

PUBLIC DISCLOSURE

August 8, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Bank of Hawaii
RSSD # 795968**

**130 Merchant Street
Honolulu, Hawaii, 96813**

**Federal Reserve Bank of San Francisco
101 Market Street
San Francisco, California 94105**

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 RATING

Institution's CRA Rating

Bank of Hawaii (BOH) is rated "OUTSTANDING."

The following table shows the performance level of Bank of Hawaii with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	LENDING TEST*	INVESTMENT TEST	SERVICE TEST
OUTSTANDING	X	X	X
HIGH SATISFACTORY			
LOW SATISFACTORY			
NEEDS TO IMPROVE			
SUBSTANTIAL NONCOMPLIANCE			

* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

The major factors supporting the institution's rating include:

- Lending levels that reflect excellent responsiveness to assessment area credit needs, with a substantial majority of loans made within the bank's assessment areas
- Overall good geographic distributions of loans, with notable levels of small business, motor vehicle, and secured consumer loans in low- and moderate-income areas
- Overall adequate distributions of loans among borrowers of different income levels and businesses of different sizes
- Leadership in making community development loans and use of flexible lending programs that are responsive to affordable housing and small business credit needs, and the need to retain jobs in low- and moderate-income areas
- Excellent levels of qualified community development investments and grants that are responsive to affordable housing needs and support non-profit community service organizations serving low- and moderate-income individuals
- Excellent levels of responsive community development services and readily accessible retail banking services that are tailored to the convenience and needs of BOH's assessment areas

INSTITUTION

Description of Institution

BOH, with \$15.9 billion in total assets as of June 30, 2016, is a state-chartered commercial bank headquartered in Honolulu, Hawaii. BOH is the primary subsidiary of Bank of Hawaii Corporation, a bank holding company. The bank and its subsidiaries provide a variety of financial services to businesses, consumers, and governments in Hawaii, Guam, and Saipan and on a limited basis in American Samoa.

BOH operates 71 full-service branches throughout its assessment areas and an agency facility in American Samoa. Hawaii is the bank's primary operating area with 68 branches in the state. The bank also operates two branches in Guam and one in Saipan. On November 30, 2012, management announced its plans to exit the American Samoa market converting the one remaining branch into an agency facility on August 30, 2016. As an agency office, BOH is precluded from originating loans in American Samoa. For the bank as a whole, the number of branches declined by four; with 13 branches closed and nine branches opened since the previous examination. Eight branches opened and six closed in the state of Hawaii, four branches closed in Guam, and two branches closed and one branch opened in Saipan. In addition to its retail branch network, BOH operates 12 residential loan offices, 15 small business centers, and nine corporate commercial banking centers for larger business needs that are located throughout BOH's assessment areas.

The bank's strategy is to continue to build on the strengths of the company's core markets of Hawaii and the Pacific Islands of Guam and Saipan. As a regional financial services company, BOH's areas of emphasis include mortgage and retail banking, commercial and small business banking, and investment services. The bank has a significant presence in most of its markets and business lines, generally ranking either first or second in terms of market share.

The composition of the loan portfolio as of December 31, 2015, is shown in Exhibit 1. The loan mix is reflective of the bank's focus on mortgage, business, and consumer lending, with mortgage lending being a major concentration.

EXHIBIT 1 LOANS AND LEASES AS OF DECEMBER 31, 2015		
Loan Type	\$ ('000s)	%
Secured by 1-4 Family Residential Real Estate	3,880,893	52.3
Commercial/Industrial & Non-Farm Non-Residential Real Estate	2,039,548	27.4
All Other	531,929	7.2
Consumer Loans & Credit Cards	529,709	7.1
Multi-Family Residential Real Estate	230,839	3.1
Construction & Land Development	207,788	2.8
Farm Land & Agriculture	5,106	0.1
Total (Gross)	7,425,812	100.0

Since the previous examination, the Office of Management and Budget designated a new metropolitan statistical area (MSA) within the state of Hawaii called the Kahului-Wailuku-Lahaina MSA in Maui County. As a result, the bank has defined a separate assessment area for Maui, and BOH now delineates the following six assessment areas:

1. The Honolulu Assessment Area is comprised of the Urban Honolulu MSA, which is also known as Honolulu County on the island of Oahu.
2. The Maui Assessment Area (new since the previous examination) is comprised of Maui County, including the previously named new MSA on the islands of Maui, Lanai, Molokai, and Kahoolawe.
3. The Non-MSA assessment area includes Hawaii and Kauai counties and includes the islands of Hawaii, Kauai, and Niihau.

Together these three assessment areas comprise the entire state of Hawaii.

The remaining three assessment areas are:

4. The United States (U.S.) Territory of Guam.
5. The Island of Saipan, in the Commonwealth of the Northern Mariana Islands.
6. The Island of Tutuila in the U.S. territory of American Samoa.

These assessment areas include diverse markets with unique credit needs that are discussed in the respective performance contexts. There were no legal or financial impediments that inhibited BOH's ability to meet the credit needs of its communities, which is consistent with its business strategy, size, financial capability, and local economic conditions in each of the respective assessment areas. BOH received an outstanding rating at its previous Community Reinvestment Act (CRA) examination conducted as of April 29, 2013.

Scope of Examination

BOH's performance was evaluated in accordance with the Interagency Large Institution CRA Examination Procedures. As such, performance was assessed under the lending, investments, and service tests. The evaluation period for the lending test was January 1, 2013 to December 31, 2015. The evaluation period for community development activity, including community development loans, investments, and services, was January 1, 2013 to August 8, 2016.

The Honolulu, Guam, Saipan, and American Samoa assessment areas were reviewed using the full-scope examination procedures. The Maui and Non-MSA assessment areas received limited scope reviews based on the bank's smaller presence and lower volumes of lending and deposit activity. The types of reviews were determined based on economic and demographic factors as well as BOH's strategic goals and objectives. As such, performance in the Honolulu assessment area carried the greatest weight in the evaluation while performance in the limited scope areas was evaluated as being either consistent, below, or above performance in the full-scope assessment areas. The Limited Scope Market Profiles in Appendix D include the facts and data upon which this evaluation is based. The Scope of the examination for Guam, Saipan, and American Samoa is generally consistent with the overall scope of the CRA examination. The scope for American Samoa does not include a lending test due to State of Hawaii lending restrictions imposed on agency offices.

The lending test, which is weighted more heavily than the investment or service tests, is based upon the lending activity and opportunities within each assessment area. Home mortgage, particularly in the state of Hawaii, carried the greatest weight in the evaluation given the volume of lending and the significant housing needs in these assessment areas. Small business and consumer loans were weighted equally and follow home mortgage lending. While small business lending is significant to the economy, consumer lending was given equal weight due to the high volumes of loans made during the review period. In some instances, lending levels were too limited to draw meaningful conclusions; however, those lending levels were considered in the review and also presented in the lending tables contained in Appendix E.¹

The scope of the evaluation is consistent throughout the evaluation unless otherwise noted. The primary differences in the scope were centered in the Pacific Islands Division (Guam, Saipan, and American Samoa), where product offerings and loan volumes did not always support a meaningful assessment for each product. Variations in scope for these assessment areas are noted in the respective sections.

¹ All *Tables* referenced in this document can be found in Appendix E-CRA Core Tables.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The following sections contain conclusions regarding BOH's overall performance followed by specific conclusions regarding the state of Hawaii (Hawaii) and each of the Pacific Island Division Territories (Guam, Saipan, and American Samoa). BOH's performance as a whole, with respect to the lending, investment, and service tests were heavily influenced by conclusions reached for Hawaii, where the vast majority of lending and deposit activities occurred.

Lending Test

BOH's performance under the lending test is outstanding. Lending levels are excellent given the opportunities and competition within the various assessment areas. A substantial majority of loans were made within the bank's assessment areas. The overall geographic distribution of loans is good and reasonably compares to local demographic data as well as to other lenders in the market. Lending to borrowers of different income levels and businesses of different revenue sizes is adequate overall. Community development lending is excellent, particularly in the Honolulu assessment area, demonstrating responsiveness to the need for affordable housing as well as the need to stabilize low- and moderate-income geographies and provide jobs to low- and moderate-income individuals.

LENDING ACTIVITY

Overall, BOH's lending levels demonstrate excellent responsiveness to the credit needs of its assessment areas. Mortgage and consumer lending levels were reflective of improving economic conditions. Overall loan volumes in the various assessment areas compare reasonably with BOH's share of deposits in those particular markets. Exhibit 2 on the following page and Tables 1, 1A, 1B, 33, 33A, 33B 50, 50A, and 63 in Appendix E show BOH's loan originations by loan type for each of its assessment areas.

EXHIBIT 2 SUMMARY OF LENDING ACTIVITY JANUARY 1, 2013 TO DECEMBER 31, 2015				
Loan Type	#	%	\$ ('000s)	%
Small Business	1,867	1.9	482,159	8.2
Small Farm	4	0.0	840	0.0
Business Automobile Leases	204	0.2	7,119	0.1
Commercial Leases	293	0.3	53,045	0.9
Total Business/Farm-Related	2,368	2.4	543,163	9.2
HMDA Home Purchase	2,448	2.5	1,130,631	19.1
HMDA Home Improvement	491	0.5	180,813	3.1
HMDA Refinance	3,565	3.6	1,397,171	23.7
HMDA Multifamily	67	0.1	192,986	3.3
Total HMDA-Related	6,571	6.6	2,901,601	49.1
Home Equity	9,711	9.7	1,248,863	21.1
Motor Vehicle	20,226	20.3	549,324	9.3
Consumer Credit Cards	32,452	32.6	243,080	4.1
Secured Consumer	1,169	1.2	100,470	1.7
Unsecured Consumer	26,088	26.2	242,967	4.1
Other Consumer Loans	53	0.1	42,268	0.7
Consumer Automobile Lease	974	1.0	33,432	0.6
Total Consumer-Related	90,673	91.0	2,460,404	41.7
Total Loans	99,612	100.0	5,905,168	100.0

ASSESSMENT AREA CONCENTRATION

A substantial majority of loans by number and dollar volume were made within the assessment areas. Exhibit 3 shows the number and dollar volume of loans originated within the designated assessment areas during the review period. The tables in Appendix E contain additional information regarding assessment area specific lending activity.

EXHIBIT 3 LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREAS JANUARY 1, 2013 TO DECEMBER 31, 2015								
Loan Type	Inside				Outside			
	#	%	\$ ('000s)	%	#	%	\$ ('000s)	%
Small Business	1,854	99.3	477,208	99.0	13	0.7	4,951	1.0
Small Farm	4	100.0	840	100.0	0	0.0	0	0.0
Business Auto Leases	204	100.0	7,119	100.0	0	0.0	0	0.0
Commercial Leases	291	99.3	52,657	99.3	2	0.7	388	0.7
Total Business/Farm-Related	2,353	99.4	537,824	99.0	15	0.6	5,339	1.0
HMDA Home Purchase	2,447	100.0	1,129,031	99.9	1	0.0	1,600	0.1
HMDA Home Improvement	491	100.0	180,813	100.0	0	0.0	0	0.0
HMDA Refinance	3,565	100.0	1,397,171	100.0	0	0.0	0	0.0
HMDA Multifamily	67	100.0	192,986	100.0	0	0.0	0	0.0
Total HMDA-Related	6,570	100.0	2,900,001	99.9	1	0.0	1,600	0.1
Home Equity	9,616	99.0	1,230,569	98.5	95	1.0	18,294	1.5
Motor Vehicle	20,224	100.0	549,250	100.0	2	0.0	74	0.0
Consumer Credit Cards	31,591	97.3	236,658	97.4	861	2.7	6,422	2.6
Secured Consumer	1,154	98.7	94,068	93.6	15	1.3	6,402	6.4
Unsecured Consumer	26,018	99.7	242,256	99.7	70	0.3	711	0.3
Other Consumer Loans	52	98.1	41,993	99.3	1	1.9	275	0.7
Consumer Automobile Leases	974	100.0	33,432	100.0	0	0.0	0	0.0
Total Consumer-Related	89,629	98.8	2,428,226	98.7	1,044	1.2	32,178	1.3
Total Loans	98,552	98.9	5,866,051	99.3	1,060	1.1	39,117	0.7

GEOGRAPHIC AND BORROWER DISTRIBUTION

BOH has a good record of lending in different geographies and an adequate record of serving borrowers and businesses, regardless of income level or revenue size. These overall conclusions are based on a variety of performance context matters that affect the individual conclusions in the assessment areas. The facts and data supporting the overall conclusions are presented within the respective assessment area analyses.

Overall geographic distributions are good. Lending patterns are generally good in the various assessment areas and among the various loan products, comparing reasonably with local demographic data and available opportunities. The proportion of lending in low- and moderate-income areas as well as distressed, rural middle-income areas was generally consistent with the aggregate lending market. While aggregate lending data is not available for consumer lending and leasing products, the geographic

distributions of loans were generally consistent with the percentage of households or owner-occupied housing units among all the geographic income categories. Loans were distributed throughout the assessment areas with no conspicuous gaps in the lending patterns.

Borrower distributions were adequate overall. There were reasonable levels of home mortgage and home equity lending to low- and moderate-income borrowers considering the high cost of housing throughout the assessment areas. High housing costs within the assessment areas make home ownership difficult, especially for low- and moderate-income borrowers. Lending levels to small businesses were adequate, and consumer lending was excellent where levels exceeded the percentage of households.

To help meet the needs of low- and moderate-income individuals and increase lending in low- and moderate-income geographies, BOH offers a number of flexible home mortgage loan programs. These programs help meet the critical need for affordable housing loans. Although not exhaustive, the following is a list of BOH specific and Hawaiian statewide or regional mortgage lending programs in which the bank participates. These programs are available to borrowers in the entire state with loans extended in all three of the Hawaii assessment areas. The following describes the programs and BOH's activity during the review period.

- First Time Home Buyer Mortgage – BOH's program features access to homeownership counseling and discounts on closing costs. Under the program, the one percent origination fee is waived. The bank originated 631 loans, totaling \$207.4 million.
- Home Affordable Refinance Program (HARP) – This program enables borrowers with Fannie Mae owned loans to refinance at a lower rate, lower their monthly payment, and move from a riskier loan structure (such as interest only or short-term adjustable rate mortgage) to a more stable product, such as a 30-year, fixed-rate loan. BOH refinanced 439 loans, totaling \$117.7 million.
- Veteran's Administration (VA) – Military veterans and active duty military personnel may borrow up to a 100 percent loan-to-value with a 25 percent guaranty by the VA on loans up to \$721,050. BOH originated 286 loans, totaling \$88.1 million.
- Mortgage Credit Certificate (MCC) – When filed with an individual tax return, the MCC allows first-time home buyers to receive a tax credit. The tax credit can be reissued each time the borrower refinances as long as they still occupy the property as their principal residence. The typical homeowner can deduct about one third of the interest they pay on their mortgage when they file taxes with an MCC. BOH originated 185 loans with MCCs, totaling \$453.5 million.
- USDA Rural Development – This program assists low- and moderate-income borrowers obtain financing to build, rehabilitate, improve, or relocate a dwelling in an eligible rural area. Borrowers pay no down payment and closing costs, and other customary charges may be financed as part of the transaction. BOH originated 28 loans, totaling \$5 million.
- Federal Housing Administration (FHA) – A mortgage loan insured by the FHA has a down payment as low as 3.5 percent and closing costs that may be covered by the lender, developer, or builder. BOH originated 11 loans, totaling \$2.4 million.

- MyCommunity Mortgage (renamed HomeReady Mortgage) – A Fannie Mae lending product targeted to low- and moderate-income borrowers who live in designated low-income, minority, and disaster-impacted communities. Eligible borrowers can obtain loans with as little as three percent down payment provided they attend homeownership education training. BOH originated 11 loans, totaling \$1.7 million.
- Hula Mae – Created by the Hawaii State Legislature for low- and moderate-income borrowers, this program provides eligible home buyers with 30-year fixed-rate mortgages at interest rates below those available on conventional loans. BOH originated six loans, totaling \$1.2 million.

Department of Hawaiian Home Lands (DHHL) – The U.S. Department of Housing and Urban Development (HUD) has various programs available for Native Hawaiians to provide financing on trust land. BOH, as a direct endorsement lender, is able to provide financing under the following two programs:

- HUD 184A – In September of 2007, BOH was the first lender in Hawaii to be approved under the Native Hawaiian housing loan guarantee program. This program provides borrowers with low down-payments (as low as 2.5 percent) and financing available for mortgage insurance premiums. BOH originated 84 loans, totaling \$19.6 million.
- FHA 247 – Qualified Native Hawaiians may purchase or refinance leasehold and Hawaiian Homeland property under this program, which features up to 96.5 percent financing. The program has a one-time mortgage insurance payment of 3.8 percent and no monthly insurance payment is required. BOH originated 42 loans, totaling \$9 million.

BOH also provides a variety of residential loan modification options to help borrowers avoid foreclosure. Options include repayment and/or forbearance plans, modifications to the terms of the mortgage loan, and pre-foreclosure short sale program. In addition, borrowers may voluntarily transfer title to satisfy the mortgage debt and avoid foreclosure (deed in lieu or voluntary conveyance). In addition, BOH participates in the following programs for loans that it services:

- Portfolio Loan Modification Program – BOH offers loan modifications to provide a temporary loan structure that offers affordable and sustainable monthly payments to borrowers experiencing a financial hardship, allowing borrowers to service their debt obligations until their financial condition has improved. The restructurings may involve terms and conditions or underwriting standards that the bank would not otherwise consider when originating residential mortgage loans. BOH modified 19 loans, totaling \$16.4 million.
- Home Affordable Modification Program (GSE HAMP) – Similar to their own modification program, BOH participates in HAMP to assist borrowers who are in default or who are at imminent risk of default by providing borrowers with affordable and sustainable monthly payments. The loan is modified only after the borrower successfully completes a trial payment period. BOH modified 37 loans, totaling \$11.4 million.

In addition to flexible mortgage loan programs, BOH also participates in a number of government guaranteed small business lending programs, such as SBA Express, 7(a), 504, and Small Loan Advantage Program. These programs make it possible to qualify small businesses such as start-ups, those lacking

experienced management, and/or collateral or guarantor support that may not otherwise qualify for conventional loans. These programs generally provide flexible terms such as higher loan-to-value ratios, longer financing options, and flexible payment options over conventional loans. BOH originated 240 loans, totaling \$26.1 million. Participation in these programs enhanced performance under the lending test.

COMMUNITY DEVELOPMENT LENDING

BOH is a leader in making community development loans that are responsive to credit and community development needs within its assessment areas. As shown on Tables 1, 1A, and 1B (Hawaii); Tables 33, 33A, and 33B (Guam); Tables 50 and 50A (Saipan); and Table 63 in Appendix E, BOH made a total of 387 community development loans, totaling \$1.5 billion. These loans are responsive to the four CRA-defined community development categories of affordable housing, economic development, revitalization and/or stabilization of certain geographies, and services targeted to low- and moderate-income individuals. BOH is a leader in lending to developers of affordable housing and financing that help retain jobs for low- and moderate-income individuals, both of which are identified as significant needs within the communities.

In addition to the loans reflected in the tables in Appendix E, BOH made 12 community development loans to four borrowers that benefitted two of the rated assessment areas. The following loans helped to revitalize and stabilize distressed middle-income geographies in Guam and Saipan:

- Four loans, totaling \$25 million, to a major employer that provides jobs to 450 low- and moderate-income individuals as well as equipment rental, retail services and rental property.
- Two loans, totaling \$19.5 million, to an energy company that provides 98 jobs as well as petroleum fuel.
- Three loans, totaling \$13 million, to a wholesale grocery company that employs 74 low- and moderate-income individuals as well as provide imported groceries to major retailers.
- Three loans, totaling \$4.5 million, to a major importer and wholesaler of pharmaceuticals and consumer non-perishable items that employs 111 low- and moderate-income workers.

Investment Test

Overall performance under the investment test is outstanding. BOH continues to make an excellent level of community development investments and grants, often in a leadership role. These investments demonstrate excellent responsiveness to community development needs with particular emphasis in meeting the need for affordable housing to low- and moderate-income individuals.

As shown on Tables 31, 48, 61, and 70, BOH made a total of 245 investments totaling \$53.5 million in qualified community development investments and grants. Of these, 22 (totaling \$28.8 million) were prior period investments and 223 (totaling \$24.7 million) were made during the review period. BOH also had six qualified investments totaling \$19.2 million in unfunded commitments. All of these investments and grants benefitted BOH's assessment areas or Hawaii on a statewide basis. Investments were

predominately made in Hawaii, where the majority of BOH's branches are located. A majority of these investments consist of low-income housing tax credits that facilitated the development of affordable housing complexes to low- and moderate-income individuals. The following is a summary of these investments, with highlights of the broader statewide or regional investments:

- Low-Income Housing Tax Credits (LIHTCs) – as of August 8, 2016, BOH had \$49 million in LIHTCs on its books, of which \$13 million benefited a broader statewide area or regional area that includes the assessment areas. Since the prior examination in April 2013, BOH made an investment in five LIHTCs, totaling \$21.3 million. These tax credits provide incentives to develop low-income housing. BOH takes a leadership role by investing in a dedicated team to serve Hawaii's affordable housing market.
- Community Development Financial Institutions (CDFIs) – as of the date of this examination, BOH had \$713,000 of equity investments on its books in two CDFIs. The sole purpose of these organizations is community development.
- Mortgage-Backed Securities (MBS) – BOH has \$390,056 in MBS secured by mortgages to low- and moderate-income individuals that were purchased during prior periods. The securities are backed by loans originated in Honolulu and other Hawaii counties.
- Low-Income Credit Unions – BOH made a total of \$1.1 million in seven low-income credit unions in its assessment areas.

In addition to qualified community development investments, BOH also funded grants and donations to community organizations providing a variety of social services to low- and moderate-income individuals. The following are examples of grants to those organizations that operate on a statewide basis:

- A \$25,000 grant to a religious organization that provides a range of social services to low- and moderate-income individuals including programs designed to help transition into affordable permanent housing and attain self-sufficiency.
- Two donations totaling \$22,500 to an organization focused on overcoming employment barriers for low- and moderate-income individuals with disabilities.
- Three donations, totaling \$30,000, to a network of food banks that distribute food through charitable agencies to reach low- and moderate-income individuals in Hawaii statewide.
- A \$10,000 donation to a HUD-approved non-profit housing counseling and community lending institution that builds the capacity of low- and moderate-income communities, with a focus on Native Hawaiians.

Service Test

BOH's overall performance under the service test is outstanding. The assessment is based primarily on the excellent levels of community development services provided during the review period as well as efforts to enhance the accessibility of retail banking products to underbanked and unbanked low- and moderate-income individuals.

RETAIL BANKING SERVICES

Retail delivery systems are generally readily accessible to most portions of BOH's assessment areas. In addition to its headquarters in Honolulu, BOH operates 71 full-service branches. During the review period, 13 branches were closed (two in Honolulu, three in Maui, one in Kauai, four in Guam, two in Saipan, and one in American Samoa, which was converted to an agency office as mentioned previously) and nine were opened (four in Honolulu, two in Maui, two in Kauai, and one in Saipan). The closures did not generally adversely affect the accessibility of its delivery systems, as alternative branches and ATM machines were located within close proximity of most of the closures. However, the closure of four out of six branches in Guam negatively impacted accessibility for that market; details are in the Guam Assessment Area section. As shown on Tables 32, 49, 62, and 71, BOH's network of branches and ATMs reasonably serve low- and moderate-income geographies, as a number of them are located either in or near those neighborhoods.

BOH offers a full range of products and services that are available throughout the various assessment areas. Alternative delivery systems include telephone banking, internet banking, mobile banking, bank-by-mail, and 483 ATMs, many with deposit taking capability, further enhancing accessibility. BOH continues to be the exclusive provider of ATMs for many retailers in Hawaii statewide. Internet banking allows customers to transfer funds, view transactions, check statements, and view processed checks online. With mobile banking, customers can bank anytime, anywhere via their cell phone, smart phone or Personal Digital Assistant (PDA) device. Starting in 2015, mobile payments using the bank's debit and credit cards can be made with a single touch using ApplePay™ on the iPhone®6 or higher. BOH's mobile banking services allow customers to check balances, view transaction history, make transfers and pay bills safely and securely. Customers may also receive account balances and the last three transactions via text message or look up interest rates and branch and ATM locations. Telephone banking utilizes an interactive voice response system which is available 24/7. The system allows clients to conduct routine bank transactions quickly and efficiently via the telephone. The service is free for personal and business account holders. In addition, the Bankoh BankMobile is a shuttle-size vehicle housing two cash-dispensing ATMs that provide mobile ATM service to the public at community events statewide.

To increase the accessibility of retail banking services for the unbanked and underbanked, BOH developed EASE checking. As a check-less deposit account, EASE checking offers low minimum opening deposit, no monthly service fee with online statements, no overdraft or non-sufficient funds fees, and free access to most of BOH's alternative delivery systems. The response from the community, including low- and moderate-income individuals, has been very positive. Since its introduction in April of 2015, 9,000 new EASE checking accounts have been opened. The accounts are particularly popular in the West Oahu and Neighbor Islands, where there are large low- and moderate-income populations. EASE checking accounts opened in those areas account for 83 percent of all EASE checking account openings as of April 2016.

COMMUNITY DEVELOPMENT SERVICES

BOH provided an excellent level of community development services, often acting in a leadership role. BOH employees provided more than 3,428 services, totaling 19,114 service hours, to organizations involved in all four of the community development categories. A majority of these services were targeted to providing personal financial education to over 21,500 low- and moderate-income individuals. Technical assistance was also provided to nonprofit organizations that offer needed community services to low- and moderate-income individuals. A large majority of these activities benefited Hawaii, where the bank has its greatest presence and the greatest opportunities for partnership with local organizations. Community development service activities in the bank's Pacific Island Division were largely centered in Guam, where the bank has its largest presence within this region. Activities specific to the assessment areas are discussed in their respective sections of this evaluation.

Highlights of services supporting more than one rated area or assessment area are listed below:

- BOH employees served in leadership positions as board members or chair persons in organizations involved in providing services to low- and moderate-income individuals. These organizations address such concerns as affordable housing and homelessness. As board members, 130 employees provided 309 services totaling 1,851 hours of community development services during the review period.
- BOH employees continued to participate in the Volunteer Income Tax Assistance Preparation Program (VITA) by providing free tax preparation for low- and moderate-income individuals. BOH played a leadership role in collaborating with the statewide VITA coordinator to offer training to bank employees on tax preparation in order to increase volunteers at VITA centers. These services help working low- and moderate-income families and individuals get the federal tax credit they earned. During the review period, 51 employees provided over 1,046 hours of community development services by assisting with income tax preparation to low- and moderate-income individuals statewide.
- BOH employees provided financial education and outreach in all assessment areas. BOH employees conducted a variety of financial education seminars targeting low- and moderate-income individuals. Seminars were geared toward increasing financial literacy among different groups, including students, first-time homebuyers, and small businesses owners. The training for students was accomplished through a number of programs, including the American Bankers Association's "Get Smart about Credit" and "Teach Children to Save" programs, as well as Junior Achievement activities. Employees provided over 1,234 hours of community development services through the "Get Smart about Credit" program and over 2,319 hours of community development services through the "Teach Children to Save" program, conducting several hundred total sessions. Information was also provided to low- and moderate-income first-time home buyers on saving strategies, the importance of good credit, and home financing options. Seminars were also provided to small business owners regarding obtaining credit, financing options, and export opportunities.

- BOH also continued its multi-faceted personal financial education program called "Smart Money." Developed by the bank in 2009, the program is comprised of free public seminars taught by BOH employees at the bank's branches, schools, and community organizations serving low- and moderate-income individuals. BOH employees have been trained to lead the seminars on topics that range from the importance of saving and establishing good credit to the prevention of identity theft. The Smart Money seminars are offered in languages such as Tagalog, Korean, Chinese, and Japanese to assist Hawaii's large ethnically-diverse population. During the review period, 23 employees provided 35 seminars totaling 99 service hours throughout the assessment areas.
- Small businesses are a driving force in BOH's assessment areas and while current unemployment rates are relatively low, many individuals are underemployed and unable to find full-time work that provides a living wage. BOH employees supported small business owners and organizations that work with individuals who are improving their prospects for employment through seminars on how to obtain financing, outreach, and technical assistance. During the review period, 68 BOH employees provided over 1,196 hours of community development services through these activities.
- BOH is a founding member and continues to support a local affordable housing consortium that was founded in 1991. The purpose of the organization is to improve the quality and availability of affordable housing in the state of Hawaii. In addition to this organization, BOH employees also provide technical assistance as board members, presidents, and in other leadership positions to developers of affordable housing that utilize sweat equity and multiple funding sources to lower the cost of developing affordable housing for low- and moderate-income homebuyers. During the review period, 17 employees provided 11 housing organizations with a total of 409 service hours throughout the assessment areas.

Fair Lending or Other Illegal Practices Review

While management has implemented policies, procedures, training programs, and internal assessments, substantive violations of Section (5) of the Federal Trade Commission Act involving unfair acts and practices were identified during the concurrent Consumer Compliance examination. The violations did not result in an adjustment to the CRA rating. The bank has since discontinued the identified practices.

STATE OF HAWAII

CRA Rating for Hawaii

Performance in Hawaii is rated "OUTSTANDING"

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: Outstanding

The major factors supporting the institution's rating include:

- Excellent levels of lending with a substantial majority of loans within BOH's assessment areas
- Overall good geographic distributions of loans with notable performance in small business and consumer lending
- Adequate levels of lending to borrowers of different incomes and businesses of different revenue sizes
- Excellent levels of community development loans and flexible lending practices that are responsive to meeting affordable housing needs, sustaining jobs in low- and moderate-income geographies, and providing financing to small businesses
- Excellent levels of community development investments and grants that are responsive to meeting affordable housing needs and supporting non-profit organizations that provide essential services to low- and moderate-income individuals
- Readily accessible retail banking services that meet the convenience and needs of small businesses and low- and moderate-income individuals
- Excellent levels of community development services

Scope of Examination

The scope of the examination for Hawaii is consistent with the overall scope of the CRA examination. The Honolulu assessment area was reviewed using the full-scope examination procedures. The Maui and Non-MSA assessment areas received limited scope reviews based on the bank's smaller presence and lower lending volumes and deposit activity. The types of reviews were determined based on economic and demographic factors and BOH's strategic goals and objectives. As such, performance in the Honolulu assessment area carried the greatest weight in the evaluation, while performance in the limited scope areas was evaluated as being either consistent, below, or above performance in Honolulu. The Limited Scope Market Profiles in Appendix D include the facts and data upon which this evaluation is based.

In some instances, lending levels were insufficient to draw meaningful conclusions; however, those lending levels were considered during the review and are also presented in the lending tables contained in Appendix E. Tables 1, 1A, and 1B in Appendix E contain loan volume figures for the different loan products broken out by assessment area.

Loans were evaluated as follows:

- All loan types were used to evaluate the responsiveness to assessment area credit needs based on the volume of lending within each assessment area.
- Small business loans and business automobile leases were reviewed; however, revenue information was not collected for business automobile leases and was excluded from the overall borrower distribution analysis.
- Home purchase, refinance, home improvement, home equity lines of credit, motor vehicle, secured and unsecured consumer, credit card, and consumer automobile leases were reviewed.
- Small farm, commercial leases, multi-family, and other consumer loans were considered during the review, but did not influence the overall assessment due to their limited volume.

Description of Operations in Hawaii

BOH has three assessment areas in Hawaii that together consist of the entire state and contain 68 of its 71 branches, as well as its corporate and administrative headquarters. In addition to its retail branch network, BOH operates 12 residential loan offices, nine commercial loan sales offices, and 15 business banking centers in Hawaii. During the review period, 95 percent of BOH's deposits and loan originations were in Hawaii.

BOH has a considerable presence in Hawaii. As of June 30, 2016, there were 12 Federal Deposit Insurance Corporation (FDIC) insured institutions operating 276 offices with deposits totaling \$40.7 billion in Hawaii. BOH, with a nearly 32 percent market share, ranked second to First Hawaiian Bank in deposit balances.² In 2016, there were 263 mortgage lenders and 71 small business lenders that were required to report loans under the Home Mortgage Disclosure Act (HMDA) and CRA data reporting requirements, making the competition significant for mortgage and small business loans. These lenders extended 33,540 mortgage loans totaling \$14.4 billion and 29,611 small business loans totaling \$1.2 billion.³

Economic Conditions

Hawaii's economy is driven by tourism and defense, which are also the largest sources of employment in the state. Based on the most current available data, leisure and hospitality services and government make up 18 percent and 19.9 percent, respectively of total employment in Hawaii.⁴ More than one in six jobs in Hawaii is in leisure and hospitality, and many others depend on tourism in some way or another.⁵ The public sector is Hawaii's largest and highest paying industry and the top five employers are military bases.⁶

² Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2015; available from: <http://www2.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

³ Information based on 2016 aggregate data from institutions required to file annual CRA and HMDA data.

⁴ Moody's Analytics, Précis® U.S. STATE, Hawaii, April 2016.

⁵ Ibid.

⁶ Ibid.

Hawaii's economic recovery slowed for several months in 2014,⁷ inched closer to expansion by the end of 2014,⁸ and was thriving by April of 2016.⁹ The public sector was the major drag on the local economy. Government employment grew less than one percent from 2013 to 2014, forcing the recovery to rely upon growth in low-wage jobs for support.¹⁰ Hawaii's large debt burden led the state government to freeze the payrolls of several agencies and public universities in the fourth quarter of 2015.¹¹ Thanks to a significant military presence on the islands, the federal government acted as a backstop against collapsing public payrolls. In December of 2015, defense spending in Hawaii increased by more than \$200 million and transportation funding increased by nearly \$10 million; additionally, military construction in Hawaii was fully funded at \$444 million.¹²

While tourism made a strong comeback in 2013 with over 8 million visitors, 2014 struggled to keep up with that pace.¹³ Tourism growth sputtered early in 2014, but came back strong and by the summer of 2015, visitor arrival growth was robust.¹⁴ Low oil prices helped airlines add flights to Hawaii and low airfares contributed to record visitations. However, lower fares attracted more budget conscious visitors who spent less on average. In addition, the U.S. dollar appreciated and key Asian economies slowed during the period. Spending by Japanese tourists, for example, was down nearly 20 percent in 2015 compared to 2014.¹⁵ Regardless, with record visitors and additional military funding, state jobs returned to the pre-recession level of 635,000 and the unemployment rate dropped below four percent.¹⁶

Signs of an improving economy are also reflected in the housing market where median sales prices rose from \$650,000 in 2013 to \$700,000 in 2015 on Oahu.¹⁷ The improving real estate trends were also experienced on the Neighbor Islands; however, they went through more serious market contractions than Oahu. In spite of good comebacks, these markets are still more than 20 percent below their prior price peaks seen before the recession.¹⁸ More jobs, higher incomes, and favorable interest rates

⁷ Moody's Analytics, Précis® U.S. STATE, Hawaii, August 2014.

⁸ Moody's Analytics, Précis® U.S. STATE, Hawaii, Dec 2014.

⁹ Moody's Analytics, Précis® U.S. STATE, Hawaii, April 2016.

¹⁰ Moody's Analytics, Précis® U.S. STATE, Hawaii, August 2014.

¹¹ Moody's Analytics, Précis® U.S. STATE, Hawaii, December 2015.

¹² Schatz Senate Press Releases, *Defense, Transportation Funding to Rise in Appropriations Deal*, (accessed October 15, 2016): available from: <http://www.schatz.senate.gov/press-releases/defense-transportation-funding-to-rise-in-appropriations-deal>.

¹³ Dr. Jack Suyderhoud, First Hawaiian Bank Economic Forecast, *Continued Progress Expected for Hawaii into 2015*, (accessed October 15, 2016); available from: https://www.fhb.com/en/assets/File/Marketing/2014_Oahu_EconForecast.pdf.

¹⁴ Dr. Jack Suyderhoud, First Hawaiian Bank Economic Forecast, *Robust Tourism Drives Hawaii's Growth*, (accessed October 15, 2016): available from: https://www.fhb.com/en/assets/File/Marketing/FHB_OahuEconForecast2015.pdf.

¹⁵ Moody's Analytics, Précis® U.S. STATE, Hawaii, December 2015.

¹⁶ Dr. Jack Suyderhoud, First Hawaiian Bank Economic Forecast, *Robust Tourism Drives Hawaii's Growth*, (accessed October 15, 2016): available from: https://www.fhb.com/en/assets/File/Marketing/FHB_OahuEconForecast2015.pdf.

¹⁷ Honolulu Board of Realtors, 2015 Median and Average Sales Prices; available from: <http://www.hicentral.com/oahu-historical-data.php>.

¹⁸ Dr. Jack Suyderhoud, First Hawaiian Bank Economic Forecast, *Continued Progress Expected for Hawaii into 2015*, (accessed October 15, 2016); available from: https://www.fhb.com/en/assets/File/Marketing/2014_Oahu_EconForecast.pdf.

continue to stimulate a demand for housing that is unmet by greater supply.¹⁹ Despite the robust demand, the high cost of housing in Hawaii makes it unaffordable for many families.

Credit Availability and Community Development Needs

Hawaii's expensive housing market contributes to the need for affordable housing across the state. Another contributing factor is the income disparity compared to the price of homes. Wage and salary increases have been below those of the U.S. since 2011, while house price appreciation has outpaced that of the nation.²⁰ The state has one of the highest proportions of residents who spend more than 50 percent of their income on housing.²¹ And given the low wages associated with the tourist industry, which is Hawaii's economic core, affordable housing is unattainable for many low- and moderate-income families. Furthermore, even middle-income individuals are challenged to find housing that is affordable. According to housing advocates, it would take 3.19 firemen, 3.63 school teachers, and 5.2 hotel front desk clerks to afford a median-priced home on Oahu.²² As such, in addition to affordable housing for low- and moderate-income individuals, workforce housing is also a need in the state.

Overall loan demand increased from both commercial and consumer borrowers during the period and small businesses continued to need loans in small dollar amounts. Most of Hawaii's businesses are small. According to data from the U.S. Small Business Administration, small firms make up 96.3 percent of all employers in the state and employed over half of the state's private workforce.²³ A survey of senior loan officers reported having eased their lending standards across major loan categories in January of 2013. For the same period demand for business loans, prime residential mortgages, and automobile loans strengthened, while demand for other types of loans was unchanged.²⁴ By July of 2016 respondents indicated tightening of credit standards for business loans, but did not generally change standards for residential mortgage or consumer loans. Demand for business loans remained steady while demand for commercial real estate loans strengthened. Banks reported demand for most types of residential real estate loans and consumer loans increased during the July 2016 period.²⁵ These national trends are seen locally with the number of SBA-backed loans in Hawaii rising more than

¹⁹ Dr. Jack Suyderhoud, First Hawaiian Bank Economic Forecast, *Robust Tourism Drives Hawaii's Growth*, (accessed October 15, 2016): available from:

https://www.fhb.com/en/assets/File/Marketing/FHB_OahuEconForecast2015.pdf.

²⁰ Moody's Analytics, Précis® U.S. STATE, Hawaii, August 2014.

²¹ Ibid.

²² Dennis Hollier, Hawaii Business, *The High Cost of Affordable Housing*, (accessed October 15, 2016): available from: <http://www.hawaiibusiness.com/the-high-cost-of-affordable-housing/>.

²³ SBA Office of Advocacy, *Small Business Profile, Hawaii 2015*, (accessed October 15, 2016); available from: https://www.sba.gov/sites/default/files/advocacy/HI_0.pdf.

²⁴ Board of Governors of the Federal Reserve System, *The January 2013 Senior Loan Officer Opinion Survey on Bank Lending Practices*, October 2013, (accessed October 15, 2016); available from: <https://www.federalreserve.gov/boarddocs/snloansurvey/201302/default.htm>.

²⁵ Board of Governors of the Federal Reserve System, *The January 2013 Senior Loan Officer Opinion Survey on Bank Lending Practices*, July 2016, (accessed October 15, 2016); available from: <https://www.federalreserve.gov/boarddocs/snloansurvey/201302/default.htm>.

50 percent in 2015 compared to 2014. According to local sources, business confidence has picked up and the state has some key advocates and bank executives with a keen interest in supporting their small business clientele.²⁶

Along with unaffordable housing, poverty is a problem for the State of Hawaii. Despite the improving economy, respondents to the Federal Reserve Bank of San Francisco Vantage Point Survey noted that many of the jobs available to low-income residents are low paying and seasonal in nature, making it difficult for low-income residents to save money and build capital. The ongoing demand for social services often results in needs for these organizations in terms of financial support and technical assistance as they serve significant low- and moderate-income populations within the bank's assessment areas. Ultimately, this can result in community development service or investment opportunities for financial institutions.

Conclusions with Respect to Performance Tests in Hawaii

Conclusions regarding BOH's performance in Hawaii with respect to lending, investment, and service tests are the same as the overall conclusions for the bank as a whole. Over 95 percent of deposits and loan originations occurred in the state. As a result, the overall conclusions of this report were heavily influenced by the conclusions for the Hawaii market. The following sections contain specific comments regarding the individual assessment areas within Hawaii, noting any differences in performance among the individual assessment areas.

²⁶ Kathleen Gallagher, Pacific Business News, *Local SBA loans to continue to be strong in 2016*, (accessed October 15, 2016); available from: <http://www.bizjournals.com/pacific/news/2016/04/29/localsba-loans-to-continue-to-be-strong-in-2016.html>.

Honolulu Assessment Area Conclusions

DESCRIPTION OF OPERATIONS IN HONOLULU

The Honolulu assessment area consists of the County of Honolulu in its entirety. Honolulu County is part of the island chain of Hawaii, located in the northern Pacific Ocean. The county encompasses the city of Honolulu, the state's capital, and the remainder of the island of Oahu and is located to the west of Kauai and the east of Molokai and Lanai. As of 2014, the assessment area was home to 991,788 people and the median household income was \$74,634.²⁷

BOH has a large presence and portion of the overall deposit market share in the assessment area, ranking second, among competing institutions within the area. The assessment area was home to 13 Federal Deposit Insurance Corporation insured institutions operating 189 offices with total deposits of \$31.6 billion, as of June 30, 2015. BOH's 38 branches in the assessment area had total deposits of \$9.9 billion which accounted for 31.3 percent of the deposit market share.²⁸ In 2015, there were 52 small business lenders operating within Honolulu County subject to the reporting requirements of CRA. These lenders extended 20,201 small business loans totaling approximately \$814.7 million.²⁹ Reporting institutions represent only a portion of all institutions competing for the small business lending in the assessment area.

Exhibit 4 on the following page presents key demographic and business information used to help develop a performance context for the assessment area, based on 2010 U.S. Census and 2015 Dun and Bradstreet data.

²⁷ U.S. Census Bureau, American Community Survey 1-Yr Estimate, Selected Social Characteristics DPO3, 2014; available from: <http://factfinder2.census.gov>.

²⁸ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2015; available from: <http://www2.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

²⁹ Information based on 2015 aggregate data consisting of institutions required to file annual CRA data.

EXHIBIT 4 ASSESSMENT AREA DEMOGRAPHICS HONOLULU								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	4.9	5,547	2.6	1,643	29.6	42,688	19.8
Moderate-income	57	23.4	46,119	21.4	5,618	12.2	39,274	18.2
Middle-income	93	38.1	94,565	43.9	4,824	5.1	49,039	22.8
Upper-income	70	28.7	69,100	32.1	1,150	1.7	84,362	39.2
Tract not reported	12	4.9	32	0.0	0	0.0	0	0.0
Total AA	244	100.0	215,363	100.0	13,235	6.1	215,363	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	11,262	1,988	1.1	17.7	7,909	70.2	1,365	12.1
Moderate-income	85,849	23,190	13.2	27.0	52,002	60.6	10,657	12.4
Middle-income	146,123	81,753	46.6	55.9	51,465	35.2	12,905	8.8
Upper-income	91,546	68,623	39.1	75.0	17,865	19.5	5,058	5.5
Tract not reported	32	0	0.0	0.0	32	100.0	0	0.0
Total AA	334,812	175,554	100.0	52.4	129,273	38.6	29,985	9.0
Income Categories	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,314	4.1	1,170	4.1	141	4.1	3	1.7
Moderate-income	11,373	35.2	9,667	33.6	1,597	46.4	109	63.4
Middle-income	10,986	34.0	9,957	34.7	990	28.8	39	22.7
Upper-income	7,672	23.7	7,288	25.4	368	10.7	16	9.3
Tract not reported	998	3.1	647	2.3	346	10.1	5	2.9
Total AA	32,343	100.0	28,729	100.0	3,442	100.0	172	100.0
Percentage of Total Businesses			88.8		10.6		0.5	
2010 U.S. Census Median Family Income ³⁰			\$81,370		2015 Median Housing Value ³¹			\$700,000
2016 HUD Adjusted Median Family Income ³²			\$87,900		2015 Unemployment Rate ³³			3.40%

³⁰ FFIEC Estimated Family Median Income, *FFIEC US Census and FFIEC Estimated Median Family Income Report*, (accessed October 15, 2016), available from: <http://www.ffiec.gov/Medianincome.htm>.

³¹ Honolulu Board of Realtors, 2015 Median and Average Sales Prices; available from: <http://www.hicentral.com/oahu-historical-data.php>.

³² FFIEC Estimated Family Median Income, *FFIEC US Census and FFIEC Estimated Median Family Income Report*, (accessed October 15, 2016), available from: <http://www.ffiec.gov/Medianincome.htm>.

³³ Bureau of Labor Statistics, Labor force data by county, not seasonally adjusted, July 2015-August 2016; available from: <http://www.bls.gov/web/metro/laucntycur14.txt>.

Economic Conditions

Tourism and the military are the economic drivers in Honolulu. Due to its location in the Pacific, Honolulu is both a popular tourist destination and ideal home base for U.S. military forces operating in the Pacific. The local economy improved during the review period, which was driven by strong tourism and active construction.³⁴ From 2013 to the first half of 2015, Honolulu experienced strong growth in its tourism sector. Low oil prices drew many visitors from the continental U.S. and in 2014, Hawaii saw the most overnight visitors since the data point was first recorded.³⁵ Tourism started to cool in the second half of 2015 as the decreasing value of the Yen impacted the ability of Japanese tourists, who traditionally account for 30 percent of arrivals, to travel to the island.³⁶

Mirroring the rise in tourism, Honolulu also saw major upticks in construction from developers trying to meet housing demand. In early 2015, statewide building permits were up 70 percent compared to the year before, and low building material prices encouraged developers to build more homes in 2015 than any period since the early 1990s.³⁷ Despite the strength of the tourism and construction sectors, defense, a staple of the Honolulu economy, saw slight setbacks during the review period. Recent budget cuts in Hawaii have caused the military to reduce troop numbers as a part of a move towards a smaller force. These cuts have also impacted other government employment as the state has implemented a 10 percent across-the-board spending cut to limit the deficit.³⁸ Overall, thanks to a strong tourism sector, 2015 was the sixth year of Hawaii GDP growth since the Great Recession of 2008; nominal state GDP is now over \$80 billion.³⁹

The economic improvements in Honolulu have benefited smaller businesses. An analysis of loans to businesses with revenues of less than \$1 million by institutions subject to the reporting requirements of CRA shows significant improvements in lending levels within the assessment area since the Great Recession. More recently, lending levels held steady during the review period. From 2013 to 2014, the number of loans in the assessment area increased from 7,900 to 8,061, but the dollar amount of those loans dropped slightly, from \$234 million to \$230 million, as seen in Exhibit 5, on the next page. As depicted in Exhibit 4, on the previous page, there were approximately 28,729 small businesses operating in 2015, representing 88.8 percent of all businesses in Honolulu.

³⁴ First Hawaiian Bank, Economic Forecast Oahu Edition 2015-2016, *Robust Tourism Drives Hawaii's Growth*, (accessed October 23, 2016), available from:

https://www.fhb.com/en/assets/File/Marketing/FHB_OahuEconForecast2015.pdf.

³⁵ The State of Hawaii Data Book 2014 (pg. 8); available from:

<http://files.hawaii.gov/dbedt/economic/databook/db2014/section07.pdf>.

³⁶ Moody's Analytics, Précis Report, December 2015, Honolulu.

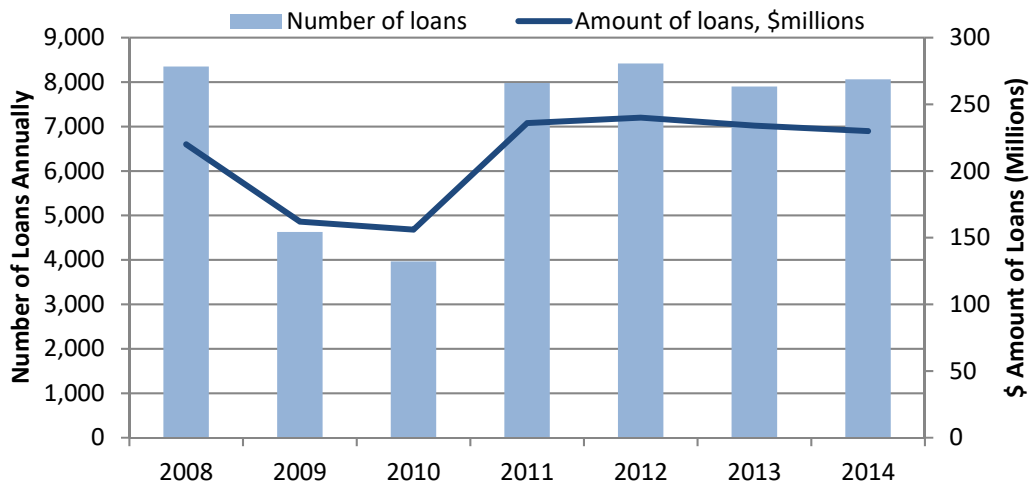
³⁷ Ibid.

³⁸ Moody's Analytics, Précis Report, April 2016, Honolulu.

³⁹ First Hawaiian Bank, Economic Forecast Oahu Edition 2015-2016, *Robust Tourism Drives Hawaii's Growth*, (accessed October 23, 2016), available from:

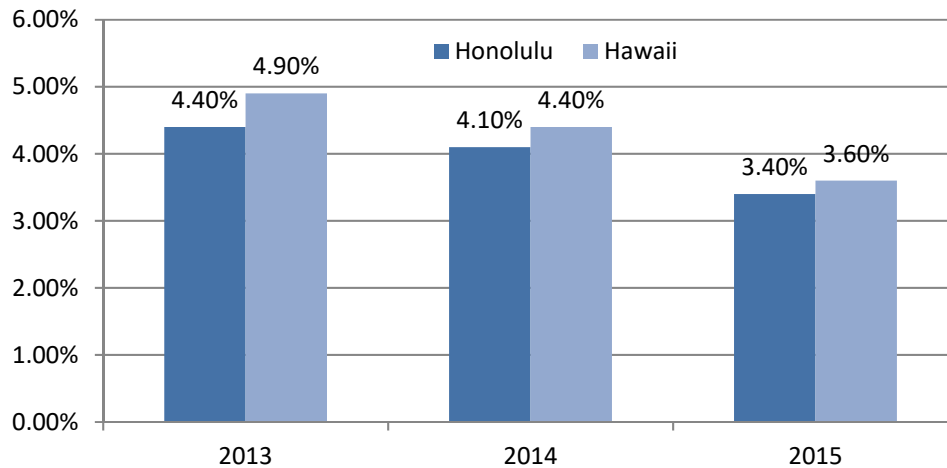
https://www.fhb.com/en/assets/File/Marketing/FHB_OahuEconForecast2015.pdf.

EXHIBIT 5
SMALL BUSINESS LOANS



Despite the aforementioned stalls in tourism and cutbacks in government spending, the area economy generally saw improvements during the review period. From 2013 to 2015, Honolulu County added 12,781 jobs,⁴⁰ and the unemployment rate decreased from 4.4 percent in 2013 to 3.4 percent in 2015, as seen in Exhibit 6.⁴¹

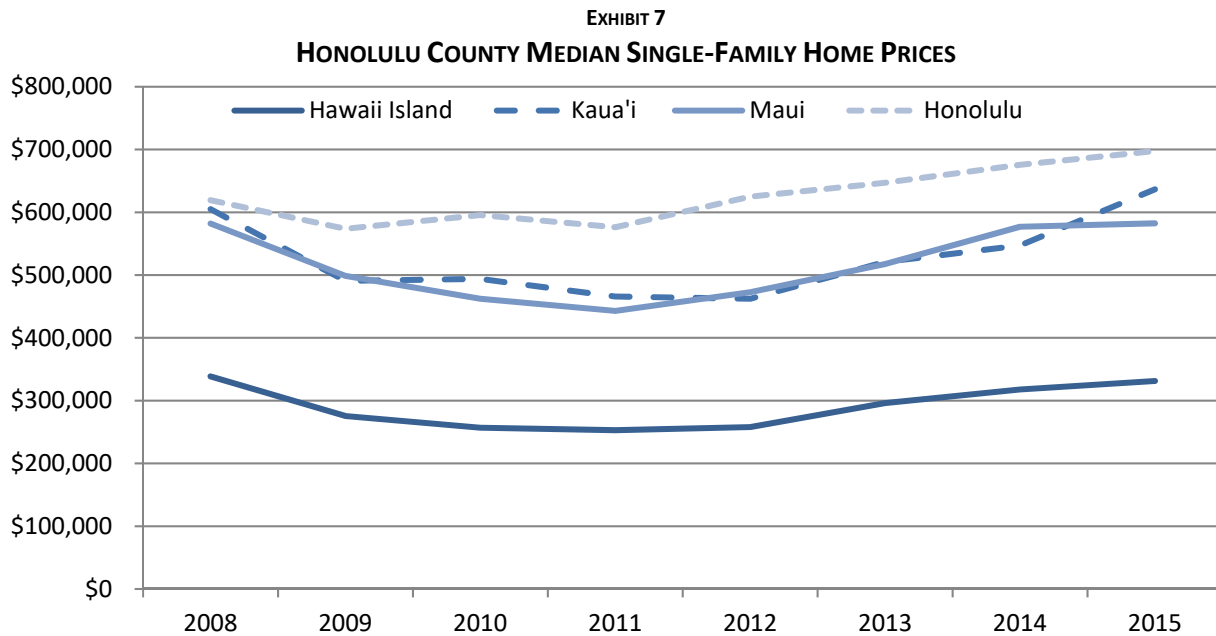
EXHIBIT 6
ANNUAL UNEMPLOYMENT RATES



⁴⁰ Bureau of Labor Statistics, Quarterly Census of Employment and Wages; available from: <http://www.bls.gov/cew/>.

⁴¹ Bureau of Labor Statistics, Local Area Unemployment Statistics, annual average; available from: <http://www.bls.gov/lau/>.

Consistent with an improving economy, the assessment area also saw improvements in the housing market during the review period. Median home prices in Honolulu County rose from \$646,979 in 2013 to \$697,533 in 2015.⁴² At the end of 2015, the assessment area had the most valuable median home prices in the state of Hawaii, as seen below in Exhibit 7.



During the review period, increased housing demand, a scarcity of buildable lands, and high construction costs contributed to strong price growth. Near the end of the review period, however, supply began to catch up to demand, and by the end of 2015, house appreciation was one-fifth of its rate at the end of 2014.⁴³

With the rising cost of homes, rental housing has also become unaffordable, and in some instances unavailable, for many households within the assessment area. While declining vacancies impact all renters, the absence of affordable rental housing is particularly challenging for low-income residents. The Urban Institute, a nonprofit social and economic policy research group, estimates that for every 100 very low-income renter households, there are only 27 housing units available and affordable in Honolulu County.⁴⁴

Accompanying the high costs of housing is a high cost of living in general. Notably, the state of Hawaii has the highest cost of living in the country, and on a local level, Honolulu's cost of living exceeds that of high-priced cities like New York or San Francisco.⁴⁵ Due in part to this cost of living, the poverty and food stamp usage rates increased slightly in the assessment area during the review period, as seen in

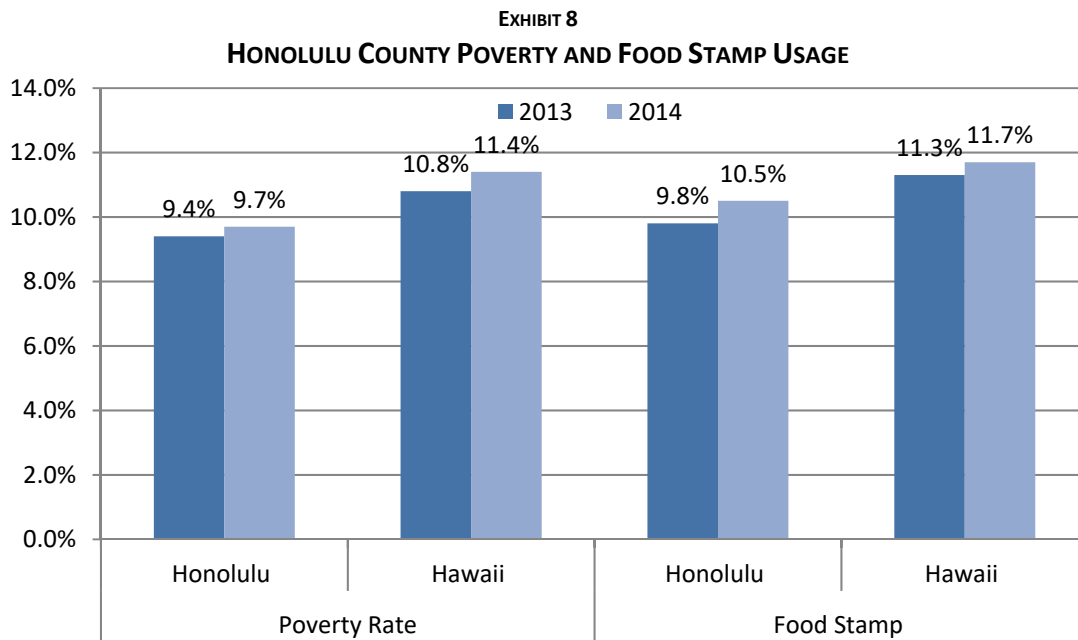
⁴² Hawaii Association of Realtors; available from: <http://www.hawaiiirealtors.com/MarketInfo>.

⁴³ Moody's Analytics, Précis Report, December 2015, Honolulu.

⁴⁴ Urban Institute, Housing Assistance Matters Initiative; available from: https://www.urban.org/research/publication/housing-affordability-gap-extremely-low-income-renters-2013/view/full_report.

⁴⁵ The State Of Poverty in Hawaii (pg. 5); available from: <http://www.hiappleseed.org/poverty-2016>.

Exhibit 8.⁴⁶ The rising poverty and food stamp usage is an indication of the need for social support services for the significant disadvantaged population within Honolulu.



Credit and Community Development Needs

Given the prevalence of small businesses in Honolulu, small business financing was identified as a critical need in the assessment area. Business purpose loans in the range of \$10,000 to \$30,000 were identified by community contacts as a particular need for very small businesses; however, there were indications that small businesses are reluctant to approach larger banks because of the small dollar amount.

A variety of factors indicate that there is also a need for affordable housing development and financing within the assessment area. High housing costs and low affordability mentioned earlier are evidence that home ownership is out of reach for a large number of individuals living in the assessment area and highlight a need for products and services that support access to affordable housing. Down-payment assistance for low- and moderate-income individuals as well as long-term, low-interest lending facilities for non-profit affordable housing organizations were identified as specific credit needs of the community.

Finally, the pervasiveness of poverty and the need for social support services discussed earlier highlight the importance of community service organizations within the bank's communities. The ongoing demand for social services often results in needs for these organizations in terms of financial support and technical assistance as they attempt to serve significant low- and moderate-income populations within the bank's assessment areas. Ultimately, this has the potential to create community development service or investment opportunities for financial institutions.

⁴⁶ U.S. Census Bureau, American Community Survey 1-Yr Estimate, Selected Social Characteristics DPO3, 2014; available from: <http://factfinder2.census.gov>.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN HONOLULU

Lending Test

Overall lending performance in the Honolulu assessment area is outstanding. Lending levels reflect excellent responsiveness to the credit needs given the opportunities and competition within Honolulu. The geographic distribution of loans reflects an overall good penetration of loans in geographies of different income levels, including low- and moderate-income geographies. Lending was distributed throughout the assessment area, and there were no conspicuous gaps in lending patterns. Borrower distributions are also good. Lastly, the level and impact of community development loans demonstrated excellent responsiveness to community development needs.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs. BOH originated the largest number and dollar volume of loans in this assessment area for all product types. As shown on Table 1 in Appendix E, the percentage of loans originated in the Honolulu assessment area was only slightly less than the percentage of area deposits taken. The bank's lending data and assortment of loan programs evidence active efforts to meet area credit needs.

Lending Distribution by Geography

Overall lending distributions by geography are good. As shown in Tables 2-16, loans were generally originated within geographies of all income levels commensurate with the opportunities in those areas. Lending distributions also generally followed the concentrations of business entities, owner-occupied housing units, or households, and there were no unusual or conspicuous lending gaps in this assessment area.

Small Business Lending

The geographic distribution of small business loans, commercial leases and business automobile leases is excellent. As shown on Tables 2, 4 and 5, the levels of lending were particularly strong in moderate-income geographies where BOH's lending substantially exceeded the percentage of small businesses. Small business lending also exceeded aggregate lending in low- and moderate-income geographies. In addition, the bank's market share of lending in low- and moderate-income geographies exceeded its overall market share of small business loans in the assessment area in 2013. The bank's market share of lending in moderate-income geographies exceeded its overall market share of small business loans in the assessment area in 2014 and 2015. For all three years, lending performance in low-income geographies was good, given limited lending opportunities due to the lower concentrations of business entities within those geographies.

Home Mortgage Lending

The geographic distribution of home purchase loans is good. As shown on Table 7, performance was particularly strong in low- and moderate-income geographies where BOH's lending exceeded or was comparable to both the percentage of owner-occupied housing units and aggregate lending. In

addition, as shown on Table 7, the bank's market share of home purchase loans in moderate-income geographies exceeded its overall market share for 2013, 2014, and 2015. As the economy continued to improve, the bank's market share in low-income geographies also exceeded its overall market share in 2015. Lending levels within middle- and upper-income geographies were similarly comparable to the percentage of owner-occupied housing units. The strong performance in home purchase lending can be partially attributable to a number of flexible home mortgage loan programs designed to make credit available. These statewide programs are detailed in the overall conclusion section of this report.

The geographic distribution of home refinance loans is not as strong, but is adequate given available opportunities in the assessment area. As shown on Table 8, BOH's refinance lending is concentrated in middle- and upper-income geographies where over 80 percent of owner-occupied housing units are located. Lending opportunities in low-income geographies is limited based on the small number (less than two percent) of owner-occupied housing units in these areas. Lending levels in moderate-income geographies are good, although below the percentage of owner-occupied housing units, they exceed or are comparable to aggregate lending. The bank's market share within moderate-income geographies was comparable to its overall market share of home refinance loans in the assessment area in 2013 and 2014. Similar to home purchase loans, mortgage refinance lending in low- and moderate-income geographies improved with market share in those areas either exceeding or comparable to the overall market share as the economy continued to improve.

Home Equity Lending

The geographic distribution of home improvement and home equity lines of credit is adequate, with home improvement loans trailing below the percentage of owner-occupied units within low- and moderate-income census tracts, but above or equal to aggregate lending. Home equity lines of credit were dispersed slightly less than the percentage of owner-occupied units in low-, moderate-, and middle-income geographies. Similar to home refinance loans, lending levels are concentrated in middle- and upper income geographies where over 80 percent of the owner-occupied housing units are located. As mentioned previously, lending opportunities in low-income geographies was limited by the lower levels (roughly one percent) of owner-occupied housing units in those tracts. Because reporting home equity loan data is optional, aggregate lending data is not available.

Consumer Lending

The geographic distribution of consumer loans is good given lending opportunities within the assessment area. As shown on Tables 12-15, the highest levels of lending were in moderate-, middle -, and upper-income geographies where the largest concentrations of households are located. Particularly strong performance was in motor vehicle lending, which exceeded the percentage of households in low- and moderate-income geographies. In addition, secured consumer lending in low-income geographies increased steadily during the review period and exceeded the percentage of households. As with home equity loans, reporting consumer loan data is optional, thus aggregate lending data is not available.

Lending Distribution by Borrower Income and Business Revenue

Lending distributions by borrower income and business revenue are generally good. Loans were made to borrowers of all income levels and to businesses of different revenue sizes. As shown in Tables 16-27, lending levels generally followed the distribution of businesses and families within the different income

levels and aggregate lending levels, where that data is available. The distribution of consumer loans to low- and moderate-income borrowers was excellent overall.

Small Business Lending

The level of lending to small businesses is generally adequate. As shown on Tables 16 and 19, lending levels were well below the percentage of small businesses and to a lesser extent, aggregate lending levels. The amount of loans made in small dollar amounts was good, and helped to meet an identified credit need of small dollar amount small business loans. Management cited competition from credit card and financial technology lenders for the low level of lending to small businesses.

Home Mortgage Lending

The distribution of home purchase and home mortgage refinance loans to borrowers of all income levels is adequate. As shown on Tables 20 and 21, BOH's lending to low- and moderate-income families was comparable to aggregate lending levels for home purchase and home refinance loans. Given the limited availability of affordable housing, many low-income families are priced out of the market; as a result, the level of lending to low-income borrowers was significantly less than the percentage of families.

Home Equity Lending

The distribution of home improvement and home equity loans to borrowers of different income levels is adequate. As shown on Table 22, home improvement loans to low- and moderate-income borrowers were comparable to aggregate lending and in 2013, exceeded aggregate lending. The bank also exceeded aggregate lending in 2015 for moderate-income borrowers. As stated previously, aggregate data is not available for home equity loans. While lending levels are well below the percentage of low-income families, these levels are reasonable given the low level of homeownership among low-income individuals and the aforementioned housing affordability issues.

Consumer Lending

Overall, the borrower distribution of secured and unsecured consumer and motor vehicle loans is excellent with loan distributions comparing favorably to the percentage of households in all income categories. As shown on Tables 24-27, a majority of the loans were extended to low- and moderate-income borrowers and were generally consistent with or exceeded the percentage of households. As stated previously, aggregate lending data is not available.

Community Development Lending

The bank is a leader in making community development loans considering available opportunities and competition. These loans, which were particularly responsive to affordable housing needs, created or maintained over 6,600 affordable housing units for low- and moderate-income individuals. The bank also made loans for economic revitalization and economic development that helped create or retain over 23,450 jobs. As shown on Table 1, BOH originated 206 community development loans totaling \$836.4 million in Honolulu.

Highlights of community development loans in this assessment area include:

- A \$28.2 million loan to a major employer located in a moderate-income census tract to purchase and improve commercial property. The loan helped to stabilize the area with employment for 475 low- and moderate-income individuals.
- A \$26.6 million loan to finance the construction of a 46-story tower comprised of 410 residential condominium units designated as workforce housing. As mentioned previously, Honolulu is a high cost housing area with a shortage of affordable housing. With 75 percent of the units affordable to residents earning 140 percent or less of area median income, the financing for this project will provide affordable housing.
- A \$25 million construction loan to build an affordable 423-unit residential housing complex consisting of 388 apartment units, 35 townhouses, and 2,900 square feet of commercial space. This is a complex transaction with multiple sources of funding from BOH, the state of Hawaii, and funding raised by the developer in order to build needed workforce housing.
- A \$14.5 million term loan to a community based non-profit corporation founded to improve the quality and availability of affordable housing. With participation from eight major financial institutions, this organization provides financing opportunities to developers, investors, and owners of multifamily projects for low- and moderate-income individuals. To date, this organization has helped finance over 60 projects with over 3,000 units of affordable housing.
- A \$7.9 million loan to fund a solar energy project that will benefit 10 schools where a majority of students are on the free or reduced lunch program or are located in low- and moderate-income census tracts. The borrower is a special purpose entity formed by BOH and a renewable energy partner for the purpose of owning and operating solar photovoltaic systems. Hawaii has the highest average price for electricity in the United States. By fixing energy costs, these schools will be able to operate at a lower cost.
- A \$5 million working capital loan to a non-profit, post-secondary education institution located in a moderate-income area and in an enterprise zone. Funding the operations of this institution helps to stabilize this moderate-income area by providing jobs to low- and moderate-income individuals and also provides patronage to the local small eateries and retail establishments that surround the campus.
- A \$3.5 million loan to a non-profit organization to fund the purchase and improvement of a residential property that will be used to provide housing for the elderly, homeless, and economically disadvantaged. In addition to housing, this organization provides a wide range of social services for low- and moderate-income individuals including transitional housing, housing placement, employment training, and emergency funding to prevent homelessness.
- A \$2.7 million working capital loan to a non-profit organization that provides advocacy and social services to over 40,000 low- and moderate-income individuals. Programs include childhood education programs, counseling for families in crisis, and respite, resources, and support for families caring for elderly family members.

Investment Test

BOH's performance under the investment test in the Honolulu assessment area is excellent. As shown in Table 31, BOH made a total of \$31.7 million in qualified community development investments and grants in Honolulu, of which \$17.4 million are prior period investments and \$14.3 million, are current period investments and grants. In addition, BOH also had \$17 million in unfunded commitments for this assessment area. There were also statewide investments in Hawaii that also benefited Honolulu; those are comprised of \$4.9 million in prior period, \$8.9 million in current period, and \$1.6 million in unfunded commitments. These investments exhibited excellent responsiveness to community development needs with particular emphasis on the need for affordable housing, which targeted low- and moderate-income individuals.

BOH made significant use of low-income housing tax credits that provide critically needed affordable housing targeted to low- and moderate-income individuals and families. Some of these investments were made during a prior period, but remain on the bank's books. Investments were also made in low-income credit unions and to non-profit organizations providing a variety of community development services. Activity specific to Honolulu compares favorably to the level of investment opportunities available during the review period.

Highlights of community development investments in this assessment area include:

- Low-income Housing Tax Credits – BOH invested \$12.9 million, which funded four housing funds to build or maintain 401 housing units for low and moderate individuals during the review period. BOH also had \$16.9 million of prior period investments that funded six housing funds totaling 880 housing units for low- and moderate-income individuals on Oahu.
- Grants and Donations- During the review period, BOH provided over \$1.2 million to 66 organizations engaged in providing essential community services to low- and moderate-income segments of the community. Services include, among others, homeless shelters, food, medical and mental health, support to schools attended predominately by students from low- and moderate-income families, early childhood development, and self-sufficiency and financial stability.
- Community Development Credit Union – BOH invested a total of \$225,573 in a local credit union located on Oahu.

Service Test

BOH's level of qualified community development services coupled with delivery systems that are accessible to essentially all portions of the assessment area demonstrated excellent responsiveness to identified area needs.

Retail Banking Services

BOH's delivery systems are readily accessible to all portions of the Honolulu assessment area, including low- and moderate-income geographies and individuals of different income levels. BOH operates

39 branches in this market at locations that generally follow population concentrations. As shown on Table 32, the majority of branches are located in middle-income geographies, which have the highest population levels. Twenty-eight percent of the branches are located in low- and moderate-income geographies. As such, the bank has excellent presence in low-income geographies where 7.7 percent of the branches are located. In addition, services are tailored to the convenience and needs of the local community with extended hours at most branches and weekend and holiday hours at several of the in-store branches. Additionally, BOH has an extensive ATM network with 313 ATMs located in various retail establishments and a variety of other alternative delivery systems previously mentioned.

During the review period, BOH closed two branches and opened four branches in Honolulu. The branch closures did not adversely affect access to retail banking services. One of the closed branches was located in a moderate-income geography and the other was located in a middle-income geography. For both branches, there were other full-service branches located in close proximity (within one mile) to the closed branches. In addition, BOH opened one branch in a moderate-income geography, two in middle-income geographies, and one in an upper-income geography during the review period.

Community Development Services

BOH is a leader in providing community development services. During the review period, management and staff provided 2,120 services totaling over 12,400 hours of financial service to a number of organizations involved in various community development activities in Honolulu.

Highlights of community development services in this assessment area include the following:

- BOH employees conducted a variety of financial education seminars targeting low- and moderate-income individuals. Employees provided over 1,900 hours of community development services at 627 events presenting "Smart Money," "Get Smart about Credit" and "Teach Children to Save" seminars for students from low- and moderate-income families who attend schools throughout Honolulu. These seminars included topics such as saving money and the importance of having a good credit history.
- Volunteer Income Tax Assistance Program (VITA) - As noted in the overall assessment, BOH employees were instrumental in helping low- and moderate-income individuals obtain earned income tax credits by providing free income tax preparation services. During the review period, 68 employees provided over 1,500 hours volunteering at VITA centers in Honolulu.
- BOH has worked to assist current and former incarcerated inmates with successful transitions into society. Through a work furlough program, inmates are able to transition over to managing their money by opening a deposit account, setting up certain automatic payments and monitoring transactions. Since May 2013, BOH has assisted over 395 incarcerated individuals transitioning from correctional facilities to independent living through financial education and services. During the review period, two employees provided a total of 349 hours in support of this program.
- Homeless services – BOH provides leadership support to four organizations serving the homeless in Honolulu by serving as board members. These organizations provide a full array of services to the homeless including emergency shelter, transitional housing, meals, mental

health, and substance abuse treatments. Eight BOH employees provided a total of 567 hours of community development services to these organizations during the period.

TERRITORY OF GUAM

CRA Rating for Guam

Performance in Guam is rated "SATISFACTORY"

The lending test is rated: High Satisfactory
The investment test is rated: High Satisfactory
The service test is rated: Low Satisfactory

The major factors supporting the institution's rating include:

- Lending levels that reflect adequate responsiveness to assessment area credit needs
- Excellent geographic distribution of loans
- Excellent levels of lending to borrowers of different income levels
- Poor levels of lending to businesses of different revenues
- Relatively high levels of community development loans that are responsive to community credit needs
- High levels of community development investments that are responsive to community development needs
- A relatively high level of community development services
- A record of branch closures that adversely affected accessibility of delivery systems, particularly in distressed middle-income geographies

Scope of Examination

The scope of the examination for Guam is generally consistent with the overall scope of the CRA examination. Although BOH's overall presence and loan activity in this area are significantly less than in Hawaii, a full-scope review was conducted in order to determine the overall rating for Guam. Unlike the Hawaiian markets, BOH primarily offers consumer lending in this assessment area; as such, consumer lending received the most weight, followed by small business lending and commercial leases. No home mortgage loans were originated in this assessment area because legal restrictions with regard to land ownership create limited opportunities for home-secured lending. Loans were evaluated as follows:

- All loan types originated by the bank were used to evaluate the responsiveness to assessment area credit needs based on the volume of lending within the assessment area.
- Small business loans were reviewed. Commercial leases were considered during the review, but did not influence the overall assessment due to their limited volume.
- Home equity, motor vehicle, secured consumer, and unsecured consumer loans were reviewed.
- Small farm, home mortgage, multifamily, and other business and consumer purpose loans were not reviewed as none of these types of loans were originated in Guam.

Description of Operations in Guam

BOH's assessment area comprises the entire island of Guam, which is a U.S. territory in the western Pacific Ocean. Guam is located approximately 3,800 miles west of Honolulu, 1,500 miles south of Tokyo and a similar distance east of Manila. The island is 212 square miles, and is approximately 30 miles long and four to nine miles wide. The Central Intelligence Agency estimates that Guam's population is 161,785.⁴⁷

BOH is one of six Federal Deposit Insurance Corporation-insured institutions operating on the Island and the third largest by deposit market share. As of June 30, 2015, BOH's two branches in the assessment area had total deposits of \$521 million which accounted for 21.6 percent of the deposit market share.⁴⁸ In 2015, there were nine small business lenders operating within Guam subject to the reporting requirements of CRA. These lenders extended 814 loans totaling approximately \$73.7 million.⁴⁹ Reporting institutions represent only a portion of all institutions competing for the small business lending in the assessment area.

As shown in Exhibit 9 on the following page, 61.4 percent of the geographies in Guam are middle-income, according to the 2010 U.S. Census data. These middle-income geographies are designated distressed, non-metropolitan middle-income geographies due to poverty rates.⁵⁰

⁴⁷ CIA Factbook; available from: <https://www.cia.gov/library/publications/the-world-factbook/geos/gq.html>.

⁴⁸ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2015; available from: <http://www2.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

⁴⁹ Information based on 2015 aggregate data consisting of institutions required to file annual CRA data.

⁵⁰ FFIEC, Community Reinvestment Act, *Distressed and Underserved Tracts*; (accessed April 9, 2020), available from: <https://www.ffiec.gov/cra/distressed.htm>.

EXHIBIT 9 ASSESSMENT AREA DEMOGRAPHICS GUAM								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	7,834	22.9
Moderate-income	8	14.0	3,601	10.5	973	27.0	5,599	16.4
Middle-income	35	61.4	25,348	74.1	4,843	19.1	7,914	23.1
Upper-income	8	14.0	5,250	15.4	698	13.3	12,852	37.6
Tract not reported	6	10.5	0	0.0	0	0.0	0	0.0
Total AA	57	100.0	34,199	100.0	6,514	19.0	34,199	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Moderate-income	6,021	1,846	8.7	30.7	2,668	44.3	1,507	25.0
Middle-income	36,398	15,423	73.0	42.4	15,284	42.0	5,691	15.6
Upper-income	8,128	3,870	18.3	47.6	2,934	36.1	1,324	16.3
Tract not reported	20	1	0.0	5.0	0	0.0	0	0.0
Total AA	50,567	21,140	100.0	41.8	20,886	41.3	8,522	16.9
2010 U.S. Census Median Family Income ⁵¹			\$50,607		2015 Median Housing Value ⁵²			\$220,835
2016 FFIEC Estimated Median Family Income ⁵³			\$54,400		March 2015 Unemployment Rate ⁵⁴			6.9%

Economic Conditions

The Guam economy depends largely on U.S. military spending and tourism. These primary industries are followed by finance, insurance, and real estate. During the review period, the Guam economy grew as both the military and tourism sectors expanded. In 2010, military spending in Guam peaked at \$1.5 billion and was followed by three years of decreases as the federal government cut spending in response to large debt and increased budget deficits. In 2014, however, spending rose to \$1.2 billion as military strategy shifted to rebalance U.S. forces within the Asia-Pacific region. Additionally, Guam had \$162 million in military construction approved for fiscal year 2015 under the Defense Authorization Act

⁵¹ FFIEC Estimated Family Median Income, *FFIEC US Census and FFIEC Estimated Median Family Income Report*, (accessed October 15, 2016), available from: <http://www.ffiec.gov/Medianincome.htm>.

⁵² Cornerstone Valuation Guam, Inc., 2012-2015 Guam Real Estate Data Released, *Guam Residential Median Prices*, (accessed 10/16/2016); available from: <http://cornerstonevaluation.com/new-guam-real-estate-market-data-released/>.

⁵³ FFIEC Estimated Family Median Income, *FFIEC US Census and FFIEC Estimated Median Family Income Report*, (accessed October 15, 2016), available from: <http://www.ffiec.gov/Medianincome.htm>.

⁵⁴ Government of Guam Bureau of Labor Statistics, Department of Labor, *Unemployment Rate* (accessed 10/16/2016); available from: <http://bls.guam.gov/>.

of 2015. Total federal spending, both defense and non-defense, amounted to nearly \$2 billion in 2014, which made up 40 percent of Guam's GDP.⁵⁵

In 2014, 1.3 million visitors travelled to Guam which represented a 0.6 percent increase from 2013 and was the highest visitor total since 1997. In 2014, 60 percent of the island's visitors were from Japan while 22.9 percent were from Korea, and only 4 percent were from the US mainland. The growth in visitors is especially impressive considering the strong value of the U.S. dollar against most Asian visitors' currencies. The hotel occupancy rate remained steady at 75 percent from 2013 to 2014, but the average hotel nightly room rates increased from \$134 to \$149.⁵⁶

Overall, Guam experienced a one percent growth from 2013 to 2014. Federal sector jobs were up 2.7 percent during this period while private sector jobs were up 1 percent and local government jobs were up .43 percent. As a whole, 75 percent of all jobs in Guam are private sector while Federal government jobs make up 6.6 percent and local government jobs make up 18.6 percent.⁵⁷

Guam's housing market also saw improvements during the review period. The sale of residential units increased 13.3 percent between 2013 and 2014, driven mainly by sales of condominiums. Along with increased sales, the state also saw a 4.5 percent increase in the median price of housing. These gains continued through the review period, and the number of residential units sold in the first quarter of 2015, the most recent data available, was up 25 percent from the same quarter a year earlier.⁵⁸

Credit and Community Development Needs

Rising home prices have made housing unaffordable for many residents, as such, financing to develop affordable housing for low- and moderate-income individuals is a credit need in Guam. With the median housing value at \$220,835 and median income at \$54,400, community contacts from local sources indicate only 80 percent of families can afford a housing price range of \$150,000 to \$190,000; however, availability in that price range is uncommon. Affordable rental housing is also a need. According to the community contact from the housing authority, there is a waitlist of families that have applied for Guam's public housing program. Due to the lack of affordable housing, some families have been on the waitlist since 2013.

Poverty, a key issue in Guam, highlights the need for social services. While there are no low-income and only eight moderate-income census tracts, all of the middle-income census tracts, where a majority of the population resides, are designated as distressed due to high rates of poverty. In addition, while the unemployment rate is the lowest since September of 2006, this rate masks the persistently high number of people who do not participate in Guam's labor market; that total at 49,300 is 40 percent of the civilian population or 31 percent of Guam's total population.⁵⁹

⁵⁵ First Hawaiian Bank Economic Forecast (Pg. 4); available from:
https://www.fhb.com/en/assets/File/Marketing/2015_GuamCNMI_EconForecast.pdf.

⁵⁶ Ibid (pg. 2).

⁵⁷ Ibid (pg. 6)

⁵⁸ Ibid (pg. 4).

⁵⁹ Dr. Maria Claret M. Ruane, First Hawaiian Bank Economic Forecast, *Guam: Fourth Straight Year of Stable Growth in 2015* (accessed October 16, 2016): available from:
https://www.fhb.com/en/assets/File/Marketing/2015_GuamCNMI_EconForecast.pdf.

On a positive note, the overall number of homeless people in Guam in 2016 decreased compared to 2015. However, more homeless are now living in shelters or transitional housing according to preliminary data from the 2016 homeless count conducted by the Guam Housing and Urban Renewal Authority. Subpopulations among the homeless were also identified during the count, including veterans, victims of domestic violence, those suffering from chronic substance abuse, and those with severe mental illness.⁶⁰ These findings highlight the need for community services for low- and moderate-income individuals as well as financial and technical support for these organizations. In addition, the high rates of unemployment underscore the need to revitalize and stabilize moderate-income and distressed middle-income geographies by helping to retain jobs in the area.

Small business credit needs and demand in Guam are increasing as demonstrated by reported CRA data. Reported CRA loans for 2013, 2014, and 2015 increased steadily at 592, 672, and 814 respectively for the financial institutions that report small business data. Community contacts indicate demand is bolstered by the anticipated military buildup in Guam referred to earlier. Small businesses continue to need small business loans in small dollar amount ranging from \$15,000 to \$75,000, but the most sought after credit amount is \$100,000 or less. The contacts further stated that given the isolation of Guam within the Pacific Ocean, working lines of credit to keep up inventories are critical as most goods need to be shipped to the island from long distances. In addition, the anticipated arrival of additional U.S. military personnel is expected to spur the demand for business start-up loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GUAM

Lending Test

BOH's overall performance under the lending test in Guam is high satisfactory. Lending levels demonstrate adequate responsiveness to assessment area credit needs. The level of lending to borrowers of different income levels and the geographic distribution of lending is excellent. In addition, the high levels of community development loans helped revitalize and stabilize moderate-income and distressed middle-income geographies by retaining jobs in the area.

Lending Activity

Lending levels are good overall. As shown on Tables 33, 33A and 33B, the bank originated low numbers of small business and home equity loans and commercial leases; however, this is offset by a significant level of consumer loan originations and high levels of community development loans.

Lending Distribution by Geography

Lending distributions by geography are good. Loans were generally made within geographies of all income levels commensurate with the opportunities in those areas. Lending distributions generally

⁶⁰ Maria Hernandez, Pacific Daily News, *Preliminary Findings from 2016 Homeless Count Released*, (accessed October 16, 2016), available from: <http://www.guampdn.com/story/news/2016/02/21/preliminary-findings-2016-homeless-count-released/80641548/>.

followed the concentrations of owner-occupied housing units or households, and there were no unusual or conspicuous lending gaps in this assessment area.

Small Business Lending

The geographic distribution of small business loans is good. As shown on Table 34, lending levels in moderate-income geographies are comparable to aggregate lending. Performance in 2013 is particularly strong in distressed middle-income geographies where lending levels significantly exceed aggregate lending in 2013 and compare favorably during 2014 and 2015.

Home Equity Lending

The geographic distribution of home equity lines of credit is also good. Lending levels in moderate-income geographies are particularly noteworthy in light of housing affordability issues in Guam. Levels in distressed middle-income geographies compare favorably with aggregate lending patterns and comprised the majority of loans overall during the review period.

Consumer Lending

The geographic distribution of consumer loans is excellent. As shown on tables 37-40, BOH's performance for all four products (motor vehicle, secured and unsecured consumer loans, and credit cards) is generally consistent with the geographic distribution of households. The level of consumer lending in moderate-income geographies, where there is less opportunity, compares reasonably with the percentage of households, while performance in distressed middle income geographies exceed the percentage of households for these loan products.

Lending Distribution by Borrower Income and Business Revenue

Lending distributions by borrower income is good overall. The distributions of motor vehicle and secured and unsecured consumer loans, and credit cards to low- and moderate-income borrowers are excellent. However, the distribution of small business loans among businesses of different revenue sizes and the distributions of home equity lines of credit among borrowers of different incomes are poor.

Small Business Lending

The levels of lending and leasing to small businesses are poor. As shown on Table 41, lending levels to small businesses are significantly below aggregate levels. Management indicated the low penetration among small businesses is due to competitive factors. Reported lending data indicates that the market was dominated by larger institutions with 83 percent market share of the small business lending space during the review period. BOH appears to have the capability of meeting these needs as over 70 percent of small business loans and commercial leases originated during the period were in dollar amounts of \$100,000 or less, addressing an identified credit need. However, these small dollar loans were made to larger businesses. In addition, despite rising demand, BOH's lending to small businesses significantly decreased during the period from 40.4 percent to 14 percent.

Home Equity Lending

The distribution of borrowers of home equity lines of credit reflects poor penetration among customers of different income levels. Lending levels to low- and moderate-income borrowers are below the percentage of families in those income categories. The majority of home equity lines of credit were made to upper-income borrowers. Nevertheless, the high cost of housing compared to relatively low median income was considered in this assessment.

Consumer Lending

Overall, the borrower distributions of consumer loans are excellent. As shown on Tables 44-47, the level of lending to low- and moderate-income borrowers is particularly strong for secured and unsecured consumer loans, where lending levels exceeded the percentage of households. Motor vehicle and credit card lending performance was not as strong to low-income borrowers, where lending levels were below or comparable to the percentage of households; however, lending levels to moderate-income borrowers substantially exceeded the percentage of households.

Community Development Lending

BOH originated a relatively high level of community development loans in Guam. As shown on Table 33, the bank originated 28 loans, totaling \$176.3 million, during the review period. Community development loans were targeted toward the economic revitalization and stabilization of the local community. All community development loans helped create or retain jobs in or near distressed middle-income geographies. The following are examples of community development loans in Guam:

- A \$24,000 loan to finance the acquisition of a new forklift to support warehousing and distribution services. The borrower is a non-profit providing employment services to individuals with disabilities who cannot meet the demands of the competitive labor market. The organization provides workforce development services to low- and moderate-income individuals.
- A \$3.6 million loan to refinance a 74-unit affordable housing project. All units are restricted to households earning 60 percent or less of the area median income. The apartment project is comprised of rental units that can house families of 1- 8 persons. The borrower was specifically established to develop and manage the project that involves low-income housing tax credits. Given the shortage of rental units affordable to low- and moderate-income families, this loan is seen as meeting a critical need in Guam.
- A \$6 million loan to purchase warehouse property by a major employer. The borrower is engaged in retail sales of new and used autos, car rentals, restaurants, and food wholesale. This loan helps to stabilize the area by helping to retain 650 jobs for low- and moderate-income individuals in a distressed middle-income area.

Investment Test

Investment test performance in Guam is high satisfactory. As shown on table 48, BOH made high levels of community development investments and grants totaling \$494,295, which consisted of \$4,216 in

prior period investments remaining on BOH's books, and \$490,079 of new investments made during the review period. Investments helped to support community development credit unions and non-profit organizations serving low- and moderate-income individuals. In addition, total investment levels are significantly above peer bank levels. The following are examples of these investments:

- Low-Income Credit Unions – BOH provided \$460,079 in deposits to two low-income credit unions.
- A \$5,000 donation to a non-profit organization providing crisis intervention services for low- and moderate-income families including emergency food and shelter and counseling.
- A \$25,000 grant to fund the Bank of Hawaii Center for Entrepreneurship at the local university. The purpose of the center is to host an interactive learning laboratory for students to launch start-up businesses. With support from existing resources such as the Guam Small Business Development Center, the goal is to create successful small businesses and generate jobs in an area with high poverty rates.

Service Test

Performance under the service test is low satisfactory. Despite, high levels of community development services, access to the bank's delivery systems was negatively impacted by the branch closures that occurred during the review period.

Retail Banking Services

BOH's retail delivery systems services are reasonably accessible. However, the closure of four branches in the assessment area adversely affected accessibility of its delivery system to all portions of the assessment area. Although Guam benefits from a network of 27 stand-alone ATMs, only four are full-function ATMs, the remaining are limited to dispensing cash. The branches that were closed were located in distressed middle-income census tracts. As shown on Table 49, BOH now operates only two branches in Guam; however both branches are located in distressed middle-income areas with high poverty rates, have extended hours, and are open on Saturdays. A total of 38 ATMs are located throughout Guam in a number of retail, food, and business establishments. One stand-alone ATM is located in a moderate-income geography, while 26 are located in distressed, middle-income geographies. BOH provides a full range of banking products and services including 24-hour customer service, bank-by-phone, and commercial services. These delivery systems and services do not vary in a way that unduly inconveniences the assessment area.

Community Development Services

BOH provided a relatively high level of community development services in Guam. BOH employees provided 383 services totaling over 2,000 hours of community development services to non-profit organizations. The vast majority of these hours were spent providing personal financial education to students from low- and moderate-income families. BOH staff members also served in a leadership capacity on various nonprofit organizations' boards of directors, serving low- and moderate-income individuals and providing information to small business owners regarding SBA programs.

Highlights of community development services in this assessment area include:

- Leadership – 11 BOH employees provided 47 services to eight organizations totaling 329 community development service hours. Employees provided technical assistance to these organizations in leadership capacities including board chair, vice chair, board members, and treasurer. These organizations provide a variety of services to low- and moderate-income individuals such as food and shelter for the homeless, support for families in crisis, mentoring to children, and affordable housing developed with sweat equity.
- Personal Financial Education – BOH partnered with several non-profit organizations to deliver personal financial education to low- and moderate-income individuals using curriculum such as “Get Smart about Credit”, “Smart Money”, and “Teach Children to Save”. Employees presented at 174 events totaling 501 community development service hours.
- Fundraising – To help maintain the capacity of two non-profit organizations involved in affordable housing and providing food and shelter to the homeless, 15 employees provided over 87 hours of community development service hours collecting donations at three fundraising events.

ISLAND OF SAIPAN (COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS)

CRA Rating for Saipan

Performance in Saipan is rated "SATISFACTORY"

The lending test is rated: Low Satisfactory
The investment test is rated: High Satisfactory
The service test is rated: Low Satisfactory

The major factors supporting the institution's rating include:

- Adequate lending levels that reflect adequate responsiveness to assessment area credit needs despite overall low levels of lending in relation to total deposits
- Good geographic distribution of loans
- Good levels of lending to borrowers of different income levels
- Adequate level of community development loans that are responsive to credit needs
- Significant levels of community development investments
- Reasonably accessible delivery systems and adequate levels of community development services

Scope of Examination

The scope of the examination for Saipan is generally consistent with the overall scope of the CRA examination. Given limited lending activity in the area, the lending test assessment was limited to the origination of small business, motor vehicle, secured and unsecured consumer loans, and credit cards. Home mortgage loans were not originated in this assessment area because legal restrictions with regard to land ownership result in limited opportunities for home-secured lending. Small business loans were considered during the review but did not influence the overall assessment due to their limited volume. While the scope of the bank's operations in the area is relatively small when compared to the organization's activities as a whole, BOH has a sizeable presence in this market. As such, a full-scope review was conducted in order to determine the overall rating for Saipan.

Description of Operations in Saipan

The Saipan assessment area consists of the island of Saipan in its entirety. At approximately 45 square miles, Saipan is the capital and largest island of the United States Commonwealth of the Northern Mariana Islands (CNMI or Marianas), a chain of 14 tropical islands belonging to the Mariana Islands Archipelago in the Western Pacific Ocean. The populated islands are Rota, Saipan, and Tinian. Saipan is located about 1,660 miles east of Manila, Philippines; 3,728 miles west of Honolulu, Hawaii; and

approximately 124 miles north east of Guam.⁶¹ More than 90 percent of CNMI’s estimated population of 94,360 is concentrated in Saipan.⁶²

BOH is one of the three Federal Deposit Insurance Corporation insured institutions operating on the island and the second largest by deposit market share. BOH’s one branch in the assessment area had total deposits of \$183.8 million which accounted for 32.9 percent of the deposit market share.⁶³ In 2015, there were 140 small business loans originated totaling \$10.9 million by four financial institutions. In terms of small business lending, Saipan is dominated by one financial institution that captured 91.4 percent of this market.

As shown in Exhibit 10 below, similar to Guam, 50 percent of the geographies in Saipan are middle-income, according to the 2010 U.S. Census data. These middle-income geographies are designated distressed, non-metropolitan middle-income geographies due to poverty, unemployment and population loss.⁶⁴

EXHIBIT 10 ASSESSMENT AREA DEMOGRAPHICS SAIPAN								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Moderate-income	4	22.2	1,935	20.1	1,107	57.2	1,723	17.9
Middle-income	9	50	5,762	59.8	2,627	45.6	1,443	15.0
Upper-income	4	22.2	1,936	20.1	645	33.3	4,365	45.3
Tract not reported	1	5.6	0	0	0	0.0	0	0.0
Total AA	18	100.0	9,633	100.0	4,379	45.5	9,633	100.0
2010 U.S. Census Median Family Income ⁶⁵			\$22,455		Median Housing Value			N/A
2016 FFIEC Adjusted Median Family Income ⁶⁶			\$24,200		2010 Unemployment Rate ⁶⁷			16.6%

⁶¹ Google Map of Saipan, (accessed October 19, 2016); available from:

http://www.nationsonline.org/oneworld/map/google_map_Saipan.htm.

⁶² U.S. Department of Commerce, National Oceanic and Atmospheric Administration, *Commonwealth of the Northern Mariana Islands Key Facts*, (accessed October 19, 2016): available from:

http://www.coris.noaa.gov/activities/coral_demographics/05_CNMI.pdf.

⁶³ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2016; available from:

<http://www2.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

⁶⁴ FFIEC, Community Reinvestment Act, *Distressed and Underserved Tracts*; (accessed April 9, 2020), available from: <https://www.ffiec.gov/cra/distressed.htm>.

⁶⁵ FFIEC Estimated Family Median Income, *FFIEC US Census and FFIEC Estimated Median Family Income Report*, (accessed October 15, 2016), available from: <http://www.ffiec.gov/Medianincome.htm>.

⁶⁶ FFIEC Estimated Family Median Income, *FFIEC US Census and FFIEC Estimated Median Family Income Report*, (accessed October 15, 2016), available from: <http://www.ffiec.gov/Medianincome.htm>.

⁶⁷ CNMI Department of Commerce, Central Statistics Division, *2014 CNMI Broadband Survey page 12*, (accessed July 22, 2019); available from: https://microdata.pacificdata.org/index.php/catalog/46/related_materials.

Economic Conditions

With the decline of the garment industry in 2009, tourism is now the economic driver of Saipan.⁶⁸ The economy has been sustaining its growth due to strong tourism. After the last recorded decline in visitor arrivals in 2011, Saipan's tourist industry experienced three consecutive years of growth in visitor arrivals. From January to March, 2015 there were 6.1 percent more visitors compared to the same months in 2014. According to local sources, visitors during 2014 approached a half million people. The main factors for these trends appear to be airline seat availability combined with promotional efforts by the Marianas Visitors Authority and its industry partners.⁶⁹ Local sources indicate the Saipan economy is booming due to the construction of a new casino in Garapan, the largest urban center on Saipan and the capital of the Northern Marianas.

On August 2, 2015, Saipan was hit with Typhoon Soudelor. As a result of the typhoon, hundreds of Saipan residents were placed in shelters.⁷⁰ According to local sources, the entire island was affected and some areas did not have power or water until months later in December. Saipan was declared a federal disaster area by President Obama.⁷¹ In addition to the physical damage wrought by Soudelor, the typhoon also caused economic damage. In August 2015, the cancellation of flights and the inability for large planes to land in Saipan translated to \$30.8 million in lost revenue for the islands, according to the Marianas Visitor Authority.⁷²

With regard to housing, local laws exacerbate hurdles to homeownership and there is little public support for affordable housing. As in Guam, the indigenous population is the Chamorro people. Unlike Guam, however, in Saipan only persons of at least one quarter Northern Marianas Chamorro may own land in fee simple title. Others are able to receive only a leasehold interest with a maximum term of 55 years. Because of these rules, ownership acquired by a bank through foreclosure is restrictive. As a result, financial institutions do not typically originate residential mortgage loans in Saipan. Publicly supported housing in Saipan is not readily available. According to community contacts, the Department of Housing and Urban Development (HUD) does not have public housing units in Saipan. The only available HUD assistance is in the Section 8 voucher program and there are only 300 of those available.

Poverty is an issue in Saipan. As seen earlier in Exhibit 10 on the previous page, while there are no low-income census tracts and only four of the 18 census tracts are moderate-income, each of the nine

⁶⁸ United States Government Accountability Office, March 2014 Report to Congressional Committees, *American Samoa and the Commonwealth of the Northern Mariana Islands – Economic Indicators Since Minimum Wage Increase Began*, (accessed October 19, 2016) available from <http://www.gao.gov/assets/670/662127.pdf>.

⁶⁹ First Hawaiian Bank, Economic Forecast Guam-CNMI Edition 2015, *CNMI Economy: Tourism Growth Fuels Optimism for 2015*, (accessed October 19, 2016), available from: https://www.fhb.com/en/assets/File/Marketing/2015_GuamCNMI_EconForecast.pdf.

⁷⁰ Gaynor Dumat-ol Daleno, Pacific Daily News, *Saipan in State of Disaster after Typhoon Soudelor Direct Hit*, (accessed October 19, 2016): available from: <http://www.guampdn.com/story/news/2015/08/03/fema-cnmi-state-disaster-after-typhoon-soudelor-direct-hit/31042799/>.

⁷¹ NBC News, Asian America, *Recovery Begins in Saipan After Typhoon Soudelor*, (accessed October 19, 2016): available from: <http://www.nbcnews.com/news/asian-america/recovery-begins-saipan-after-typhoon-soudelor-n409196>.

⁷² Jayson Camacho, Saipan Tribune, *\$30.8 M Impact on Tourism in August Alone*, (accessed October 20, 2016); available from: <http://www.saipantribune.com/index.php/30-8m-impact-on-tourism-in-august-alone/>.

middle-income census tracts are distressed due to high rates of poverty, unemployment, and population loss.

Credit and Community Development Needs

Conclusions about credit and community development needs are primarily based on information received from community contacts, due to the lack of other publicly available data and information. Community contacts with housing expertise indicated that local residents are frustrated by the lack of residential mortgage loans and homeownership opportunities. Community contacts also indicated that the restrictions on those who can hold property in fee simple title has contributed to depressed property values across the CNMI.

Community contacts further indicated most small businesses continue to need business loans in amounts of \$100,000 or less, with smaller businesses needing smaller loans ranging from \$15,000 to \$75,000. Given Saipan's remote location in the Western Pacific Ocean, working capital loans are needed to maintain inventories of goods for sale.

The high rates of poverty and unemployment in Saipan point to the need for support to organizations that provide social and community services to low- and moderate-income individuals. The damage brought on by Typhoon Soudelor highlights the need for disaster relief programs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SAIPAN

Lending Test

Lending performance in Saipan is low satisfactory. While the overall level of lending is low in relation to total deposits, given the limited economic diversity in Saipan during the review period and legal restrictions on land ownership, BOH is reasonably meeting community credit needs by extending an adequate number of consumer loans in the assessment area.

Consideration was also given to the bank's establishment of four special emergency loan programs to aid disaster recovery from Typhoon Soudelor, as follows:

1. An unsecured loan for emergency cash;
2. An unsecured loan to repair or replace living essentials;
3. An indirect automobile loan for damage to new or used vehicles; and
4. An extension for existing BOH customers who borrowed funds for Hurricane Iselle.

These loans included features such as, low interest rates, no payments for the first three months of repayment, fast approval and funding, terms of 24 to 60 months, and loan amounts of up to \$25,000. In addition, the bank also applied flexible terms to existing borrowers including automatic payment relief for six months after Typhoon Soudelor.

The geographic distribution of consumer loans is good. As shown on Tables 51-55, BOH's performance for secured and unsecured consumer loans is generally consistent with the geographic distribution of households. The level of secured and unsecured consumer loans when compared to the percentage of households is generally reasonable. Motor vehicle loans in moderate-income geographies during the

review period are significantly below the percentage of households; however, this performance is reasonable due to the low percentage of moderate-income geographies in the assessment area. Performance in distressed middle-income geographies was close to or exceeded the percentage of households for all consumer loan products. The level of secured consumer loans originated in moderate-income geographies substantially exceeded the number of households. Good performance was also seen in unsecured consumer loans where lending levels in moderate-income and distressed middle-income geographies exceeded or were comparable to the percentage of households.

Overall, the borrower distribution of consumer loans is good. As shown on Tables 56-60, the distribution of borrowers generally followed the percentage of households. Secured and unsecured consumer loans generally exceed the percentage of moderate-income households, but were below low-income households. Performance in motor vehicle loans was poor as lending levels were substantially below low- and moderate-income households. The special emergency loan programs bolstered performance in this criterion.

In addition, there is an adequate level of community development loans that helped retain jobs and develop affordable housing in the area. As shown in Table 50, BOH made eight community development loans totaling \$32.5 million that helped retain 396 jobs to low- and moderate-income individuals and created 40 affordable housing units. The loans supported the purchase of inventory and short-term working capital needs. Given the high unemployment rate and lack of affordable housing in Saipan, BOH's community development lending helped the economic stabilization and need for affordable housing of the assessment area.

Investment Test

BOH's performance under the investment test is high satisfactory. As shown on Table 61, BOH made high levels of community development investments totaling \$180,000 into the community during the review period. The majority of these investments provided economic development grants to small businesses in Saipan. Grants and donations were also made to a number of non-profit community-based organizations that provide essential services to low- and moderate-income individuals. The following summarizes community development investments in Saipan:

- A \$75,000 grant to fund an annual business development program. For three years, \$25,000 was awarded annually to five small businesses to promote economic stability and job creation in Saipan. BOH partnered with the CNMI Small Business Development Center to help select small business owners who would be recipients of these grants. Examples of grant recipients include a day care center, a retailer of Saipan made products, a crop farm, a fitness and nutrition center, and a commercial farming company.
- A \$40,000 grant to an organization that provides food, clothing and shelter to the homeless.
- A \$15,000 grant provided to a disaster relief organization.

Service Test

Performance under the service test is low satisfactory. This performance is attributable to adequate levels of community development services and the reasonable accessibility of retail banking delivery systems.

Retail Banking Services

BOH's retail delivery systems are reasonably accessible to the bank's geographies and individuals of different incomes. As shown on Table 62, BOH operates one branch in Saipan. This branch is located in a distressed middle-income census tract and has extended hours on Fridays and is open for four hours on Saturday. BOH's six ATMs are conveniently located throughout Saipan in retail and recreational establishments. Three of the ATMs are located in distressed, middle-income geographies and the remaining three are in upper-income geographies. BOH provides a full range of banking products and services such as 24-hour customer service, bank-by-phone, small business and large commercial services. There were two branches closed during the review period: one in a moderate-income census tract and one in an upper-income census tract. The branch closures did not generally adversely affect accessibility of BOH's delivery systems given the close proximity of ATMs and the relatively small land mass of Saipan. The two closed branches were replaced by a new branch. In addition, the new branch is open Saturdays when the previous two branches were open only during the work week.

Community Development Services

BOH provided an adequate level of community development services in Saipan. BOH employees provided 542 hours of community development services during the review period. The majority of community development service hours were comprised of 112 personal financial information presentations for 500 low-and moderate-income individuals covering such topics as budgeting, responsible use of credit, and building a positive credit history. Employees spent 398 hours providing financial information using the American Bankers Association (ABA) developed programs, "Get Smart about Credit" and "Teach Children to Save" and BOH developed "Smart Money" program. Other activities included participation in banker roundtables on how to respond to Typhoon Soudelor and providing technical assistance and fundraising for organizations serving low- and moderate-income individuals.

TERRITORY OF AMERICAN SAMOA

CRA Rating for American Samoa

Performance in American Samoa is rated "SATISFACTORY"

The lending test is rated: Not Applicable
The investment test is rated: High Satisfactory
The service test is rated: Low Satisfactory

The major factors supporting the institution's rating include:

- Significant levels of community development investments
- Adequate levels of community development services

Scope of Examination

As stated previously, BOH announced its intent to leave American Samoa's market in 2012. Since BOH is one of two financial institutions in American Samoa, the bank's departure would create a shortage of financial services. As such, for four years, BOH remained in American Samoa to serve the community until a new bank could enter the market. As a transitional step towards exiting the market, BOH converted the last remaining branch into an agency office on August 30, 2013. Under Hawaii state law, an agency office may accept deposits, but may not originate loans. The scope of the examination for American Samoa is generally consistent with the overall scope of the CRA examination, but excludes the lending test due to lending restrictions on agency offices in American Samoa. Prior to conversion of the branch into an agency office, BOH originated 114 consumer loans that included two motor vehicle loans, 32 credit cards, and 80 unsecured loans. While the scope of the bank's operations in the area is relatively small when compared to the organization's activities as a whole, BOH has a sizeable presence in this market where there is a limited number of organizations providing financial services. As such, a full-scope review was conducted in order to determine the overall rating for American Samoa.

Description of Operations in American Samoa

The American Samoa assessment area consists of the island of Tutuila (Island) in the U.S. Territory of American Samoa, located in the South Pacific Ocean approximately 2,300 miles southwest of Hawaii and 1,600 miles northeast of New Zealand. The capital of American Samoa is Pago Pago, located on Tutuila, the main island of the seven American Samoa islands.⁷³ In 2016, the Island had a population of 54,194.⁷⁴

BOH's operations in American Samoa are relatively small; however, as noted above, BOH does have a relatively large presence in this market with limited financial services. In 2016, there were only two FDIC-insured institutions operating three offices on the Island. BOH's one office on the Island had total

⁷³ U.S. Department of Labor, Wage and Hour Division, *Information on American Samoa Geography, History, Culture, Government, and Economics*. (accessed October 21, 2016); available from: <https://www.dol.gov/whd/as/sec2.htm#content>.

⁷⁴ CIA Factbook; available from: <https://www.cia.gov/library/publications/the-world-factbook/geos/aq.html>.

deposits of \$43.5 million which accounted for 27.4 percent of the deposit market share.⁷⁵ In 2015, only one bank on the Island reported small business loans pursuant to the reporting requirements of CRA; BOH reported no such loans.⁷⁶

As shown in Exhibit 11 below, 93.3 percent of the geographies in American Samoa are middle-income, according to the 2010 U.S. Census data. These middle-income geographies are designated distressed, non-metropolitan middle-income geographies due to high rates of poverty and unemployment.⁷⁷

EXHIBIT 11 ASSESSMENT AREA DEMOGRAPHICS AMERICAN SAMOA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,962	22.8
Moderate-income	0	0.0	0	0.0	0	0.0	1,525	17.7
Middle-income	14	93.3	7,750	90.1	4,302	55.5	1,521	17.7
Upper-income	1	6.7	855	9.9	370	43.3	3,597	41.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	15	100.0	8,605	100.0	4,672	54.3	8,605	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	9,525	6,323	92.4	66.4	2,129	22.4	1,073	11.3
Upper-income	1,055	521	7.6	49.4	427	40.5	107	10.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	10,580	6,844	100.0	64.7	2,556	24.2	1,180	11.2
2010 U.S. Census Median Family Income ⁷⁸			\$24,706		December 2015 Median Housing Value			N/A
2015 HUD Adjusted Median Family Income ⁷⁹			\$26,600		2015 Unemployment Rate ⁸⁰			9.2%

⁷⁵ Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2015; available from: <http://www2.fdic.gov/sod/sodMarketBank.asp?barItem=2>.

⁷⁶ Information based on 2015 aggregate data consisting of institutions required to file annual CRA data.

⁷⁷ FFIEC, Community Reinvestment Act, *Distressed and Underserved Tracts*; (accessed April 9, 2020), available from: <https://www.ffiec.gov/cra/distressed.htm>.

⁷⁸ FFIEC Estimated Family Median Income, *FFIEC US Census and FFIEC Estimated Median Family Income Report*, (accessed October 15, 2016), available from: <http://www.ffiec.gov/Medianincome.htm>.

⁷⁹ FFIEC Estimated Family Median Income, *FFIEC US Census and FFIEC Estimated Median Family Income Report*, (accessed October 15, 2016), available from: <http://www.ffiec.gov/Medianincom.htm>.

⁸⁰ GAO Highlights, March 2014 American Samoa and CNMI, *Economic Indicators Since Minimum Wage Increased Began page 8*, (accessed October 21, 2016), available from: <http://www.gao.gov/assets/670/662127.pdf>

American Samoa has a traditional Polynesian economy, and as such, over 90 percent of the Island's land is communally owned. Economic activity is strongly linked to the U.S. which is the Island's top trading partner. Tuna fishing and tuna canning represent the cornerstones of private sector employment and three tuna canneries alone accounted for 14 percent of total employment in 2012.⁸¹ The industry has seen some setbacks in recent years, as the closing of the Chicken of the Sea cannery in 2009 led to significant employment losses. The reduction in tuna industry employment was attributed in part to wage increases following the enactment of The Fair Minimum Wage Act of 2007 (Act), which sets minimum wage rates in American Samoa. The Act mandated annual minimum wage increases beginning in 2007 and continuing until American Samoa's minimum wage reaches the minimum wage generally applicable in the U.S. Two of the three employers in the tuna canning industry indicated that they have taken cost-cutting actions in recent years, including labor-and cost-saving strategies, to offset the increased hourly wage. Despite the impacts on the industry, more recently there have been slight signs of improvement in the tuna canning industry as another fishing company has begun limited operation in the area and purchased the old Chicken of the Sea facility.⁸²

The American Samoa government, which is the Island's largest employer, has also seen some negative impacts from the minimum wage increase. American Samoa government data shows the minimum wage increases have raised government payroll costs by approximately one percent over the implementation period, negatively affecting government employment levels. In addition, private sector officials indicate that the minimum wage enactment was one of a number of factors, including the high cost of goods and utilities, making it difficult to do business and hire workers in American Samoa. Although tourism has been an emerging industry in the assessment area, the number of visitors remains limited due to American Samoa's geographic isolation and lack of economic development.⁸³

On a positive note, small businesses in American Samoa benefited from both the American Recovery and Reinvestment Act of 2009 (ARRA), referred to as the Stimulus Bill, and the Small Business Jobs Act of 2010 (SBJA). The primary objective of the ARRA is to retain and create jobs, to provide temporary relief programs for those most impacted by the 2008-2009 recession, and to invest in infrastructure, education, health, and "green" energy. As result of the SBJA, the American Samoa Small Business Development Center (SBDC) was awarded funding to provide counseling, training, and technical assistance to American Samoa businesses aimed at job creation. In 2014, the American Samoa SBDC provided counseling services to 117 clients resulting in the establishment of 22 new businesses.⁸⁴

American Samoa was declared a federal disaster area following the September 2009 earthquake and tsunami which caused severe flooding across the island. The designation brought significant federal government support to the community for the repair or replacement of utilities, schools, hospitals, roads, and bridges and for temporary housing and rental assistance. As of September 2012, the Federal

⁸¹ GAO Highlights, March 2014 American Samoa and CNMI, *Economic Indicators Since Minimum Wage Increased Began page 8*, (accessed October 21, 2016), available from: <http://www.gao.gov/assets/670/662127.pdf>.

⁸² U.S. General Accountability Office, *American Samoa and Commonwealth of Northern Mariana Islands: Wages, Employment, Employer Actions and Worker Views Since Minimum Wage Increases Began*. U.S. Government Accountability Office (Pg. 6); available from: <http://www.gao.gov/assets/670/662127.pdf>.

⁸³ *Ibid* (pg. 49).

⁸⁴ American Samoa Small Business Development, *Annual Report, 2014*; available from: http://www.as-sbdc.org/data/pdf/AS_SBDC_Annual_Report_2014.pdf.

Emergency Management Agency (FEMA) had awarded \$100 million in post-tsunami disaster improvements in the assessment area. It is estimated that nearly 57.8 percent of the population in American Samoa lives below the national poverty line.⁸⁵

Community Development Needs

Conclusions about community development needs are primarily based on information received from community contacts, due to the lack of other publicly available data and information. Local sources indicate there is a need for more banks in American Samoa. As stated earlier, there are only two banks operating in this market. Aside from BOH, there is a local development bank, but it is not a consumer bank and thus cannot fully meet local banking and community needs. Financing for the development of affordable housing was also identified as a need. Similar to Saipan, there is no public housing in American Samoa and there is also no Section-8 voucher assistance. As mentioned above, 57.8 percent of American Samoa's population lives below the poverty rate, which far exceeds the U.S. rate of 15.1 percent. These high rates of poverty highlight the need to support organizations that provide essential services to the area's low- and moderate-income individuals.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN AMERICAN SAMOA

Investment Test

BOH's performance under the investment test is high satisfactory. As shown on Table 70, BOH provided 11 community development investments for \$150,000 during the review period. These investments benefited a number of small businesses by allowing them to expand and create new jobs in American Samoa. Grants and donations were also made to a number of non-profit community-based organizations serving low- and moderate-income individuals.

Since its inception in 2012, BOH has funded the BOH American Samoa Economic Development Grant Program to help stimulate small business development in American Samoa. Under this program, grants are provided to entrepreneurs to promote new businesses and encourage existing small businesses to expand. Applicants are provided with training through the American Samoa SBDC's Small Business Training Program or BOH's Smart Money small business financial education program. During the review period, BOH awarded a total of \$75,000 in grants to 15 small businesses. Examples of recipients of the \$5,000 grants include:

- A collaborative, community-based company that assists local artists with product development and marketing
- A producer and distributor of jam and nut products to purchase kitchen equipment and ingredients to expand the business
- A Persian and Puerto Rican fast food establishment to acquire equipment that will create two jobs

⁸⁵ GAO Highlights, March 2014 American Samoa and CNMI, *Economic Indicators Since Minimum Wage Increased Began page 45*, (accessed October 21, 2016), available from: <http://www.gao.gov/assets/670/662127.pdf>.

- A tattoo and t-shirt design business to purchase supplies and equipment that will create three jobs

Other grants include \$35,500 to an organization that provides long-term care to the elderly and disabled and \$39,500 to two youth organizations that provide services to youth from low- and moderate-income families.

Service Test

Performance under the service test is low satisfactory. This performance is attributable to adequate levels of community development services and the reasonable accessibility of retail banking delivery systems.

Retail Banking Services

BOH's retail delivery systems are reasonably accessible to essentially all portions of the assessment area. As shown on Table 71, BOH operated one agency office in American Samoa during the review period. The agency office and seven cash dispensing ATMs are located in middle-income geographies where over 90 percent of the population resides. In addition, ATMs are located throughout American Samoa at the local hospital and retail establishments. As noted earlier, all of the middle-income geographies in American Samoa are designated as distressed, non-metropolitan middle-income geographies due to high poverty rates and unemployment. The agency office provides services for existing BOH customers and no longer opens new deposit accounts or makes loans. It is comprised of a "Bank Lanai" consisting of two ATMs and a night depository, an e-Bankoh kiosk, and a branch concierge.

As mentioned earlier, BOH announced its intention to exit the American Samoa market in 2012. To mitigate the negative impact of the closure and loss of banking services, BOH management committed to the American Samoa government (ASG) to stay in the market until another bank could enter the area. In order to support the ASG's effort to identify an alternative bank, BOH management gifted all BOH assets in American Samoa to the ASG, including BOH's local buildings, equipment, ATMs, and a residential unit.⁸⁶

Community Development Services

BOH provides an adequate level of community development services. Bank employees continue to deliver financial information presentations for low-and moderate-income individuals covering such topics as budgeting, responsible use of credit, and building a positive credit history. The Bank provided financial education through programs, such as "SmartMoney" seminars, and ABA "Teach Children to Save" and "Get Smart About Credit." These programs are designed to strengthen the community and provide education on the importance of making smart personal finance decisions. During the review period, bank employees provided 93 services totaling 518 community development service hours that reached nearly 1,300 individuals.

⁸⁶ Joyetter Feagaimaalii-Luamanu, Pacific Islands Report, *Territorial Bank of American Samoa Opens Its Doors*, (accessed October 22, 2016), available from: <http://www.pireport.org/articles/2016/10/04/territorial-bank-american-samoa-opens-its-doors>.

Limited-Scope Assessment Area Conclusions

Bank of Hawaii’s performance in the assessment areas receiving a limited review is largely consistent with performance in Honolulu. Lending levels, lending within the assessment area, geographic and borrower distributions of loans followed lending patterns in Honolulu. The level of qualified community development investments and grants, as well as the degree of responsiveness to community credit and development needs, were largely consistent with Honolulu. However, investment test performance was below performance in Honolulu. Investment and grant levels in the Maui MSA were comparatively lower than levels in Hawaii Non-MSA, despite BOH having similar presence, deposit, and lending activity in the two assessment areas. The disparity in investment and grant levels is reasonable given the higher level of community needs and opportunities in the Hawaii Non-MSA assessment area compared to the Maui MSA. This disparity is particularly evident in Hawaii County, where housing values are roughly half the values in the Maui MSA and the unemployment rate is higher. In addition, family median income in the Non-MSA assessment area shrunk 8.4 percent in 2015 compared to 2010 figures. Service test performance in each of the limited scope assessment areas was comparable to performance in Honolulu with readily accessible retail delivery systems and high levels of community development services. Facts and data reviewed, including performance and demographic information, can be found in the tables accompanying this report.

EXHIBIT 12 LIMITED-SCOPE ASSESSMENT AREA CONCLUSIONS			
ASSESSMENT AREA(S)	LENDING TEST	INVESTMENT TEST	SERVICE TEST
Maui MSA	Consistent	Below	Consistent
Hawaii Non-MSA	Consistent	Consistent	Consistent

APPENDIX A

SCOPE OF EXAMINATION

Please refer to page 3 of this report for a discussion of the examination scope. The following chart is a supplement to that discussion and serves to illustrate the scope of the various states and assessment areas.

SCOPE OF EXAMINATION	
TIME PERIOD REVIEWED	January 1, 2013 – December 31, 2015 (Lending) January 1, 2013 – August 8, 2016 (Community Development)
FINANCIAL INSTITUTION	PRODUCTS REVIEWED
Bank of Hawaii Honolulu, Hawaii	<ul style="list-style-type: none"> – Home Mortgage (Purchase & Refinance) – Home Equity (Home Improvement, Home Equity, Multi-family) – Small Business (Small Business, Small Farm, Commercial Leases, Business Auto Leases) – Consumer (Motor Vehicle, Secured Consumer, Unsecured Consumer, Consumer Credit Cards, Other Consumer Loans, Consumer Auto Leases,)

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
Assessment Area	Type of Examination	Branches Visited	Other Information
Hawaii <ul style="list-style-type: none"> • Honolulu MSA • Maui MSA • Non-MSA 	<p style="text-align: center;">Full</p> <p style="text-align: center;">Limited</p> <p style="text-align: center;">Limited</p>	<p>1</p> <p>0</p> <p>0</p>	
Guam <ul style="list-style-type: none"> • Guam 	Full	0	
Saipan <ul style="list-style-type: none"> • Saipan 	Full	0	
American Samoa <ul style="list-style-type: none"> • American Samoa 	Full	0	

APPENDIX B

SUMMARY OF RATINGS

SUMMARY OF RATINGS				
STATE/TERRITORY	LENDING TEST RATING	INVESTMENT TEST RATING	SERVICE TEST RATING	OVERALL RATING
Hawaii	Outstanding	Outstanding	Outstanding	Outstanding
Guam	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Saipan	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
American Samoa	N/A	High Satisfactory	Low Satisfactory	Satisfactory

APPENDIX C

GLOSSARY OF TERMS

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small 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 their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language. Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

- (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 that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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 and community development 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, responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

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

Limited-scope review: Performance under the lending and community development 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.

APPENDIX D

LIMITED-SCOPE ASSESSMENT AREA MARKET PROFILES

All demographic and economic information in this appendix is from the following sources:

- U.S. Census, Quick Facts, Maui County, Hawaii, (accessed October 22, 2016), available from: <http://www.census.gov/quickfacts/table/PST045215/15009>.
- U.S. Census, Quick Facts, Hawaii County, Hawaii, (accessed October 22, 2016), available from: <http://www.census.gov/quickfacts/table/AGE115210/15001>.
- U.S. Census, Quick Facts, Kauai County, Hawaii, (accessed October 22, 2016), available from: <http://www.census.gov/quickfacts/table/PST045215/15007>.
- U.S. Census, Quick Facts, Kalawao County, Hawaii, (accessed October 22, 2016), available from:
- FDIC Deposit Market Share, June 30, 2016, (accessed October 22, 2016), available from: <http://www.census.gov/quickfacts/table/PST045215/15005>.
- FFIEC Estimated Family Median Income, *FFIEC Median Family Income Report*, (accessed October 15, 2016), available from: <http://www.ffiec.gov/Medianincome.htm>.
- Bureau of Labor Statistics, Labor force data by county, not seasonally adjusted, July 2015-August 2016; available from: <http://www.bls.gov/web/metro/laucntycur14.txt>.
- Maui Association of Realtors, Brief Maui Statistics Overview, (accessed October 22, 2016), available from: <http://www.ramaui.com/UserFiles/File/Stats/All-August2016.pdf>.
- Hawaii Association of Realtors, Market Info, *Statewide Real Estate Statistics, Hawaii and Kauai counties, August 2016*, (accessed October 23, 2016), available from: <https://www.hawaiiirealtors.com/MarketInfo>.

Maui Assessment Area

The Maui Assessment Area is comprised of Maui County and includes the Kahului-Wailuku-Lahaina MSA (Islands of Maui and Lanai, Molokai, and Kahoolawe). Maui County is the third most populated county in Hawaii, with an estimated population of 164,637 in 2015. The total land mass at 1,162 square miles is roughly one sixth of the land mass in the state of Hawaii. The island of Maui is the economic center and county government seat.

BOH has a significant presence in this competitive market for financial services. As of June 30, 2016, the bank's 12 offices held over \$1 billion in deposits with a 34.1 percent market share of the entire MSA. BOH ranks second out of seven FDIC-insured depository institutions, operating 38 offices and holding \$3.2 billion in total deposits within the MSA. Deposits are primarily concentrated in three financial institutions that collectively hold 86.5 percent of the market share in the MSA. In 2015, BOH was one of 165 mortgage lenders and 41 small business lenders operating within the assessment area that are subject to the reporting requirements of the CRA. These lenders extended 4,130 mortgage loans for \$1.8 billion and 4,218 small business loans for \$159 million. Reporting institutions represent only a portion of all institutions competing for home mortgage and small business lending in the assessment area.

Exhibit 13 on the following page, presents key demographic and business information used to help develop a performance context for the Maui assessment area, based on 2015 FFIEC U.S. Census and 2015 Dun and Bradstreet data.

EXHIBIT 13 ASSESSMENT AREA DEMOGRAPHICS MAUI ASSESSMENT AREA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	7,334	21.0
Moderate-income	6	15.0	5,143	14.7	576	11.2	6,025	17.2
Middle-income	21	52.5	21,643	61.9	1,312	6.1	7,768	22.2
Upper-income	8	20.0	8,163	23.4	230	2.8	13,822	39.5
Unknown-income	5	12.5	0	0.0	0	0.0	0	0.0
Total AA	40	100.0	34,949	100.0	2,118	6.1	34,949	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Moderate-income	11,897	3,969	13.2	33.4	4,497	37.8	3,431	28.8
Middle-income	39,665	18,488	61.3	46.6	12,213	30.8	8,964	22.6
Upper-income	16,972	7,710	25.6	45.4	4,471	26.3	4,791	28.2
Total AA	68,534	30,167	100.0	44.0	21,181	30.9	17,186	25.1
Income Categories	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Moderate-income	1,276	17.1	1,179	17.0	92	17.5	5	22.7
Middle-income	4,450	59.5	4,095	59.0	344	65.4	11	50.0
Upper-income	1,745	23.3	1,654	23.9	86	16.3	5	22.7
Unknown-income	12	0.2	7	0.1	4	0.8	1	4.5
Total AA	7,483	100.0	6,935	100.0	526	100.0	22	100.0
% of Total Businesses				92.7		7.0		0.3
2010 U.S. Census Median Family Income			\$74,307	August 2016 Median Housing Value			\$669,125	
2016 FFIEC Estimated Median Family Income			\$81,500	December 2015 Unemployment Rate			3.1%	

Data regarding Bank of Hawaii's deposits, loans, investments, and branches may be found in the Core Tables, under Appendix E.

Hawaii Non-MSA Assessment Area

The Hawaii Non-MSA Assessment Area is comprised of Hawaii County (island of Hawaii) and Kauai County (island of Kauai and Niihau).

- Hawaii County – Hawaii County is on the island of Hawaii and is the largest in terms of land mass of the six major islands and the second most populous with an estimated population of 196,428 in 2015. Despite having one of the higher population totals among the neighboring islands, Hawaii County is perceived to be relatively underdeveloped because of its vast land size of 4,028 square miles. Twenty middle-income geographies in Hawaii County were designated as distressed in 2013 and 2014, but the designation was removed in 2015. In accordance with the CRA Q&As, these census tracts were considered distressed during the review period in recognition of the one-year lag from the time the designation was removed. Hawaii County has the highest unemployment rate in the state and the median housing value is roughly half of the median value in Kauai.
- Kauai County – Kauai County includes the islands of Kauai and Niihau. Kauai is the fourth largest of the six major Hawaiian Islands at 620 square miles. Only a small portion of the island is developed, mostly in coastal areas, leaving the interior of the island reserved for agriculture and conservation. Kauai County's estimated 2015 population was 71,735.

BOH has a significant presence in this competitive market for financial services. As of June 30, 2016, the bank's 16 offices held over \$1.6 billion in deposits with a 37.7 percent market share of the entire Non-MSA area. BOH ranks second out of eight FDIC-insured depository institutions operating 53 offices and holding \$4.2 billion in total deposits within the MSA. Deposits are primarily concentrated in three financial institutions that collectively hold 87.9 percent of the market share in the MSA. In 2015, BOH was one of 178 mortgage lenders and 45 small business lenders operating within the assessment area that are subject to the reporting requirements of the CRA. These lenders extended 5,021 mortgage loans for \$1.8 billion and 5,192 small business loans for \$190 million. Reporting institutions represent only a portion of all institutions competing for home mortgage and small business lending in the assessment area.

Exhibit 14 on the following page presents key demographic and business information used to help develop a performance context for the Maui assessment area, based on 2015 FFIEC U.S. Census and 2015 Dun and Bradstreet data.

EXHIBIT 14 ASSESSMENT AREA DEMOGRAPHICS NON-MSA HAWAII ASSESSMENT AREA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	1.5	842	1.4	305	36.2	12,469	21.4
Moderate-income	10	14.9	12,265	21.1	2,246	18.3	9,736	16.7
Middle-income	29	43.3	36,887	63.4	2,580	7.0	12,701	21.8
Upper-income	6	9.0	8,219	14.1	291	3.5	23,307	40.0
Unknown-income	21	31.3	0	0.0	0	0.0	0	0.0
Total AA	67	100.0	58,213	100.0	5,422	9.3	58,213	100.0
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,125	568	1.0	26.7	1,301	61.2	256	12.0
Moderate-income	23,820	12,940	22.8	54.3	6,666	28.0	4,214	17.7
Middle-income	65,885	34,352	60.6	52.1	18,661	28.3	12,872	19.5
Upper-income	16,981	8,838	15.6	52.0	2,766	16.3	5,377	31.7
Total AA	108,811	56,698	100.0	52.1	29,394	27.0	22,719	20.9
Income Categories	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	473	5.5	437	5.5	35	5.0	1	4.2
Moderate-income	1,181	13.7	1,090	13.8	87	12.5	4	16.7
Middle-income	5,901	68.6	5,401	68.5	484	69.7	16	66.7
Upper-income	1,034	12.0	945	12.0	86	12.4	3	12.5
Unknown-income	15	0.2	13	0.2	2	0.3	0	0.0
Total AA	8,604	100.0	7,886	100.0	694	100.0	24	100.0
% of Total Businesses				91.7		8.1		0.3
2010 U.S. Census Median Family Income			\$66,247	August 2016 Median Housing Value Hawaii County Kauai County				\$355,000 \$617,500
2016 FFIEC Estimated Median Family Income			\$60,700	August 2016 Unemployment Rate Hawaii County Kauai County				4.1% 3.4%

APPENDIX E

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BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 1 - Lending Volume of Reported Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	% of Rated Area Loans	Small Business Loans		Small Farm Loans		All HMDA Loans		Community Development Loans ¹		Total Reported Loans		% of Rated Area Deposits
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<i>Full Scope</i>												
Honolulu	73.8	1,073	303,743	1	426	5,037	2,285,606	206	836,372	6,317	3,122,404	80.1
<i>Limited Scope</i>												
Maui	10.2	300	78,152	1	341	538	280,265	37	89,281	876	448,039	8.3
Non-MSA Hawaii	15.9	328	76,515	2	73	995	334,130	40	81,094	1,365	491,812	11.6
Statewide/Regional								56	184,726	56	184,726	

Table 1A - Lending Volume of Optional Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	% of Rated Area Loans	Home Equity		Motor Vehicle		Credit Card		Secured Consumer		Unsecured Consumer		Other Loans		Total Optional Loans	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	\$ (000's)	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)
<i>Full Scope</i>															
Honolulu	73.3	7,418	986,575	12,162	346,670	19,868	152,210	477	56,900	11,381	108,914	37	32,455	51,343	1,683,724
<i>Limited Scope</i>															
Maui	11.9	796	88,125	1,573	40,262	3,482	27,005	83	13,013	2,389	23,165	3	2,980	8,326	194,550
Non-MSA Hawaii	14.8	1,222	134,884	2,434	62,563	3,339	25,527	116	22,469	3,244	31,929	12	6,558	10,367	283,930

¹ Evaluation period: January 1, 2013 to August 8, 2016

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 1B - Lending Volume of Optional Leases

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	% of Rated Area Loans	Business Auto Leases		Consumer Auto Leases		Equipment Leases		Total Optional Leases	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)
<i>Full Scope</i>									
Honolulu	81.6	174	6,052	871	29,974	145	27,977	1,190	64,003
<i>Limited Scope</i>									
Maui	6.3	14	512	53	1,824	25	2,822	92	5,158
Non-MSA Hawaii	12.1	16	555	50	1,634	110	20,774	176	22,963

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 2 - Geographic Distribution of Small Business Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Honolulu 2013	339	63.6	2.9	4.2	47.2	35.9	34.2	35.8	15.6	24.1	3.3	31.7	37.0	27.9	2.6	2.1	3.8	2.4	1.4
Honolulu 2014	290	59.5	1.4	4.0	48.3	36.2	32.8	35.6	17.6	24.2	3.4	31.1	38.4	27.2	2.0	1.1	3.2	1.8	1.3
Honolulu 2015	350	59.6	0.9	4.2	45.4	36.3	31.4	35.0	22.3	24.5	2.9	29.6	38.8	28.8	1.9	0.9	2.9	1.5	1.4
<i>Limited Scope</i>																			
Maui 2013	105	19.7	0.0	0.0	9.5	14.7	74.3	60.0	16.2	25.3	0.0	9.9	62.8	27.3	3.5	0.0	3.4	4.1	2.3
Maui 2014	87	17.9	0.0	0.0	18.4	18.2	65.5	58.4	16.1	23.4	0.0	13.8	61.2	25.0	3.0	0.0	3.8	3.1	2.4
Maui 2015	108	18.4	0.0	0.0	13.0	17.1	66.7	59.6	20.4	23.4	0.0	13.8	61.9	24.3	2.8	0.0	2.9	2.9	2.3
Non-MSA Hawaii 2013	89	16.7	4.5	5.2	15.7	14.3	76.4	70.6	3.4	9.9	2.8	12.2	74.4	10.5	2.6	5.6	3.2	2.6	1.3
Non-MSA Hawaii 2014	110	22.6	4.5	5.5	9.1	13.9	80.0	68.7	6.4	11.9	2.5	11.0	70.9	15.6	2.8	5.9	2.2	3.2	1.1
Non-MSA Hawaii 2015	129	22.0	3.9	5.5	16.3	13.8	72.1	68.7	7.8	12.0	2.6	11.1	70.4	16.0	2.7	5.3	3.8	2.8	1.3

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 3 - Geographic Distribution of Small Farm Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Farm Entities (%)	Bank Loans (%)	Farm Entities (%)	Bank Loans (%)	Farm Entities (%)	Bank Loans (%)	Farm Entities (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Honolulu 2013	1	100.0	0.0	1.4	0.0	20.6	100.0	55.4	0.0	22.6	0.0	12.5	50.0	37.5	6.3	0.0	0.0	12.5	0.0
Honolulu 2014	0	0.0	0.0	1.1	0.0	23.7	0.0	54.8	0.0	20.4	0.0	17.6	52.9	29.4	0.0	0.0	0.0	0.0	0.0
Honolulu 2015	0	0.0	0.0	1.1	0.0	26.6	0.0	52.2	0.0	20.1	5.6	22.2	33.3	38.9	0.0	0.0	0.0	0.0	0.0
<i>Limited Scope</i>																			
Maui 2013	0	0.0	0.0	0.0	0.0	16.9	0.0	43.5	0.0	39.6	0.0	13.3	20.0	66.7	0.0	0.0	0.0	0.0	0.0
Maui 2014	0	0.0	0.0	0.0	0.0	15.1	0.0	51.8	0.0	33.2	0.0	9.1	36.4	54.5	0.0	0.0	0.0	0.0	0.0
Maui 2015	1	100.0	0.0	0.0	0.0	15.9	100.0	50.0	0.0	34.1	0.0	0.0	41.2	58.8	5.9	0.0	0.0	14.3	0.0
Non-MSA Hawaii 2013	0	0.0	0.0	0.9	0.0	19.6	0.0	73.5	0.0	6.1	0.0	8.3	87.5	4.2	0.0	0.0	0.0	0.0	0.0
Non-MSA Hawaii 2014	2	100.0	0.0	1.0	0.0	20.6	100.0	70.6	0.0	7.7	0.0	13.3	83.3	3.3	6.7	0.0	0.0	8.0	0.0
Non-MSA Hawaii 2015	0	0.0	0.0	1.2	0.0	21.1	0.0	69.9	0.0	7.9	2.6	10.5	78.9	7.9	0.0	0.0	0.0	0.0	0.0

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 4 - Geographic Distribution of Commercial Leases

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)
<i>Full Scope</i>										
Honolulu 2013	31	34.4	9.7	4.2	38.7	35.9	35.5	35.8	16.1	24.1
Honolulu 2014	34	45.3	2.9	4.0	58.8	36.2	35.3	35.6	2.9	24.2
Honolulu 2015	45	56.3	6.7	4.2	44.4	36.3	46.7	35.0	2.2	24.5
<i>Limited Scope</i>										
Maui 2013	4	4.4	0.0	0.0	0.0	14.7	100.0	60.0	0.0	25.3
Maui 2014	10	13.3	0.0	0.0	0.0	18.2	100.0	58.4	0.0	23.4
Maui 2015	11	13.8	0.0	0.0	18.2	17.1	81.8	59.6	0.0	23.4
Non-MSA Hawaii 2013	55	61.1	0.0	5.2	0.0	14.3	90.9	70.6	9.1	9.9
Non-MSA Hawaii 2014	31	41.3	0.0	5.5	29.0	13.9	61.3	68.7	9.7	11.9
Non-MSA Hawaii 2015	24	30.0	0.0	5.5	20.8	13.8	62.5	68.7	16.7	12.0

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 5 - Geographic Distribution of Business Auto Leases

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)
<i>Full Scope</i>										
Honolulu 2013	31	77.5	6.5	4.2	38.7	35.9	45.2	35.8	9.7	24.1
Honolulu 2014	76	91.6	2.6	4.0	53.9	36.2	25.0	35.6	18.4	24.2
Honolulu 2015	62	81.6	1.6	4.2	48.4	36.3	27.4	35.0	22.6	24.5
<i>Limited Scope</i>										
Maui 2013	3	7.5	0.0	0.0	33.3	14.7	0.0	60.0	66.7	25.3
Maui 2014	3	3.6	0.0	0.0	33.3	18.2	33.3	58.4	33.3	23.4
Maui 2015	8	10.5	0.0	0.0	12.5	17.1	50.0	59.6	37.5	23.4
Non-MSA Hawaii 2013	6	15.0	33.3	5.2	16.7	14.3	50.0	70.6	0.0	9.9
Non-MSA Hawaii 2014	4	4.8	0.0	5.5	50.0	13.9	25.0	68.7	25.0	11.9
Non-MSA Hawaii 2015	6	7.9	0.0	5.5	33.3	13.8	66.7	68.7	0.0	12.0

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 6 - Geographic Distribution of Home Purchase Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Honolulu 2013	445	72.2	0.7	1.1	20.9	13.2	38.2	46.6	40.2	39.1	1.1	15.3	52.7	30.9	4.8	2.8	6.5	3.5	6.2
Honolulu 2014	642	76.9	1.2	1.1	15.1	13.2	49.7	46.6	34.0	39.1	2.6	13.4	54.1	29.9	6.8	3.3	7.7	6.3	7.7
Honolulu 2015	810	81.3	2.1	1.1	15.4	13.2	58.0	46.6	24.4	39.1	1.7	13.3	56.8	28.2	7.8	9.6	9.0	7.9	6.7
<i>Limited Scope</i>																			
Maui 2013	41	6.7	0.0	0.0	4.9	11.0	65.9	59.0	29.3	30.0	0.0	5.3	58.0	36.7	2.4	0.0	2.2	2.0	3.0
Maui 2014	45	5.4	0.0	0.0	13.3	13.2	53.3	61.3	33.3	25.6	0.0	11.5	58.4	30.1	2.8	0.0	3.2	2.5	3.1
Maui 2015	58	5.8	0.0	0.0	8.6	13.2	62.1	61.3	29.3	25.6	0.0	11.7	62.8	25.5	3.1	0.0	2.3	3.1	3.6
Non-MSA Hawaii 2013	130	21.1	0.0	1.0	15.4	22.8	70.0	64.6	14.6	11.6	0.5	19.7	63.5	16.4	5.4	0.0	4.2	6.2	3.8
Non-MSA Hawaii 2014	148	17.7	2.0	1.0	16.2	22.8	58.1	60.6	23.6	15.6	0.6	23.8	54.1	21.5	6.2	21.4	4.2	6.6	6.8
Non-MSA Hawaii 2015	128	12.9	0.0	1.0	17.2	22.8	64.8	60.6	18.0	15.6	0.5	21.3	54.7	23.5	5.1	0.0	4.1	6.1	3.9

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 7 - Geographic Distribution of Home Mortgage Refinance Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Honolulu 2013	1,456	75.7	0.6	1.1	8.1	13.2	45.1	46.6	46.2	39.1	0.8	9.9	48.7	40.6	7.6	6.1	6.3	7.1	8.7
Honolulu 2014	424	73.1	1.2	1.1	9.2	13.2	46.7	46.6	42.9	39.1	1.0	10.1	51.0	37.9	5.8	7.1	5.3	5.3	6.6
Honolulu 2015	815	76.7	0.6	1.1	12.1	13.2	41.0	46.6	46.3	39.1	0.6	9.7	50.6	39.1	7.2	7.1	9.0	5.8	8.5
<i>Limited Scope</i>																			
Maui 2013	183	9.5	0.0	0.0	9.3	11.0	63.4	59.0	27.3	30.0	0.0	6.0	57.9	36.1	5.8	0.0	6.4	6.2	5.2
Maui 2014	67	11.6	0.0	0.0	11.9	13.2	59.7	61.3	28.4	25.6	0.0	10.4	61.0	28.6	5.1	0.0	5.8	5.0	5.0
Maui 2015	98	9.2	0.0	0.0	15.3	13.2	62.2	61.3	22.4	25.6	0.0	9.2	61.5	29.2	5.2	0.0	8.6	5.2	4.0
Non-MSA Hawaii 2013	284	14.8	1.1	1.0	15.5	22.8	68.3	64.6	15.1	11.6	0.5	17.4	68.3	13.8	6.8	14.3	6.1	7.2	5.5
Non-MSA Hawaii 2014	89	15.3	0.0	1.0	15.7	22.8	70.8	60.6	13.5	15.6	0.5	19.3	59.6	20.5	4.9	0.0	4.0	5.8	3.2
Non-MSA Hawaii 2015	149	14.0	1.3	1.0	17.4	22.8	69.8	60.6	11.4	15.6	0.7	15.7	62.6	21.0	6.5	11.8	7.2	7.2	3.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 8 - Geographic Distribution of Home Improvement Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Bank Loans (%)	Owner Occ Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Honolulu 2013	181	79.7	0.6	1.1	9.4	13.2	38.7	46.6	51.4	39.1	0.4	6.5	49.4	43.6	5.4	6.7	7.7	4.2	6.3
Honolulu 2014	73	79.3	0.0	1.1	8.2	13.2	47.9	46.6	43.8	39.1	0.5	8.2	51.3	40.0	3.7	0.0	3.7	3.5	4.1
Honolulu 2015	141	82.0	0.0	1.1	6.4	13.2	41.8	46.6	51.8	39.1	0.4	6.7	50.9	42.0	5.6	0.0	5.3	4.6	6.9
<i>Limited Scope</i>																			
Maui 2013	15	6.6	0.0	0.0	20.0	11.0	46.7	59.0	33.3	30.0	0.0	8.2	59.6	32.2	7.2	0.0	11.8	5.6	9.0
Maui 2014	7	7.6	0.0	0.0	42.9	13.2	14.3	61.3	42.9	25.6	0.0	7.7	66.7	25.6	2.6	0.0	14.3	0.5	4.3
Maui 2015	14	8.1	0.0	0.0	7.1	13.2	64.3	61.3	28.6	25.6	0.0	8.0	59.0	33.0	4.0	0.0	3.6	4.3	3.4
Non-MSA Hawaii 2013	31	13.7	0.0	1.0	9.7	22.8	64.5	64.6	25.8	11.6	0.0	18.0	67.4	14.7	9.3	0.0	5.0	8.9	16.3
Non-MSA Hawaii 2014	12	13.0	0.0	1.0	8.3	22.8	75.0	60.6	16.7	15.6	0.0	21.1	63.7	15.3	6.3	0.0	2.5	7.4	6.9
Non-MSA Hawaii 2015	17	9.9	0.0	1.0	11.8	22.8	76.5	60.6	11.8	15.6	0.5	11.7	71.4	16.4	8.0	0.0	8.0	8.6	5.7

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 9 - Geographic Distribution of Home Equity Lines of Credit

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)
<i>Full Scope</i>										
Honolulu 2013	2,571	80.8	0.9	1.1	9.6	13.2	40.0	46.6	49.5	39.1
Honolulu 2014	2,092	77.4	0.9	1.1	10.0	13.2	41.8	46.6	47.3	39.1
Honolulu 2015	2,753	77.5	1.2	1.1	10.0	13.2	41.3	46.6	47.5	39.1
<i>Limited Scope</i>										
Maui 2013	220	6.9	0.0	0.0	5.9	11.0	62.3	59.0	31.8	30.0
Maui 2014	250	9.2	0.0	0.0	8.8	13.2	60.8	61.3	30.4	25.6
Maui 2015	326	9.2	0.0	0.0	11.7	13.2	57.1	61.3	31.3	25.6
Non-MSA Hawaii 2013	389	12.2	0.3	1.0	13.1	22.8	74.3	64.6	12.3	11.6
Non-MSA Hawaii 2014	361	13.4	0.0	1.0	16.6	22.8	70.1	60.6	13.3	15.6
Non-MSA Hawaii 2015	472	13.3	0.6	1.0	14.2	22.8	69.1	60.6	16.1	15.6

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 10 - Geographic Distribution of Multifamily Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Bank Loans (%)	Multifamily Units (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Honolulu 2013	17	73.9	0.0	6.1	82.4	39.4	17.6	41.7	0.0	12.8	0.9	63.7	31.9	3.5	15.0	0.0	19.4	8.3	0.0
Honolulu 2014	10	66.7	0.0	6.1	70.0	39.4	30.0	41.7	0.0	12.8	6.5	59.8	29.9	3.7	9.3	0.0	10.9	9.4	0.0
Honolulu 2015	23	79.3	4.3	6.1	43.5	39.4	39.1	41.7	13.0	12.8	5.5	64.1	26.6	3.9	18.0	14.3	12.2	26.5	60.0
<i>Limited Scope</i>																			
Maui 2013	3	13.0	0.0	0.0	0.0	11.2	100.0	63.8	0.0	25.0	0.0	0.0	100.0	0.0	50.0	0.0	0.0	50.0	0.0
Maui 2014	4	26.7	0.0	0.0	25.0	21.8	75.0	53.7	0.0	24.5	0.0	33.3	50.0	16.7	66.7	0.0	50.0	100.0	0.0
Maui 2015	3	10.3	0.0	0.0	0.0	21.8	33.3	53.7	66.7	24.5	0.0	16.7	33.3	50.0	50.0	0.0	0.0	50.0	66.7
Non-MSA Hawaii 2013	3	13.0	0.0	4.7	0.0	8.4	100.0	67.9	0.0	19.0	27.3	0.0	72.7	0.0	27.3	0.0	0.0	37.5	0.0
Non-MSA Hawaii 2014	1	6.7	0.0	4.7	0.0	8.4	100.0	67.0	0.0	19.9	0.0	25.0	50.0	25.0	12.5	0.0	0.0	25.0	0.0
Non-MSA Hawaii 2015	3	10.3	0.0	4.7	33.3	8.4	66.7	67.0	0.0	19.9	0.0	30.0	60.0	10.0	30.0	0.0	33.3	33.3	0.0

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 11 - Geographic Distribution of Motor Vehicle Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Honolulu 2013	3,339	78.2	7.2	3.2	30.7	24.7	43.0	43.7	19.1	28.4
Honolulu 2014	4,145	75.4	6.1	3.2	28.7	24.7	46.2	43.7	19.0	28.4
Honolulu 2015	4,657	73.0	5.1	3.2	26.9	24.7	46.2	43.7	21.9	28.4
<i>Limited Scope</i>										
Maui 2013	359	8.4	0.0	0.0	9.5	13.1	63.0	60.1	27.6	26.8
Maui 2014	498	9.1	0.0	0.0	13.7	16.5	64.3	59.8	22.1	23.7
Maui 2015	716	11.2	0.0	0.0	12.4	16.5	62.2	59.8	25.4	23.7
Non-MSA Hawaii 2013	574	13.4	1.9	2.2	23.0	22.8	66.4	64.8	8.7	10.2
Non-MSA Hawaii 2014	855	15.6	2.3	2.2	24.4	22.8	59.3	61.6	13.9	13.5
Non-MSA Hawaii 2015	1,005	15.8	1.6	2.2	24.8	22.8	58.9	61.6	14.7	13.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 12 - Geographic Distribution of Secured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Honolulu 2013	124	79.5	3.2	3.2	29.0	24.7	44.4	43.7	23.4	28.4
Honolulu 2014	172	68.0	7.0	3.2	26.7	24.7	37.8	43.7	28.5	28.4
Honolulu 2015	181	67.8	8.3	3.2	24.9	24.7	32.6	43.7	34.3	28.4
<i>Limited Scope</i>										
Maui 2013	14	9.0	0.0	0.0	35.7	13.1	57.1	60.1	7.1	26.8
Maui 2014	30	11.9	0.0	0.0	16.7	16.5	63.3	59.8	20.0	23.7
Maui 2015	39	14.6	0.0	0.0	5.1	16.5	66.7	59.8	28.2	23.7
Non-MSA Hawaii 2013	18	11.5	0.0	2.2	16.7	22.8	72.2	64.8	11.1	10.2
Non-MSA Hawaii 2014	51	20.2	0.0	2.2	23.5	22.8	66.7	61.6	9.8	13.5
Non-MSA Hawaii 2015	47	17.6	0.0	2.2	8.5	22.8	78.7	61.6	12.8	13.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 13 - Geographic Distribution of Unsecured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Honolulu 2013	3,808	68.3	3.0	3.2	22.9	24.7	48.9	43.7	25.2	28.4
Honolulu 2014	3,654	65.4	2.7	3.2	21.6	24.7	49.3	43.7	26.4	28.4
Honolulu 2015	3,905	66.9	2.3	3.2	21.7	24.7	50.5	43.7	25.5	28.4
<i>Limited Scope</i>										
Maui 2013	742	13.3	0.0	0.0	14.7	13.1	57.5	60.1	27.8	26.8
Maui 2014	831	14.9	0.0	0.0	14.6	16.5	60.6	59.8	24.8	23.7
Maui 2015	816	14.0	0.0	0.0	16.7	16.5	58.3	59.8	25.0	23.7
Non-MSA Hawaii 2013	1,024	18.4	1.1	2.2	27.3	22.8	64.0	64.8	7.6	10.2
Non-MSA Hawaii 2014	1,105	19.8	1.1	2.2	28.9	22.8	61.2	61.6	8.9	13.5
Non-MSA Hawaii 2015	1,115	19.1	2.1	2.2	28.0	22.8	58.8	61.6	11.1	13.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 14 - Geographic Distribution of Consumer Credit Cards

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Honolulu 2013	8,242	75.0	2.5	3.2	19.6	24.7	46.0	43.7	31.9	28.4
Honolulu 2014	5,975	74.9	3.0	3.2	20.7	24.7	46.0	43.7	30.3	28.4
Honolulu 2015	5,636	73.1	2.6	3.2	19.0	24.7	48.5	43.7	30.0	28.4
<i>Limited Scope</i>										
Maui 2013	1,386	12.6	0.0	0.0	12.2	13.1	63.2	60.1	24.6	26.8
Maui 2014	1,025	12.8	0.0	0.0	19.0	16.5	56.2	59.8	24.8	23.7
Maui 2015	1,071	13.9	0.0	0.0	18.4	16.5	59.0	59.8	22.6	23.7
Non-MSA Hawaii 2013	1,359	12.4	1.1	2.2	18.5	22.8	73.1	64.8	7.3	10.2
Non-MSA Hawaii 2014	980	12.3	1.8	2.2	24.1	22.8	64.6	61.6	9.5	13.5
Non-MSA Hawaii 2015	1,000	13.0	1.5	2.2	24.7	22.8	62.1	61.6	11.7	13.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 15- Geographic Distribution of Other Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Honolulu 2013	37	71.2	0.0	3.2	10.8	24.7	24.3	43.7	64.9	28.4
Honolulu 2014	0	0.0	0.0	3.2	0.0	24.7	0.0	43.7	0.0	28.4
Honolulu 2015	0	0.0	0.0	3.2	0.0	24.7	0.0	43.7	0.0	28.4
<i>Limited Scope</i>										
Maui 2013	3	5.8	0.0	0.0	0.0	13.1	100.0	60.1	0.0	26.8
Maui 2014	0	0.0	0.0	0.0	0.0	16.5	0.0	59.8	0.0	23.7
Maui 2015	0	0.0	0.0	0.0	0.0	16.5	0.0	59.8	0.0	23.7
Non-MSA Hawaii 2013	12	23.1	0.0	2.2	8.3	22.8	83.3	64.8	8.3	10.2
Non-MSA Hawaii 2014	0	0.0	0.0	2.2	0.0	22.8	0.0	61.6	0.0	13.5
Non-MSA Hawaii 2015	0	0.0	0.0	2.2	0.0	22.8	0.0	61.6	0.0	13.4

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 16 - Geographic Distribution of Consumer Auto Leases

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Honolulu 2013	139	85.8	2.2	3.2	14.4	24.7	28.8	43.7	54.7	28.4
Honolulu 2014	272	91.0	0.7	3.2	14.0	24.7	37.1	43.7	48.2	28.4
Honolulu 2015	459	89.6	1.1	3.2	13.9	24.7	42.9	43.7	42.0	28.4
<i>Limited Scope</i>										
Maui 2013	9	5.6	0.0	0.0	0.0	13.1	33.3	60.1	66.7	26.8
Maui 2014	10	3.3	0.0	0.0	10.0	16.5	40.0	59.8	50.0	23.7
Maui 2015	34	6.6	0.0	0.0	5.9	16.5	64.7	59.8	29.4	23.7
Non-MSA Hawaii 2013	14	8.6	0.0	2.2	0.0	22.8	85.7	64.8	14.3	10.2
Non-MSA Hawaii 2014	17	5.7	5.9	2.2	5.9	22.8	70.6	61.6	17.6	13.5
Non-MSA Hawaii 2015	19	3.7	0.0	2.2	21.1	22.8	63.2	61.6	15.8	13.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 17 - Borrower Distribution of Small Business Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Small Business Loans		Businesses with Revenue <= \$1 Million		Originations Regardless of Revenue Size			Aggregate Lending (%)		Market Share (%)	
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Businesses (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million	All Loans	Loans to Revenue <= \$1 Million (%)	All Loans	Loans to Revenue <= \$1 Million (%)
<i>Full Scope</i>											
Honolulu 2013	364	65.2	30.2	87.4	39.8	26.1	34.1	15,050	51.8	2.7	1.6
Honolulu 2014	318	61.7	23.3	86.6	36.5	26.1	37.4	16,482	48.3	2.1	1.2
Honolulu 2015	391	62.3	21.2	88.8	35.3	26.6	38.1	20,201	54.0	2.1	0.9
<i>Limited Scope</i>											
Maui 2013	105	18.8	34.3	90.4	43.8	26.7	29.5	3,306	59.2	3.5	2.2
Maui 2014	87	16.9	25.3	90.1	37.9	20.7	41.4	3,463	55.8	3.0	1.5
Maui 2015	108	17.2	23.1	92.7	43.5	22.2	34.3	4,218	57.7	2.8	1.1
Non-MSA Hawaii 2013	89	15.9	41.6	90.2	38.2	31.5	30.3	3,775	57.5	2.6	1.8
Non-MSA Hawaii 2014	110	21.4	34.5	89.4	48.2	26.4	25.5	4,092	54.8	2.8	1.7
Non-MSA Hawaii 2015	129	20.5	20.2	91.7	37.2	28.7	34.1	5,192	56.7	2.7	1.1

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 18 - Borrower Distribution of Small Farm Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Small Farm Loans		Farms with Revenue <= \$1 Million		Originations Regardless of Revenue Size			Aggregate Lending (%)		Market Share (%)	
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Farms (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million	All Loans	Loans to Revenue <= \$1 Million (%)	All Loans	Loans to Revenue <= \$1 Million (%)
<i>Full Scope</i>											
Honolulu 2013	1	100.0	100.0	94.3	0.0	0.0	100.0	16	56.3	6.3	11.1
Honolulu 2014	0	0.0	0.0	95.2	0.0	0.0	0.0	18	61.1	0.0	0.0
Honolulu 2015	0	0.0	0.0	94.9	0.0	0.0	0.0	18	72.2	0.0	0.0
<i>Limited Scope</i>											
Maui 2013	0	0.0	0.0	93.2	0.0	0.0	0.0	15	60.0	0.0	0.0
Maui 2014	0	0.0	0.0	95.0	0.0	0.0	0.0	11	36.4	0.0	0.0
Maui 2015	1	100.0	0.0	96.6	0.0	0.0	100.0	17	23.5	5.9	0.0
Non-MSA Hawaii 2013	0	0.0	0.0	93.3	0.0	0.0	0.0	24	62.5	0.0	0.0
Non-MSA Hawaii 2014	2	100.0	100.0	92.6	100.0	0.0	0.0	30	56.7	6.7	11.8
Non-MSA Hawaii 2015	0	0.0	0.0	92.6	0.0	0.0	0.0	38	57.9	0.0	0.0

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Rated Area: State of Hawaii

Table 19 - Borrower Distribution of Commercial Leases

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Small Farm Loans		Farms with Revenue <= \$1 Million		Originations Regardless of Revenue Size		
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Businesses (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million
<i>Full Scope</i>							
Honolulu 2013	31	34.4	4.3	87.4	74.5	17.0	4.3
Honolulu 2014	34	45.3	9.5	86.6	69.0	16.7	11.9
Honolulu 2015	45	56.3	3.6	88.8	71.4	14.3	7.1
<i>Limited Scope</i>							
Maui 2013	4	4.4	0.0	90.4	75.0	0.0	25.0
Maui 2014	10	13.3	0.0	90.1	100.0	0.0	0.0
Maui 2015	11	13.8	0.0	92.7	81.8	0.0	18.2
Non-MSA Hawaii 2013	55	61.1	1.8	90.2	58.2	21.8	16.4
Non-MSA Hawaii 2014	31	41.3	6.5	89.4	67.7	12.9	12.9
Non-MSA Hawaii 2015	24	30.0	0.0	91.7	79.2	4.2	12.5

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Rated Area: State of Hawaii

Table 20 - Borrower Distribution of Business Auto Leases

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Small Farm Loans		Farms with Revenue <= \$1 Million		Originations Regardless of Revenue Size		
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Businesses (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million
<i>Full Scope</i>							
Honolulu 2013	31	77.5	0.0	87.4	100.0	0.0	0.0
Honolulu 2014	76	91.6	0.0	86.6	100.0	0.0	0.0
Honolulu 2015	62	81.6	0.0	88.8	100.0	0.0	0.0
<i>Limited Scope</i>							
Maui 2013	3	7.5	0.0	90.4	100.0	0.0	0.0
Maui 2014	3	3.6	0.0	90.1	100.0	0.0	0.0
Maui 2015	8	10.5	0.0	92.7	100.0	0.0	0.0
Non-MSA Hawaii 2013	6	15.0	0.0	90.2	100.0	0.0	0.0
Non-MSA Hawaii 2014	4	4.8	0.0	89.4	100.0	0.0	0.0
Non-MSA Hawaii 2015	6	7.9	0.0	91.7	100.0	0.0	0.0

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Rated Area: State of Hawaii

Table 21 - Borrower Distribution of Home Purchase Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Honolulu 2013	427	71.6	4.0	19.8	13.8	18.2	23.4	22.8	58.8	39.2	4.4	17.2	31.5	46.9	4.9	4.5	4.0	3.7	6.2
Honolulu 2014	610	76.3	1.6	19.8	11.1	18.2	17.4	22.8	69.8	39.2	2.7	12.6	28.0	56.7	7.4	4.5	6.6	4.6	9.1
Honolulu 2015	770	81.4	2.3	19.8	12.2	18.2	23.1	22.8	62.3	39.2	2.9	12.9	32.1	52.1	8.3	6.6	7.9	6.0	10.0
<i>Limited Scope</i>																			
Maui 2013	40	6.7	0.0	19.5	12.5	16.2	12.5	21.2	75.0	43.0	1.5	8.4	18.7	71.4	2.5	0.0	3.7	1.7	2.6
Maui 2014	43	5.4	2.3	21.0	11.6	17.2	14.0	22.2	72.1	39.5	3.3	12.0	22.2	62.5	3.0	2.1	2.9	1.9	3.4
Maui 2015	52	5.5	0.0	21.0	9.6	17.2	15.4	22.2	75.0	39.5	1.6	9.9	24.4	64.2	3.1	0.0	3.0	2.0	3.6
Non-MSA Hawaii 2013	129	21.6	3.9	23.1	11.6	17.7	21.7	22.6	62.8	36.7	3.8	12.9	22.4	60.8	5.7	5.8	5.2	5.5	5.9
Non-MSA Hawaii 2014	147	18.4	0.0	21.4	4.1	16.7	15.0	21.8	81.0	40.0	2.5	8.7	20.6	68.2	7.3	0.0	3.4	5.3	8.6
Non-MSA Hawaii 2015	124	13.1	1.6	21.4	6.5	16.7	20.2	21.8	71.8	40.0	2.7	10.0	23.4	63.9	5.6	3.4	3.6	4.8	6.3

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Rated Area: State of Hawaii

Table 22 - Borrower Distribution of Home Mortgage Refinance Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Honolulu 2013	1,407	75.2	6.0	19.8	17.1	18.2	26.7	22.8	50.3	39.2	6.9	17.4	29.2	46.4	8.9	7.6	8.7	8.1	9.6
Honolulu 2014	415	73.1	2.9	19.8	14.7	18.2	25.5	22.8	56.9	39.2	6.1	16.1	27.3	50.5	7.3	3.4	6.7	6.9	8.2
Honolulu 2015	765	75.9	3.4	19.8	12.3	18.2	26.1	22.8	58.2	39.2	4.6	14.9	29.6	51.0	9.1	6.8	7.5	8.1	10.4
<i>Limited Scope</i>																			
Maui 2013	181	9.7	2.2	19.5	11.6	16.2	23.8	21.2	62.4	43.0	4.5	11.6	23.3	60.6	6.4	3.1	6.4	6.5	6.6
Maui 2014	64	11.3	7.8	21.0	9.4	17.2	23.4	22.2	59.4	39.5	9.4	15.6	24.4	50.6	5.4	4.5	3.3	5.2	6.4
Maui 2015	96	9.5	2.1	21.0	14.6	17.2	30.2	22.2	53.1	39.5	4.5	15.1	28.1	52.3	5.9	2.7	5.7	6.4	6.0
Non-MSA Hawaii 2013	284	15.2	3.2	23.1	17.6	17.7	23.2	22.6	56.0	36.7	7.6	15.6	23.1	53.7	7.6	3.2	8.6	7.6	7.9
Non-MSA Hawaii 2014	89	15.7	5.6	21.4	12.4	16.7	20.2	21.8	61.8	40.0	6.7	13.4	22.7	57.2	5.5	4.6	5.1	4.9	5.9
Non-MSA Hawaii 2015	147	14.6	2.7	21.4	11.6	16.7	23.1	21.8	62.6	40.0	4.5	13.5	23.5	58.5	7.5	4.5	6.5	7.4	8.1

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Rated Area: State of Hawaii

Table 23 - Borrower Distribution of Home Improvement Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Honolulu 2013	172	78.9	8.1	19.8	16.3	18.2	25.6	22.8	50.0	39.2	5.8	15.5	27.5	51.1	5.3	7.4	5.6	4.9	5.2
Honolulu 2014	69	79.3	4.3	19.8	13.0	18.2	27.5	22.8	55.1	39.2	9.7	14.5	25.3	50.6	3.6	1.6	3.2	3.9	3.9
Honolulu 2015	134	81.2	2.2	19.8	15.7	18.2	24.6	22.8	57.5	39.2	9.1	13.2	26.7	51.1	5.5	1.3	6.5	5.0	6.1
<i>Limited Scope</i>																			
Maui 2013	15	6.9	0.0	19.5	20.0	16.2	33.3	21.2	46.7	43.0	5.0	13.0	21.5	60.5	7.5	0.0	11.5	11.6	5.8
Maui 2014	7	8.0	0.0	21.0	0.0	17.2	0.0	22.2	100.0	39.5	4.5	13.9	30.7	50.9	2.6	0.0	0.0	0.0	5.1
Maui 2015	14	8.5	0.0	21.0	21.4	17.2	21.4	22.2	57.1	39.5	3.7	15.3	27.4	53.6	4.0	0.0	5.7	3.2	4.3
Non-MSA Hawaii 2013	31	14.2	3.2	23.1	16.1	17.7	38.7	22.6	41.9	36.7	3.1	16.7	27.2	52.9	9.6	10.0	9.3	13.6	7.6
Non-MSA Hawaii 2014	11	12.6	9.1	21.4	27.3	16.7	36.4	21.8	27.3	40.0	6.0	17.0	20.9	56.0	6.0	9.1	9.7	10.5	2.9
Non-MSA Hawaii 2015	17	10.3	0.0	21.4	11.8	16.7	35.3	21.8	52.9	40.0	2.9	17.4	21.7	58.0	8.2	0.0	5.6	13.3	7.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 24 - Borrower Distribution of Home Equity Lines of Credit

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)
<i>Full Scope</i>										
Honolulu 2013	2,481	80.4	9.4	19.8	18.6	18.2	24.7	22.8	47.4	39.2
Honolulu 2014	2,036	77.2	6.8	19.8	13.3	18.2	24.9	22.8	55.0	39.2
Honolulu 2015	2,667	77.3	4.7	19.8	13.4	18.2	21.8	22.8	60.0	39.2
<i>Limited Scope</i>										
Maui 2013	218	7.1	9.6	19.5	11.5	16.2	25.2	21.2	53.7	43.0
Maui 2014	245	9.3	9.4	21.0	22.0	17.2	22.9	22.2	45.7	39.5
Maui 2015	317	9.2	5.0	21.0	18.0	17.2	19.9	22.2	57.1	39.5
Non-MSA Hawaii 2013	385	12.5	9.4	23.1	14.8	17.7	26.8	22.6	49.1	36.7
Non-MSA Hawaii 2014	356	13.5	8.1	21.4	14.9	16.7	23.9	21.8	53.1	40.0
Non-MSA Hawaii 2015	464	13.5	3.2	21.4	10.6	16.7	19.8	21.8	66.4	40.0

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 25 - Borrower Distribution of Motor Vehicle Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Honolulu 2013	3,323	78.2	30.0	23.2	32.1	16.4	25.0	19.4	12.8	41.0
Honolulu 2014	4,129	75.5	24.9	23.2	31.1	16.4	27.4	19.4	16.7	41.0
Honolulu 2015	4,634	73.0	27.2	23.2	29.2	16.4	27.0	19.4	16.6	41.0
<i>Limited Scope</i>										
Maui 2013	357	8.4	10.6	20.4	36.7	15.7	26.3	19.5	26.3	44.5
Maui 2014	491	9.0	23.6	22.1	33.0	16.6	28.5	20.3	14.9	41.1
Maui 2015	714	11.2	19.6	22.1	36.3	16.6	23.9	20.3	20.2	41.1
Non-MSA Hawaii 2013	571	13.4	15.9	26.9	41.3	15.6	25.2	18.6	17.5	38.9
Non-MSA Hawaii 2014	852	15.6	10.3	25.7	34.3	15.1	30.8	17.7	24.6	41.5
Non-MSA Hawaii 2015	1,004	15.8	15.3	25.7	34.6	15.1	27.4	17.7	22.7	41.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 26 - Borrower Distribution of Consumer Credit Cards

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Honolulu 2013	7,963	74.9	45.0	23.2	27.2	16.4	18.5	19.4	9.3	41.0
Honolulu 2014	5,893	75.0	41.6	23.2	27.3	16.4	15.9	19.4	15.2	41.0
Honolulu 2015	5,549	73.0	43.3	23.2	25.5	16.4	20.1	19.4	11.1	41.0
<i>Limited Scope</i>										
Maui 2013	1,360	12.8	26.5	20.4	35.6	15.7	19.3	19.5	18.5	44.5
Maui 2014	1,009	12.8	31.5	22.1	35.5	16.6	16.7	20.3	16.3	41.1
Maui 2015	1,063	14.0	35.2	22.1	34.3	16.6	18.0	20.3	12.5	41.1
Non-MSA Hawaii 2013	1,314	12.4	34.4	26.9	30.0	15.6	17.1	18.6	18.5	38.9
Non-MSA Hawaii 2014	953	12.1	33.2	25.7	26.8	15.1	20.9	17.7	19.2	41.5
Non-MSA Hawaii 2015	992	13.0	34.2	25.7	31.6	15.1	18.6	17.7	15.6	41.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 27 - Borrower Distribution of Secured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Honolulu 2013	123	79.4	59.3	23.2	21.1	16.4	10.6	19.4	8.9	41.0
Honolulu 2014	166	68.6	48.2	23.2	12.0	16.4	8.4	19.4	31.3	41.0
Honolulu 2015	172	67.2	46.5	23.2	12.2	16.4	9.9	19.4	31.4	41.0
<i>Limited Scope</i>										
Maui 2013	14	9.0	21.4	20.4	28.6	15.7	28.6	19.5	21.4	44.5
Maui 2014	26	10.7	23.1	22.1	23.1	16.6	26.9	20.3	26.9	41.1
Maui 2015	38	14.8	34.2	22.1	15.8	16.6	7.9	20.3	42.1	41.1
Non-MSA Hawaii 2013	18	11.6	22.2	26.9	22.2	15.6	33.3	18.6	22.2	38.9
Non-MSA Hawaii 2014	50	20.7	26.0	25.7	14.0	15.1	14.0	17.7	46.0	41.5
Non-MSA Hawaii 2015	46	18.0	28.3	25.7	19.6	15.1	17.4	17.7	34.8	41.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 28 - Borrower Distribution of Unsecured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Honolulu 2013	1,930	72.5	55.4	23.2	22.3	16.4	12.9	19.4	9.4	41.0
Honolulu 2014	1,628	67.9	46.8	23.2	26.7	16.4	14.3	19.4	12.2	41.0
Honolulu 2015	1,413	67.3	48.1	23.2	24.8	16.4	14.7	19.4	12.3	41.0
<i>Limited Scope</i>										
Maui 2013	329	12.4	31.6	20.4	30.7	15.7	22.5	19.5	15.2	44.5
Maui 2014	346	14.4	41.6	22.1	27.2	16.6	16.5	20.3	14.7	41.1
Maui 2015	297	14.2	41.1	22.1	32.0	16.6	14.1	20.3	12.8	41.1
Non-MSA Hawaii 2013	404	15.2	37.9	26.9	27.7	15.6	18.8	18.6	15.6	38.9
Non-MSA Hawaii 2014	424	17.7	36.8	25.7	24.5	15.1	21.5	17.7	17.2	41.5
Non-MSA Hawaii 2015	388	18.5	35.3	25.7	31.4	15.1	17.0	17.7	16.2	41.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 29 - Borrower Distribution of Other Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Honolulu 2013	37	71.2	0.0	23.2	0.0	16.4	2.7	19.4	97.3	41.0
Honolulu 2014	0	0.0	0.0	23.2	0.0	16.4	0.0	19.4	0.0	41.0
Honolulu 2015	0	0.0	0.0	23.2	0.0	16.4	0.0	19.4	0.0	41.0
<i>Limited Scope</i>										
Maui 2013	3	5.8	0.0	20.4	0.0	15.7	0.0	19.5	100.0	44.5
Maui 2014	0	0.0	0.0	22.1	0.0	16.6	0.0	20.3	0.0	41.1
Maui 2015	0	0.0	0.0	22.1	0.0	16.6	0.0	20.3	0.0	41.1
Non-MSA Hawaii 2013	12	23.1	8.3	26.9	0.0	15.6	0.0	18.6	91.7	38.9
Non-MSA Hawaii 2014	0	0.0	0.0	25.7	0.0	15.1	0.0	17.7	0.0	41.5
Non-MSA Hawaii 2015	0	0.0	0.0	25.7	0.0	15.1	0.0	17.7	0.0	41.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 30 - Borrower Distribution of Consumer Auto Leases

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Honolulu 2013	140	85.9	4.3	23.2	15.0	16.4	20.7	19.4	60.0	41.0
Honolulu 2014	271	90.9	6.6	23.2	17.7	16.4	26.6	19.4	49.1	41.0
Honolulu 2015	453	89.5	7.7	23.2	18.1	16.4	24.9	19.4	49.2	41.0
<i>Limited Scope</i>										
Maui 2013	9	5.5	0.0	20.4	0.0	15.7	0.0	19.5	100.0	44.5
Maui 2014	10	3.4	10.0	22.1	10.0	16.6	0.0	20.3	80.0	41.1
Maui 2015	34	6.7	5.9	22.1	11.8	16.6	32.4	20.3	50.0	41.1
Non-MSA Hawaii 2013	14	8.6	0.0	26.9	7.1	15.6	14.3	18.6	78.6	38.9
Non-MSA Hawaii 2014	17	5.7	0.0	25.7	11.8	15.1	17.6	17.7	70.6	41.5
Non-MSA Hawaii 2015	19	3.8	0.0	25.7	5.3	15.1	31.6	17.7	63.2	41.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: State of Hawaii

Table 31 - Qualified Investments

Evaluation Period: January 1, 2013 to August 8, 2016

Assessment Areas	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
<i>Full Scope</i>									
Honolulu	8	17,405	113	14,339	121	31,744	60.3	4	16,979
Statewide/Regional	4	4,891	33	8,917	37	13,808	26.2	1	1,606
<i>Limited Scope</i>									
Maui	3	253	14	69	17	322	0.6	1	636
Non-MSA Hawaii	6	6,256	32	540	38	6,796	12.9	0	0

Table 32- Distribution of Branch Delivery System and Branch Openings/Closings

Evaluation Period: April 30, 2013 to August 8, 2016

Assessment Areas	Deposits	Branches						Branch Openings / Closings				Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income Level of Geography (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Population within each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full Scope</i>																	
Honolulu	80.0	39	57.4	7.7	20.5	41.0	28.2	4	2	0	0	1	1	3.4	23.2	45.3	28.0
<i>Limited Scope</i>																	
Maui	8.4	12	17.6	0.0	16.7	66.7	16.7	2	3	0	0	-2	1	0.0	14.4	61.6	24.0
Non-MSA Hawaii	11.7	17	25.0	0.0	17.6	82.4	0.0	2	1	0	0	1	0	1.6	24.8	60.5	13.0

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Guam

Table 33 - Lending Volume of Reported Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	% of Rated Area Loans	Small Business Loans		Small Farm Loans		All HMDA Loans		Community Development Loans ¹		Total Reported Loans		% of Rated Area Deposits
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<i>Full Scope</i>												
Guam	100.0	138	17,466	0	0	0	0	28	176,267	166	237,936	100.0

Table 33 A - Lending Volume of Optional Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	% of Rated Area Loans	Home Equity		Motor Vehicle		Credit Card		Secured Consumer		Unsecured Consumer		Other Loans		Total Optional Loans	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	\$ (000's)	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)
<i>Full Scope</i>															
Guam	100.0	180	20,985	3,729	92,717	4,810	31,437	278	840	4,603	49,924	0	0	13,600	195,903

Table 33 B - Lending Volume of Optional Leases

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	% of Rated Area Loans	Business Auto Leases		Consumer Auto Leases		Equipment Leases		Total Optional Leases	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)
<i>Full Scope</i>									
Guam	100.0	11	1,084	0	0	0	0	11	1,084

¹ Evaluation Period: January 1, 2013 to August 8, 2016

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Guam

Table 34 - Geographic Distribution of Small Business Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Guam 2013	52	100.0	0.0	N/A	11.5	N/A	71.2	N/A	17.3	N/A	0.0	17.3	56.1	26.6	9.2	0.0	5.9	11.8	5.7
Guam 2014	36	100.0	0.0	N/A	16.7	N/A	69.4	N/A	13.9	N/A	0.0	16.2	64.0	19.8	5.5	0.0	5.5	6.0	3.8
Guam 2015	50	100.0	0.0	N/A	12.0	N/A	62.0	N/A	26.0	N/A	0.0	15.1	65.3	19.6	6.4	0.0	4.9	6.2	8.2

Table 35 - Geographic Distribution of Commercial Leases

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)
<i>Full Scope</i>										
Guam 2013	3	100.0	0.0	N/A	0.0	N/A	0.0	N/A	100.0	N/A
Guam 2014	2	100.0	0.0	N/A	0.0	N/A	100.0	N/A	0.0	N/A
Guam 2015	6	100.0	0.0	N/A	0.0	N/A	83.3	N/A	16.7	N/A

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Guam

Table 36 - Geographic Distribution of Home Equity Lines of Credit

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)	Bank Loans (%)	Owner Occupancy (%)
<i>Full Scope</i>										
Guam 2013	60	100.0	0.0	0.0	11.7	8.7	70.0	73.0	18.3	18.3
Guam 2014	85	100.0	0.0	0.0	9.4	8.7	67.1	73.0	23.5	18.3
Guam 2015	35	100.0	0.0	0.0	2.9	8.7	82.9	73.0	14.3	18.3

Table 37 - Geographic Distribution of Motor Vehicle Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Guam 2013	1,044	100.0	0.0	0.0	11.5	10.7	75.4	73.1	13.1	16.2
Guam 2014	1,365	100.0	0.0	0.0	11.5	10.7	76.7	73.1	11.8	16.2
Guam 2015	1,299	100.0	0.0	0.0	11.5	10.7	76.9	73.1	11.6	16.2

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Guam

Table 38 - Geographic Distribution of Secured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Guam 2013	152	100.0	0.0	0.0	11.2	10.7	80.9	73.1	7.9	16.2
Guam 2034	75	100.0	0.0	0.0	18.7	10.7	70.7	73.1	10.7	16.2
Guam 2015	51	100.0	0.0	0.0	17.6	10.7	74.5	73.1	7.8	16.2

Table 39 - Geographic Distribution of Unsecured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Guam 2013	1,339	100.0	0.0	0.0	9.3	10.7	79.5	73.1	11.3	16.2
Guam 2014	1,474	100.0	0.0	0.0	11.9	10.7	76.3	73.1	11.8	16.2
Guam 2015	1,785	100.0	0.0	0.0	10.5	10.7	79.1	73.1	10.4	16.2

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Guam

Table 40 - Geographic Distribution of Consumer Credit Cards

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Guam 2013	1,541	100.0	0.0	0.0	8.9	10.7	79.0	73.1	12.1	16.2
Guam 2014	1,813	100.0	0.0	0.0	9.8	10.7	75.9	73.1	14.3	16.2
Guam 2015	1,450	100.0	0.0	0.0	11.2	10.7	78.1	73.1	10.7	16.2

Table 41 - Borrower Distribution of Small Business Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Small Business Loans		Businesses with Revenue <= \$1 Million		Originations Regardless of Revenue Size			Aggregate Lending (%)		Market Share (%)	
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Businesses (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million	All Loans	Loans to Revenue <= \$1 Million (%)	All Loans	Loans to Revenue <= \$1 Million (%)
<i>Full Scope</i>											
Guam 2013	52	100.0	40.4	N/A	71.2	19.2	9.6	592	57.4	9.1	6.5
Guam 2014	36	100.0	16.7	N/A	72.2	8.3	19.4	672	53.7	5.5	1.7
Guam 2015	50	100.0	14.0	N/A	72.0	18.0	10.0	814	53.8	6.4	1.8

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Guam

Table 42 - Borrower Distribution of Commercial Leases

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Small Farm Loans		Farms with Revenue <= \$1 Million		Originations Regardless of Revenue Size		
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Businesses (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million
<i>Full Scope</i>							
Guam 2013	3	100.0	33.3	N/A	100.0	0.0	0.0
Guam 2014	2	100.0	50.0	N/A	100.0	0.0	0.0
Guam 2015	6	100.0	50.0	N/A	66.7	16.7	16.7

Table 43 - Borrower Distribution of Home Equity Lines of Credit

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)	Bank Loans (%)	Families (%)
<i>Full Scope</i>										
Guam 2013	59	100.0	3.4	22.9	5.1	16.4	15.3	23.1	76.3	37.6
Guam 2014	83	100.0	1.2	22.9	8.4	16.4	20.5	23.1	69.9	37.6
Guam 2015	35	100.0	0.0	22.9	5.7	16.4	14.3	23.1	80.0	37.6

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Guam

Table 44 - Borrower Distribution of Motor Vehicle Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Guam 2013	1,046	100.0	8.5	24.3	31.7	17.1	34.7	19.1	25.0	39.5
Guam 2014	1,375	100.0	7.6	24.3	30.6	17.1	37.4	19.1	24.4	39.5
Guam 2015	1,307	100.0	11.5	24.3	32.7	17.1	33.4	19.1	22.5	39.5

Table 45 - Borrower Distribution of Secured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Guam 2013	148	100.0	60.8	24.3	24.3	17.1	10.1	19.1	4.7	39.5
Guam 2014	73	100.0	60.3	24.3	17.8	17.1	12.3	19.1	9.6	39.5
Guam 2015	49	100.0	57.1	24.3	22.4	17.1	10.2	19.1	10.2	39.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Guam

Table 46 - Borrower Distribution of Unsecured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Guam 2013	498	100.0	41.8	24.3	27.9	17.1	21.5	19.1	8.8	39.5
Guam 2014	443	100.0	40.2	24.3	30.5	17.1	17.6	19.1	11.7	39.5
Guam 2015	362	100.0	40.3	24.3	27.6	17.1	18.2	19.1	13.8	39.5

Table 47 - Borrower Distribution of Consumer Credit Cards

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Guam 2013	1,528	100.0	24.5	24.3	30.8	17.1	26.2	19.1	18.4	39.5
Guam 2014	1,805	100.0	28.5	24.3	31.4	17.1	23.2	19.1	17.0	39.5
Guam 2015	1,449	100.0	32.6	24.3	31.5	17.1	20.7	19.1	15.2	39.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Guam

Table 48 - Qualified Investments

Evaluation Period: January 1, 2013 to August 8, 2016

Assessment Areas	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
<i>Full Scope</i>									
Guam	1	4	7	490	8	494	100.0	0	0

Table 49 - Distribution of Branch Delivery System and Branch Openings/Closings

Evaluation Period: April 30, 2013 to August 8, 2016

Assessment Areas	Deposits	Branches						Branch Openings / Closings						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income Level of Geography (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Population within each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full Scope</i>																	
Guam	100.0	2	100.0	0	0	2	0	0	4	0	0	-4	0	0.0	10.8	74.7	14.5

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Saipan

Table 50 - Lending Volume of Reported Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	% of Rated Area Loans	Small Business Loans		Small Farm Loans		All HMDA Loans		Community Development Loans ¹		Total Reported Loans		% of Rated Area Deposits
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<i>Full Scope</i>												
Saipan	100.0	15	1,332	0	0	0	0	8	32,460	22	31,542	100.0

Table 50 A - Lending Volume of Optional Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	% of Rated Area Loans	Home Equity		Motor Vehicle		Credit Card		Secured Consumer		Unsecured Consumer		Other Loans		Total Optional Loans	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	\$ (000's)	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)
<i>Full Scope</i>															
Saipan	100.0	0	0	324	6,998	60	334	200	846	4,321	27,837	0	0	4,905	36,015

¹ Evaluation Period: January 1, 2013 to August 8, 2016

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Saipan

Table 51 - Geographic Distribution of Small Business Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%)				Market Share (%)				
	# Loans	% Rated Area Total	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Bank Loans (%)	Business Entities (%)	Low	Mod	Mid	Upp	Overall	Low	Mod	Mid	Upp
<i>Full Scope</i>																			
Saipan 2013	8	100.0	0.0	N/A	12.5	N/A	87.5	N/A	0.0	N/A	0.0	11.2	75.3	13.5	4.5	0.0	5.0	5.2	0.0
Saipan 2014	4	100.0	0.0	N/A	50.0	N/A	50.0	N/A	0.0	N/A	0.0	16.5	71.4	12.0	3.0	0.0	9.1	2.1	0.0
Saipan 2015	3	100.0	0.0	N/A	0.0	N/A	100.0	N/A	0.0	N/A	0.0	18.6	63.6	17.9	2.1	0.0	0.0	3.4	0.0

Table 52 - Geographic Distribution of Motor Vehicle Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Saipan 2013	116	100.0	0.0	0.0	13.8	21.5	66.4	59.2	19.8	19.2
Saipan 2014	121	100.0	0.0	0.0	19.8	21.5	65.3	59.2	14.9	19.2
Saipan 2015	87	100.0	0.0	0.0	9.2	21.5	65.5	59.2	25.3	19.2

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Saipan

Table 53 - Geographic Distribution of Secured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Saipan 2013	67	100.0	0.0	0.0	29.9	21.5	61.2	59.2	9.0	19.2
Saipan 2014	59	100.0	0.0	0.0	27.1	21.5	55.9	59.2	16.9	19.2
Saipan 2015	74	100.0	0.0	0.0	27.0	21.5	55.4	59.2	17.6	19.2

Table 54 - Geographic Distribution of Unsecured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Saipan 2013	1,242	100.0	0.0	0.0	23.5	21.5	61.0	59.2	15.5	19.2
Saipan 2014	1,489	100.0	0.0	0.0	23.4	21.5	59.5	59.2	17.1	19.2
Saipan 2015	1,590	100.0	0.0	0.0	22.8	21.5	59.9	59.2	17.4	19.2

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Saipan

Table 55 - Geographic Distribution of Consumer Credit Cards

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Saipan 2013	15	100.0	0.0	0.0	13.3	21.5	60.0	59.2	26.7	19.2
Saipan 2014	20	100.0	0.0	0.0	25.0	21.5	45.0	59.2	30.0	19.2
Saipan 2015	25	100.0	0.0	0.0	20.0	21.5	68.0	59.2	12.0	19.2

Table 56 - Borrower Distribution of Small Business Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Small Business Loans		Businesses with Revenue <= \$1 Million		Originations Regardless of Revenue Size			Aggregate Lending (%)		Market Share (%)	
	Bank Loans (#)	% Rated Area Total	Bank Loans (%)	All Businesses (%)	<= \$100K	> \$100K and <= \$250K	> \$250K and <= \$1 Million	All Loans	Loans to Revenue <= \$1 Million (%)	All Loans	Loans to Revenue <= \$1 Million (%)
<i>Full Scope</i>											
Saipan 2013	8	100.0	25.0	N/A	87.5	12.5	0.0	178	72.5	4.5	1.6
Saipan 2014	4	100.0	25.0	N/A	75.0	25.0	0.0	133	67.7	3.0	1.1
Saipan 2015	3	100.0	0.0	N/A	33.3	66.7	0.0	140	67.1	2.1	0.0

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Saipan

Table 57 - Borrower Distribution of Motor Vehicle Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Saipan 2013	115	100.0	0.0	25.5	0.9	13.2	12.2	21.0	87.0	40.3
Saipan 2014	121	100.0	0.0	25.5	1.7	13.2	16.5	21.0	81.8	40.3
Saipan 2015	87	100.0	0.0	25.5	1.1	13.2	25.3	21.0	73.6	40.3

Table 58 - Borrower Distribution of Secured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Saipan 2013	67	100.0	43.3	25.5	31.3	13.2	13.4	21.0	11.9	40.3
Saipan 2014	59	100.0	11.9	25.5	45.8	13.2	23.7	21.0	18.6	40.3
Saipan 2015	72	100.0	15.3	25.5	59.7	13.2	16.7	21.0	8.3	40.3

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Saipan

Table 59 - Borrower Distribution of Unsecured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Saipan 2013	906	100.0	20.5	25.5	24.0	13.2	34.5	21.0	21.0	40.3
Saipan 2014	1,088	100.0	13.7	25.5	37.7	13.2	29.3	21.0	19.3	40.3
Saipan 2015	1,237	100.0	6.2	25.5	43.8	13.2	25.0	21.0	25.0	40.3

Table 60 - Borrower Distribution of Consumer Credit Cards

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
Saipan 2013	13	100.0	7.7	25.5	15.4	13.2	38.5	21.0	38.5	40.3
Saipan 2014	19	100.0	5.3	25.5	15.8	13.2	21.1	21.0	57.9	40.3
Saipan 2015	25	100.0	0.0	25.5	24.0	13.2	16.0	21.0	60.0	40.3

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: Saipan

Table 61 - Qualified Investments

Evaluation Period: January 1, 2013 to August 8, 2016

Assessment Areas	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
<i>Full Scope</i>									
Saipan	0	0	13	180	13	180	100.0	0	0

Table 62 - Distribution of Branch Delivery System and Branch Openings/Closings

Evaluation Period: April 30, 2013 to August 8, 2016

Assessment Areas	Deposits	Branches						Branch Openings / Closings				Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income Level of Geography (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Population within each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full Scope</i>																	
Saipan	100.0	1	100.0	0	0	1	0	1	2	0	-1	1	-1	0.0	20.5	60.4	19.1

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: American Samoa

Table 63 - Lending Volume of Optional Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	% of Rated Area Loans	Home Equity		Motor Vehicle		Credit Card		Secured Consumer		Unsecured Consumer		Other Loans		Total Optional Loans	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	\$ (000's)	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)
<i>Full Scope</i>															
American Samoa	100.0	0	0	2	40	32	145	0	0	80	487	0	0	114	672

Table 64 - Geographic Distribution of Motor Vehicle Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
American Samoa 2013	2	100.0	0.0	0.0	0.0	0.0	50.0	89.9	50.0	10.1
American Samoa 2014	0	0.0	0.0	0.0	0.0	0.0	0.0	89.9	0.0	10.1
American Samoa 2015	0	0.0	0.0	0.0	0.0	0.0	0.0	89.9	0.0	10.1

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: American Samoa

Table 65 - Geographic Distribution of Unsecured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
American Samoa 2013	80	100.0	0.0	0.0	0.0	0.0	86.3	89.9	13.8	10.1
American Samoa 2014	0	0.0	0.0	0.0	0.0	0.0	0.0	89.9	0.0	10.1
American Samoa 2015	0	0.0	0.0	0.0	0.0	0.0	0.0	89.9	0.0	10.1

Table 66 - Geographic Distribution of Consumer Credit Cards

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
American Samoa 2013	12	100.0	0.0	0.0	0.0	0.0	91.7	89.9	8.3	10.1
American Samoa 2014	17	100.0	0.0	0.0	0.0	0.0	82.4	89.9	17.6	10.1
American Samoa 2015	3	100.0	0.0	0.0	0.0	0.0	100.0	89.9	0.0	10.1

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: American Samoa

Table 67 - Borrower Distribution of Motor Vehicle Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
American Samoa 2013	2	100.0	0.0	18.0	0.0	23.9	0.0	17.1	100.0	41.0
American Samoa 2014	0	0.0	0.0	18.0	0.0	23.9	0.0	17.1	0.0	41.0
American Samoa 2015	0	0.0	0.0	18.0	0.0	23.9	0.0	17.1	0.0	41.0

Table 68 - Borrower Distribution of Unsecured Consumer Loans

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
American Samoa 2013	80	100.0	11.3	18.0	28.8	23.9	27.5	17.1	32.5	41.0
American Samoa 2014	0	0.0	0.0	18.0	0.0	23.9	0.0	17.1	0.0	41.0
American Samoa 2015	0	0.0	0.0	18.0	0.0	23.9	0.0	17.1	0.0	41.0

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: American Samoa

Table 69 - Borrower Distribution of Consumer Credit Cards

Evaluation Period: January 1, 2013 to December 31, 2015

Assessment Areas	Total Loans from Bank		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	# Loans	% Rated Area Total	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)	Bank Loans (%)	Households (%)
<i>Full Scope</i>										
American Samoa 2013	12	100.0	0.0	18.0	8.3	23.9	8.3	17.1	83.3	41.0
American Samoa 2014	17	100.0	5.9	18.0	0.0	23.9	17.6	17.1	76.5	41.0
American Samoa 2015	3	100.0	0.0	18.0	0.0	23.9	0.0	17.1	100.0	41.0

Table 70 - Qualified Investments

Evaluation Period: January 1, 2013 to August 8, 2016

Assessment Areas	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
<i>Full Scope</i>									
American Samoa	0	0	11	150	11	150	100.0	0	0

BANK OF HAWAII, Honolulu, Hawaii

Rated Area: American Samoa

Table 71- Distribution of Branch Delivery System and Branch Openings/Closings

Evaluation Period: April 30, 2013 to December 31, 2015

Assessment Areas	Deposits	Branches						Branch Openings / Closings						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income Level of Geography (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Population within each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<i>Full Scope</i>																	
American Samoa	100.0	0	100.0	N/A	N/A	N/A	N/A	0	1	0	0	-1	0	0.0	0.0	90.7	9.3