moderate-income borrowers (22%) exceeded both aggregate lending (19%) and proxy (17%). The bank's geographic distribution of HMDA loans in low-income tracts (3%) trailed both aggregate lending levels (4%) and proxy (7%). In moderate-income tracts, the bank's lending (2%) was below aggregate lending and proxy, both of which were 4%.

Finally, during 2021, Univest originated 127 HMDA loans aggregating \$24.4 million. The bank's lending to low-income borrowers (9%) matched aggregate lending (9%), but trailed proxy (21%). The bank's lending to moderate-income borrowers (25%) exceeded the aggregate lending levels (20%), and proxy (17%). The bank's geographic distribution of HMDA loans in low-income tracts (12%) exceeded both aggregate lending levels (5%), and proxy (7%). In moderate-income tracts, the bank's lending of6%, exceeded aggregate peer lending levels and proxy, both 4%.

### **Small Business Lending**

During 2019, Univest originated nine small business loans, aggregating \$3.5 million. Of these loans, 11% were originated to small businesses, which was below aggregate lending levels of 48% to small businesses by all lenders in the assessment area, and was below the proxy of 90%. With respect to the geographic distribution of small business loans, none of the bank's small business loans were originated in the assessment area's low-income tracts, below both the aggregate lending levels (7%) and proxy (9%). Similarly, the bank made no small business loans in moderate-income tracts, compared to the aggregate lending level of 4% and proxy of 5%.

During 2020, Univest originated 21 small business loans, aggregating \$7.2 million. Of these loans, 5% were originated to small businesses, which was below the aggregate lending level (41%) and the proxy of 90%. From a geographic perspective, none of the bank's small business loans were originated in the assessment area's low-income tracts, below both the aggregate lending level and proxy (both 9%) respectively. Similarly, the bank made no small business loans in moderate-income tracts, compared to aggregate lending and proxy, both of which were 5%.

Finally, in 2021, Univest originated 19 small business loans, aggregating \$5.4 million. Of these loans, 21% were originated to small businesses, and was below the aggregate lending level (50%), and the proxy of 90%. As in other years, none of the bank's small business loans were made in low- or moderate-income census tracts. For comparison, both aggregate lending and proxy in low-income tracts were 9%, while both measures were 5% in moderate-income tracts.

Lending performance in the assessment area often lags behind aggregate lending levels. Univest designated the Reading MSA as a separate assessment area in 2016 without a physical branch location. Notably, Univest established a branch presence in the assessment area on December 14, 2020.

### Innovative and/or Flexible Lending Practices and Community Development Lending

As discussed previously, Univest offers alternative mortgage products using a variety of different programs, and also offers small business loans through the SBA. Within the Reading, PA assessment area, Univest made 28 FHA loans totaling \$4.8 million, five VA loans totaling almost \$1.7 million, two RHS loans totaling \$327 thousand, one Fannie Mae loan totaling \$176 thousand, and five PHFA loans totaling \$877 thousand. This represents an increase from the prior evaluation of four loans totaling \$723 thousand. In addition, Univest made one loan totaling \$250 thousand through the SBA small business loan program.

Finally, during the period evaluated, the bank made eight community development loans totaling \$3.9 million in the Reading, PA assessment area. The bank's community development lending increased from the prior evaluation, when Univest made four community development loans totaling \$2.4 million. Of the total dollar amount, nearly 93% supported affordable housing initiatives (\$3.6 million), and over 7% supported revitalization/stabilization efforts (\$289 thousand). Of the bank's total community development lending by dollar amount, three percent was within the Reading, PA assessment area.

The following table includes the bank's community development lending in the limited-scope Reading, PA assessment area, by community development purpose.

	Univest Bank and Trust Co. Reading, PA Assessment Area Community Development Lending											
Affordable Community Activity Housing Services			•	Economic Development			italize or abilize	Totals				
Year	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)		
2020	1	220	0	0	0	0	1	9	2	229		
2021	4	1,769	0	0	0	0	0	0	4	1,769		
2022	1	1,585	0	0	0	0	1	280	2	1,865		
TOTAL	6	3,574	0	0	0	0	2	289	8	3,863		

#### **INVESTMENT TEST**

The bank's investment performance in this assessment area is consistent with the bank's investment performance in the full-scope assessment areas in the Commonwealth of Pennsylvania. Qualified investments and donations totaled \$5.3 million. This represents an increase from \$1.2 million at the previous evaluation. Of the bank's total investments made within its assessment areas, 16% were made within the Reading, PA assessment area.

Univest made 13 qualified investments totaling \$5.2 million in the Reading, PA assessment area. All of the investments supported activities focused on affordable housing (31 loans), a need noted by the community contact interviewed in conjunction with the evaluation.

In addition to the qualified investments discussed above, Univest made 17 donations totaling \$77 thousand in the Reading, PA assessment area. The donations supported activities focused on affordable housing (nearly 16%), community services targeting low- and moderate-income individuals (72%), and economic development (13%).

The following table presents investment and donation activity for the Reading, PA assessment area.

	Univest Bank & Trust Co. Reading, PA Assessment Area Qualified Investments											
CD Category		ordable ousing		munity rvices		conomic elopment		italize or abilize	Т	otals		
CD Category	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)		
Qualified Investments	13	5,243	0	0	0	0	0	0	13	5,243		
Donations	4	12	12	55	1	10	0	0	17	77		
In-Kind Donations	0	0	0	0	0	0	0	0	0	0		
TOTAL	17	5,255	12	55	1	10	0	0	30	5,320		

### **SERVICE TEST**

The bank's service performance in the Reading, PA assessment area is consistent with the bank's service test performance in the full-scope assessment areas in the Commonwealth of Pennsylvania.

The bank established its single branch location in West Lawn, PA Berks County (3% of total branches), in an upper-income census tract on December 14, 2020. The West Lawn branch is located in a commercial business park, and as such, hours deviate from those offered in the full-scope assessment areas. More specifically, the branch offers standard hours Monday through Friday, with no extended hours on certain days of the week or Saturday hours. The branch includes a full-service ATM, but it does not provide drive-through services. Retail services offered in the branch were consistent with those offered in full-scope assessment areas in the Commonwealth.

In addition to retail services, a limited number of bank officers and employees conducted community development services by participating as board and committee members for economic development and community service non-profit agencies. Finally, the bank participates as an intermediary for the FHLB of Pittsburgh's "Home4Good Initiative." In their role as intermediary, the bank effectively acts as a co-applicant to non-profits, sponsoring them, and submitting funding requests to FHLB of Pittsburgh, on their behalf.

### STATE OF NEW JERSEY / OCEAN CITY, NJ ASSESSMENT AREA FULL-SCOPE REVIEW

#### **STATE RATING**

Performance Test	Performance Level
Lending	Needs to Improve
Investment	Low Satisfactory
Service	Low Satisfactory
Overall	Needs to Improve

#### SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors contributing to the rating include the following:

- The distribution of borrowers, given the product lines offered by the bank, reflects poor penetration among retail customers;
- The geographic distribution of loans reflects good penetration throughout the assessment area;
- The bank makes little use of innovative and/or flexible lending practices;
- The bank made a low level of community development loans in the assessment area;
- The bank makes an adequate level of qualified community development investments and grants in the state;
- The bank exhibits poor responsiveness to credit and community development needs; and
- The bank provides few, if any community development services.

### **SCOPE OF EXAMINATION**

For purposes of this CRA evaluation, the state rating is based solely on the bank's performance in the Ocean City, NJ assessment area, which was evaluated using full-scope review procedures. Univest operates just one branch in the Ocean City, NJ assessment area.

The lending, investment, and service tests were applied in assessing the bank's performance under the CRA. Under the lending test, loan products evaluated included HMDA loans and other loans that qualified as community development loans. Due to low loan volumes, small business and small farm loans were not included in the lending analysis, as they would not have been sufficient to provide a meaningful analysis, and would not have had a significant effect on the bank's overall performance in the Ocean City, NJ assessment area<sup>25</sup>. However, data on small business and small farm loans is included in Appendix E, for contextual purposes.

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During the three-year period evaluated, Univest made only 32 small business loans in the Ocean City, NJ assessment area (one during 2019, 20 during 2020, and 11 during 2021). No small farm loans were made in this assessment area in 2019, 2020 or 2021.

For purposes of assessing Univest's overall CRA performance, very little weight was given to the bank's performance in the State of New Jersey, as the overwhelming majority of the bank's operations are located in the Pennsylvania assessment areas.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS**

### **Description of Assessment Area**

Univest's Ocean City, NJ assessment area consists of Cape May County, which comprises the entirety of the Ocean City, NJ MSA, situated along the southeastern coast of New Jersey. As of the 2015 ACS, the Ocean City, NJ assessment area had a population of 95,805 residents, making it the least populated assessment area of Univest's footprint.

As indicated previously, for the purposes of assessing Univest's overall CRA performance, the least weight was given to the performance in the Ocean City, NJ assessment area. Of the bank's total loans, 1% by number, and 3% by dollar volume can be attributed to this assessment area. Univest operates one branch in this assessment area (3% of total branches), which holds \$71 million in deposits, or 1% of the bank's total deposits as of June 30, 2022. It is also noted that since the previous evaluation, on February 10, 2020, the bank established a LPO in an upper-income census tract in Moorestown, NJ. Moorestown is located in Burlington County, which is part of the Camden, NJ MD, and part of the larger Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA.

Univest's CRA performance was evaluated in terms of the demographic and business context in which the bank operates.

According to 2015 ACS data, the Ocean City, NJ assessment area consisted of 33 census tracts. Of these 33 tracts, one was designated as low-income (3%), five were moderate-income (15%), 18 were middle-income (55%), eight were upper-income (24%) and one was unknown-income (3%). The single low-income tract is located along the lower southeastern coastline of the state, in the city of Wildwood, NJ. In total, 4% of the assessment area's population resided in low-income census tracts as of the 2015 ACS. Of the five moderate-income tracts, two are located adjacent to Wildwood City in the lower southeastern border of the county, one tract is located in Villas, within Lower Township along the southwestern border, one tract is located in Woodbine in Central Cape May, and one is located in Ocean City, New Jersey, along the northeastern shore. In total, 17% of the assessment area's population resided in moderate-income census tracts as of the 2015 ACS.

A map of the Ocean City, NJ assessment area at the 2015 ACS update is available in Appendix F.

According to the FDIC's Deposit Market Share Report as of June 30, 2022, there were 11 depository institutions operating in the Ocean City, NJ assessment area. These institutions maintained a total of 43 branches holding \$4.5 billion in deposits. Univest, with one branch in the assessment area, ranked ninth, with \$71 million, or less than 2% of the deposit market. Sturdy Savings Bank held the largest share of deposits with 23% of the market, followed by TD Bank, N.A. with 20% of the market, and OceanFirst Bank, N.A. with 15% of the market.

Univest reports home-mortgage loans pursuant to HMDA and was compared to the aggregate of all lenders in the market reporting real estate loans pursuant to HMDA. This data is reported annually. According to the 2019 data, there were 370 HMDA reporters in the assessment area, who originated or purchased 7,664 loans in the Ocean City, NJ assessment area. Univest ranked thirty-eighth with less than 1% of the HMDA market. Wells Fargo Bank, N.A. ranked first with almost 12% of the HMDA market, followed by Citizens Bank, N.A. (5%), and Caliber Home Loans, Inc. (5%).

According to 2020 data, there were 413 HMDA reporters in the assessment area who originated or purchased 12,029 loans in the Ocean City, NJ assessment area. Univest ranked thirty-fourth with less than 1% of the HMDA market. Wells Fargo Bank, N.A. ranked first with just under 10% of the HMDA market, followed by Quicken Loans, LLC (5%), and Caliber Home Loans, Inc. (4%).

Finally, according to 2021 data, there were 408 HMDA reporters in the assessment area who originated or purchased 12,322 loans in the Ocean City, NJ assessment area. Univest tied for thirty-fourth with less than 1% of the HMDA market. Wells Fargo Bank, N.A. ranked first with 8% of the HMDA market, followed by Rocket Mortgage, LLC (6%), and Citizens Bank, N.A. (4%).

To supplement economic, demographic, and performance data, interviews were conducted with two local community organizations, which provided perspective on the credit and community development needs of the Ocean City, NJ assessment area. One interview was held with an agency focused on providing affordable housing to residents and their families in the assessment area, and the other was with an agency that focused on economic development, particularly workforce development efforts within Ocean City, and Cape May County, at-large.

Each contact identified affordable housing as a major concern in the assessment area, because housing prices in this resort area are prohibitive, particularly with such a large population of low-and moderate-income individuals with minimum-wage seasonal employment. In addition, contacts identified the need for financial literacy, budgeting, and workforce development training, as well as a local transportation system to support full-time, year-round employment opportunities.

### **Economic Characteristics**

As indicated above, Univest's Ocean City, NJ assessment area consists of the Ocean City, NJ MSA, which consists of the entirety of Cape May County in the State of New Jersey. Ocean City NJ, a city in Cape May County, is the principal city of the Ocean City, NJ MSA.

Cape May County is located in the southernmost part of the State of New Jersey, and borders Atlantic County to the northeast, and Cumberland County, NJ to the northwest. The counties of Kent and Sussex in Delaware are situated on the western border of Cape May County, separated by the Delaware Bay. The county is a tourist destination in the summer months due to its beaches and location between the Delaware Bay and the Atlantic Ocean. Based on information provided by the Cape May County Chamber of Commerce, it is estimated that the county swells to over 750 thousand people in the heigh of the summer season, despite the much smaller year-round population of less than 100 thousand residents.

According to the Moody's Analytics Precis Report as of January 2022, the economy of Ocean City, NJ is at risk. Despite the job losses in both the private and public sector, employment remains above its pre-pandemic level. Tourism remains an important driver of the economy, particularly as the region attempts to regain its footing in a post-pandemic environment. New home.

construction has slowed as a result of increasing interest rates, but strong demand among the wealthy, and those looking to purchase a second home in the area, may incentivize more homebuilding. House price appreciation continues to outpace the national rate. Finally, healthcare is a key source of near-term job gains, driven by the aging Ocean City population which will increase demand for healthcare workers.

Strengths of the assessment area's economy are proximity to northeast population centers and its well-developed summer tourism industry and infrastructure. Weaknesses include a declining population, a highly seasonal labor market which includes a concentration of low-paying industries and high business costs, and low educational attainment among residents.

Leisure and hospitality services represent the largest employment segment in Ocean City, contributing 27% of the total jobs. Other important industries include government at 20%, followed by retail trade at 16% and education and health services at 11%. Major employers include Morey Organization, LLC, the U.S. Coast Guard, Cape Regional Medical Center, Acme Markets, and Wawa.

During the evaluation period, seasonally unadjusted unemployment rates in the Ocean City, NJ assessment area were consistently and notably higher than those in New Jersey and the country as a whole. Unemployment rates in the assessment area for years 2019 through 2021, as reported by the Bureau of Labor Statistics are reflected in the following table, and are compared to state and national levels.

Univest Bank and Trust Co. Ocean City, NJ Assessment Area								
Unemployment Rates (Annual, Not Seasonally Adjusted)								
% % % %   %   %   %   %   %   %   %								
Cape May County, NJ	6.9	13.6	8.9					
State of New Jersey	3.4	9.5	6.3					
United States	3.7	8.1	5.3					

### **Housing**

According to 2015 ACS data, the Ocean City, NJ assessment area contained 98,747 housing units, 31% of which were owner-occupied, 10% of which were rental units, and 59% of which were vacant. It is noteworthy that the overall occupancy rate in the assessment area (31%) is much lower than that in the State of New Jersey (58%). Conversely, the vacancy rate in the assessment area (59%) is much higher than the statewide average (11%). Both anomalies can be attributed to the high number of secondary residence homes and the summer rental market within the assessment area.

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 tracts. According to 2015 ACS data, 3% of owner-occupied housing was located in low-income tracts, and 15% was located in moderate-income tracts. The majority of owner-occupied housing was located in both middle- and upper-income tracts (61% and 21% respectively).

Of the total existing housing units, over 70% were single-family units, 15% were two-to-four family units, 11% were multifamily units (five families or more), and 3% were mobile homes. The median age of the housing stock was 46 years, making it similar to that in the State of New Jersey as a whole, at 49 years.

Available data shows that the price of housing in the assessment area is slightly less expensive than in the State of New Jersey overall. The 2015 ACS Data indicates that the median housing value in the Ocean City, NJ assessment area was \$299,668, and is slightly lower than the median housing value in New Jersey as a whole at \$315,900. Data shows a disparity between housing values in low- and moderate-income tracts compared to those in middle-and upper-income tracts, though prices in low- and moderate-income tracts were still quite high. The median housing value in low-income tracts was \$237,629, and this increased to \$247,920 in moderate-income tracts. These values were lower than median housing values in middle-income tracts (\$284,283), and were significantly lower than in upper-income tracts (\$446,739). In the assessment area, only 6% of the total owner-occupied housing units were valued at less than \$100 thousand, matching home affordability in the state of New Jersey as a whole.

Finally, median gross rent (rent plus utilities) in the assessment area was comparable to that in New Jersey. Median gross rent in the Ocean City, NJ assessment area was \$1,038, which was slightly less than the median gross rent in New Jersey of \$1,192. Within the Ocean City, NJ assessment area, 53% of renters spent more than 30% of their income on rent, similar to the figure in New Jersey as a whole (51%).

#### **Borrower Income Data**

The percentages of low- and moderate-income families are used as proxies o estimate demand for home-mortgage lending in the assessment area. The 2015 ACS shows that there were 25,946 families in the assessment area. Of the total families in the assessment area, 20% were low-income, 19% were moderate-income, 21% were middle-income, and 40% were upper-income. In the assessment area, 7% of families were living below the poverty level, compared to 8% in the State of New Jersey overall.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon the HUD annually-adjusted median family income data made available by the FFIEC. Median family incomes for the assessment area are listed in the following table for each of the years covered by the evaluation, 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	\$83,600	Less than \$41,800	\$41,800 - \$66,879	\$66,880 - \$100,319	\$100,320 or more
2020	\$85,800	Less than \$42,900	\$42,900 - \$64,639	\$68,640 - \$102,959	\$102,960 or more
2021	\$84,900	Less than \$42,450	\$42,450 - \$67,919	\$67,920 - \$101,879	\$101,880 or more

Assessment area demographics used to evaluate Univest's CRA performance in the Ocean City, NJ assessment area in 2019, 2020 and 2021 are detailed in the tables on the following pages.

		Ocean City,	Bank and Tru NJ Assessm t Area Demo 2019	nent Area				
Income Categories	Trac Distrib			Families by Tract Income		< Poverty as % of by Tract	Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.0	995	3.8	304	30.6	5,154	19.9
Moderate-income	5	15.2	4,273	16.5	384	9.0	4,933	19.0
Middle-income	18	54.5	15,437	59.5	952	6.2	5,525	21.3
Upper-income	8	24.3	5,241	20.2	168	3.2	10,334	39.8
Unknown-income	1	3.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	33	100.0	25,946	100.0	1,808	7.0	25,946	100.0
	Housing			Housin	g Types by	Tract		
	Units by	Ov	vner-Occupie	d	Rei	ntal	Vaca	ınt
	Tract	#	%	%	#	%	#	%
Low-income	5,936	933	3.0	15.7	825	13.9	4,178	70.4
Moderate-income	19,333	4,698	15.3	24.3	2,398	12.4	12,237	63.3
Middle-income	48,311	18,605	60.7	38.5	4,953	10.3	24,753	51.2
Upper-income	25,167	6,447	21.0	25.6	1,553	6.2	17,167	68.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	98,747	30,683	100.0	31.1	9,729	9.9	58,335	59.1
	7.15			Busines	ses by Trac	t & Revenue	Size	
		Total Businesses by Tract		Less Than or = \$1 Million		r \$1 lion	Revenu Repor	
	#	%	#	%	#	%	#	%
Low-income	327	5.4	297	5.3	28	7.2	2	3.0
Moderate-income	894	14.6	825	14.6	55	14.1	14	21.2
Middle-income	3,528	58.0	3,266	58.0	227	58.2	35	53.0
Upper-income	1,339	22.0	1,244	22.1	80	20.5	15	22.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	6,088	100.0	5,632	100.0	390	100.0	66	100.0
	Percentage	of Total Bu	ısinesses:	92.5		6.4		1.1
	Tatal Fac	b		Farm	s by Tract 8	Revenue Si	ze	
	Total Far Trac		Less Tha \$1 Mil		Ove Mill	r \$1 lion	Revenu Repor	
	#	%	#	%	#	%	#	%
Low-income	1	1.3	1	1.3	0	0.0	0	0.0
Moderate-income	4	5.1	4	5.3	0	0.0	0	0.0
Middle-income	55	70.5	52	69.4	3	100.0	0	0.0
Upper-income	18	23.1	18	24.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	78	100.0	75	100.0	3	100.0	0	0.0
	Percenta	age of Total	Farms:	96.2		3.8		0.0

2015 ACS Data and 2019 D&B Information

		Ocean City	Bank and T /, NJ Assess nt Area Den 2020	ment Are	a S			
Income Categories	Tra Distrib		Families by Tract Income		Level	< Poverty as % of by Tract	Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.0	995	3.8	304	30.6	5,154	19.9
Moderate-income	5	15.2	4,273	16.5	384	9.0	4,933	19.0
Middle-income	18	54.5	15,437	59.5	952	6.2	5,525	21.3
Upper-income	8	24.3	5,241	20.2	168	3.2	10,334	39.8
Unknown-income	1	3.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	33	100.0	25,946	100.0	1,808	7.0	25,946	100.0
	Housing			Housi	ing Types by	y Tract		
	Units by	Own	er-Occupie	d	Re	ntal	Vacai	nt
	Tract	#	%	%	#	%	#	%
Low-income	5,936	93	3.0	15.7	825	13.9	4,178	70.4
Moderate-income	19,333	4,69	98 15.3	24.3	2,398	12.4	12,237	63.3
Middle-income	48,311	18,60	05 60.6	38.5	4,953	10.3	24,753	51.2
Upper-income	25,167	6,44	7 21.1	25.6	1,553	6.2	17,167	68.2
Unknown-income	0		0.0	0.0	0	0.0	0	0.0
Total Assessment Area	98,747	30,68	3 100.0	31.1	9,729	9.9	58,335	59.1
	Total Busir	annon by		Busin	esses by Tra	act & Revenu	e Size	
	Tra		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	326	5.4	297	5.3	27	6.9	2	3.1
Moderate-income	906	14.9	834	14.8	57	14.6	15	23.1
Middle-income	3,506	57.7	3,247	57.8	225	57.5	34	52.3
Upper-income	1,340	22.0	1,244	22.1	82	21.0	14	21.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	6,078	100.0	5,622	100.0	391	100.0	65	100.0
	Percentage	e of Total Bus	sinesses:	92.5		6.4		1.1
	Total Fa	rme by		Far	ms by Tract	& Revenue S	ize	
	Tra	-	Less Tha \$1 Mill			er \$1 lion	Revenue Report	
	#	%	#	%	#	%	#	%
Low-income	1	1.3	1	1.3	0	0.0	0	0.0
Moderate-income	3	3.9	3	4.0	0	0.0	0	0.0
Middle-income	56	73.7	55	73.3	1	100.0	0	0.0
Upper-income	16	21.1	16	21.4	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	76	100.0	75	100.0	1	100.0	0	0.0
	Percent	age of Total I	Farms:	98.7		1.3		0.0

2015 ACS Data and 2020 D&B Information

		Ocean C		l Trust Co. essment Are emographic					
Income Categories		act bution		Families by Tract Income		<pre>Poverty s % of by Tract</pre>	Families by Family Income		
_	#	%	#	%	#	%	#	%	
Low-income	1	3.0	995	3.8	304	30.6	5,154	19.9	
Moderate-income	5	15.2	4,273	16.5	384	9.0	4,933	19.0	
Middle-income	18	54.5	15,437	59.5	952	6.2	5,525	21.3	
Upper-income	8	24.3	5,241	20.2	168	3.2	10,334	39.8	
Unknown-income	1	3.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	33	100.0	25,946	100.0	1,808	7.0	25,946	100.0	
	Housing			Housin	g Types by	Tract	<b>'</b>		
	Units by	Ow	ner-Occupie	ed	Rer	ntal	Vac	ant	
	Tract	#	%	%	#	%	#	%	
Low-income	5,936	933	3.0	15.7	825	13.9	4,178	70.4	
Moderate-income	19,333	4,698	15.3	24.3	2,398	12.4	12,237	63.3	
Middle-income	48,311	18,605	60.6	38.5	4,953	10.3	24,753	51.2	
Upper-income	25,167	6,447	21.1	25.6	1,553	6.2	17,167	68.2	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	98,747	30,683	100.0	31.1	9,729	9.9	58,335	59.1	
	Total Decai			Busine	sses by Tra	ct & Revenu	ie Size		
		Total Businesses by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%	
Low-income	330	5.5	304	5.5	24	6.6	2	2.9	
Moderate-income	880	14.7	812	14.6	53	14.5	15	21.4	
Middle-income	3,479	58.1	3,228	58.1	215	58.7	36	51.4	
Upper-income	1,304	21.7	1,213	21.8	74	20.2	17	24.3	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	5,993	100.0	5,557	100.0	366	100.0	70	100.0	
	Percentag	e of Total Bu	sinesses:	92.7		6.1		1.2	
	T-4-1-5			Farr	ns by Tract	& Revenue \$	Size		
		arms by act	Less Th	nan or = illion	Ove Mill		Revenu Repo		
	#	%	#	%	#	%	#	%	
Low-income	1	1.3	1	1.3	0	0.0	0	0.0	
Moderate-income	3	3.8	3	3.9	0	0.0	0	0.0	
Middle-income	58	73.4	56	72.7	2	100.0	0	0.0	
Upper-income	17	21.5	17	22.1	0	0.0	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	79	100.0	77	100.0	2	100.0	0	0.0	
	Percent	tage of Total	Farms:	97.5		2.5		0.0	

2015 ACS Data and 2021 D&B Information

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### LENDING\_TEST

The lending test evaluates an institution's lending activities based on the following characteristics:

- Lending activity in the assessment area;
- Borrower distribution of loans, including the distribution of loans to low- and moderate-income borrowers<sup>26</sup>;
- Geographic distribution of loans, including loans originated in low- and moderate-income census tracts<sup>27</sup>;
- Responsiveness to the credit needs of low- and moderate-income individuals and geographies, and very small businesses;
- Innovativeness and flexibility of lending practices; and
- Community development lending activities.

Performance under the lending test is rated needs to improve in the Ocean City, NJ assessment area.

### **Lending Activity**

Univest's lending levels in the Ocean City, NJ assessment area reflect adequate responsiveness to the assessment area's credit needs, given its limited presence in the assessment area. During the evaluation period, lending activity in the Ocean City, NJ assessment area represented 1% of the bank's overall lending by number of loans, and 3% by dollar volume. During the evaluation period, Univest made 184 HMDA loans totaling \$108 million, and 32 small business loans totaling \$5 million in the Ocean City, NJ assessment area. No small farm loans were made in the Ocean City, NJ assessment area.

### **Borrower Distribution of Loans**

Given the assessment area's demographics and economic characteristics, the borrower distribution of lending reflects, given the product lines offered, poor penetration among individuals of different income levels, including low- and moderate-income individuals.

It is noted that borrower distribution is given more weight than geographic distribution in this assessment area in driving lending performance due to the demographics of the area. Further, as mentioned previously, only HMDA loans were evaluated, as low loan volumes in small business loans prevented a meaningful analysis. Finally, no small farm loans were made within the assessment area.

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<sup>&</sup>lt;sup>26</sup>Borrower distribution of small business and small farm loans is not included in the analysis for the Ocean City, NJ assessment area due to low loan volumes.

<sup>&</sup>lt;sup>27</sup>Geographic distribution of small business and small farm loans is not included in the analysis for the Ocean City, NJ assessment area due to low loan volumes.

#### **Home-Mortgage Lending**

Univest's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers, is poor.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data made available by the FFIEC. The respective percentages of low- and moderate-income families in the assessment area ae used as proxies to estimate demand for home-mortgage credit. Generally, the higher the percentages of low- and moderate-income families in an assessment area, the greater the demand for credit is among low- and moderate-income individuals and families within the assessment area. As noted previously, according to the 2015 ACS data, 20% of assessment area families were low-income, 19% were moderate-income, 21% were middle-income, and 40% were upper-income. According to 2015 ACS data, 39% of families were designated as low- or moderate-income families, which indicates a notable need for home-mortgage credit among this segment of the population.

The following table compares Univest's home-mortgage lending to aggregate home-mortgage lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The table relies on 2015 ACS data along with updated HMDA data, following the requirements of Regulation C.

	Univest Bank and Trust Co. Ocean City, NJ Assessment Area Distribution of HMDA Loans by Borrower Income Level										
Aggregate Comparison											
Income Level	% Families by	2	019	20	20	2	021				
	Family Income (2015 ACS Data)	% Univest's Lending	% Aggregate Lending	% Univest's Lending	% Aggregate Lending	% Univest's Lending	% Aggregate Lending				
Low	19.9	0.0	3.2	1.5	2.1	1.1	2.5				
Moderate	19.0	0.0	9.7	4.5	8.0	2.3	7.9				
Middle	21.3	10.0	12.9	4.5	11.7	9.1	11.9				
Upper	39.8	80.0	63.5	80.3	68.0	70.5	64.9				
Unknown	0.0	10.0	10.0 10.7 9.2 10.2 17.0 12.8								
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0				

#### Lending to Low-Income Borrowers

For the period under review, Univest's lending to low-income borrowers was poor.

In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration median family incomes and housing costs, and the challenges faced by low-income borrowers in saving for a down payment and closing costs, which can present a significant obstacle to homeownership, thereby limiting lending opportunities.

Univest's lending in 2019 to low-income borrowers was poor. In 2019, the bank made none of its 30 HMDA loans to low-income borrowers, compared to the proxy of 20%, and the aggregate lending to low-income borrowers of 3%. By loan type, aggregate lenders made 3% of home purchase loans, 4% of refinance loans, 4% of home improvement loans, and no multifamily or loans with purpose "not applicable" to low-income borrowers in 2019.

Univest's lending in 2020 to low-income borrowers was poor. In total, 2% of the bank's 66 HMDA loans (one loan) were originated to low-income borrowers, trailing the proxy of 20%, and matching the aggregate lending to low-income borrowers of 2%. The single loan made by the bank to a low-income borrower was an "other purpose closed/exempt" loan type. By loan type, aggregate lenders made 2% of home purchase loans, 2% of refinance loans, 6% of home improvement loans, and no multifamily loans, or loans with purpose "not applicable" to low-income borrowers in 2020.

Univest's lending in 2021 to low-income borrowers was poor. In total, 1% of the bank's 88 HMDA loans (one loan) were originated to low-income borrowers, trailing the proxy of 20%, and the aggregate lending to low-income borrowers of 3%. The single loan made to a low-income borrower in 2021 was a refinance loan. In comparison, aggregate lenders made 2% of home purchase loans, 3% of refinance loans, 5% of home improvement loans, and no multifamily loans, or loans with purpose "not applicable" to low-income borrowers in 2021.

#### <u>Lending to Moderate-Income Borrowers</u>

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

Univest's lending in 2019 to moderate-income borrowers was poor. In 2019, none of the bank's 30 HMDA loans were made to moderate-income borrowers, compared to the proxy of 19%, and the aggregate lending to moderate-income borrowers of 10%. By loan type, aggregate lenders made 9% of home purchase loans, 10% of refinance loans, 12% of home improvement loans, 1% of loans with purpose "not applicable," and no multifamily loans to moderate-income borrowers in 2019.

Univest's lending in 2020 to moderate-income borrowers was adequate. Of the bank's 66 HMDA loans, 5% (three loans) were originated to moderate-income borrowers. The bank's lending trailed both the proxy of 19% and the aggregate lending to moderate-income borrowers of 8%. By loan category, Univest originated 7% of its home purchase loans (two loans), 3% of its refinance loans (one loan), and no home improvement loans, multifamily loans, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 8% of home purchase loans, 8% of refinance loans, 16% of home improvement loans, and no multifamily loans, or loans with purpose "not applicable" to moderate-income borrowers in 2020.

Univest's lending in 2021 to moderate-income borrowers was poor. Of the bank's 88 HMDA loans, 2% (two loans) were originated to moderate-income borrowers, again trailing the proxy of 19% and the aggregate lending to moderate-income borrowers of 8%. By loan category, Univest originated 2% of its refinance loans (one loan), 11% of its home improvement loans (one loan), and no home purchase loans, multifamily loans, or loans with purpose "not applicable" to moderate-income borrowers. In comparison, aggregate lenders made 7% of home purchase loans, 9% of refinance loans, 11% of home improvement loans, and no multifamily loans, or loans with purpose "not applicable" to moderate-income borrowers in 2021.

#### **Geographic Distribution of Loans**

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. Overall, the geographic distribution of loans reflects good penetration throughout the Ocean City, NJ assessment area, including in low- and moderate-income census tracts. Once again, it is noted that the analysis included only HMDA loans.

#### **Home-Mortgage Lending**

Univest's distribution of home-mortgage loans among geographies of different income levels, including low- and moderate-income census tracts is good. As noted earlier, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage lending within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit is in the tract.

According to 2015 ACS data, 3% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 15% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle-income tracts (61%), and upper-income tracts (21%).

The following table presents Univest's geographic distribution of HMDA loans from 2019 to 2021, in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area. The tables used for lending in all three years rely on 2015 ACS data, along with updated HMDA data, following the requirements of Regulation C.

	Univest Bank and Trust Co. Ocean City, NJ Assessment Area Geographic Distribution of HMDA Loans									
	Aggregate Comparison									
Census Tract Income Level	%	2019		202	0:	20	21			
	Owner-Occupied Units (2015 ACS Data)	% Univest's Lending	% Aggregate Lending	% Univest's Lending	% Aggregate Lending	% Univest's Lending	% Aggregate Lending			
Low	3.0	0.0	4.5	3.0	4.3	2.3	5.1			
Moderate	15.3	16.7	19.2	21.2	18.8	18.2	18.8			
Middle	60.7	30.0	49.1	34.9	50.4	40.9	50.2			
Upper	21.0	53.3	27.2	40.9	26.5	38.6	25.9			
Unknown	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0			

#### Lending in Low-Income Census Tracts

For the period under review, Univest's overall HMDA lending in low-income tracts was considered adequate.

Univest's HMDA lending in low-income census tracts in 2019 was poor. Of the 30 HMDA loans originated by Univest in 2019, none were made in low-income tracts. This performance was below the aggregate lending level of 5% and the proxy of 3%. Aggregate lenders made 6% of home purchase loans, 3% of refinance loans, 4% of home improvement loans, 40% of multifamily loans, and no loans with purpose "not applicable" in low-income tracts in the assessment area in 2019.

Univest's lending in low-income census tracts in 2020 was adequate. In total, 3% of the bank's 66 HMDA loans (two loans) were originated in low-income tracts, meeting the proxy of 3%, and trailing the aggregate lending in low-income tracts of 4%. By loan type, Univest originated 3% of its home purchase loans (one loan), 3% of its refinance loans (one loan), and no home improvement loans, multifamily loans, or loans with purpose "not applicable" in low-income tracts in the assessment area. In comparison, aggregate lenders made 6% of home purchase loans, 3% of refinance loans, 3% of home improvement loans, 23% of multifamily loans, and 3% of loans with purpose "not applicable" in low-income tracts in the assessment area in 2020.

Univest's lending in low-income census tracts in 2021 was adequate. In total, 2% of the bank's 88 HMDA loans (two loans) were originated in low-income tracts in the assessment area, trailing the proxy of 3%, and the aggregate lending in low-income tracts of 5%. By loan type, both loans in low-income tracts were home purchase loans. In comparison, aggregate lenders made 7% of home purchase loans, 4% of refinance loans, 2% of home improvement loans, 25% of multifamily loans, and 3% of loans with purpose "not applicable" in low-income tracts in the assessment area in 2021.

#### Lending in Moderate-Income Census Tracts

For the period under review, the bank's HMDA lending in moderate-income tracts was considered excellent.

Univest's lending in moderate-income census tracts in 2019 was good. Of Univest's 30 HMDA loans originated in the assessment area in 2019, 17% (five loans) were made in moderate-income census tracts. The bank's lending exceeded the proxy of 15% and trailed the aggregate lending level of 19%. By product type, the bank made 24% of its home purchase loans (four loans), 9% of its refinance loans (one loan), and no home improvement loans, multifamily loans, or loans with purpose "not applicable" in moderate-income census tracts in the assessment area. In comparison, aggregate lenders made 22% of home purchase loans, 16% of refinance loans, 17% of home improvement loans, 30% of multifamily loans, and 18% of its loans with purpose "not applicable" in moderate-income tracts in the assessment area in 2019.

Univest's lending in moderate-income census tracts in 2020 was excellent. Of Univest's 66 HMDA loans originated in the assessment area in 2020, 21% (14 loans) were made in moderate-income census tracts. The bank's lending exceeded both the proxy of 15% and the aggregate lending level of 19%. By product type, the bank made 30% of its home purchase loans (nine loans), 15% of its refinance loans (five loans), and no home improvement loans, multifamily loans, or loans with purpose "not applicable" in moderate-income census tracts in the assessment area. In comparison, aggregate lenders made 22% of home purchase loans, 17% of refinance loans, 16% of home improvement loans, 31% of multifamily loans, and 22% of loans with purpose "not applicable" in moderate-income tracts in the assessment area in 2020.

Finally, Univest's lending in moderate-income census tracts in 2021 was excellent. Of Univest's 88 HMDA loans originated in the assessment area in 2021, 18% (16 loans) were made in moderate-income census tracts. The bank's lending exceeded the proxy of 15% and was just below the aggregate lending level of 19%. By product type, the bank made 19% of its home purchase loans (five loans), 19% of its refinance loans (10 loans), 11% of its home improvement loans (one loan), and no multifamily loans, or loans with purpose "not applicable" in moderate-income census tracts in the assessment area. In comparison, aggregate lenders made 22% of home purchase loans, 17% of refinance loans, 16% of home improvement loans, 25% of multifamily loans, and 18% of loans with purpose "not applicable" in moderate-income tracts in the assessment area in 2021.

#### **Responsiveness to Credit Needs**

Univest exhibits a poor record of servicing the credit needs of low- and moderate-income borrowers and very small businesses, consistent with safe and sound banking practices. As mentioned previously, the primary community development needs mentioned by community contacts were affordable housing, financial literacy education for low- and moderate-income individuals, workforce development, and a local transportation system in support of workforce development efforts in the assessment area.

These needs were not fully addressed through the bank's retail HMDA, and small business lending, nor through the use of innovative or flexible lending programs, or community development lending, as explained below.

#### **Innovative and/or Flexible Lending Practices**

Univest makes little use of innovative and/or flexible lending practices in serving the Ocean City, NJ assessment area credit needs. Though the bank offers several mortgage products aimed at low-and moderate-income borrowers, and small business products tailored to businesses with revenues under \$1 million, none of these products were used in the Ocean City, NJ assessment area. During the evaluation period, the bank made one \$5 thousand grant through the FHLB of Pittsburgh's FFD program.

#### **Community Development Lending**

Univest makes a low level of community development loans in the Ocean City, NJ assessment area. During the period evaluated, which included the timeframe between January 14, 2020, through December 5, 2022, the bank made two community development loans in the assessment area, totaling \$2.5 million. Of the bank's total community development lending by dollar volume, just under 2% was within the Ocean City, NJ assessment area.

Univest's community development lending increased from the previous evaluation, when one new loan totaling just under \$1.7 million was reported.

Of the bank's two community development loans, one loan totaling \$675 thousand (27%) supported affordable housing initiatives for low- and moderate-income individuals, and the other loan totaling \$1.8 million (73%) supported revitalization and/or stabilization efforts through the bank's participation in the PPP.

Finally, the bank's participation in the PPP during the COVID-19 pandemic was particularly responsive to revitalization and stabilization efforts for businesses to be able to retain employees in low- and moderate-income census tracts. Univest made a total of 20 PPP loans in the assessment area totaling \$2.3 million, with one loan totaling \$1.8 million counted as a CD loan.

The following table includes the bank's community development loans in the Ocean City, NJ assessment area, broken out by community development purpose.

Univest Bank and Trust Co. Ocean City, NJ Assessment Area Community Development Lending										
Activity Affordable Housing				Community Economic Services Development		_	talize or abilize	Totals		
Year	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	1	1,793	1	1,793
2022	1	675	0	0	0	0	0	0	1	675
TOTAL	1	675	0	0	0	0	1	1,793	2	2,468

#### **INVESTMENT TEST**

The investment test evaluates a financial institution's level of qualified investments that serve lowor moderate-income areas or individuals, together with the responsiveness, innovativeness, and complexity of such investments. Qualified investments made prior to the previous evaluation, which are still outstanding, are considered under the test. For purposes of the CRA, the term qualified investment has been defined to include: a lawful investment, deposit, membership share, or grant, including a donation or in-kind contribution of property, that has as its primary purpose, community development.

Performance under the investment test is assessed as low satisfactory.

#### **Volume of Investment and Grant Activity**

Univest has an adequate level of qualified community development investments and grants, rarely in a leadership position. Qualified investments and donations for the Ocean City, NJ assessment area totaled \$1.9 million, which is a slight increase from the investment level of \$1.7 million at the prior evaluation. Of the bank's overall investments in its assessment areas, just under 6% were within the Ocean City, NJ assessment area.

The entirety of qualified investments supported affordable housing for low- and moderate-income borrowers via maturing investments in mortgage-backed securities totaling \$1.8 million. This total is comprised of 11 home-mortgage loans in 7 investments to low- and moderate-income individuals and/or geographies. Three of the seven mortgage-backed security investments were recognized in the previous evaluation and remained outstanding.

In addition to the qualified investments discussed above, the bank also made 6 donations totaling nearly \$26 thousand to local organizations that routinely provide community development services in the assessment area. Of the total dollar amount, \$10 thousand (39%) supported affordable housing, and nearly \$16 thousand (61%) went to organizations that provided community services to low- and moderate-income individuals in the assessment area.

The following table presents the investment and grant activity for the Ocean City, NJ assessment area.

Univest Bank & Trust Co. Ocean City, NJ Assessment Area Qualified Investments										
CD Category	Affordable Community Housing Services		•	Economic Development		Revitalize or Stabilize		Totals		
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Qualified Investments	7	1,836	0	0	0	0	0	0	7	1,836
Donations	2	10	4	16	0	0	0	0	6	26
In-Kind Donations	0	0	0	0	0	0	0	0	0	0
TOTAL	9	1,846	4	16	0	0	0	0	13	1,862

#### Responsiveness to Credit and Community Development Needs

Univest exhibits adequate responsiveness to credit and community development needs of the assessment area. As noted in the table above, the vast majority of the bank's investments supported affordable housing in the assessment area, a pronounced community need as indicated through community contact interviews.

#### **Community Development Initiatives**

Univest makes rare use of innovative and/or complex investments to support community development initiatives. In the Ocean City, NJ assessment area, the vast majority of investment dollars consisted of mortgage-backed securities investments, which were supplemented with donations and grants which supported community development organizations in the assessment area. These activities are not considered to be particularly innovative or complex.

#### SERVICE TEST

The service test evaluates the financial services provided by a financial institution using the following characteristics:

- the accessibility of delivery mechanisms within an assessment area, including the distribution of an institution's branch offices and alternative delivery mechanisms;
- the impact of changes in branch locations upon low- and moderate-income census tracts or low- and moderate-income persons in the assessment area;
- the reasonableness of business hours and services in meeting assessment area needs; and
- the extent to which an institution provides community development services.

Performance under the service test is assessed as low satisfactory in the assessment area.

#### **Accessibility of Delivery Systems**

Delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment areas. During the review period, Univest operated one full-service branch in the Ocean City, NJ assessment area (3% of the bank's total branches). Using the 2015 ACS data, the single branch operating in the assessment area was located in a moderate-income census tract.

The following table details the location of the bank's branch with comparison to 2015 ACS population demographics.

Univest Bank Ocean City, NJ Assessment Area Retail Branch Distribution 2015 ACS Data										
Census Tract Type Number of Branches Percent of Branches Population Percent of Population										
Low	0	0.0	3,907	4.1						
Moderate	1	100.0	16,568	17.3						
Middle	0	0.0	56,581	59.1						
Upper	0	0.0	18,749	19.6						
Unknown Income	Unknown Income         0         0.0         0         0.0									
Totals	1	100.0	95,805	100.0						

The branch includes a cash-dispense-only ATM provides electronic access to banking services. In addition, Univest participates in the Allpoint ATM network, which provides access to surcharge free ATMs nationwide. To supplement traditional banking services, Univest provides alternative delivery systems that include online banking services, telephone banking services and a smart phone mobile banking application that includes mobile deposit capture capabilities for retail and small business customers. Customers are able to pay bills, open accounts, and apply for loans using the bank's online website at <a href="https://www.univest.net">https://www.univest.net</a>.

#### **Changes in Branch Locations**

Univest did not open or close any branches within the Ocean City, NJ assessment area during the evaluation period, and therefore this component of the service test was not considered in this assessment area.

#### Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income census tracts or individuals The single branch in the assessment area includes a walk-up ATM and a drive-through facility. The branch operates Monday through Friday from 9:00 a.m. to 5:00 p.m., and offers Saturday hours from 9:00 a.m. to 1:00 p.m. during the summer season, which runs from Memorial Day to Labor Day.

The impetus for Saturday hours during the summer months is attributed to the large influx of tourists that visit the beach communities. As mentioned previously, the population of the county swells to over 750 thousand in the height of the summer season, compared to the nearly 96 thousand people living in the county year-round.

#### **Bank Products**

Univest offers deposit products that provide greater access to banking services for low- and moderate-income customers. The bank offers two free checking accounts for consumers, which feature no minimum monthly balance requirement, no monthly service fee and no paper statement fee. One of the free checking products offers no non-Univest ATM fees, while the other provides for no overdraft item fees if the account overdraft total is within daily threshold limits.

The bank also offers a low-cost small business checking account for small businesses with limited transaction activity. The account charges no monthly service fee, and has no minimum monthly balance requirement. Further, this account offers 200 free transaction items processed through the account, with transactions above the monthly maximum incurring a \$.50 per item charge. This account allows very small businesses access to banking services that meet their needs.

#### **Community Development Services**

Univest provides few, if any community development services in this assessment area. No community development services were provided by the bank in the Ocean City, NJ assessment area.

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## **CRA APPENDICES**

## **CRA APPENDIX A: SCOPE OF EXAMINATION TABLE**

		PPE OF INATION						
		od Reviewed 0 – 12/5/22						
	Institution c and Trust Co.	Products Reviewed  HMDA  Small Business  Small Farm						
Affiliates N/A	Affiliate Relationship N/A	Pro A	ducts Reviewed N/					
	List of Assessment Areas and Type of Examination							
Assessment Area  Philadelphia, PA Assessment Area	Type of Examination  Full-Scope	Branches Visited <sup>28</sup> N/A	Other Information					
Allentown, PA Assessment Area	Full-Scope	N/A	Small farm loans were not evaluated in this assessment area due to low loan volume.					
Lancaster, PA Assessment Area	Limited-Scope	N/A	Geographic distribution of small farm loans was not analyzed in this assessment area due to assessment area demographics.					
Reading, PA Assessment Area	Limited-Scope	N/A	Small farm loans were not evaluated in this assessment area due to low loan volume.					
Ocean City, NJ Assessment Area	Full-Scope	N/A	Small business and small farm loans were not evaluated in this assessment are due to low loan volumes.					

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No branch visits were performed in accordance with the scoping process for this evaluation. The institution's CRA Public File was reviewed electronically.

## **CRA APPENDIX B: SUMMARY OF STATE RATINGS**

State Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Commonwealth of Pennsylvania	-	-	-	Satisfactory
Philadelphia, PA Assessment Area	Outstanding	High Satisfactory	Low Satisfactory	Satisfactory
Allentown, PA Assessment Area	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Lancaster, PA Assessment Area	Consistent	Consistent	Consistent	Consistent
Reading, PA Assessment Area	Below	Consistent	Consistent	Below
State of New Jersey	State of New Jersey -		-	Needs to Improve
Ocean City, NJ Assessment Area	Needs to Improve	Low Satisfactory	Low Satisfactory	Needs to Improve

#### **CRA APPENDIX C: GLOSSARY**

**Aggregate lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area 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;
- (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; or

**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 refinancings 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.

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	CRA APPENDIX D: HMDA LOAN DISTRIBUTION TABLES						

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

		HMDA									
Income Categories		Ву Ті	act Income			By Borro	wer Income				
Categories	#	%	\$(000s)	%	#	%	\$(000s)	%			
	•		Home	Purchase	•	•	•				
Low	20	3.4%	3,769	2.7%	77	13.3%	12,407	8.8%			
Moderate	142	24.5%	27,645	19.7%	122	21.0%	24,424	17.4%			
Middle	274	47.2%	66,790	47.5%	120	20.7%	28,362	20.2%			
Upper	144	24.8%	42,423	30.2%	215	37.1%	63,361	45.1%			
Unknown	0	0.0%	0	0.0%	46	7.9%	12,073	8.6%			
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	580	100.0%	140,627	100.0%	580	100.0%	140,627	100.0%			
			Ref	inance							
Low	14	2.8%	2,036	1.7%	65	13.0%	7,990	6.6%			
Moderate	77	15.4%	13,424	11.0%	86	17.2%	13,144	10.8%			
Middle	265	53.0%	56,131	46.1%	109	21.8%	24,508	20.1%			
Upper	144	28.8%	50,299	41.3%	205	41.0%	67,627	55.5%			
Unknown	0	0.0%	0	0.0%	35	7.0%	8,621	7.1%			
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	500	100.0%	121,889	100.0%	500	100.0%	121,889	100.0%			
			Home In	provement							
Low	13	4.7%	563	2.1%	37	13.3%	1,693	6.2%			
Moderate	58	20.8%	4,278	15.7%	54	19.4%	3,860	14.2%			
Middle	136	48.7%	10,318	37.8%	67	24.0%	3,814	14.0%			
Upper	72	25.8%	12,112	44.4%	109	39.1%	15,902	58.3%			
Unknown	0	0.0%	0	0.0%	12	4.3%	2,001	7.3%			
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	279	100.0%	27,270	100.0%	279	100.0%	27,270	100.0%			
			Mult	i-Family							
Low	3	11.1%	976	3.5%	0	0.0%	0	0.0%			
Moderate	11	40.7%	15,106	54.2%	0	0.0%	0	0.0%			
Middle	4	14.8%	4,272	15.3%	0	0.0%	0	0.0%			
Upper	9	33.3%	7,504	26.9%	0	0.0%	0	0.0%			
Unknown	0	0.0%	0	0.0%	27	100.0%	27,857	100.0%			
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	27	100.0%	27,857	100.0%	27	100.0%	27,857	100.0%			

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

		HMDA									
Income Categories		Ву Т	ract Income			By Borro	wer Income				
Gutegories	#	%	\$(000s)	%	#	%	\$(000s)	%			
	1	•	Other Pu	rpose LOC	•	•	•				
Low	0	0.0%	0	0.0%	19	21.1%	946	15.7%			
Moderate	24	26.7%	1,387	23.1%	16	17.8%	1,045	17.4%			
Middle	50	55.6%	3,582	59.6%	20	22.2%	1,360	22.6%			
Upper	16	17.8%	1,040	17.3%	33	36.7%	2,503	41.7%			
Unknown	0	0.0%	0	0.0%	2	2.2%	156	2.6%			
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	90	100.0%	6,009	100.0%	90	100.0%	6,009	100.0%			
			Other Purpos	e Closed/Exem	pt						
Low	0	0.0%	0	0.0%	1	9.1%	25	7.0%			
Moderate	3	27.3%	112	31.5%	5	45.5%	143	40.4%			
Middle	6	54.5%	173	48.7%	3	27.3%	102	28.6%			
Upper	2	18.2%	70	19.7%	2	18.2%	85	24.0%			
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	11	100.0%	355	100.0%	11	100.0%	355	100.0%			
			Loan Purpos	e Not Applicab	le						
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%			
			HMD	A Totals							
Low	50	3.4%	7,343	2.3%	199	13.4%	23,062	7.1%			
Moderate	315	21.2%	61,952	19.1%	283	19.0%	42,616	13.2%			
Middle	735	49.4%	141,265	43.6%	319	21.5%	58,146	17.9%			
Upper	387	26.0%	113,447	35.0%	564	37.9%	149,476	46.1%			
Unknown	0	0.0%	0	0.0%	122	8.2%	50,707	15.7%			
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	1,487	100.0%	324,007	100.0%	1,487	100.0%	324,007	100.0%			

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

		HMDA									
Income Categories		By Tr	act Income			By Borro	wer Income				
Categories	#	%	\$(000s)	%	#	%	\$(000s)	%			
		l	Home	Purchase		l	l	1			
Low	17	2.6%	3,509	2.0%	73	11.2%	12,748	7.2%			
Moderate	115	17.7%	20,172	11.3%	156	24.0%	37,489	21.1%			
Middle	301	46.3%	80,557	45.3%	144	22.2%	40,394	22.7%			
Upper	217	33.4%	73,542	41.4%	240	36.9%	76,751	43.2%			
Unknown	0	0.0%	0	0.0%	37	5.7%	10,399	5.8%			
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	650	100.0%	177,780	100.0%	650	100.0%	177,780	100.0%			
			Ref	inance							
Low	22	1.8%	3,477	1.0%	123	9.8%	18,203	5.2%			
Moderate	159	12.6%	27,831	8.0%	232	18.5%	45,484	13.1%			
Middle	637	50.7%	159,290	45.9%	295	23.5%	72,389	20.9%			
Upper	439	34.9%	156,221	45.0%	524	41.7%	183,657	53.0%			
Unknown	0	0.0%	0	0.0%	83	6.6%	27,087	7.8%			
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	1,257	100.0%	346,819	100.0%	1,257	100.0%	346,819	100.0%			
			Home Im	provement							
Low	14	5.3%	475	2.5%	44	16.7%	2,013	10.5%			
Moderate	63	24.0%	2,659	13.9%	74	28.1%	4,160	21.7%			
Middle	130	49.4%	9,808	51.3%	59	22.4%	4,025	21.0%			
Upper	56	21.3%	6,189	32.4%	77	29.3%	7,008	36.6%			
Unknown	0	0.0%	0	0.0%	9	3.4%	1,924	10.1%			
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	263	100.0%	19,131	100.0%	263	100.0%	19,131	100.0%			
			Multi	-Family							
Low	5	41.7%	6,108	38.5%	0	0.0%	0	0.0%			
Moderate	3	25.0%	2,714	17.1%	0	0.0%	0	0.0%			
Middle	4	33.3%	7,062	44.5%	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%	12	100.0%	15,884	100.0%			
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	12	100.0%	15,884	100.0%	12	100.0%	15,884	100.0%			

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

		HMDA							
Income Categories		Ву Ті	ract Income			By Borro	wer Income		
Categories	#	%	\$(000s)	%	#	%	\$(000s)	%	
	•	•	Other Pu	rpose LOC		•		•	
Low	0	0.0%	0	0.0%	6	8.3%	378	6.0%	
Moderate	6	8.3%	311	5.0%	19	26.4%	1,364	21.8%	
Middle	44	61.1%	3,549	56.8%	14	19.4%	1,030	16.5%	
Upper	22	30.6%	2,387	38.2%	31	43.1%	3,247	52.0%	
Unknown	0	0.0%	0	0.0%	2	2.8%	230	3.7%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	72	100.0%	6,248	100.0%	72	100.0%	6,248	100.0%	
			Other Purpos	e Closed/Exem	pt				
Low	0	0.0%	0	0.0%	1	12.5%	60	13.8%	
Moderate	1	12.5%	60	13.8%	3	37.5%	64	14.6%	
Middle	7	87.5%	376	86.2%	3	37.5%	297	68.1%	
Upper	0	0.0%	0	0.0%	1	12.5%	15	3.4%	
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	8	100.0%	436	100.0%	8	100.0%	436	100.0%	
			Loan Purpos	e Not Applicab	le				
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%	
			HMD	A Totals					
Low	58	2.6%	13,568	2.4%	247	10.9%	33,401	5.9%	
Moderate	347	15.3%	53,748	9.5%	484	21.4%	88,560	15.6%	
Middle	1,123	49.6%	260,642	46.0%	515	22.8%	118,135	20.9%	
Upper	734	32.4%	238,339	42.1%	873	38.6%	270,677	47.8%	
Unknown	0	0.0%	0	0.0%	143	6.3%	55,523	9.8%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	2,262	100.0%	566,297	100.0%	2,262	100.0%	566,297	100.0%	

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

				HMD	A									
Income Categories		Ву Ті	ract Income			By Borro	wer Income							
Categories	#	%	\$(000s)	%	#	%	\$(000s)	%						
	•	•	Home	Purchase	•	•	1	•						
Low	19	2.6%	2,335	1.1%	71	9.8%	13,608	6.2%						
Moderate	167	23.1%	35,030	15.9%	161	22.2%	39,792	18.1%						
Middle	311	43.0%	95,196	43.2%	173	23.9%	48,897	22.2%						
Upper	227	31.4%	87,776	39.8%	291	40.2%	106,849	48.5%						
Unknown	0	0.0%	0	0.0%	28	3.9%	11,191	5.1%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	724	100.0%	220,337	100.0%	724	100.0%	220,337	100.0%						
			Re	finance										
Low	20	1.8%	3,502	1.1%	96	8.5%	14,555	4.7%						
Moderate	173	15.4%	34,121	11.1%	204	18.2%	39,454	12.8%						
Middle	537	47.8%	126,525	41.1%	252	22.4%	57,823	18.8%						
Upper	393	35.0%	143,844	46.7%	446	39.7%	146,699	47.6%						
Unknown	0	0.0%	0	0.0%	125	11.1%	49,460	16.1%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	1,123	100.0%	307,991	100.0%	1,123	100.0%	307,991	100.0%						
			Home Ir	nprovement										
Low	25	7.3%	1,195	4.5%	42	12.3%	2,883	10.7%						
Moderate	69	20.2%	3,042	11.3%	66	19.3%	4,084	15.2%						
Middle	161	47.1%	13,331	49.7%	85	24.9%	4,630	17.2%						
Upper	87	25.4%	9,274	34.6%	135	39.5%	13,178	49.1%						
Unknown	0	0.0%	0	0.0%	14	4.1%	2,067	7.7%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	342	100.0%	26,843	100.0%	342	100.0%	26,843	100.0%						
			Mul	ti-Family										
Low	1	3.2%	132	0.4%	0	0.0%	0	0.0%						
Moderate	12	38.7%	11,688	39.5%	0	0.0%	0	0.0%						
Middle	12	38.7%	11,313	38.3%	0	0.0%	0	0.0%						
Upper	6	19.4%	6,441	21.8%	0	0.0%	0	0.0%						
Unknown	0	0.0%	0	0.0%	31	100.0%	29,574	100.0%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	31	100.0%	29,574	100.0%	31	100.0%	29,574	100.0%						

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

				HMD	Α								
Income Categories		Ву Ті	act Income			By Borro	wer Income						
Gutegories	#	%	\$(000s)	%	#	%	\$(000s)	%					
	•	•	Other P	urpose LOC			1	•					
Low	0	0.0%	0	0.0%	5	9.8%	220	4.0%					
Moderate	5	9.8%	308	5.6%	17	33.3%	1,240	22.6%					
Middle	29	56.9%	2,629	48.0%	8	15.7%	854	15.6%					
Upper	17	33.3%	2,541	46.4%	18	35.3%	2,799	51.1%					
Unknown	0	0.0%	0	0.0%	3	5.9%	365	6.7%					
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%					
Total	51	100.0%	5,478	100.0%	51	100.0%	5,478	100.0%					
			Other Purpos	e Closed/Exer	npt								
Low	0	0.0%	0	0.0%	2	50.0%	27	20.5%					
Moderate	1	25.0%	15	11.4%	0	0.0%	0	0.0%					
Middle	3	75.0%	117	88.6%	0	0.0%	0	0.0%					
Upper	0	0.0%	0	0.0%	1	25.0%	90	68.2%					
Unknown	0	0.0%	0	0.0%	1	25.0%	15	11.4%					
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%					
Total	4	100.0%	132	100.0%	4	100.0%	132	100.0%					
			Loan Purpos	e Not Applical	ole								
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%					
			НМД	A Totals									
Low	65	2.9%	7,163	1.2%	216	9.5%	31,293	5.3%					
Moderate	427	18.8%	84,204	14.3%	448	19.7%	84,570	14.3%					
Middle	1,053	46.3%	249,110	42.2%	518	22.8%	112,203	19.0%					
Upper	730	32.1%	249,876	42.3%	891	39.2%	269,615	45.7%					
Unknown	0	0.0%	0	0.0%	202	8.9%	92,671	15.7%					
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%					
Total	2,275	100.0%	590,353	100.0%	2,275	100.0%	590,353	100.0%					

## 2019 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

				HMD	A									
Income Categories		By Tr	act Income			By Borro	wer Income							
Categories	#	%	\$(000s)	%	#	%	\$(000s)	%						
	1		Home	Purchase				1						
Low	1	1.9%	84	0.6%	4	7.4%	483	3.6%						
Moderate	4	7.4%	643	4.8%	9	16.7%	1,848	13.8%						
Middle	20	37.0%	4,617	34.5%	12	22.2%	2,568	19.2%						
Upper	29	53.7%	8,058	60.1%	28	51.9%	8,410	62.8%						
Unknown	0	0.0%	0	0.0%	1	1.9%	93	0.7%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	54	100.0%	13,402	100.0%	54	100.0%	13,402	100.0%						
			Re	finance										
Low	0	0.0%	0	0.0%	1	3.2%	100	1.2%						
Moderate	1	3.2%	102	1.2%	3	9.7%	466	5.5%						
Middle	10	32.3%	2,231	26.1%	7	22.6%	1,457	17.0%						
Upper	20	64.5%	6,222	72.7%	16	51.6%	5,360	62.7%						
Unknown	0	0.0%	0	0.0%	4	12.9%	1,171	13.7%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	31	100.0%	8,554	100.0%	31	100.0%	8,554	100.0%						
			Home Ir	nprovement										
Low	1	11.1%	50	7.5%	0	0.0%	0	0.0%						
Moderate	1	11.1%	100	15.1%	2	22.2%	209	31.5%						
Middle	1	11.1%	60	9.0%	1	11.1%	50	7.5%						
Upper	6	66.7%	454	68.4%	6	66.7%	405	61.0%						
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%	664	100.0%	9	100.0%	664	100.0%						
			Mult	ti-Family										
Low	1	100.0%	397	100.0%	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%	1	100.0%	397	100.0%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	1	100.0%	397	100.0%	1	100.0%	397	100.0%						

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

				НМ	DA .									
Income Categories		By Tra	ct Income			By Borrov	wer Income							
outogoco	#	%	\$(000s)	%	#	%	\$(000s)	%						
	•		Other P	urpose 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	1	100.0%	25	100.0%	1	100.0%	25	100.0%						
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	1	100.0%	25	100.0%	1	100.0%	25	100.0%						
	•		Other Purpos	e Closed/Exe	empt									
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	100.0%	85	100.0%	0	0.0%	0	0.0%						
Upper	0	0.0%	0	0.0%	1	100.0%	85	100.0%						
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%	85	100.0%	1	100.0%	85	100.0%						
	•		Loan Purpos	e Not Applica	able									
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%						
			НМС	A Totals										
Low	3	3.1%	531	2.3%	5	5.2%	583	2.5%						
Moderate	6	6.2%	845	3.7%	14	14.4%	2,523	10.9%						
Middle	33	34.0%	7,018	30.3%	21	21.6%	4,100	17.7%						
Upper	55	56.7%	14,734	63.7%	51	52.6%	14,260	61.7%						
Unknown	0	0.0%	0	0.0%	6	6.2%	1,661	7.2%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	97	100.0%	23,127	100.0%	97	100.0%	23,127	100.0%						

## 2020 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

				НМЕ	)A									
Income Categories		By Tra	ct Income			By Borrov	wer Income							
Categories	#	%	\$(000s)	%	#	%	\$(000s)	%						
	•	•	Home	Purchase	•	•		•						
Low	6	8.1%	875	5.6%	11	14.9%	1,446	9.3%						
Moderate	13	17.6%	1,725	11.1%	18	24.3%	3,327	21.4%						
Middle	21	28.4%	4,257	27.4%	24	32.4%	5,433	35.0%						
Upper	34	45.9%	8,660	55.8%	19	25.7%	5,021	32.4%						
Unknown	0	0.0%	0	0.0%	2	2.7%	290	1.9%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	74	100.0%	15,517	100.0%	74	100.0%	15,517	100.0%						
	•	•	Re	finance										
Low	1	1.3%	40	0.2%	3	3.8%	399	2.0%						
Moderate	4	5.1%	455	2.3%	10	12.7%	1,661	8.5%						
Middle	31	39.2%	7,897	40.2%	22	27.8%	4,533	23.1%						
Upper	43	54.4%	11,260	57.3%	38	48.1%	12,145	61.8%						
Unknown	0	0.0%	0	0.0%	6	7.6%	914	4.7%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	79	100.0%	19,652	100.0%	79	100.0%	19,652	100.0%						
	•	•	Home I	mprovement										
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Moderate	1	10.0%	65	11.2%	1	10.0%	40	6.9%						
Middle	3	30.0%	150	25.9%	1	10.0%	50	8.6%						
Upper	6	60.0%	365	62.9%	8	80.0%	490	84.5%						
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	10	100.0%	580	100.0%	10	100.0%	580	100.0%						
			Mul	ti-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	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 (ALLENTOWN, PA ASSESSMENT AREA)

				НМЕ	DA .									
Income Categories		By Tra	ct Income			By Borro	wer Income							
Gulogorios	#	%	\$(000s)	%	#	%	\$(000s)	%						
			Other P	urpose LOC										
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Moderate	1	25.0%	42	11.0%	1	25.0%	42	11.0%						
Middle	2	50.0%	299	77.4%	1	25.0%	45	11.6%						
Upper	1	25.0%	45	11.6%	2	50.0%	299	77.4%						
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	4	100.0%	386	100.0%	4	100.0%	386	100.0%						
			Other Purpos	e Closed/Exe	empt									
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 Purpos	e Not Applica	able									
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%						
			HMD	A Totals										
Low	7	4.2%	915	2.5%	14	8.4%	1,844	5.1%						
Moderate	19	11.4%	2,288	6.3%	30	18.0%	5,071	14.0%						
Middle	57	34.1%	12,603	34.9%	48	28.7%	10,061	27.8%						
Upper	84	50.3%	20,330	56.3%	67	40.1%	17,956	49.7%						
Unknown	0	0.0%	0	0.0%	8	4.8%	1,204	3.3%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	167	100.0%	36,135	100.0%	167	100.0%	36,135	100.0%						

## 2021 HMDA LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

				НМЕ	)A									
Income Categories		By Tra	ct Income			By Borrov	wer Income							
Categories	#	%	\$(000s)	%	#	%	\$(000s)	%						
	•	•	Home	Purchase		•		•						
Low	6	5.9%	870	3.6%	16	15.7%	2,668	10.9%						
Moderate	20	19.6%	3,381	13.9%	23	22.5%	4,947	20.3%						
Middle	44	43.1%	10,612	43.5%	21	20.6%	4,710	19.3%						
Upper	32	31.4%	9,544	39.1%	40	39.2%	11,439	46.9%						
Unknown	0	0.0%	0	0.0%	2	2.0%	645	2.6%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	102	100.0%	24,408	100.0%	102	100.0%	24,408	100.0%						
			Re	finance										
Low	0	0.0%	0	0.0%	6	7.4%	762	4.5%						
Moderate	7	8.6%	977	5.7%	15	18.5%	2,397	14.1%						
Middle	37	45.7%	7,071	41.5%	15	18.5%	2,764	16.2%						
Upper	37	45.7%	8,987	52.8%	42	51.9%	10,570	62.0%						
Unknown	0	0.0%	0	0.0%	3	3.7%	544	3.2%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	81	100.0%	17,036	100.0%	81	100.0%	17,036	100.0%						
			Home I	mprovement										
Low	1	12.5%	100	11.2%	1	12.5%	25	2.8%						
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Middle	2	25.0%	110	12.3%	1	12.5%	100	11.2%						
Upper	5	62.5%	681	76.4%	4	50.0%	656	73.6%						
Unknown	0	0.0%	0	0.0%	2	25.0%	110	12.3%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	8	100.0%	891	100.0%	8	100.0%	891	100.0%						
			Mul	ti-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	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 (ALLENTOWN, PA ASSESSMENT AREA)

				НМЕ	DA .									
Income Categories		By Tra	ct Income			By Borro	wer Income							
Gutogories	#	%	\$(000s)	%	#	%	\$(000s)	%						
			Other P	urpose LOC										
Low	0	0.0%	0	0.0%	1	33.3%	6	5.7%						
Moderate	1	33.3%	6	5.7%	1	33.3%	78	70.7%						
Middle	2	66.7%	103	94.3%	0	0.0%	0	0.0%						
Upper	0	0.0%	0	0.0%	1	33.3%	26	23.5%						
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	3	100.0%	110	100.0%	3	100.0%	110	100.0%						
			Other Purpos	e Closed/Exe	empt									
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 Purpos	e Not Applica	able									
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%						
			нмр	A Totals										
Low	7	3.6%	970	2.3%	24	12.4%	3,460	8.2%						
Moderate	28	14.4%	4,365	10.3%	39	20.1%	7,421	17.5%						
Middle	85	43.8%	17,897	42.2%	37	19.1%	7,574	17.8%						
Upper	74	38.1%	19,212	45.3%	87	44.8%	22,690	53.5%						
Unknown	0	0.0%	0	0.0%	7	3.6%	1,299	3.1%						
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%						
Total	194	100.0%	42,444	100.0%	194	100.0%	42,444	100.0%						

## 2019 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

		HMDA							
Income Categories		By Tra	ct Income			By Borrov	wer Income		
Categories	#	%	\$(000s)	%	#	%	\$(000s)	%	
		•	Home	Purchase				•	
Low	5	3.5%	489	1.6%	20	13.9%	2,822	9.3%	
Moderate	8	5.6%	1,034	3.4%	47	32.6%	10,016	32.9%	
Middle	127	88.2%	28,108	92.3%	25	17.4%	5,145	16.9%	
Upper	4	2.8%	818	2.7%	39	27.1%	9,989	32.8%	
Unknown	0	0.0%	0	0.0%	13	9.0%	2,476	8.1%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	144	100.0%	30,449	100.0%	144	100.0%	30,449	100.0%	
			Re	finance					
Low	3	3.2%	316	1.8%	5	5.3%	516	3.0%	
Moderate	7	7.4%	758	4.4%	34	35.8%	5,101	29.7%	
Middle	81	85.3%	15,223	88.5%	27	28.4%	5,409	31.5%	
Upper	4	4.2%	903	5.2%	22	23.2%	5,423	31.5%	
Unknown	0	0.0%	0	0.0%	7	7.4%	750	4.4%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	95	100.0%	17,200	100.0%	95	100.0%	17,200	100.0%	
			Home I	mprovement		•			
Low	0	0.0%	0	0.0%	4	10.0%	383	11.9%	
Moderate	0	0.0%	0	0.0%	17	42.5%	1,079	33.5%	
Middle	39	97.5%	3,147	97.7%	6	15.0%	505	15.7%	
Upper	1	2.5%	75	2.3%	12	30.0%	1,244	38.6%	
Unknown	0	0.0%	0	0.0%	1	2.5%	10	0.3%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	40	100.0%	3,222	100.0%	40	100.0%	3,222	100.0%	
			Mul	ti-Family		•			
Low	1	4.5%	265	1.9%	0	0.0%	0	0.0%	
Moderate	8	36.4%	6,272	43.8%	1	4.5%	260	1.8%	
Middle	12	54.5%	7,425	51.8%	2	9.1%	805	5.6%	
Upper	1	4.5%	360	2.5%	1	4.5%	150	1.0%	
Unknown	0	0.0%	0	0.0%	18	81.8%	13,107	91.5%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	22	100.0%	14,322	100.0%	22	100.0%	14,322	100.0%	

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

		НМДА							
Income Categories		By Tra	ct Income			By Borro	wer Income		
Categories	#	%	\$(000s)	%	#	%	\$(000s)	%	
	•	u .	Other P	urpose 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%	
	•	u .	Other Purpos	e Closed/Exe	empt		•	•	
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%	
	•	u .	Loan Purpos	e Not Applica	able		•	•	
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%	
	•	1	НМД	A Totals	•	•	•	•	
Low	9	3.0%	1,069	1.6%	29	9.6%	3,721	5.7%	
Moderate	23	7.6%	8,064	12.4%	99	32.9%	16,456	25.2%	
Middle	259	86.0%	53,903	82.7%	60	19.9%	11,865	18.2%	
Upper	10	3.3%	2,155	3.3%	74	24.6%	16,807	25.8%	
Unknown	0	0.0%	0	0.0%	39	13.0%	16,343	25.1%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	301	100.0%	65,192	100.0%	301	100.0%	65,192	100.0%	

## 2020 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

				НМС	)A								
Income Categories		By Tra	ct Income			By Borrov	wer Income						
Categories	#	%	\$(000s)	%	#	%	\$(000s)	%					
			Home	Purchase		•							
Low	8	5.2%	703	2.2%	17	11.0%	2,532	8.1%					
Moderate	16	10.4%	1,673	5.3%	58	37.7%	11,110	35.4%					
Middle	125	81.2%	27,579	87.9%	26	16.9%	6,547	20.9%					
Upper	5	3.2%	1,435	4.6%	27	17.5%	6,829	21.8%					
Unknown	0	0.0%	0	0.0%	26	16.9%	4,369	13.9%					
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%					
Total	154	100.0%	31,389	100.0%	154	100.0%	31,389	100.0%					
			Re	finance									
Low	3	2.0%	470	1.4%	7	4.7%	1,175	3.6%					
Moderate	6	4.0%	1,642	5.0%	64	42.7%	12,623	38.7%					
Middle	136	90.7%	29,943	91.7%	29	19.3%	5,938	18.2%					
Upper	5	3.3%	585	1.8%	31	20.7%	8,315	25.5%					
Unknown	0	0.0%	0	0.0%	19	12.7%	4,589	14.1%					
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%					
Total	150	100.0%	32,639	100.0%	150	100.0%	32,639	100.0%					
			Home I	mprovement									
Low	2	8.3%	125	6.1%	0	0.0%	0	0.0%					
Moderate	1	4.2%	150	7.3%	10	41.7%	695	34.0%					
Middle	21	87.5%	1,772	86.6%	8	33.3%	657	32.1%					
Upper	0	0.0%	0	0.0%	4	16.7%	516	25.2%					
Unknown	0	0.0%	0	0.0%	2	8.3%	180	8.8%					
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%					
Total	24	100.0%	2,047	100.0%	24	100.0%	2,047	100.0%					
			Mul	ti-Family									
Low	4	15.4%	1,737	9.2%	1	3.8%	310	1.6%					
Moderate	9	34.6%	3,395	17.9%	0	0.0%	0	0.0%					
Middle	11	42.3%	12,498	66.0%	0	0.0%	0	0.0%					
Upper	2	7.7%	1,300	6.9%	0	0.0%	0	0.0%					
Unknown	0	0.0%	0	0.0%	25	96.2%	18,619	98.4%					
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%					
Total	26	100.0%	18,929	100.0%	26	100.0%	18,929	100.0%					

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

Income Categories	HMDA								
		By Tra	ct Income	By Borrower Income					
	#	%	\$(000s)	%	#	%	\$(000s)	%	
	•	•	Other P	urpose 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%	
	•	•	Other Purpos	se Closed/Exe	empt	•		•	
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%	
	•	1	Loan Purpos	se Not Applica	able	•		•	
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%	
		•	НМС	A Totals				II.	
Low	17	4.8%	3,034	3.6%	25	7.1%	4,017	4.7%	
Moderate	32	9.0%	6,859	8.1%	132	37.3%	24,428	28.7%	
Middle	293	82.8%	71,792	84.5%	63	17.8%	13,142	15.5%	
Upper	12	3.4%	3,319	3.9%	62	17.5%	15,660	18.4%	
Unknown	0	0.0%	0	0.0%	72	20.3%	27,757	32.7%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	354	100.0%	85,004	100.0%	354	100.0%	85,004	100.0%	

## 2021 HMDA LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

	HMDA								
Income Categories		By Tra	ct Income	By Borrower Income					
	#	%	\$(000s)	%	#	%	\$(000s)	%	
	•	1	Home	Purchase		1	1	•	
Low	3	2.2%	269	0.8%	21	15.6%	4,101	12.3%	
Moderate	15	11.1%	2,164	6.5%	37	27.4%	8,219	24.7%	
Middle	112	83.0%	29,737	89.5%	28	20.7%	6,939	20.9%	
Upper	5	3.7%	1,073	3.2%	38	28.1%	11,163	33.6%	
Unknown	0	0.0%	0	0.0%	11	8.1%	2,820	8.5%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	135	100.0%	33,242	100.0%	135	100.0%	33,242	100.0%	
			Re	finance					
Low	6	3.6%	1,112	2.8%	10	6.1%	1,605	4.1%	
Moderate	10	6.1%	1,512	3.8%	24	14.5%	4,954	12.6%	
Middle	143	86.7%	35,590	90.4%	27	16.4%	5,049	12.8%	
Upper	6	3.6%	1,158	2.9%	52	31.5%	14,361	36.5%	
Unknown	0	0.0%	0	0.0%	52	31.5%	13,402	34.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	165	100.0%	39,372	100.0%	165	100.0%	39,372	100.0%	
	•	1	Home Ir	nprovement		1	1	•	
Low	1	3.4%	35	1.3%	1	3.4%	100	3.7%	
Moderate	1	3.4%	75	2.8%	10	34.5%	868	32.5%	
Middle	24	82.8%	2,346	87.8%	9	31.0%	711	26.6%	
Upper	3	10.3%	217	8.1%	8	27.6%	645	24.1%	
Unknown	0	0.0%	0	0.0%	1	3.4%	350	13.1%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	29	100.0%	2,673	100.0%	29	100.0%	2,673	100.0%	
	•	1	Mult	i-Family		1	1	•	
Low	3	12.5%	1,544	10.6%	0	0.0%	0	0.0%	
Moderate	8	33.3%	3,637	24.9%	0	0.0%	0	0.0%	
Middle	13	54.2%	9,438	64.6%	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%	24	100.0%	14,619	100.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	24	100.0%	14,619	100.0%	24	100.0%	14,619	100.0%	

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

Income Categories	HMDA								
		By Tra	ct Income		By Borrower Income				
	#	%	\$(000s)	%	#	%	\$(000s)	%	
	1	•	Other P	urpose LOC	•		1	•	
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%	
		•	Other Purpos	e Closed/Exe	empt				
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%	
	1	•	Loan Purpos	e Not Applica	able		1	•	
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%	
	1	-	HMD	A Totals	•	•		•	
Low	13	3.7%	2,960	3.3%	32	9.1%	5,806	6.5%	
Moderate	34	9.6%	7,388	8.2%	71	20.1%	14,041	15.6%	
Middle	292	82.7%	77,111	85.8%	64	18.1%	12,699	14.1%	
Upper	14	4.0%	2,448	2.7%	98	27.8%	26,169	29.1%	
Unknown	0	0.0%	0	0.0%	88	24.9%	31,191	34.7%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	353	100.0%	89,906	100.0%	353	100.0%	89,906	100.0%	

## 2019 HMDA LOAN DISTRIBUTION TABLE (READING, PA ASSESSMENT AREA)

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	\$(000s)	%	#	%	\$(000s)	%		
	•	•	Home	Purchase		1				
Low	0	0.0%	0	0.0%	1	5.3%	50	1.2%		
Moderate	0	0.0%	0	0.0%	4	21.1%	635	15.4%		
Middle	12	63.2%	2,397	57.9%	4	21.1%	952	23.0%		
Upper	7	36.8%	1,740	42.1%	8	42.1%	2,047	49.5%		
Unknown	0	0.0%	0	0.0%	2	10.5%	453	10.9%		
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%		
Total	19	100.0%	4,136	100.0%	19	100.0%	4,136	100.0%		
			Re	finance						
Low	0	0.0%	0	0.0%	1	7.7%	35	1.4%		
Moderate	0	0.0%	0	0.0%	1	7.7%	65	2.7%		
Middle	8	61.5%	1,218	50.4%	3	23.1%	797	33.0%		
Upper	5	38.5%	1,197	49.6%	8	61.5%	1,518	62.8%		
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%	2,415	100.0%	13	100.0%	2,415	100.0%		
			Home I	mprovement						
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%	25	25.0%	2	100.0%	100	100.0%		
Upper	1	50.0%	75	75.0%	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	2	100.0%	100	100.0%	2	100.0%	100	100.0%		
			Mul	ti-Family						
Low	1	50.0%	150	37.3%	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	50.0%	252	62.7%		
Upper	1	50.0%	252	62.7%	0	0.0%	0	0.0%		
Unknown	0	0.0%	0	0.0%	1	50.0%	150	37.3%		
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%		
Total	2	100.0%	402	100.0%	2	100.0%	402	100.0%		

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

Income Categories	HMDA								
		By Tra	ct Income		By Borrower Income				
	#	%	\$(000s)	%	#	%	\$(000s)	%	
	•	•	Other P	urpose 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%	1	100.0%	39	100.0%	
Upper	1	100.0%	39	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%	39	100.0%	1	100.0%	39	100.0%	
			Other Purpos	se Closed/Exe	empt				
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	100.0%	30	100.0%	0	0.0%	0	0.0%	
Upper	0	0.0%	0	0.0%	1	100.0%	30	100.0%	
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%	30	100.0%	1	100.0%	30	100.0%	
			Loan Purpos	se Not Applica	able				
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%	
			НМЕ	A Totals					
Low	1	2.6%	150	2.1%	2	5.3%	85	1.2%	
Moderate	0	0.0%	0	0.0%	5	13.2%	700	9.8%	
Middle	22	57.9%	3,670	51.5%	11	28.9%	2,140	30.0%	
Upper	15	39.5%	3,303	46.4%	17	44.7%	3,595	50.5%	
Unknown	0	0.0%	0	0.0%	3	7.9%	603	8.5%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	38	100.0%	7,123	100.0%	38	100.0%	7,123	100.0%	

#### 2020 HMDA LOAN DISTRIBUTION TABLE (READING, PA ASSESSMENT AREA)

				HMD	4			
Income Categories		By Tra	act Income			By Borro	wer Income	
Guiogorios	#	%	\$(000s)	%	#	%	\$(000s)	%
	•		Home	Purchase				
Low	2	6.9%	90	1.4%	2	6.9%	293	4.5%
Moderate	0	0.0%	0	0.0%	5	17.2%	813	12.5%
Middle	18	62.1%	4,039	62.2%	7	24.1%	1,728	26.6%
Upper	9	31.0%	2,365	36.4%	14	48.3%	3,300	50.8%
Unknown	0	0.0%	0	0.0%	1	3.4%	361	5.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	29	100.0%	6,494	100.0%	29	100.0%	6,494	100.0%
			Re	finance				
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	9	26.5%	1,309	19.7%
Middle	24	70.6%	4,772	71.9%	11	32.4%	2,048	30.9%
Upper	10	29.4%	1,864	28.1%	11	32.4%	2,928	44.1%
Unknown	0	0.0%	0	0.0%	3	8.8%	351	5.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	34	100.0%	6,636	100.0%	34	100.0%	6,636	100.0%
	•		Home I	mprovement				
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%	100	80.0%	1	50.0%	100	80.0%
Upper	1	50.0%	25	20.0%	1	50.0%	25	20.0%
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	2	100.0%	125	100.0%	2	100.0%	125	100.0%
			Mul	ti-Family				
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	220	88.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	50.0%	30	12.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	250	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	250	100.0%	2	100.0%	250	100.0%

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

				HMD	A				
Income Categories		By Tr	act Income		By Borrower Income				
Categories	#	%	\$(000s)	%	#	%	\$(000s)	%	
	•	•	Other P	urpose LOC	•	•		•	
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate	0	0.0%	0	0.0%	1	100.0%	179	100.0%	
Middle	1	100.0%	179	100.0%	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	1	100.0%	179	100.0%	1	100.0%	179	100.0%	
		•	Other Purpos	se Closed/Exe	npt			•	
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 Purpos	e Not Applica	ble	•		•	
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%	
	•	•	НМС	A Totals				•	
Low	2	2.9%	90	0.7%	2	2.9%	293	2.1%	
Moderate	1	1.5%	220	1.6%	15	22.1%	2,301	16.8%	
Middle	44	64.7%	9,091	66.4%	19	27.9%	3,877	28.3%	
Upper	21	30.9%	4,284	31.3%	26	38.2%	6,252	45.7%	
Unknown	0	0.0%	0	0.0%	6	8.8%	962	7.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	68	100.0%	13,684	100.0%	68	100.0%	13,684	100.0%	

#### 2021 HMDA LOAN DISTRIBUTION TABLE (READING, PA ASSESSMENT AREA)

				HMD	A			
Income Categories		By Tra	act Income			By Borro	wer Income	
Guiogonios	#	%	\$(000s)	%	#	%	\$(000s)	%
	•	•	Home	Purchase	•	•		•
Low	9	12.9%	861	5.9%	8	11.4%	817	5.6%
Moderate	5	7.1%	482	3.3%	20	28.6%	3,343	22.8%
Middle	42	60.0%	9,526	65.0%	16	22.9%	3,065	20.9%
Upper	14	20.0%	3,797	25.9%	17	24.3%	5,076	34.6%
Unknown	0	0.0%	0	0.0%	9	12.9%	2,365	16.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	70	100.0%	14,666	100.0%	70	100.0%	14,666	100.0%
	•	•	Re	finance				
Low	3	6.7%	433	5.6%	3	6.7%	330	4.2%
Moderate	2	4.4%	128	1.6%	10	22.2%	1,293	16.6%
Middle	23	51.1%	3,810	48.9%	11	24.4%	1,331	17.1%
Upper	17	37.8%	3,415	43.9%	18	40.0%	3,585	46.0%
Unknown	0	0.0%	0	0.0%	3	6.7%	1,248	16.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	45	100.0%	7,785	100.0%	45	100.0%	7,785	100.0%
		•	Home I	mprovement				
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	33.3%	84	31.9%
Middle	3	50.0%	94	35.7%	0	0.0%	0	0.0%
Upper	3	50.0%	169	64.3%	3	50.0%	169	64.3%
Unknown	0	0.0%	0	0.0%	1	16.7%	10	3.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6	100.0%	262	100.0%	6	100.0%	262	100.0%
		•	Mul	ti-Family				
Low	3	60.0%	962	64.4%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	40.0%	532	35.6%	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%	5	100.0%	1,494	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	5	100.0%	1,494	100.0%	5	100.0%	1,494	100.0%

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

				HMD	A					
Income Categories		By Tr	act Income			By Borrower Income				
Gutegories	#	%	\$(000s)	%	#	%	\$(000s)	%		
	•	1	Other P	urpose 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	1	100.0%	176	100.0%	1	100.0%	176	100.0%		
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	1	100.0%	176	100.0%	1	100.0%	176	100.0%		
			Other Purpos	e Closed/Exer	npt					
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 Purpos	e Not Applica	ble					
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%		
			НМД	A Totals						
Low	15	11.8%	2,256	9.3%	11	8.7%	1,146	4.7%		
Moderate	7	5.5%	611	2.5%	32	25.2%	4,719	19.4%		
Middle	71	55.9%	14,137	58.0%	28	22.0%	4,572	18.8%		
Upper	34	26.8%	7,380	30.3%	38	29.9%	8,829	36.2%		
Unknown	0	0.0%	0	0.0%	18	14.2%	5,116	21.0%		
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%		
Total	127	100.0%	24,384	100.0%	127	100.0%	24,384	100.0%		

#### 2019 HMDA LOAN DISTRIBUTION TABLE (OCEAN CITY, NJ ASSESSMENT AREA)

				HMD	Α			
Income Categories		By Tra	act Income			By Borro	wer Income	
Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
	•	1	Home	Purchase				
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	4	23.5%	1,849	11.4%	0	0.0%	0	0.0%
Middle	4	23.5%	1,632	10.0%	2	11.8%	419	2.6%
Upper	9	52.9%	12,799	78.6%	12	70.6%	8,421	51.7%
Unknown	0	0.0%	0	0.0%	3	17.6%	7,440	45.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	16,280	100.0%	17	100.0%	16,280	100.0%
			Re	finance				
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	9.1%	193	2.8%	0	0.0%	0	0.0%
Middle	5	45.5%	2,508	36.3%	1	9.1%	100	1.4%
Upper	5	45.5%	4,203	60.9%	10	90.9%	6,804	98.6%
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	11	100.0%	6,904	100.0%	11	100.0%	6,904	100.0%
			Home I	mprovement				
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	2	100.0%	367	100.0%	2	100.0%	367	100.0%
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	2	100.0%	367	100.0%	2	100.0%	367	100.0%
			Mul	ti-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	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 (OCEAN CITY, NJ ASSESSMENT AREA)

				HMD	A				
Income Categories		By Tra	act Income		By Borrower Income				
Gategories	#	%	\$(000s)	%	#	%	\$(000s)	%	
	1	•	Other P	urpose LOC	•	1	1	•	
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%	
	•	•	Other Purpos	e Closed/Exer	npt	•		•	
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%	
	1	•	Loan Purpos	e Not Applica	ole	1	1	•	
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%	
			НМС	A Totals					
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate	5	16.7%	2,042	8.7%	0	0.0%	0	0.0%	
Middle	9	30.0%	4,140	17.6%	3	10.0%	519	2.2%	
Upper	16	53.3%	17,369	73.7%	24	80.0%	15,593	66.2%	
Unknown	0	0.0%	0	0.0%	3	10.0%	7,440	31.6%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	30	100.0%	23,552	100.0%	30	100.0%	23,552	100.0%	

#### 2020 HMDA LOAN DISTRIBUTION TABLE (OCEAN CITY, NJ ASSESSMENT AREA)

				HMD	A					
Income Categories		By Tra	act Income			By Borrower Income				
Gategories	#	%	\$(000s)	%	#	%	\$(000s)	%		
	1	1	Home	Purchase		•				
Low	1	3.3%	270	1.5%	0	0.0%	0	0.0%		
Moderate	9	30.0%	2,379	13.1%	2	6.7%	380	2.1%		
Middle	10	33.3%	3,926	21.5%	2	6.7%	508	2.8%		
Upper	10	33.3%	11,648	63.9%	24	80.0%	12,678	69.6%		
Unknown	0	0.0%	0	0.0%	2	6.7%	4,656	25.6%		
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%		
Total	30	100.0%	18,222	100.0%	30	100.0%	18,222	100.0%		
			Re	finance						
Low	1	3.0%	120	0.6%	0	0.0%	0	0.0%		
Moderate	5	15.2%	1,203	6.4%	1	3.0%	166	0.9%		
Middle	11	33.3%	4,842	25.7%	1	3.0%	297	1.6%		
Upper	16	48.5%	12,658	67.2%	27	81.8%	16,664	88.5%		
Unknown	0	0.0%	0	0.0%	4	12.1%	1,696	9.0%		
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%		
Total	33	100.0%	18,823	100.0%	33	100.0%	18,823	100.0%		
		•	Home I	mprovement						
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%	25	27.4%	0	0.0%	0	0.0%		
Upper	1	50.0%	66	72.6%	2	100.0%	91	100.0%		
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	2	100.0%	91	100.0%	2	100.0%	91	100.0%		
		•	Mul	ti-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	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 (OCEAN CITY, NJ ASSESSMENT AREA)

				HMD	A				
Income Categories		By Tr	act Income		By Borrower Income				
Gutogories	#	%	\$(000s)	%	#	%	\$(000s)	%	
	•	•	Other P	urpose 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%	
	•	•	Other Purpos	se Closed/Exe	mpt	•		•	
Low	0	0.0%	0	0.0%	1	100.0%	32	100.0%	
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Middle	1	100.0%	32	100.0%	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	1	100.0%	32	100.0%	1	100.0%	32	100.0%	
	•	•	Loan Purpos	se Not Applica	ble	•		•	
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%	
	•	•	НМГ	DA Totals	•	•		•	
Low	2	3.0%	390	1.0%	1	1.5%	32	0.1%	
Moderate	14	21.2%	3,582	9.6%	3	4.5%	546	1.5%	
Middle	23	34.8%	8,825	23.7%	3	4.5%	805	2.2%	
Upper	27	40.9%	24,372	65.6%	53	80.3%	29,433	79.2%	
Unknown	0	0.0%	0	0.0%	6	9.1%	6,353	17.1%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	66	100.0%	37,168	100.0%	66	100.0%	37,168	100.0%	

#### 2021 HMDA LOAN DISTRIBUTION TABLE (OCEAN CITY, NJ ASSESSMENT AREA)

				HMD	A			
Income Categories		By Tra	act Income			By Borro	wer Income	
Gutegories	#	%	\$(000s)	%	#	%	\$(000s)	%
	1		Home	Purchase		•		-
Low	2	7.7%	338	2.5%	0	0.0%	0	0.0%
Moderate	5	19.2%	1,322	9.7%	0	0.0%	0	0.0%
Middle	12	46.2%	5,708	42.0%	5	19.2%	1,296	9.5%
Upper	7	26.9%	6,232	45.8%	20	76.9%	11,724	86.2%
Unknown	0	0.0%	0	0.0%	1	3.8%	580	4.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	13,599	100.0%	26	100.0%	13,599	100.0%
			Re	finance				
Low	0	0.0%	0	0.0%	1	1.9%	150	0.5%
Moderate	10	19.2%	2,714	8.9%	1	1.9%	75	0.2%
Middle	21	40.4%	8,401	27.6%	3	5.8%	997	3.3%
Upper	21	40.4%	19,353	63.5%	35	67.3%	15,728	51.6%
Unknown	0	0.0%	0	0.0%	12	23.1%	13,518	44.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	52	100.0%	30,468	100.0%	52	100.0%	30,468	100.0%
			Home I	mprovement				
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	11.1%	41	2.2%	1	11.1%	100	5.4%
Middle	2	22.2%	350	19.0%	0	0.0%	0	0.0%
Upper	6	66.7%	1,450	78.7%	7	77.8%	1,491	81.0%
Unknown	0	0.0%	0	0.0%	1	11.1%	250	13.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	1,841	100.0%	9	100.0%	1,841	100.0%
			Mul	ti-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	100.0%	1,475	100.0%	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%	1	100.0%	1,475	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	1,475	100.0%	1	100.0%	1,475	100.0%

#### CONTINUED- 2021 HMDA LOAN DISTRIBUTION TABLE (OCEAN CITY, NJ ASSESSMENT AREA)

				HMD	A			
Income Categories		By Tr	act Income			By Borro	wer Income	
Gategories	#	%	\$(000s)	%	#	%	\$(000s)	%
	1	1	Other P	urpose LOC		1	1	•
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%
			Other Purpos	e Closed/Exer	npt			
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 Purpos	e Not Applica	ble			
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%
			НМС	A Totals				
Low	2	2.3%	338	0.7%	1	1.1%	150	0.3%
Moderate	16	18.2%	4,077	8.6%	2	2.3%	175	0.4%
Middle	36	40.9%	15,934	33.6%	8	9.1%	2,293	4.8%
Upper	34	38.6%	27,035	57.1%	62	70.5%	28,944	61.1%
Unknown	0	0.0%	0	0.0%	15	17.0%	15,823	33.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	88	100.0%	47,384	100.0%	88	100.0%	47,384	100.0%

LARGE INSTITUTION PERFORMANCE EVALUATION DECEMBER 2022
CRA APPENDIX E: SMALL BUSINESS / SMALL FARM LOAN DISTRIBUTION TABLES
TABLES

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

		SMALL B	SUSINESS			SMAL	L FARM	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
	•		By Tract In	come				-
Low	13	1.3%	2,613	1.4%	0	0.0%	0	0.0%
Moderate	181	17.7%	26,338	14.3%	26	57.8%	3,073	48.3%
Middle	535	52.2%	95,966	52.1%	19	42.2%	3,293	51.7%
Upper	293	28.6%	59,070	32.1%	0	0.0%	0	0.0%
Unknown	2	0.2%	85	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,024	100.0%	184,072	100.0%	45	100.0%	6,366	100.0%
		•	By Reve	nue		1		1
Total \$1 Million or Less	280	27.3%	65,387	35.5%	44	97.8%	6,102	95.9%
Over \$1 Million	458	44.7%	103,480	56.2%	1	2.2%	264	4.1%
Not Known	286	27.9%	15,205	8.3%	0	0.0%	0	0.0%
Total	1,024	100.0%	184,072	100.0%	45	100.0%	6,366	100.0%
	•		By Loan	Size				-1
\$100,000 or less	601	58.7%	27,752	15.1%	24	53.3%	1,066	16.7%
\$100,001 - \$250,000	193	18.8%	32,904	17.9%	12	26.7%	2,286	35.9%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	230	22.5%	123,416	67.0%	9	20.0%	3,014	47.3%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1,024	100.0%	184,072	100.0%	45	100.0%	6,366	100.0%
		By Loan Si	ze and Revenu	ue \$1 Million o	r Less			
\$100,000 or less	119	42.5%	5,930	9.1%	24	54.5%	1,066	17.5%
\$100,001 - \$250,000	63	22.5%	11,323	17.3%	12	27.3%	2,286	37.5%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	98	35.0%	48,134	73.6%	8	18.2%	2,750	45.1%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	280	100.0%	65,387	100.0%	44	100.0%	6,102	100.0%

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

In a sure Oats wenter		SMALL B	USINESS			SMA	LL FARM	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
			By Tract	Income				
Low	64	2.1%	12,464	3.0%	0	0.0%	0	0.0%
Moderate	472	15.8%	66,106	15.8%	20	46.5%	3,353	47.2%
Middle	1,537	51.5%	212,811	50.9%	23	53.5%	3,744	52.8%
Upper	906	30.3%	125,911	30.1%	0	0.0%	0	0.0%
Unknown	8	0.3%	672	0.2%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,987	100.0%	417,964	100.0%	43	100.0%	7,097	100.0%
			By Rev	enue	•			•
Total \$1 Million or Less	301	10.1%	79,436	19.0%	43	100.0%	7,097	100.0%
Over \$1 Million	367	12.3%	86,989	20.8%	0	0.0%	0	0.0%
Not Known	2,319	77.6%	251,539	60.2%	0	0.0%	0	0.0%
Total	2,987	100.0%	417,964	100.0%	43	100.0%	7,097	100.0%
			By Loai	n Size		•		•
\$100,000 or less	1,962	65.7%	72,619	17.4%	22	51.2%	1,199	16.9%
\$100,001 - \$250,000	537	18.0%	87,589	21.0%	10	23.3%	1,662	23.4%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	488	16.3%	257,756	61.7%	11	25.6%	4,236	59.7%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,987	100.0%	417,964	100.0%	43	100.0%	7,097	100.0%
		By Loan S	ize and Reve	nue \$1 Million	or Less			
\$100,000 or less	126	41.9%	6,542	8.2%	22	51.2%	1,199	16.9%
\$100,001 - \$250,000	62	20.6%	10,418	13.1%	10	23.3%	1,662	23.4%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	113	37.5%	62,476	78.6%	11	25.6%	4,236	59.7%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	301	100.0%	79,436	100.0%	43	100.0%	7,097	100.0%

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

		SMALL B	USINESS			SMALL	FARM		
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%	
			By Tract	Income					
Low	28	1.6%	6,217	2.3%	0	0.0%	0	0.0%	
Moderate	320	18.4%	51,112	18.5%	29	56.9%	4,952	49.2%	
Middle	898	51.6%	134,940	48.9%	21	41.2%	4,662	46.3%	
Upper	487	28.0%	83,282	30.2%	1	2.0%	450	4.5%	
Unknown	7	0.4%	660	0.2%	0	0.0%	0	0.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	1,740	100.0%	276,211	100.0%	51	100.0%	10,064	100.0%	
By Revenue									
Total \$1 Million or Less	203	11.7%	51,217	18.5%	49	96.1%	9,458	94.0%	
Over \$1 Million	419	24.1%	116,678	42.2%	2	3.9%	606	6.0%	
Not Known	1,118	64.3%	108,316	39.2%	0	0.0%	0	0.0%	
Total	1,740	100.0%	276,211	100.0%	51	100.0%	10,064	100.0%	
		•	By Loa	n Size	•	•	•		
\$100,000 or less	1,076	61.8%	40,676	14.7%	22	43.1%	859	8.5%	
\$100,001 - \$250,000	331	19.0%	54,195	19.6%	9	17.6%	1,762	17.5%	
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	333	19.1%	181,340	65.7%	20	39.2%	7,443	74.0%	
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	1,740	100.0%	276,211	100.0%	51	100.0%	10,064	100.0%	
		By Loan	Size and Reve	enue \$1 Millio	n or Less				
\$100,000 or less	70	34.5%	4,364	8.5%	22	44.9%	859	9.1%	
\$100,001 - \$250,000	57	28.1%	9,475	18.5%	9	18.4%	1,762	18.6%	
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	76	37.4%	37,378	73.0%	18	36.7%	6,837	72.3%	
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	203	100.0%	51,217	100.0%	49	100.0%	9,458	100.0%	

### 2019 SMALL BUSINESS / SMALL FARM LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

		SMALL BI	USINESS			SMAL	L FARM	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
			By Tract I	ncome				
Low	4	5.6%	2,250	10.9%	0	0.0%	0	0.0%
Moderate	12	16.7%	4,683	22.6%	0	0.0%	0	0.0%
Middle	15	20.8%	5,038	24.3%	0	0.0%	0	0.0%
Upper	41	56.9%	8,734	42.2%	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	72	100.0%	20,705	100.0%	0	0.0%	0	0.0%
1		•	By Reve	enue		•	•	
Total \$1 Million or Less	13	18.1%	3,125	15.1%	0	0.0%	0	0.0%
Over \$1 Million	53	73.6%	17,437	84.2%	0	0.0%	0	0.0%
Not Known	6	8.3%	143	0.7%	0	0.0%	0	0.0%
Total	72	100.0%	20,705	100.0%	0	0.0%	0	0.0%
		•	By Loan	Size		•	•	
\$100,000 or less	36	50.0%	1,384	6.7%	0	0.0%	0	0.0%
\$100,001 - \$250,000	8	11.1%	1,474	7.1%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	28	38.9%	17,847	86.2%	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	72	100.0%	20,705	100.0%	0	0.0%	0	0.0%
		By Loan S	ize and Reven	ue \$1 Millio	n or Less			
\$100,000 or less	4	30.8%	269	8.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	4	30.8%	609	19.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	38.5%	2,247	71.9%	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%	3,125	100.0%	0	0.0%	0	0.0%

### 2020 SMALL BUSINESS / SMALL FARM LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

		SMALL E	BUSINESS			SMA	LL FARM	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
		1	By Tract Inc	ome	•		•	•
Low	14	10.7%	5,713	15.0%	0	0.0%	0	0.0%
Moderate	20	15.3%	6,855	18.0%	0	0.0%	0	0.0%
Middle	40	30.5%	11,782	30.9%	0	0.0%	0	0.0%
Upper	57	43.5%	13,744	36.1%	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	131	100.0%	38,094	100.0%	0	0.0%	0	0.0%
		•	By Reven	ue	•		•	•
Total \$1 Million or Less	22	16.8%	7,734	20.3%	0	0.0%	0	0.0%
Over \$1 Million	34	26.0%	16,156	42.4%	0	0.0%	0	0.0%
Not Known	75	57.3%	14,204	37.3%	0	0.0%	0	0.0%
Total	131	100.0%	38,094	100.0%	0	0.0%	0	0.0%
			By Loan S	ize				
\$100,000 or less	53	40.5%	1,940	5.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	24	18.3%	4,379	11.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	54	41.2%	31,775	83.4%	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	131	100.0%	38,094	100.0%	0	0.0%	0	0.0%
		By Loan S	ize and Revenue	\$1 Million	or Less			
\$100,000 or less	7	31.8%	423	5.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	4.5%	201	2.6%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	14	63.6%	7,110	91.9%	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	22	100.0%	7,734	100.0%	0	0.0%	0	0.0%

### 2021 SMALL BUSINESS / SMALL FARM LOAN DISTRIBUTION TABLE (ALLENTOWN, PA ASSESSMENT AREA)

		SMALL E	BUSINESS			SMAL	L FARM	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
			By Tract	ncome	•	•		
Low	10	11.4%	2,720	11.1%	0	0.0%	0	0.0%
Moderate	18	20.5%	6,382	26.0%	0	0.0%	0	0.0%
Middle	23	26.1%	8,166	33.2%	0	0.0%	0	0.0%
Upper	37	42.0%	7,293	29.7%	1	100.0%	400	100.0%
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	88	100.0%	24,561	100.0%	1	100.0%	400	100.0%
			By Rev	enue	•	•		
Total \$1 Million or Less	11	12.5%	4,846	19.7%	1	100.0%	400	100.0%
Over \$1 Million	32	36.4%	11,301	46.0%	0	0.0%	0	0.0%
Not Known	45	51.1%	8,414	34.3%	0	0.0%	0	0.0%
Total	88	100.0%	24,561	100.0%	1	100.0%	400	100.0%
			l	By Loan S	Size			I.
\$100,000 or less	39	44.3%	1,736	7.1%	0	0.0%	0	0.0%
\$100,001 - \$250,000	17	19.3%	2,985	12.2%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	32	36.4%	19,840	80.8%	1	100.0%	400	100.0%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	88	100.0%	24,561	100.0%	1	100.0%	400	100.0%
		By Loan S	Size and Rever	nue \$1 Million	or Less			
\$100,000 or less	2	18.2%	110	2.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	18.2%	297	6.1%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	7	63.6%	4,439	91.6%	1	100.0%	400	100.0%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11	100.0%	4,846	100.0%	1	100.0%	400	100.0%

### 2019 SMALL BUSINESS / SMALL FARM LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

		SMALL E	BUSINESS			SMAI	LL FARM	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
		•	By Tract I	ncome		•		
Low	4	1.8%	1,545	3.1%	0	0.0%	0	0.0%
Moderate	2	0.9%	426	0.9%	0	0.0%	0	0.0%
Middle	201	91.8%	43,860	89.3%	476	96.6%	62,794	96.1%
Upper	12	5.5%	3,306	6.7%	17	3.4%	2,562	3.9%
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	219	100.0%	49,137	100.0%	493	100.0%	65,356	100.0%
		•	By Rev	enue		•		
Total \$1 Million or Less	151	68.9%	25,525	51.9%	477	96.8%	62,491	95.6%
Over \$1 Million	67	30.6%	23,587	48.0%	16	3.2%	2,865	4.4%
Not Known	1	0.5%	25	0.1%	0	0.0%	0	0.0%
Total	219	100.0%	49,137	100.0%	493	100.0%	65,356	100.0%
			By Loar	Size				
\$100,000 or less	109	49.8%	4,724	9.6%	293	59.4%	13,278	20.3%
\$100,001 - \$250,000	41	18.7%	7,513	15.3%	112	22.7%	19,499	29.8%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	69	31.5%	36,900	75.1%	88	17.8%	32,579	49.8%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	219	100.0%	49,137	100.0%	493	100.0%	65,356	100.0%
		By Loan S	ize and Rever	nue \$1 Million	or Less			
\$100,000 or less	91	60.3%	3,716	14.6%	288	60.4%	13,057	20.9%
\$100,001 - \$250,000	22	14.6%	3,836	15.0%	105	22.0%	18,295	29.3%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	38	25.2%	17,973	70.4%	84	17.6%	31,139	49.8%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	151	100.0%	25,525	100.0%	477	100.0%	62,491	100.0%

### 2020 SMALL BUSINESS / SMALL FARM LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

		SMALL E	BUSINESS			SMAI	L FARM	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
		•	By Tract I	ncome		•		
Low	2	0.6%	261	0.4%	0	0.0%	0	0.0%
Moderate	21	6.0%	4,868	7.2%	2	0.5%	304	0.4%
Middle	307	87.5%	59,827	88.2%	414	96.1%	69,107	96.8%
Upper	21	6.0%	2,869	4.2%	15	3.5%	2,010	2.8%
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	351	100.0%	67,825	100.0%	431	100.0%	71,421	100.0%
		•	By Rev	enue		•		
Total \$1 Million or Less	138	39.3%	23,416	34.5%	410	95.1%	66,791	93.5%
Over \$1 Million	62	17.7%	22,397	33.0%	21	4.9%	4,630	6.5%
Not Known	151	43.0%	22,012	32.5%	0	0.0%	0	0.0%
Total	351	100.0%	67,825	100.0%	431	100.0%	71,421	100.0%
			By Loan	Size				
\$100,000 or less	175	49.9%	8,103	11.9%	205	47.6%	9,365	13.1%
\$100,001 - \$250,000	85	24.2%	14,535	21.4%	115	26.7%	20,006	28.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	91	25.9%	45,187	66.6%	111	25.8%	42,050	58.9%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	351	100.0%	67,825	100.0%	431	100.0%	71,421	100.0%
		By Loan S	ize and Rever	ue \$1 Million	or Less			
\$100,000 or less	82	59.4%	4,131	17.6%	200	48.8%	9,056	13.6%
\$100,001 - \$250,000	27	19.6%	4,697	20.1%	107	26.1%	18,776	28.1%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	29	21.0%	14,588	62.3%	103	25.1%	38,959	58.3%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	138	100.0%	23,416	100.0%	410	100.0%	66,791	100.0%

### 2021 SMALL BUSINESS / SMALL FARM LOAN DISTRIBUTION TABLE (LANCASTER, PA ASSESSMENT AREA)

		SMALL E	BUSINESS			SMAI	LL FARM	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
		1	By Tract	Income	•	-1	•	•
Low	3	1.1%	543	1.0%	0	0.0%	0	0.0%
Moderate	6	2.3%	1,156	2.1%	0	0.0%	0	0.0%
Middle	236	90.4%	48,359	88.9%	469	96.7%	69,544	96.5%
Upper	16	6.1%	4,323	7.9%	16	3.3%	2,498	3.5%
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	261	100.0%	54,381	100.0%	485	100.0%	72,042	100.0%
1		1	By Rev	enue		1	•	•
Total \$1 Million or Less	130	49.8%	22,481	41.3%	460	94.8%	66,232	91.9%
Over \$1 Million	87	33.3%	24,891	45.8%	25	5.2%	5,810	8.1%
Not Known	44	16.9%	7,009	12.9%	0	0.0%	0	0.0%
Total	261	100.0%	54,381	100.0%	485	100.0%	72,042	100.0%
		1	By Loai	n Size	•	-	•	•
\$100,000 or less	110	42.1%	5,206	9.6%	255	52.6%	12,443	17.3%
\$100,001 - \$250,000	81	31.0%	14,169	26.1%	131	27.0%	23,733	32.9%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	70	26.8%	35,006	64.4%	99	20.4%	35,866	49.8%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	261	100.0%	54,381	100.0%	485	100.0%	72,042	100.0%
<u>.</u>		By Loan S	ize and Reve	nue \$1 Million	or Less			
\$100,000 or less	63	48.5%	2,789	12.4%	251	54.6%	12,142	18.3%
\$100,001 - \$250,000	39	30.0%	6,609	29.4%	119	25.9%	21,521	32.5%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	28	21.5%	13,083	58.2%	90	19.6%	32,569	49.2%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	130	100.0%	22,481	100.0%	460	100.0%	66,232	100.0%

### 2019 SMALL BUSINESS / SMALL FARM LOAN DISTRIBUTION TABLE (READING, PA ASSESSMENT AREA)

		SMALL B	USINESS			SMALL	FARM	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
		•	By Trac	t 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	7	77.8%	2,057	59.0%	1	50.0%	150	37.2%
Upper	2	22.2%	1,428	41.0%	1	50.0%	253	62.8%
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%	3,485	100.0%	2	100.0%	403	100.0%
			By Re	venue		•		
Total \$1 Million or Less	1	11.1%	200	5.7%	1	50.0%	150	37.2%
Over \$1 Million	7	77.8%	3,275	94.0%	1	50.0%	253	62.8%
Not Known	1	11.1%	10	0.3%	0	0.0%	0	0.0%
Total	9	100.0%	3,485	100.0%	2	100.0%	403	100.0%
			By Lo	an Size				
\$100,000 or less	2	22.2%	98	2.8%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	33.3%	556	16.0%	1	50.0%	150	37.2%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	4	44.4%	2,831	81.2%	1	50.0%	253	62.8%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	3,485	100.0%	2	100.0%	403	100.0%
		By Loan	Size and Rev	enue \$1 Millior	or Less			
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	100.0%	200	100.0%	1	100.0%	150	100.0%
\$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	1	100.0%	200	100.0%	1	100.0%	150	100.0%

### 2020 SMALL BUSINESS / SMALL FARM LOAN DISTRIBUTION TABLE (READING, PA ASSESSMENT AREA)

		SMALL B	USINESS			SMAL	LFARM	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
<u>.</u>			By Trac	t 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	15	71.4%	4,605	63.5%	0	0.0%	0	0.0%
Upper	6	28.6%	2,642	36.5%	4	100.0%	1,029	100.0%
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	21	100.0%	7,247	100.0%	4	100.0%	1,029	100.0%
1		1	By Re	venue		•	1	
Total \$1 Million or Less	1	4.8%	10	0.1%	2	50.0%	315	30.6%
Over \$1 Million	4	19.0%	2,138	29.5%	2	50.0%	714	69.4%
Not Known	16	76.2%	5,099	70.4%	0	0.0%	0	0.0%
Total	21	100.0%	7,247	100.0%	4	100.0%	1,029	100.0%
			By Lo	an Size				
\$100,000 or less	9	42.9%	472	6.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	3	14.3%	723	10.0%	2	50.0%	315	30.6%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	9	42.9%	6,052	83.5%	2	50.0%	714	69.4%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	21	100.0%	7,247	100.0%	4	100.0%	1,029	100.0%
		By Loan	Size and Rev	enue \$1 Millior	or Less			
\$100,000 or less	1	100.0%	10	100.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	0	0.0%	0	0.0%	2	100.0%	315	100.0%
\$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	1	100.0%	10	100.0%	2	100.0%	315	100.0%

### 2021 SMALL BUSINESS / SMALL FARM LOAN DISTRIBUTION TABLE (READING, PA ASSESSMENT AREA)

		SMALL B	USINESS			SMAL	L FARM	
Income Categories -	#	%	\$(000s)	%	#	%	\$(000s)	%
		-	By Trac	t 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	15	78.9%	3,927	72.3%	4	100.0%	1,150	100.0%
Upper	4	21.1%	1,504	27.7%	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	19	100.0%	5,431	100.0%	4	100.0%	1,150	100.0%
1		1	By Re	evenue		•	-	
Total \$1 Million or Less	4	21.1%	1,232	22.7%	2	50.0%	500	43.5%
Over \$1 Million	4	21.1%	2,000	36.8%	2	50.0%	650	56.5%
Not Known	11	57.9%	2,199	40.5%	0	0.0%	0	0.0%
Total	19	100.0%	5,431	100.0%	4	100.0%	1,150	100.0%
			By Lo	an Size		•		
\$100,000 or less	8	42.1%	575	10.6%	0	0.0%	0	0.0%
\$100,001 - \$250,000	2	10.5%	268	4.9%	2	50.0%	350	30.4%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	9	47.4%	4,588	84.5%	2	50.0%	800	69.6%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	5,431	100.0%	4	100.0%	1,150	100.0%
		By Loan	Size and Rev	enue \$1 Millio	n or Less			
\$100,000 or less	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	25.0%	120	9.7%	1	50.0%	200	40.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	75.0%	1,112	90.3%	1	50.0%	300	60.0%
Over \$1 Million (Bus)- \$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	1,232	100.0%	2	100.0%	500	100.0%

#### 2019 SMALL BUSINESS / SMALL FARM LOAN DISTRIBUTION TABLE (OCEAN CITY, NJ ASSESSMENT AREA)

		SMALL B	BUSINESS			SMA	LL FARM	
Income Categories	#	%	\$(000s)	%	#	%	\$(000s)	%
<u>.</u>			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	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	100.0%	600	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%	600	100.0%	0	0.0%	0	0.0%
1		•	By Rev	enue		•	<u> </u>	
Total \$1 Million or Less	1	100.0%	600	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	1	100.0%	600	100.0%	0	0.0%	0	0.0%
<u>.</u>			By Loa	n Size				
\$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)	1	100.0%	600	100.0%	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	1	100.0%	600	100.0%	0	0.0%	0	0.0%
		By Loan S	Size and Reve	nue \$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)	1	100.0%	600	100.0%	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	1	100.0%	600	100.0%	0	0.0%	0	0.0%

#### 2020 SMALL BUSINESS / SMALL FARM LOAN DISTRIBUTION TABLE (OCEAN CITY, NJ ASSESSMENT AREA)

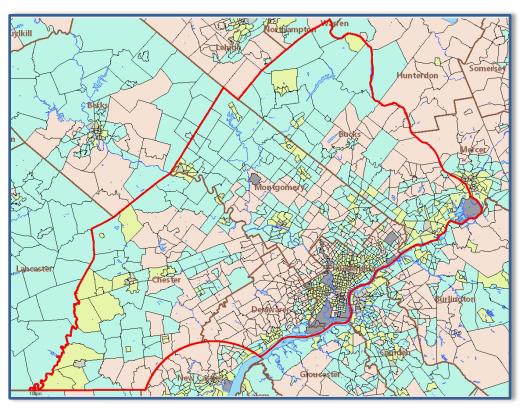
Income Categories	SMALL BUSINESS				SMALL FARM				
	#	%	\$(000s)	%	#	%	\$(000s)	%	
			By Tract	Income					
Low	1	5.0%	250	8.7%	0	0.0%	0	0.0%	
Moderate	2	10.0%	153	5.3%	0	0.0%	0	0.0%	
Middle	7	35.0%	313	10.8%	0	0.0%	0	0.0%	
Upper	10	50.0%	2,169	75.2%	0	0.0%	0	0.0%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	20	100.0%	2,885	100.0%	0	0.0%	0	0.0%	
			By Rev	renue					
Total \$1 Million or Less	5	25.0%	1,134	39.3%	0	0.0%	0	0.0%	
Over \$1 Million	2	10.0%	502	17.4%	0	0.0%	0	0.0%	
Not Known	13	65.0%	1,249	43.3%	0	0.0%	0	0.0%	
Total	20	100.0%	2,885	100.0%	0	0.0%	0	0.0%	
			By Loa	n Size					
\$100,000 or less	12	60.0%	595	20.6%	0	0.0%	0	0.0%	
\$100,001 - \$250,000	3	15.0%	455	15.8%	0	0.0%	0	0.0%	
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	25.0%	1,835	63.6%	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	20	100.0%	2,885	100.0%	0	0.0%	0	0.0%	
		By Loan	Size and Reve	nue \$1 Million	or Less				
\$100,000 or less	3	60.0%	176	15.5%	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	40.0%	958	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	5	100.0%	1,134	100.0%	0	0.0%	0	0.0%	

#### 2021 SMALL BUSINESS / SMALL FARM LOAN DISTRIBUTION TABLE (OCEAN CITY, NJ 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	36.4%	169	10.5%	0	0.0%	0	0.0%	
Upper	7	63.6%	1,447	89.5%	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	11	100.0%	1,616	100.0%	0	0.0%	0	0.0%	
			By Rev	renue					
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	11	100.0%	1,616	100.0%	0	0.0%	0	0.0%	
Total	11	100.0%	1,616	100.0%	0	0.0%	0	0.0%	
			By Loa	n Size					
\$100,000 or less	7	63.6%	403	24.9%	0	0.0%	0	0.0%	
\$100,001 - \$250,000	2	18.2%	333	20.6%	0	0.0%	0	0.0%	
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	18.2%	880	54.5%	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	11	100.0%	1,616	100.0%	0	0.0%	0	0.0%	
		By Loan	Size and Reve	nue \$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%	

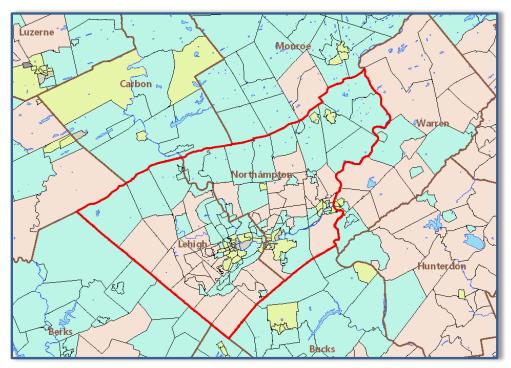
**CRA APPENDIX F: ASSESSMENT AREA MAPS** 

#### PHILADELPHIA, PA ASSESSMENT AREA (2015 ACS DATA)



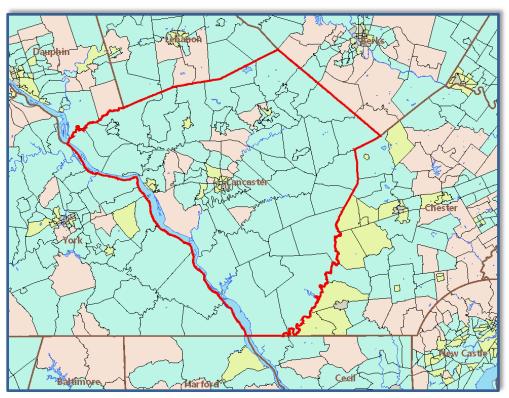


#### ALLENTOWN, PA ASSESSMENT AREA (2015 ACS DATA)



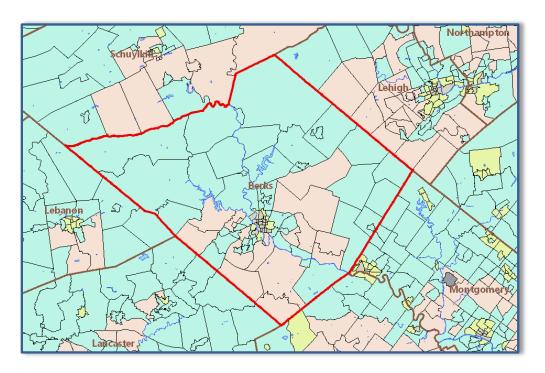


#### LANCASTER, PA ASSESSMENT AREA (2015 ACS DATA)





#### READING, PA ASSESSMENT AREA (2015 ACS DATA)





#### OCEAN CITY, NJ ASSESSMENT AREA (2015 ACS DATA)

