



PUBLIC DISCLOSURE

July 1, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

TD Bank, N.A.
Charter Number: 24096

2035 Limestone Road
Wilmington, DE 19808

Office of the Comptroller of the Currency
Large Bank Supervision
Constitution Center
400 7th Street S.W.
Washington, DC 20219

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not 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.

Table of Contents

Overall CRA Rating.....	3
Description of Institution	4
Scope of the Evaluation	5
Discriminatory or Other Illegal Credit Practices Review	10
Multistate Metropolitan Statistical Area Ratings.....	12
<i>Allentown-Bethlehem-Easton, PA-NJ MMSA (Allentown MMSA)</i>	12
<i>Boston-Cambridge-Newton, MA-NH MMSA (Boston MMSA)</i>	21
<i>Charlotte-Concord-Gastonia, NC-SC MMSA (Charlotte MMSA)</i>	31
<i>New York-Newark-Jersey City, NY-NJ MMSA (New York MMSA)</i>	40
<i>Philadelphia-Camden-Wilmington, PA-NJ-DE MMSA (Philadelphia MMSA)</i>	52
<i>Providence-Warwick, RI-MA MMSA (Providence MMSA)</i>	64
<i>Washington-Arlington-Alexandria, DC-VA-MD MMSA (Washington MMSA)</i>	73
<i>State of Connecticut</i>	82
<i>State of Delaware</i>	101
<i>State of Florida</i>	110
<i>State of Maine</i>	139
<i>State of Maryland</i>	151
<i>State of Massachusetts</i>	161
<i>State of New Hampshire</i>	180
<i>State of New Jersey</i>	199
<i>State of New York</i>	216
<i>State of North Carolina</i>	234
<i>State of South Carolina</i>	245
<i>State of Vermont</i>	264
Appendix A: Scope of Examination	A-1
Appendix B: Summary of MMSA and State Ratings	B-1
Appendix C: Definitions and Common Abbreviations	C-1
Appendix D: Tables of Performance Data	D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated Outstanding.

The following table indicates the performance level of TD Bank, N.A. (TDBNA) with respect to the Lending, Investment, and Service Tests:

Performance Levels	TD Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The bank's Outstanding Lending Test performance is based on Outstanding ratings in all 19 rating areas.
- The bank's Outstanding Investment Test performance is based on Outstanding ratings in all 19 rating areas.
- The Bank's High Satisfactory Service Test performance is based on High Satisfactory ratings in eight rating areas including the largest rated area by adjusted deposit volume (New York multistate metropolitan statistical area (MMSA)), Outstanding performance in nine rating areas, and Low Satisfactory performance in two rating areas.

Lending in Assessment Area

A substantial majority of the bank's loans are in its assessment areas (AAs). The bank originated and purchased 96.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	118,896	95.2	6,051	4.8	124,947	46,810,867	93.8%	3,089,015	6.2%	49,899,881
Small Business	163,792	98.2	3,050	1.8	166,842	5,346,031	96.0%	223,950	4.0%	5,569,981
Small Farm	379	95.0	20	5.0	399	13,301	95.4%	636	4.6%	13,937
Total	283,067	96.9	9,121	3.1	292,188	52,170,199	94.0%	3,313,601	6.0%	55,483,799

Description of Institution

TDBNA is the principal subsidiary of TD Bank US Holding Company (TDBUSH), a \$523.3 billion bank holding company. As of December 31, 2023, TDBUSH ranked as the 10th largest bank holding company by assets in the United States. TDBUSH is part of the larger TD Bank Group, headquartered in Toronto, Canada and also owns TD Bank USA, N.A. a CRA Limited Purpose Bank that operates as the issuing bank for a credit card partnership program with retailers. Other bank subsidiaries/affiliates include finance companies, a community development corporation, investment funds, and wealth management providers.

TDBNA is a full-service interstate bank headquartered in Cherry Hill, N.J. The bank operates approximately 1,200 branches and 2,700 Automatic Teller Machines (ATMs) throughout the Northeast, Mid-Atlantic, and southeastern U.S. As of year-end 2023, the bank delineated 72 Assessment Areas (AAs) across 19 rating areas that include seven MMSAs and 12 states. The bank's largest markets are New York, Philadelphia, and Boston. The bank's primary competitors include JPMorgan Chase Bank, N.A., Bank of America, N.A., and Wells Fargo Bank, N.A.

As of December 31, 2023, TDBNA had total assets of \$367.2 billion, and tier 1 capital of \$39.1 billion. Domestic deposits totaled \$303.7 billion as of year-end 2023; however, for CRA analysis purposes, the OCC excluded \$66.4 billion in sweep deposits from Charles Schwab, a bank affiliate, which are held administratively in the Philadelphia-Camden-Wilmington PA-NJ MMSA. Tier 1 capital was also adjusted proportionally, resulting in adjusted tier 1 capital of \$30.6 billion. As of year-end 2023, TDBNA's loan and lease portfolio totaled \$182.8 billion or 49.8 percent of total assets. Composition of the bank's loan portfolio was 31.1 percent commercial and industrial loans, 30.5 percent residential real estate loans, 18.7 percent consumer loans, 0.1 percent agricultural loans, and 19.6 percent other loans and leases.

TDBNA offers a full suite of financial products and services including deposit products and services; real-estate secured, consumer, and commercial credit products; and trust, investment, and financial advisory services to over 10 million retail, small business, and commercial customers. The bank offers vehicle financing and dealer services through its large TD Auto Finance division and along with its subsidiaries provides private banking and wealth management services. TDBNA's business strategy and product offerings are consistent across the entire footprint.

In February 2022, TD Bank Group announced its plan to acquire First Horizon Corporation, a regional bank headquartered in Memphis, Tenn., with \$89 billion in assets as of year-end 2021. However, the merger agreement was subsequently terminated in May 2023 by mutual agreement of both parties.

Other merger and acquisition activity included TDBNA acquiring Cowen, Inc. an American-based full-service investment bank that operates in cities across the U.S., Europe, and Asia in March 2023. This activity had no impact on the bank's CRA performance evaluation. No other significant merger or acquisition activity occurred during the evaluation period.

There were no identified legal, financial, or other factors that impeded the bank's ability to help meet the credit, investment, and service needs of its AAs during the evaluation period. TDBNA received an Outstanding rating in its previous CRA evaluation, dated July 2, 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the Large Bank Lending, Investment, and Service Tests. The evaluation period was January 1, 2021, through December 31, 2023.

The OCC evaluated the bank's lending performance by reviewing home mortgage loan products reported under the Home Mortgage Disclosure Act (HMDA), small loans to businesses and small loans to farms reported under the CRA, and Community Development (CD) loans. The bank's primary lending products are home mortgage and small businesses loans. Farm lending is not a primary product of the bank and, in most bank markets, the volume of farm lending during the evaluation period was insufficient (less than 20 loans) to conduct a meaningful analysis. Consumer lending was not considered in this evaluation, as consumer loans did not constitute a substantial majority of the bank's lending and bank management did not request consideration of these loans.

On January 1, 2022, the 2020 Census updates became effective which impacted the demographic data used in the CRA evaluation including census tract income level designations. Examiners evaluate bank loan data against applicable demographic information, which resulted in multiple analyses and presentation of data in the evaluation. Specifically, examiners evaluated 2021 lending data using 2015 American Community Survey (ACS) demographic data and 2022-2023 lending data using the updated 2020 Census data. When arriving at overall conclusions, examiners generally placed more weight on the bank's lending performance during the 2022-2023 period, as it represented a longer and more recent period of performance. Narrative sections of the evaluation include discussion of 2021 performance in comparison to the 2022-2023 performance. Appendix D includes data from both 2021 and 2022-2023.

Lending Test

Under the Lending Test, examiners considered lending activity, the geographic and borrower distribution of loans, CD lending, and any innovative or flexible lending products offered by the bank.

The bank's lending activity responsiveness was assessed by comparing the bank's deposit market rank percentage in each AA to the market rank percentage for each applicable lending product (home mortgage, small business, and small farm). Specifically, the bank's market rank (deposit or lending) was divided by the total number of FDIC-insured depository institutions or lenders, respectively, to determine the bank's "percentile". This approach takes into consideration the differences between the number of insured depository institutions and the number of home mortgage, small business, and small farm lenders within the AA. In determining conclusions, when the bank's lending market share percentile exceeded the bank's deposit market share percentile for a given product, the conclusion was

excellent. If the lending market share percentile met or equaled the deposit market share percentile for a given product, the conclusion was good. In any instances, where the bank's lending market share percentile did not meet the deposit market share percentile, the conclusion would be no better than adequate. In instances where conclusions differed between loan products in a specific AA, more weight was given to the product with the higher lending volume.

The borrower and geographic distribution of loans are weighted equally under the Lending Test unless performance context factors necessitated considering one component more heavily. For example, in instances where there are no low- or moderate- geographies in an AA, more weight would be placed on the borrower distribution of loans. Within each performance test (borrower and geographic distribution), examiners compared the bank's lending performance to the area demographics as well as the aggregate peer performance (based on reported HMDA and CRA small business and farm data). Equal weight was placed on the bank's performance against the demographics and the aggregate peer performance. Performance between low-income and moderate-income (LMI) categories was weighted equally unless otherwise noted. If emphasis was needed to reach an overall performance conclusion between low- and moderate-income categories, the category with more lending opportunities (e.g., more owner-occupied housing units, businesses, or families) was weighted more heavily.

In analyzing the borrower distribution of home mortgage loans, examiners considered housing affordability. Specifically, examiners calculated the maximum monthly mortgage payment affordable to low-income and moderate-income individuals (no more than 30 percent of an applicant's income), based on the median family income of the area. This amount was then compared to the calculated monthly mortgage payment for a home at the MSA median housing value to determine affordability. Examiners also took into consideration the increase in home prices during the evaluation period as a result of the Coronavirus disease 2019 (COVID-19) pandemic and historically low interest rate environment that was not captured by the 2020 Census data. Examiners compared changes to the Federal Housing Finance Agency (FHFA) Housing Price Index (HPI) between the first quarter of 2021 to the fourth quarter of 2023 to assess the impact on housing affordability in each MSA or MD. FHFA HPI values reference a base year allowing for an estimate of the increase in relative home prices for each MSA or MD.

The analysis of CD loans considered both the number and dollar volume of lending with emphasis placed on loans that were particularly complex or responsive to AA needs. Complexity was determined primarily based on the number of funding sources required for the project, including both public and private. Responsiveness was determined based on the needs identified from community contacts and the results of the bank's annual community needs assessments. CD lending had either a positive, neutral, or negative impact on the rating, which is described within the narrative comments. To provide perspective, the dollar volume of CD lending was compared to the tier 1 capital amount allocated to the AA based on the area's pro rata share of bank adjusted deposits.

Innovative and Flexible Lending products

TDBNA used innovative and/or flexible lending products to address credit needs throughout its AAs. Innovative and flexible products included both proprietary mortgage lending products designed to support LMI borrowers as well as government lending programs that TDBNA participated in.

TD Home Access Mortgage – TD Home Access is the bank's special purpose credit program designed to increase homeownership opportunities in specific markets within the bank's footprint. The program was launched in March 2022 and is currently set to expire in December 2026. The Home Access Mortgage is a fully amortizing fixed rate, 30-year loan that offers increased flexibility, expanded

underwriting guidelines, and a lender credit to offset affordability challenges. In 2023, the lender credit was increased from \$5,000 to \$10,000. It is available to applicants in majority-minority census tracts or to applicants in select MSAs with income at or below 120 percent of the Area Median Income (AMI). During the evaluation period, the bank originated 317 Home Access Mortgages totaling approximately \$86 million.

TD Right Step Mortgage® - The TD Right Step Mortgage is a fully-amortizing, fixed rate, 30-year mortgage product designed for LMI borrowers. The product is offered to applicants with incomes up to 80 percent of the AMI, or for properties located within LMI geographies. Product features include low-down payment requirements and a waiver of the bank's underwriting fee. In August 2021, the bank made changes to the underwriting requirements to increase access to the product including reducing the minimum credit score (from 660 to 620), increasing the debt-to-income ratio (from 43 percent to 45 percent), changing the minimum borrower contribution amount (from 3 percent of the loan amount to \$500), and increasing the combined loan to value ratio (from 100 percent to 105 percent). During the evaluation period, the bank originated 1,037 new loans under the program totaling approximately \$264 million.

Fannie Mae (FNMA) HomeReady - The HomeReady product is a fully amortizing, fixed-rate, mortgage designed for LMI borrowers. The product offers flexible underwriting requirements including a low-down payment requirement and lower mortgage insurance requirements than conventional mortgage products. TDBNA also waives its underwriting fee for this product. The product is eligible to applicants with incomes up to 80 percent of the AMI. Borrowers are required to complete homeownership education to obtain a HomeReady mortgage. During the evaluation period, TDBNA originated 401 HomeReady mortgages totaling approximately \$78 million.

Federal Housing Administration (FHA) Mortgage - The bank offers fixed-rate FHA mortgage loans which allows for a low-down payment, flexible credit requirements and a lower credit score requirement as compared to conventional mortgage loans. In addition, TDBNA waives its underwriting fee to make the product more affordable to borrowers. During the evaluation period, the bank funded 376 FHA mortgage loans totaling approximately \$130 million.

The bank also offers 30- year fixed rate, Veterans Administration (VA) mortgage loans and United States Department of Agriculture (USDA) Rural Development mortgage loans with flexible terms.

Paycheck Protection Program (PPP) - The bank participated in the Small Business Administration's (SBA's) PPP loan program which provided small businesses impacted by the COVID-19 pandemic funds to cover payroll costs and other expenses. The program started in 2020 and was extended into 2021 as the pandemic continued to impact businesses. During the evaluation period, TDBNA originated approximately 47,000 PPP loans totaling \$3.7 billion. PPP loans included approximately 43,000 small loans to businesses and farms reported under CRA and 1,722 CD loans.

Ascendus - TDBNA maintains an ongoing partnership with Ascendus, a nationwide nonprofit small business lender, which includes a second look loan referral program and collaborating to provide small business education throughout the bank's footprint. As part of the second look loan program, TDBNA refers customers that do not meet the bank's underwriting requirements to Ascendus. This program was enhanced in 2021 to offer a more seamless online experience whereby loan applicants can now opt-in for an automatic referral to Ascendus if they are declined by TDBNA. In addition to the loan referral program, during the evaluation period, the bank provided grants totaling \$350,000 to the organization

and made an equity equivalent (EQ2) investment in Ascendus totaling \$2 million. A TDBNA representative also serves on their board of directors.

Finally, TDBNA maintains flexible CRA and CD underwriting criteria for loans made to Community Development Financial Institutions (CDFIs) and other organizations or individuals where the loan proceeds directly benefit LMI households or small businesses.

Broader Regional Loans

TDBNA's qualified CD loans that benefited a specific AA or a broader statewide area that included the AA, where the entity or activity had a purpose, mandate, or function that included serving the AA, received consideration in the applicable state rating area. Because TDBNA was responsive to the CD needs of its AAs, the OCC provided consideration for qualified CD loans made in the broader regional areas surrounding the bank's AAs where the activities neither serve nor benefit the AAs. Loans in the broader regional area not considered in any of the state rating areas were considered at the institution level and further support the bank's overall Outstanding Lending Test rating.

During the evaluation period, TDBNA made six CD loans totaling \$174.2 million in the broader regional area. These loans primarily supported affordable housing initiatives in the state of Pennsylvania.

Investment Test

The Investment Test considers the bank's qualified CD investments, as well as grants and donations that were made during the evaluation period. Prior period investments that remain outstanding and continue to benefit the bank's AAs were also considered at the year-end 2023 book value. The level of qualified investments in comparison to allocated tier 1 capital, based on the pro rata share of AA adjusted deposits, received the most weight in determining the rating. For full-scope areas, examiners also considered the complexity or innovativeness of the investments, the responsiveness of the investments to community needs, and the bank's demonstrated leadership.

Broader Regional Investments

TDBNA's qualified CD investments that benefited a specific AA or a broader statewide area that included the AA, where the entity or activity had a purpose, mandate, or function that included serving the AA, received consideration in the applicable state rating area. Because TDBNA was responsive to the CD needs of its AAs, the OCC provided consideration for qualified investments made in the broader regional areas surrounding the bank's AAs where the activities neither serve nor benefit the AAs. Investments in the broader regional area not considered in any of the state rating areas were considered in the Investment Test at the institution level and further support the bank's overall Outstanding Investment Test rating.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Broader Regional	39	66,451	34	101,826	73	100.0	168,277	100.0	81	293,769

Prior Period Investments* means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

CD investments considered at the bank-wide broader regional level include 34 current period investments totaling \$101.8 million and 39 prior period investments totaling \$66.5 million. Current period investments include 20 Small Business Investment Corporation (SBIC) investments totaling \$32.9 million, two loan fund investments totaling \$21.5 million, three EQ2 investments totaling \$4.3 million (including a \$2 million investment in Ascendus), three investments in Interest on Lawyers' Trust Accounts (IOLTA) programs, totaling \$2.8 million, and six other CRA qualified investments totaling \$40.3 million. Prior period investments consisted primarily of SBIC investments. Additionally, there were 81 unfunded commitments in the broader regional area totaling \$293.8 million that consisted primarily of SBIC investments.

Innovative and Complex Investments

The bank is a significant originator of Low-Income Housing Tax Credits (LIHTCs), often in a leadership position. During the evaluation period, the bank funded over \$3 billion in CD investments (including grants and donations), of which the vast majority by dollar amount was comprised of LIHTCs. TDBNA committed to \$1.9 billion in LIHTC investments during the evaluation period which provided financing for over 10,000 LIHTC units that benefitted LMI households. These LIHTC investments are complex as they often involve participation by many parties including federal and state governments, local housing agencies, real estate developers, and other financial institutions. Further, they require more expertise and capacity on the part of the bank in terms of sourcing projects, along with structuring, underwriting, closing, managing and ultimately divestment of the LIHTCs. The bank offers both the equity and debt financing for these projects when possible.

During the evaluation period, the bank introduced a \$30 million EQ2 initiative called the TD Equity Fund which supports minority-owned businesses. TDBNA committed \$25.7 million to 19 CDFIs over the evaluation period with \$23 million funded and \$2.7 million in unfunded commitments remaining. Nine of the investments benefitted the bank's full-scope AAs while the other 10 were made in the broader statewide or regional area. These investments were considered innovative and responsive to community needs.

The OCC considered the level of investment complexity or innovation in the Investment Test narrative within each full-scope AA.

Service Test

Under the Service Test, the evaluation includes both a retail services and a CD services component. For retail services, the geographic distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies along with the impact of branch openings and closings were given the most weight. In full-scope AAs, consideration was also given to middle- and upper-income (MUI) branches located in close proximity (half-mile radius) to low- or moderate-income geographies where the bank could reasonably demonstrate that the adjacent branch actually serves customers who reside in the low- or moderate-income areas. Specifically, MUI adjacent branch usage by customers residing in low- or moderate-income areas was determined using one of three measures including deposit account opening (checking and savings), teller transactions, and onsite ATM transactions. Where bank data demonstrated that the MUI adjacent branch usage (by any of the three measures) by customers in low- or moderate-income areas met or exceeded the overall percentage of the population in the AA that reside

in the low- and moderate-income geographies, these MUI adjacent branches were counted as an adjacent or proximate branch and received positive consideration in the accessibility of retail banking services.

The Service Test also considers the availability and effectiveness of alternative delivery systems (ADS) for delivering retail banking services, including ATMs, online banking, and mobile banking. The distribution of ATMs among low-, moderate-, middle-, and upper-income geographies was evaluated similar to the branch distributions. For ADS, the OCC reviewed bank-provided data on the volume and percentage of banking transactions conducted by residents of LMI geographies through the bank's ADS, compared to residents of MUI geographies. ADS were positively considered where bank data demonstrated that usage of online and mobile banking by customers residing in low- and moderate-income areas was significant (more than 60 percent) and/or increased (more than 10 percent) over the evaluation period.

Branch hours and the range of services provided in low-, moderate-, middle-, and upper-income geographies received a lesser amount of weight in the full-scope areas and were not considered in the limited-scope areas. Finally, the extent, innovativeness and responsiveness of CD services was evaluated in full-scope areas only.

Selection of Areas for Full-Scope Review

As of December 31, 2023, TDBNA delineated 72 AAs across 12 states and seven MMSAs. In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. In total, examiners selected 27 AAs for full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA or MMSA are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings and multistate ratings. In arriving at overall conclusions, four rated areas carry the most weight as they account for 73.6 percent of the bank's adjusted deposits. These include the New York MMSA (39.6 percent), the Philadelphia MMSA (16.5 percent), the state of Florida (9.9 percent) and the Boston MMSA (7.5 percent). All other rated areas individually account for less than 4 percent of the bank's deposit base.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. § 25.28(c), in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and

regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development (HUD), and the Consumer Financial Protection Bureau (CFPB), as applicable.

The CFPB found in relevant part that TDBNA violated the Fair Credit Reporting Act (FCRA), 12 U.S.C. § 1681 *et seq.*, its implementing Regulation V, 12 C.F.R. §1022.40-43, and the Consumer Financial Protection Act (CFPA) of 2010, 12 U.S.C. §§ 5531 & 5536 (Unfair, Deceptive, or Abusive Acts or Practices) with respect to credit card accounts. Specifically, the CFPB found that the bank violated FCRA and Regulation V with respect to credit card accounts by (1) failing to promptly correct and update information it furnished to consumer reporting agencies that it determined was not complete or accurate; (2) failing to accurately report consumers' participation in COVID-19 accommodations programs pursuant to the Coronavirus Aid, Relief, and Economic Security (CARES) Act; (3) failing to provide the FCRA-required date of first delinquency on certain delinquent or charged-off accounts; (4) failing to conduct reasonable and timely investigations of consumer disputes; (5) failing to properly notify consumers when deeming a dispute frivolous or irrelevant; and (6) failing to establish and implement reasonable written policies and procedures regarding the information furnished to consumer reporting agencies. The CFPB also found that TDBNA's practice of failing to investigate credit card disputes was abusive and therefore violated the CFPA. The CFPB required TDBNA to take steps to prevent future violations and to pay \$7.8 million in remediation to affected consumers and a \$20 million civil money penalty. A Consent Order was executed on September 11, 2024. CFPB Consent Order No. 2024-CFPB-0009 (Sept. 11, 2024), cfpb.td-bank-na-consent-order-2024-09.pdf (consumerfinance.gov). The bank generally did not admit nor deny the CFPB's findings of fact or conclusions of law.

The OCC does not have additional public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

The CRA performance rating was not lowered as a result of these findings. We considered the nature, extent, and strength of the evidence of the practices; the extent to which the institution had policies and procedures in place to prevent the practices; and the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Multistate Metropolitan Statistical Area Ratings

Allentown-Bethlehem-Easton, PA-NJ MMSA (Allentown MMSA)

CRA rating for the Allentown MMSA¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include

- excellent lending activity, with overall good geographic distribution of lending and excellent borrower distribution of lending;
- an excellent level of CD lending that further supported the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- accessible retail service delivery systems with consideration for MUI adjacent branches; and
- an adequate level of CD services.

Description of Institution's Operations in the Allentown MMSA

The AA is comprised of a portion of the Allentown MMSA that includes one county in New Jersey (Warren) and two counties in Pennsylvania (Lehigh and Northampton). Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had eight branch locations and 10 ATMs, of which all were deposit-taking, within the AA. During the evaluation period, the bank made \$187.7 million or 0.4 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

The Allentown MMSA represented TDBNA's 16th largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had approximately \$1.0 billion in deposits in this AA, which represented 0.4 percent of the bank's adjusted total deposits. The AA is served by 29 FDIC-insured financial institutions operating 176 branches. TDBNA ranked seventh with a deposit market share of 5 percent. The top three competitors had 42.5 percent of the market share and consisted of Wells Fargo Bank, N.A. with 26 branches and 19.5 percent market share, PNC Bank, N.A. with 18 branches and 12.1 percent market share, and Truist Bank with 18 branches and 10.9 percent market share.

The following table provides a summary of the demographics, including housing and business information for the Allentown MMSA.

¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Allentown MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	178	7.9	20.8	40.4	30.9	0.0
Population by Geography	797,140	7.0	19.5	38.8	34.7	0.0
Housing Units by Geography	315,803	6.0	20.3	40.4	33.3	0.0
Owner-Occupied Units by Geography	203,575	2.4	13.4	42.5	41.7	0.0
Occupied Rental Units by Geography	94,119	13.0	33.4	36.9	16.7	0.0
Vacant Units by Geography	18,109	10.7	29.5	34.6	25.1	0.0
Businesses by Geography	95,398	6.6	19.2	36.4	37.8	0.0
Farms by Geography	2,737	1.2	8.6	42.7	47.6	0.0
Family Distribution by Income Level	201,092	20.0	17.7	20.9	41.4	0.0
Household Distribution by Income Level	297,694	23.4	15.9	18.0	42.6	0.0
Median Family Income MSA – 10900 Allentown-Bethlehem-Easton, PA-NJ MSA		\$84,676	Median Housing Value			\$219,312
			Median Gross Rent			\$1,116
			Families Below Poverty Level			7.2%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information from the September 2023 Moody's Analytics report, Allentown's economy has accelerated in recent months, making the area one of the better performers in the state. The area's strengths are its proximity to the East Coast ports and densely populated metro divisions, high concentration of essential commodity production, and below average costs of living and doing business. Major economic drivers for the AA are healthcare, manufacturing, and logistics. The area's weaknesses include an above average aging population and employment volatility. Allentown's post-pandemic economy has improved, and non-farm payroll growth has picked up, stimulated by gains in healthcare and secondary industries such as professional and business services. However, manufacturing and logistics industries have declined. Logistics had seen significant growth over the past decade resulting in a large concentration of warehousing/transportation jobs that is among the highest in the region and nearly double that of the U.S. overall. However, per Moody's, the logistics job boom is over with large companies such as Walmart having laid off hundreds of workers. The post-pandemic unemployment rate has continuously dropped to a series low from 2020 through year-end 2022. The MMSA's net population migration is positive. Additionally, single-family house prices continue to increase with rent and housing affordability declining. The MMSA's primary employment industries include education and health services, professional and business services, and manufacturing. Major employers in the area include Lehigh Valley Health Network, St. Luke's University Health Network, Walmart, Dorney Park/Wildwater Kingdom, and Mack Trucks.

According to the U.S. Bureau of Labor Statistics (BLS), the unemployment rate in the Allentown MMSA was 7.4 percent as of January 2021, compared to 3.3 percent in December 2023. The Allentown MMSA unemployment rate was slightly higher than the 2.9 percent unemployment rate for the state of

Pennsylvania, but lower than the 4.5 percent unemployment rate for the state of New Jersey in December 2023.

Based on information in the above table, low-income families earned less than \$42,338 and moderate-income families earned less than \$67,741. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,058 for low-income borrowers and \$1,694 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,177. Most low-income borrowers would be challenged to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the Federal Housing Finance Agency (FHFA) Housing Price Index (HPI), home prices increased by 39.3 percent from the first quarter of 2021 to the fourth quarter 2023. This acceleration in home prices worsened existing affordability concerns in the Allentown MMSA for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC relied upon information from three community contacts conducted during the evaluation period with representatives from an economic development organization, a nonprofit organization focused on neighborhood revitalization, and a nonprofit organization focused on self-sufficiency. Community contacts indicated that the following are needs within the bank's AA:

- Affordable housing units including housing for LMI seniors,
- Construction lending to affordable housing developments,
- Down payment assistance programs for first time homebuyers,
- Financial literacy education,
- Programs to improve credit for consumers,
- Small business lending to access capital needs,
- Funding community service organizations.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Development and rehabilitation of affordable rental housing,
- Basic financial education,
- Grants for organizations providing services to LMI individuals,
- Affordable mortgage products.

Scope of Evaluation in the Allentown MMSA

Examiners completed a full-scope review for the Allentown MMSA. Examiners placed more emphasis on small loans to businesses than home mortgage loans in arriving at overall conclusions as they represented the majority of TDBNA's lending in this AA. TDBNA did not originate a sufficient volume of small farm loans to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ALLENTOWN MMSA

LENDING TEST

The bank's performance under the Lending Test in the Allentown MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Allentown MMSA was excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Allentown MMSA	698	1,022	2	10	1,732

Dollar Volume of Loans \$(000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Allentown MMSA	161,419	26,107	132	28,407	216,064

TDBNA ranked seventh out of 29 depository institutions (top 25 percent) with a deposit market share of 5 percent.

For home mortgage loans, TDBNA's market share of 1.2 percent ranked 21st out of 536 lenders (top 4 percent). The top three lenders were Wells Fargo Bank, N.A. with 5.2 percent market share, Rocket Mortgage with 4.7 percent market share, and PNC Bank, N.A. with 3.4 percent market share.

For small loans to businesses, TDBNA's market share of 1.4 percent ranked 15th out of 127 lenders (top 12 percent). The top three lenders were American Express National Bank with 21.1 percent market share, JPMorgan Chase Bank, N.A. with 10.4 percent market share, and Synchrony Bank with 7.3 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the Allentown MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased in low- and moderate- income geographies exceeded the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the Allentown MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies exceeded the percentage of businesses located in those geographies and the aggregate percentage of reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was near-to the percentage of businesses located in those geographies and approximated the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Allentown MMSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the Allentown MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low- and moderate- income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was near to the percentage of low-income families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate- income borrowers exceeded the percentage of moderate-income families and approximated the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the Allentown MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Community Development Lending

The institution is a leader in making CD loans. CD lending further supported the overall excellent Lending Test conclusion in the Allentown MMSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TDBNA made 10 CD loans totaling \$28.4 million, which represented 20.7 percent of allocated tier 1 capital. Included in this total were five PPP loans totaling \$1.1 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, occasionally in a leadership position. CD loans were responsive to identified community needs including affordable housing and economic development. By dollar volume, 59.1 percent of CD loans funded affordable housing, 37.6 percent funded economic development activities, and 3.2 percent funded revitalization and stabilization efforts.

Examples of CD loans in the AA include:

- A \$16.8 million loan to finance construction of a 66-unit low-income apartment complex. All units are restricted to tenants earning up to 60 percent of the AMI with 11 units set aside for tenants earning less than 20 percent of the AMI and targeted towards homeless individuals and families. In addition, the complex offers a supportive service coordinator onsite to assist tenants with special needs. Other funding sources included LIHTC equity provided by TDBNA.
- A \$3.8 million SBA 504 permanent construction loan to build an owner-occupied property for business expansion that promoted business growth and job creation.

Product Innovation and Flexibility

The institution used of innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank funded 228 loans totaling \$16.6 million under the following innovative and/or flexible programs during the evaluation period.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	10	1,834
FNMA HomeReady Mortgage	2	418
FHA Mortgage	4	1,399
VA Mortgage	1	177
USDA-Rural Development Mortgage	1	253
PPP	210	12,549
Total	228	16,630

INVESTMENT TEST

The institution's performance under the Investment Test in the Allentown MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Allentown MMSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Allentown MMSA	6	10,163	20	14,818	26	100.0	24,981	100.0	0	\$0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period TDBNA made six investments totaling \$14.7 million and provided 14 qualifying grants and donations totaling \$95,500. The dollar volume of current- and prior-period investments represented 18.2 percent of allocated tier 1 capital.

The institution exhibited excellent responsiveness to community development needs. Investments were particularly responsive to affordable housing needs, creating 66 affordable housing units. By dollar volume, 92.9 percent of current period investments and donations funded affordable housing, 6.7 percent funded revitalization and stabilization efforts, and 0.4 percent funded community services.

The institution made significant use of innovative and/or complex qualified investments. CD investments included one direct LIHTC investment totaling \$11.6 million, and a \$1 million EQ2 investment made as part of the TD Equity Fund which supports minority-owned businesses.

Examples of qualified investments in the AA include:

- A complex LIHTC investment totaling \$11.6 million to fund construction of an affordable housing project consisting of 66 units affordable to tenants earning up to 60 percent of the AMI. The project provides safe and affordable housing to LMI families with on-site resident service programs and a variety of community amenities. All units operate as LIHTC units with five units subsidized under

Section 811 project-based rental subsidies for those living with disabilities, and several units set aside for the formerly homeless. TDBNA also provided the construction loan financing.

- A \$1 million innovative EQ2 investment in a local CDFI that promoted revitalization efforts in LMI communities by providing accessible financing to business owners whose risk factors make it difficult to obtain funding from traditional lenders. The CDFI serves prospective, start-up, and established businesses through small business loans for leasehold improvements, purchase of equipment and machinery, marketing costs, working capital, and inventory purchases.
- Three grants totaling \$45,000 to an area nonprofit organization that provides programs and services for business start-up and development, housing, neighborhood revitalization, and community services. The funds supported the organization's programs providing financial education, homebuyer education, homeowner counseling, and foreclosure mitigation targeted to LMI individuals.

SERVICE TEST

The institution's performance under the Service Test in the Allentown MMSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Allentown MMSA was good.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Allentown MMSA	100.0	8	100.0	0.0	12.5	50.0	37.5	7.0	19.5	38.8	34.7

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA.

The bank had no branches in low-income geographies. The bank's distribution of branches in moderate-income geographies was below the percentage of the population living within those geographies. Examiners considered two middle-income adjacent branches that served a low-income and a moderate-income geography respectively, within the AA as demonstrated by branch transactions and deposit account opening activity. These MUI adjacent branches improved accessibility and had a positive impact on the retail service delivery systems conclusion.

TDBNA offers ADS including ATMs and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 10 deposit taking ATMs in the AA, including two in moderate-income geographies. The bank had no ATMs in low-income geographies. The distribution of ATMs in moderate-income geographies was excellent. TDBNA provided data indicating that 87.2 percent of customers in LMI areas of the AA interacted with the bank through digital banking channels during the evaluation compared, compared with 88.7 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 66.9 percent of their transactions utilizing digital banking channels over the

evaluation period, compared to 72 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours are tailored to meet the convenience and needs of the various portions of its AA including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including extended hours on Thursdays and Fridays. All eight branches in the AA were open on Saturdays and Sundays. Additionally, all branches had drive-thru facilities. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

TDBNA provided an adequate level of CD services. During the evaluation period, the bank provided 15 financial education events to 396 participants in the Allentown MMSA. Additionally, five bank employees provided 103 service hours over the evaluation period that benefitted four organizations through board or committee participation or professional skills assistance. The bank's assistance was responsive to an identified need in the AA for financial education.

Examples of CD services in the AA include:

- A bank employee provided financial literacy education to 80 LMI youth participants in grades 9-12.
- Two bank employees led three affordable housing workshops over the course of the evaluation period. The workshops included topics on home buying and credit awareness and were attended by 86 participants.
- A bank employee served on the board of a Community Development Corporation (CDC) that works to reduce poverty, promote self-sufficiency, and build stronger communities. The employee provided 69 service hours over the evaluation period.

Boston-Cambridge-Newton, MA-NH MMSA (Boston MMSA)

CRA rating for the Boston MMSA²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include

- excellent lending activity, with overall excellent geographic and borrower distribution of lending;
- an excellent level of CD lending that further supported the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- readily accessible retail service delivery systems with consideration for MUI adjacent branches; and
- an adequate level of CD services.

Description of Institution's Operations in the Boston MMSA

The AA is comprised of the entire Boston MMSA including the Boston, MA Metropolitan Division (MD) (Boston MD), the Cambridge-Newton-Framingham, MA MD (Cambridge MD), and the Rockingham County-Strafford County, NH MD (Rockingham MD). Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had 102 branch locations and 278 ATMs, including 83 non-deposit taking ATMs located in Walgreens stores. Of the 278 ATMs in the AA, 182 were deposit-taking. During the evaluation period, the bank made \$5.8 billion or 11.2 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

The Boston MMSA represented TDBNA's fourth largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$17.6 billion in deposits in this AA, which represented 7.5 percent of the bank's total adjusted deposits. The AA is served by 106 FDIC-insured financial institutions operating 1,396 branches. TDBNA ranked fifth in deposit market share with 3.6 percent. The top three competitors had 64.7 percent of the market share and consisted of State Street Bank and Trust Company with one branch and 33.5 percent market share, Bank of America, N.A. with 124 branches and 19.5 percent market share, and Citizens Bank, N.A. with 167 branches and 11.7 percent market share.

The following table provides a summary of the demographics, including housing and business information for the Boston MMSA.

² This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Boston MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,134	9.8	18.3	36.2	31.6	4.1
Population by Geography	4,941,632	9.1	19.0	38.0	32.7	1.1
Housing Units by Geography	1,972,346	8.6	19.2	39.0	32.2	1.0
Owner-Occupied Units by Geography	1,143,559	3.3	15.0	42.8	38.4	0.5
Occupied Rental Units by Geography	709,196	16.9	26.1	32.8	22.5	1.7
Vacant Units by Geography	119,591	9.4	19.2	39.4	30.2	1.8
Businesses by Geography	608,225	6.2	15.4	35.8	41.2	1.4
Farms by Geography	11,413	3.2	14.3	43.7	38.2	0.5
Family Distribution by Income Level	1,172,623	22.5	16.6	20.2	40.7	0.0
Household Distribution by Income Level	1,852,755	26.2	14.6	17.1	42.1	0.0
Median Family Income MSA – 14454 Boston, MA		\$112,607	Median Housing Value			\$511,620
Median Family Income MSA –15764 Cambridge-Newton-Framingham, MA		\$121,481	Median Gross Rent			\$1,582
Median Family Income MSA – 40484 Rockingham County-Strafford County, NH		\$107,377	Families Below Poverty Level			5.8%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Boston MD

Based on information from the November 2023 Moody's Analytics report, the Boston MD economy has seen improvement since the beginning of the pandemic. Employment has increased slightly compared to pre-pandemic levels, with increased hiring in the construction and transportation/warehousing industries and gains in the finance and business services industries. Area economic drivers include healthcare, high technology (tech), and finance. The tech industry has flourished since the start of the pandemic, with the addition of biomedical research roles. Boston relies heavily on tech employment given the presence of major universities and many large biotech and information technology (IT) companies in nearby Cambridge. Major employers in the area include Mass General Brigham, Boston University, Amazon Air Hub & Distribution, and the University of Massachusetts. While the Boston MD has benefited from labor market stability due to the tech, education, and healthcare industries, high business and living costs are a challenge for the area. The economy is also highly exposed to cyclical finance and tech sectors. The Boston MD saw population declines during the first few years of the pandemic due to slowed international immigration coupled with workers relocating to lower cost of living areas, given the increase in remote work during the pandemic. While housing costs are increasing at an above-average rate in Boston, they are not as far above their pre-pandemic level as the rest of the nation.

Cambridge MD

Based on information from the September 2023 Moody's Analytics report, the Cambridge MD economy has kept pace with the rest of the region. The area is faring better than Massachusetts and the Northeast but lags the nation overall. Unemployment has decreased compared to pre-pandemic levels; however, the labor force has not yet fully recovered like it has nationwide. Area economic drivers include high tech, healthcare, and colleges/universities. The area benefits from a well-educated workforce and exceptional universities that attract new businesses. The Cambridge MD is one of the leading hubs for biotech and IT firms which helps provide high employment wages in the area. The area is heavily reliant on tech jobs and has become a center for tech startups and for large pharmaceutical, biotech and IT firms. Hiring within the IT industry increased over the past several years with software development and computer systems design employing more workers now than before the pandemic. However, many large firms including Google, Microsoft and Amazon may have gotten ahead of themselves with layoffs occurring this year. Major employers in the area include Harvard University, Massachusetts Institute of Technology, Raytheon Technologies Corp., Beth Israel Lahey Health and Mass General Brigham. Area weaknesses include high costs of living and doing business as well as a high exposure to cyclical finance and tech sectors. Similar to the Boston MD, Cambridge's housing price appreciation has been greater than Massachusetts and the U.S. overall, but prices are not as far above their pre-pandemic levels as the state and nation.

Rockingham MD

Based on information from the September 2023 Moody's Analytics report, the Rockingham MD economy has underperformed compared to its peers in the Northeast. The unemployment rate is well below average and slightly below pre-pandemic levels; however, the recent improvement is primarily attributable to a shrinking labor force as opposed to robust job growth. The healthcare industry is one of the key economic drivers in the MD, with top employers including Wentworth-Douglass Hospital, Genesis Healthcare, and Exeter Hospital. Other economic drivers include high tech, and finance. Population growth in the area primarily consisted of retirees, which accounts for the largest consumers of healthcare services. The lower cost of living also attracts job seekers to the area. The area economy benefits from the large commuter cohort in the region, as more than a third of residents work outside of the MD. Other strengths include high educational attainment, a lower tax rate than in other nearby metros, and tax incentives that attract high tech firms. Weaknesses include a dependence on low-value-added services and sensitivity to nearby Boston's business cycle. Although the area has a high median household income, rental and housing affordability has declined over the past few years, impacting lower-income residents. Further, while home price appreciation in the MD has fared better than the nation overall, single-family housing permits have not picked up.

According to the BLS, the unemployment rate in the Boston MMSA was 6.9 percent as of January 2021, compared to 3 percent in December 2023. The MMSA unemployment rate was lower than the unemployment rate for the state of Massachusetts (3.2 percent) as of December 2023 but was higher than the rate in the state of New Hampshire (2.6 percent).

Based on information in the above table, low-income families earned less than \$53,689-\$60,741 and moderate-income families earned less than \$85,902-\$97,185, depending on the MD. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MD, this calculated to a maximum monthly mortgage payment between \$1,342 and \$1,519 for low-income borrowers and between \$2,148 and \$2,430 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value

would be \$2,746. Most low-income and moderate-income borrowers would be challenged to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 32 percent from the first quarter of 2021 to the fourth quarter 2023 in the Boston MD. In the Cambridge MD and Rockingham MD, home prices increased by 30.8 percent and 40.7 percent respectively over the same time period. The acceleration in home prices across the MMSA worsened existing affordability concerns for low-income and moderate-income borrowers.

The OCC relied on three community contacts conducted during the evaluation period with representatives from area organizations and agencies, including a city-run community development department, a city-run small business development department, and an immigrant-focused community development organization. Community contacts indicated that the following are needs within the bank's AA:

- Developing more livable wage job opportunities,
- Affordable housing units,
- Down payment assistance programs,
- Small business lending including micro-loans,
- Technical assistance for small businesses,
- Access to multilingual banking products and support,
- Financial literacy education, including homebuyer education in other languages,
- Funding community service organizations.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing, including both owner-occupied and rental units,
- Small business access to capital,
- Neighborhood revitalization and stabilization,
- Financial education.

Scope of Evaluation in the Boston MMSA

Examiners completed a full-scope review for the Boston MMSA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at overall conclusions as they represented the majority of TDBNA's lending in this AA. TDBNA did not originate a sufficient volume of small farm loans to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BOSTON MMSA

LENDING TEST

The bank's performance under the Lending Test in the Boston MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Boston MMSA was excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Boston MMSA	11,016	9,428	37	144	20,625

Dollar Volume of Loans \$(000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Boston MMSA	5,510,415	318,947	809	278,296	6,108,467

TDBNA ranked fifth out of 106 depository institutions (top 5 percent) with a deposit market share of 3.6 percent.

For home mortgage loans, TDBNA's market share of 2.7 percent ranked seventh out of 704 lenders (top 1 percent). The top three lenders were Citizen's Bank, N.A. with 8 percent market share, Guaranteed Rate, Inc with 3.4 percent market share, and Rocket Mortgage with 3 percent market share.

For small loans to businesses, TDBNA's market share of 1.6 percent ranked 11th out of 223 lenders (top 5 percent). The top three lenders were American Express National Bank with 29.4 percent market share, Bank of America N.A. with 11.6 percent market share, and JPMorgan Chase Bank, N.A. with 11.4 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the Boston MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased in low-income and moderate-income geographies exceeded both the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the Boston MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small business loans was excellent.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies approximated, and in moderate-income geographies equaled, the percentage of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies equaled, and in moderate-income geographies approximated, the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker distribution of loans in low-income geographies compared to the demographics and the aggregate performance.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Boston MMSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the Boston MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers exceeded the percentages of those families in the AA. The percentage of home mortgage loans originated or purchased to both low- and moderate-income borrowers exceeded the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the Boston MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Community Development Lending

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test in the Boston MMSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TDBNA made 144 CD loans totaling \$278.3 million, which represented 12.1 percent of allocated tier one capital. Included in this total were 101 PPP loans totaling \$40.9 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, often in a leadership position. CD loans were responsive to identified community needs including affordable housing, economic development, and revitalization/stabilization of LMI geographies. By dollar volume, 51.8 percent of CD loans funded affordable housing, 24.4 percent funded community services, 17.5 percent funded revitalization and stabilization efforts and 6.3 percent funded economic development activities.

Examples of CD loans in the AA include:

- A \$35 million construction loan to finance the conversion of an existing industrial property into 87 units of affordable housing for LMI individuals and families. All units are restricted to households earning up to 80 percent of the AMI. TDBNA also provided LIHTC and Historic Tax Credit (HTC) equity for the project.
- A \$22 million loan to renovate a historic building into a 74-unit senior apartment community of which 58 units are restricted to LMI senior citizens with income restrictions set below 80 percent of the AMI. The project includes project-based Section 8 vouchers for those earning less than 30 percent of the AMI. TDBNA also provided LIHTC and state tax credit equity for the project.
- A \$3.7 million working capital line of credit to a CDFI that promotes neighborhood revitalization/stabilization by providing financing for affordable housing and small businesses and funding social services for underserved communities.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, TDBNA funded 2,976 loans totaling \$281.2 million under the following innovative and flexible programs during the evaluation period.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	58	19,475
TD Home Access Mortgage	5	2,455
FNMA HomeReady Mortgage	64	16,779

FHA Mortgage	11	5,371
VA Mortgage	4	1,397
PPP	2,834	235,703
Total	2,976	281,180

INVESTMENT TEST

The institution's performance under the Investment Test in the Boston MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Boston MMSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Boston MMSA	72	119,742	292	219,166	364	100.0	338,908	100.0	5	27,411

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

During the evaluation period, TDBNA made 74 investments totaling \$214.1 million and provided 218 qualifying grants and donations totaling \$5.1 million. The dollar volume of current- and prior-period investments represented 14.7 percent of allocated tier 1 capital.

The bank exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs, creating 773 affordable housing units. By dollar volume, 91.1 percent of current period investments and donations funded affordable housing, 6.8 percent funded economic development, 1.4 percent funded community services, and 0.7 percent funded revitalization and stabilization efforts.

The institution made extensive use of innovative and/or complex qualified investments. CD investments included five LIHTC investments totaling \$102.4 million. Additionally, the bank made a \$1.5 million EQ2 investment in an economic development corporation as part of the TD Equity Fund which supports minority-owned businesses.

Examples of qualified investments in the AA include:

- A \$27.8 million complex LIHTC investment that funded the rehabilitation of a historic mill into an affordable multifamily housing project consisting of 87 units. All units are income restricted to tenants earning less than 80 percent of the AMI.
- A \$1.5 million innovative EQ2 investment in a local CDFI that provides access to capital and encourages economic mobility through entrepreneurship. The CDFI supports minority and women-owned small businesses with lending focused on six LMI communities within Boston including Dorchester, Roxbury, Mattapan, Jamaica Plain, Hyde Park and Roslindale.

- Two grants totaling \$500,000 to a nonprofit organization that provides affordable housing and related services to individuals and families in the area. The funding specifically supported programs that assisted with securing affordable rental housing and reducing eviction and poverty for those experiencing homelessness.

SERVICE TEST

The institution's performance under the Service Test in the Boston MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Boston MMSA was excellent.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population*			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Boston MMSA	100.0	102	100.0	5.9	18.6	41.2	33.3	9.1	19.0	38.0	32.7

*1.1% of the population resides within an "NA" income category.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.

The bank's distribution of branches in low-income geographies was below and in moderate-income geographies approximated the percentage of the population living within those geographies. Examiners further considered seven MUI adjacent branches that served low-income geographies and 11 MUI adjacent branches that served moderate-income geographies within the AA as demonstrated by branch transactions and deposit account opening activity. These MUI adjacent branches improved accessibility and had a positive impact on the retail service delivery systems conclusion.

TDBNA offers ADS including ATMs and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 278 ATMs in the AA, of which 182 were deposit-taking, including 19 in low-income geographies and 60 in moderate-income geographies. The distribution of ATMs in low-income geographies was adequate and in moderate-income geographies was excellent. TDBNA provided data indicating that 83.1 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared with 85 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 60.3 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 65.9 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings			
Assessment Area	Branch Openings/Closings		
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)

			Low	Mod	Mid	Upp
Boston MMSA	2	6	0	-1	-1	-2

The institution's opening and closing of branches has generally not adversely affected, the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low-and moderate-income individuals. The bank opened two branches, including one in a low-income geography, and closed six branches, including one in a low-income geography and one in a moderate-income geography. Closures were attributed to a low number of customer transactions and production volumes that were lower than expected.

Services, including where appropriate, business hours, are tailored to meet the convenience and needs of the various portions of its AA including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including extended hours on Thursdays and Fridays. Of the 102 branches, 98 were open on Saturdays including all 25 low- and moderate-income branches and 85 were open on Sundays including three of six low-income branches and all 19 moderate-income branches. Of the 102 branches in the AA, 69 had drive-thru facilities, including two low-income and 13 moderate-income branches. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

TDBNA provided an adequate level of CD services. During the evaluation period, the bank provided 159 financial education events to 2,154 participants in the Boston MMSA. Additionally, 15 bank employees provided 879 service hours over the evaluation period that benefitted 17 organizations through board or committee participation or professional skills assistance. The bank's assistance was responsive to identified needs in the AA including financial education and small business technical assistance.

Examples of CD services in the AA include:

- A branch manager served on the board of a community services organization that promotes workforce development, education and job training programs, housing services, and other services targeting LMI individuals. The employee provided 295 service hours over the evaluation period.
- A mortgage loan officer led 15 home buying workshops attended by 287 participants over the evaluation period. The workshops were targeted to an LMI audience using a home buying curriculum.
- A bank employee led a small business seminar on accessing capital to 75 participants in coordination with a nonprofit economic development organization that supports women-owned businesses and female entrepreneurs.

Charlotte-Concord-Gastonia, NC-SC MMSA (Charlotte MMSA)

CRA rating for the Charlotte MMSA³: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include

- excellent lending activity, with overall good geographic distribution of lending and excellent borrower distribution of lending;
- an excellent level of CD lending that further supported the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- readily accessible retail service delivery systems; and
- an excellent level of CD services.

Description of Institution's Operations in the Charlotte MMSA

The AA is comprised of a portion of the Charlotte MMSA including Mecklenburg County in North Carolina and Lancaster and York Counties in South Carolina. Refer to appendix A for a complete list of counties reviewed.

The Charlotte MMSA became a new rating area for the bank in 2023 when the bank expanded into the North Carolina portion of the MMSA, opening a new branch in the city of Charlotte in May 2023. The bank also expanded into Lancaster County, South Carolina opening a branch in that county in June 2023. Prior to 2023, the Charlotte MSA was a separate AA consisting of York County within the state of South Carolina.

As of year-end 2023, TDBNA had nine branch locations and 14 deposit-taking ATMs within the AA. During the evaluation period, the bank made \$197.3 million or 0.4 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

The Charlotte MMSA represented TDBNA's second smallest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$628.5 million in deposits in this AA, which represented 0.3 percent of the bank's adjusted total deposits. The AA is served by 40 FDIC-insured financial institutions operating 300 branches. TDBNA ranked 11th with 0.2 percent deposit market share. The top three competitors had 95.4 percent of the market share and consisted of Bank of America, N.A. with 34 branches and 64.8 percent market share, Truist Bank with 37 branches and 21 percent market share, and Wells Fargo Bank, N.A. with 52 branches and 9.7 percent market share.

The following table provides a summary of the demographics, including housing and business information for the Charlotte MMSA.

³ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charlotte MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	382	5.8	24.6	27.5	39.3	2.9
Population by Geography	1,493,588	5.0	24.1	29.3	40.3	1.3
Housing Units by Geography	604,098	5.4	24.6	29.0	39.6	1.4
Owner-Occupied Units by Geography	341,269	2.6	19.7	30.8	46.3	0.7
Occupied Rental Units by Geography	219,491	9.4	31.6	26.7	30.0	2.2
Vacant Units by Geography	43,338	6.9	27.9	25.9	36.2	3.1
Businesses by Geography	278,236	4.9	23.0	24.1	45.8	2.3
Farms by Geography	4,433	3.9	23.2	32.3	39.6	1.0
Family Distribution by Income Level	353,164	20.0	17.0	18.8	44.2	0.0
Household Distribution by Income Level	560,760	21.6	16.5	17.7	44.3	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$80,486	Median Housing Value			\$262,723
			Median Gross Rent			\$1,177
			Families Below Poverty Level			7.6%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information from the November 2023 Moody's Analytics report, the Charlotte economy has experienced a setback with payrolls declining in recent months. Although employment in the healthcare industry has continued to grow, other industries have stalled. The unemployment rate has been steady and below average even with growth in the labor force, which has kept labor shortages from occurring. The strength of the labor market has supported the housing market despite affordability challenges. Other strengths in Charlotte include low living and business costs, an evolving technological footprint that attracts new workers, and a highly skilled workforce. The area has also experienced favorable demographic trends including strong, positive net migration. The influx of residents that began during the pandemic has not slowed, with gains remaining well above their pre-pandemic level. The strong demographics coupled with an increase in domestic travel has contributed to a significant increase in leisure/hospitality payrolls in the area. Conversely, Charlotte's economic challenges include high-cost single-family housing and stagnant new construction. The area's economic drivers include finance and logistics. The finance and tech industries have played a crucial role in the area's economic performance in recent years but have experienced a recent slowdown. A highly skilled workforce has helped attract investment and growth in the fintech segment which has helped create a more diversified economic base. The largest employment sector is professional and business services, followed by government. Major employers in the Charlotte MMSA include Atrium Health, Wells Fargo & Co., Walmart Inc., Bank of America Corp., and Nowant Health Inc.

According to the BLS, the unemployment rate in the Charlotte MMSA was 5.8 percent as of January 2021, compared to 3.1 percent in December 2023. The MMSA unemployment rate was comparable to

the unemployment rates for the states of North Carolina (3.2 percent) and South Carolina (3 percent) as of December 2023.

Based on information in the above table, low-income families earned less than \$40,243 and moderate-income families earned less than \$64,389. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,006 for low-income borrowers and \$1,610 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be \$1,410. Most low-income borrowers would be challenged to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 49.1 percent from the first quarter of 2021 to the fourth quarter 2023. This acceleration in home prices worsened existing affordability concerns in the MMSA for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC relied on information from three community contacts in the AA that were conducted during and after the evaluation period. The contacts included an economic development center and two nonprofit organizations focused on neighborhood revitalization in LMI areas. Community contacts indicated that the following are needs and opportunities within the bank's AA:

- Financing for affordable housing projects, including more flexible and longer-term financing options for developers,
- Small business development and support,
- Programs and funding to address food insecurity and other basic needs,
- Home repair assistance for seniors and low-income homeowners,
- Workforce development and job training,
- Financing and technical assistance to small businesses,
- Revitalization of distressed areas within the city of Charlotte,
- Providing funding including grants, donations, and low-interest loans to nonprofit organizations,
- Financial education and job training programs for at-risk youth,
- Volunteering on nonprofit boards and committees to provide expertise,
- Ensuring access to basic banking services, particularly in underserved areas.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable owner-occupied and rental housing, including new inventory and preservation and rehabilitation of existing housing stock,
- Funding, including grants, to nonprofit organizations providing basics community services to LMI individuals.

Scope of Evaluation in the Charlotte MMSA

Examiners completed a full-scope review of the Charlotte MMSA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at overall conclusions as they represented the majority of TDBNA's lending in this AA. The bank did not originate any small loans to farms in this AA.

For CRA analysis purposes, the volume of deposits in the Charlotte MMSA as of June 2023, was split between the Charlotte MMSA rating area (one-third) and the Charlotte MSA within the state of South Carolina (two-thirds) to account for the different time periods that the AAs were in existence. This resulted in \$209.5 million in deposits allocated to the Charlotte MMSA.

Conclusions for the Charlotte MMSA were based solely on performance in 2023. Conclusions on performance in 2021 and 2022 were included as part of the Charlotte MSA in the state of South Carolina rating area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHARLOTTE MMSA

LENDING TEST

The bank's performance under the Lending Test in the Charlotte MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Charlotte MMSA was excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Charlotte MMSA	357	110	0	6	473

Dollar Volume of Loans \$(000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Charlotte MMSA	191,562	5,760	0	31,022	228,344

TDBNA ranked 11th out of 40 depository institutions (top 28 percent) with a deposit market share of 0.2 percent.

For home mortgage loans, TDBNA's market share of 0.5 percent ranked 42nd out of 445 lenders (top 10 percent). The top three lenders were Founders Federal Credit Union with 8 percent market share, Rocket Mortgage with 7.1 percent market share, and Movement Mortgage, LLC with 5.4 percent market share.

For small loans to businesses, TDBNA's market share of 0.3 percent ranked 23rd out of 85 lenders (top 28 percent). The top three lenders were American Express National Bank with 19.7 percent market

share, Synchrony Bank with 12.3 percent market share, and Bank of America N.A. with 10.3 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the Charlotte MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good.

For 2023, the percentage of home mortgage loans originated or purchased in low-income geographies was well below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. In moderate-income geographies, the percentage of home mortgage loans originated or purchased exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

Refer to Table Q in the Charlotte MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

For 2023, the percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. In moderate-income geographies, the percentage of small loans to businesses originated or purchased was near-to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Charlotte MMSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the Charlotte MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For 2023, the percentage of home mortgage loans originated (or purchased) to low-income borrowers was well below, and to moderate-income borrowers exceeded, the percentages of those families in the AA. The percentage of home mortgage loans originated (or purchased) to low-income and moderate-income borrowers exceeded the aggregate percentages of all reporting lenders.

Small Loans to Businesses

Refer to Table R in the Charlotte MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For 2023, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

Community Development Lending

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test in the Charlotte MMSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TDBNA made six CD loans totaling \$31 million, which represented 113 percent of allocated tier 1 capital. The bank utilized complex CD loans, occasionally in a leadership position. CD loans were responsive to identified community needs including affordable housing and revitalization/stabilization of distressed areas. By dollar volume, 89.4 percent of CD loans funded affordable housing, 5.5 percent funded revitalization and stabilization efforts, and 5 percent funded economic development activities.

Examples of CD loans in the AA include:

- A \$24.2 million construction loan that funded a 136-unit senior and family housing community. The project includes 100 units for senior citizens with incomes up to 80 percent of the AMI with the remaining 36 units for families earning less than 60 percent of the AMI. Other funding sources for this project included LIHTC equity also provided by TDBNA.
- A \$2 million loan participation to acquire multi-family properties in South Carolina including one building with 50 units in the bank's AA (York County). All properties operate under LIHTC and

land use restriction agreements (LURAs) with rents restricted to tenants earning less than 60 percent of the AMI.

- A \$1.7 million loan to provide construction financing for a new retail center located in a low-income geography and Opportunity Zone in Charlotte. The project supports the city's redevelopment initiative in a historic area.

Product Innovation and Flexibility

The bank made little use of innovative and flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank made 11 loans totaling \$3.2 million under the following innovative and flexible programs during the evaluation period in the Charlotte MMSA.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Home Access Mortgage	6	1,318
FNMA Home Ready Mortgage	1	267
FHA Mortgage	3	1,177
VA Mortgage	1	425
Total	11	3,187

INVESTMENT TEST

The institution's performance under the Investment Test in the Charlotte MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Charlotte MMSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Charlotte MMSA	0	0	21	20,483	21	100.0	20,483	100.0	0	0

Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made seven investments totaling \$20.1 million and provided 14 grants and donations totaling \$382,500. The dollar volume of current- period investments (excluding unfunded commitments) represented 74.6 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs creating 136 affordable housing units. By dollar volume, 99.1 percent of current period investments and donations funded affordable housing and 0.9 percent funded community services to LMI individuals.

The institution made significant use of innovative and/or complex qualified investments. CD investments included one direct LIHTC investment totaling \$17.7 million.

Examples of qualified investments in the AA include:

- A \$17.7 million complex LIHTC investment for the new construction of an affordable housing complex that will contain 100 units for seniors and 36 family units. The senior units are restricted to tenants with incomes below 80 percent of the AMI. The family units consist of one-, two-, and three-bedroom units with income restrictions below 60 percent of the AMI. TDBNA provided the construction loan financing for the project.
- A \$250,000 grant to a nonprofit organization to support affordable housing and economic stability for individuals and families. The grant will help rehabilitate and preserve a 50-unit affordable rental portfolio of duplex and triplex units restricted to tenants earning up to 60 percent of the AMI.
- A \$20,000 grant to a nonprofit organization that provides services to LMI senior citizens including legal and tax assistance, financial education, meals and groceries, home repairs, and daily living assistance.

SERVICE TEST

The bank's performance under the Service Test in Charlotte MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Charlotte MMSA was excellent.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches*						Population**			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Charlotte MMSA	100.0	9	100.0	11.1	33.3	22.2	22.2	5.0	24.1	29.3	40.3

*One bank branch (11.1%) is located in an "NA" income category.

**1.3% of the population resides within an "NA" income category.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.

The bank's distribution of branches in both low-income and moderate-income geographies exceeded the percentages of the population living within those geographies.

TDBNA offered ADS including ATMs and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 14 deposit-taking ATMs in the AA, including two in low-income geographies and five in moderate-income geographies. The distribution of ATMs in both low-income and moderate-income geographies was excellent. TDBNA provided data indicating that 91.1 percent of customers in LMI

geographies interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 93.4 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 74.6 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 80.7 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches*			
			(+ or -)			
			Low	Mod	Mid	Upp
Charlotte MMSA	6	0	1	2	1	1

*One branch was opened in a "N/A" income geography.

The bank's opening and closing of branches has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened six branches, one in a low-income geography and two in moderate-income geographies. The bank did not close any branches during the evaluation period.

Services, including where appropriate, business hours, are tailored to meet the convenience and needs of the various portions of its AA including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA with extended hours offered on Thursdays and Fridays. All branches were open on Saturdays and five were open on Sundays, including the one low-income branch and two moderate-income branches. Of the nine branches in the AA, five had drive-thru facilities, including one in a moderate-income geography. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

TDBNA provided an excellent level of CD services, particularly given that the rated area was in existence only one year of the evaluation period. During 2023, the bank provided 24 financial education events to 409 participants in the Charlotte MMSA. Additionally, six bank employees provided 148 service hours that benefitted seven organizations through board or committee participation or professional skills assistance. The bank's assistance was responsive to an identified need in the AA for financial education.

Examples of CD services in the AA include:

- A branch manager provided 15 service hours serving on the board of a community services organization that works to build innovative communities that foster the independence of LMI individuals with all abilities.
- Seven bank employees provided financial education programs to local students from schools that are majority LMI. During 2023, more than 162 local youth attended financial literacy sessions focused on topics such as basic financial education and career planning.
- A bank employee led four affordable housing workshops attended by 27 participants in partnership with a nonprofit organization that promotes self-sufficiency.

New York-Newark-Jersey City, NY-NJ MMSA (New York MMSA)

CRA rating for the New York MMSA⁴: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include

- excellent lending activity, with overall excellent geographic and borrower distribution of lending;
- an excellent level of CD lending that further supported the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- accessible retail service delivery systems with consideration for MUI adjacent branches; and
- an excellent level of CD services.

Description of Institution's Operations in the New York MMSA

The AA is comprised of the entire MMSA, including the Nassau County-Suffolk County NY MD, (Nassau County MD), the Newark, NJ MD (Newark MD), the New Brunswick-Lakewood, NJ MD (New Brunswick MD), and the New York-Jersey City-White Plains, NY-NJ MD (New York MD). Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had 379 branch locations and 915 ATMs, of which 824 were deposit-taking, within the AA. During the evaluation period, the bank made \$17.9 billion or 34.3 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

The New York MMSA represented TDBNA's second largest rated area in terms of FDIC deposits, and its largest based on adjusted deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$92.5 billion in deposits in this AA, which represented 39.6 percent of the bank's total adjusted deposits. The AA is served by 161 FDIC-insured financial institutions operating 4,346 branches. The bank ranked eighth in deposit market share with 3.6 percent. The top three competitors had 49.5 percent of the market share and consisted of JPMorgan Chase Bank N.A., with 681 branches and 33 percent market share, Goldman Sachs Bank USA with two branches and 9 percent market share, and The Bank of New York Mellon with three branches and 7.5 percent market share.

The following table provides a summary of the demographics, including housing and business information for the New York MMSA.

⁴ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: New York MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4,928	10.1	21.2	33.2	31.5	4.0
Population by Geography	20,081,935	11.2	22.0	32.7	33.1	1.0
Housing Units by Geography	7,717,263	10.6	20.9	32.6	35.1	0.9
Owner-Occupied Units by Geography	3,624,665	3.0	14.3	37.8	44.5	0.4
Occupied Rental Units by Geography	3,418,154	19.0	27.9	27.1	24.8	1.3
Vacant Units by Geography	674,444	8.5	20.7	33.1	36.4	1.3
Businesses by Geography	3,338,542	8.1	17.2	30.4	41.9	2.4
Farms by Geography	37,264	4.5	15.1	34.9	44.5	1.0
Family Distribution by Income Level	4,623,641	24.4	15.8	17.8	41.9	0.0
Household Distribution by Income Level	7,042,819	27.1	14.3	15.7	42.9	0.0
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY		\$130,301	Median Housing Value			\$554,694
Median Family Income MSA - 35154 New Brunswick-Lakewood, NJ		\$113,495	Median Gross Rent			\$1,568
Median Family Income MSA - 35084 Newark, NJ-PA		\$107,333	Families Below Poverty Level			9.3%
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ		\$85,483				
Source: 2020 ACS Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

Nassau County MD

Based on information from the September 2023 Moody's Analytics report, the MD is recovering from an employment slow-down earlier in the year with white-collar and consumer industry jobs impacted the most. However, gains in healthcare and leisure/hospitality industries pushed employment into the positive over the summer. The area is home to diverse employers in health, medical supplies, tech, and airline. The largest employers include Northwell Health, Henry Schein Inc, Volt Information Sciences, and JetBlue Airways. Healthcare remains the core economic driver, led by hospitals and physicians' offices. The MD is among the nation's most reliant on healthcare, due to a very low uninsured rate and above-average senior population. However, the pharmaceutical industry has not fared as well with numerous firms having laid off workers this year, reflecting the impact of high interest rates and increasing competition. Area strengths include a highly skilled workforce and linkages with New York City that contribute to high per capita income. Area weaknesses include high costs of living and doing business, an aging population, continued out-migration of residents, and a lack of developable land. On the housing front, home sales have rapidly fallen year-over-year; however, low inventory and slower construction has helped maintain housing prices.

Newark MD

Based on information from the September 2023 Moody's Analytics report, Newark's economy while expanding, is showing signs of weakness. Payrolls have increased every month over the last year, but

there has been a noticeable slowing despite overall acceleration nationwide. In addition, the unemployment rate is over 4 percent for the first time since early 2022, in part due to an increasing labor force. The area benefits from a well-educated workforce and an abundance of high-value-added industries including high tech, financial services, and pharmaceuticals. In addition, Newark benefits from its location on the coast with the Port of Newark providing economic trade benefit. Various industries in the area have wide ranging performances. Healthcare has been the primary growth driver in the MD, while other major industries such as finance and logistics are struggling to add to payrolls. Newark is home to several large drug manufacturers, and pharmaceutical spending has been boosted due to development of potential new drugs. Higher-wage healthcare incomes, and a low uninsured rate have supported demand and payroll growth in these industries. Conversely, finance and professional/business services that represent a large share of employment in the MD and contribute to high-wage job creation, are struggling due to elevated interest rates. Area weaknesses include high costs of living and doing business, an unfavorable age structure and weak population growth. Per Moody's, pandemic-era population gains in Newark are losing momentum as young, working-age adults are increasingly migrating to New York City, and retiring residents are leaving for lower-cost states to stretch their savings. The area is home to several major employers such as Newark International Airport, University of Medicine and Dentistry of New Jersey, Verizon, and United Airlines.

New York MD

Based on information from the November 2023 Moody's Analytics report, New York's economy has recently surpassed its pre-pandemic peak; however, it appears to be losing momentum. Despite strong performance by consumer industries and finance, office-using industries have been volatile, and government jobs are lagging. The unemployment rate has risen consistent with the nation in recent months and given that the labor force has been downsizing, the unemployment gains are more apparent. The area economy is driven by tourism, financial services, and medical centers. New York is the financial capital of the world and benefits from high per capita income and limited exposure to manufacturing. The area's tourism industry is as strong as ever and even above pre-pandemic levels with international passenger volume rapidly rising. Top employers include Montefiore Health System, Mount Sinai Health System, JPMorgan Chase & Co., Bank of America, New York Presbyterian Health Systems, and NYU Langone Medical Center. Area weaknesses include high costs of living and doing business, a rapidly aging infrastructure, and troubled fiscal health made worse by population losses. By most measures, volatility is over for finance and tech, though both sectors still have struggles. Major banks are struggling which has led to restructuring and layoffs numbering in the thousands, which has impacted high-wage employment. Tech is in better shape as layoffs have subsided and firms can look to grow, even as some of these firms look to downsize their physical presence in this high-cost area. Despite the positive outlook, venture capital funding is trending lower and there is less spillover from tech as the workforce increasingly disperses. On the real estate front, both residential and commercial markets face challenges. The increased workplace flexibility is shrinking demand for office space, and office vacancies in the area are roughly twice that of the nation. This is not only impacting property values but also driving a significant reduction in weekday retail traffic. There is significant demand for affordable housing as the area is highly dependent on young adults with lower earnings. This has put some downward pressure on condo prices, though rents remain very high.

According to the BLS, the unemployment rate in the New York MMSA was 9.3 percent as of January 2021, compared to 4.5 percent in December 2023. The MMSA unemployment rate was comparable to the unemployment rates in both the state of New York (4.4 percent) and state of New Jersey (4.5 percent) as of December 2023. The MMSA unemployment rate was, however, higher than the national unemployment rate of 3.7 percent as of December 2023.

Based on information in the above table, low-income families earned less than \$42,742 - \$65,151 and moderate-income families earned less than \$68,386 - \$104,241, depending on the MD. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MD, this calculated to a maximum monthly mortgage payment between \$1,069 to \$1,629 for low-income borrowers and between \$1,710 and \$2,606 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be \$2,978. Most low-income and moderate-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 26.1 percent from the first quarter of 2021 to the fourth quarter 2023 in the New York MD. HPI increases ranged from 29.2 percent to 41.6 percent for other MDs in the New York MMSA over the same time period. The acceleration in home prices across the MMSA worsened existing affordability concerns for low-income and moderate-income borrowers.

The OCC relied on three community contacts conducted during the evaluation period with two nonprofit housing organizations and a city planning department. Community contacts indicated that the following are needs and opportunities within the bank's AA:

- Affordable housing, including rental housing units,
- Subsidies for rental housing,
- Flexible and affordable mortgage loan programs,
- Financing for the construction, development, and preservation of affordable housing,
- Financing for environmentally sustainable affordable housing projects,
- Small business access to credit and technical assistance,
- Repurpose of vacant commercial space for small businesses,
- Homeowner education and counseling.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing (ownership/rental) for LMI communities,
- Small business lending and technical assistance,
- Supporting nonprofits to assist with basic needs/services for LMI populations,
- Financial education, including general and homeownership.

Scope of Evaluation in the New York MMSA

Examiners completed a full-scope review for the New York MMSA. Examiners placed more emphasis on small loans to businesses than home mortgage loans in arriving at overall conclusions as they represented the majority of TDBNA's lending in this AA. Small farm lending had a negligible impact on the Lending Test rating.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NEW YORK MMSA

LENDING TEST

The bank's performance under the Lending Test in the New York MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the New York MMSA was excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
New York MMSA	35,668	73,163	71	988	109,890

Dollar Volume of Loans \$(000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
New York MMSA	15,643,302	2,256,008	2,462	2,439,377	20,341,149

TDBNA ranked eighth out of 161 depository institutions (top 5 percent) with a deposit market share of 3.6 percent.

For home mortgage loans, TDBNA's market share of 3.7 percent ranked fifth out of 862 lenders (top 1 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 6.1 percent market share, Wells Fargo Bank N.A. with 5.7 percent market share, and Rocket Mortgage with 4.1 percent market share.

For small loans to businesses, TDBNA's market share of 2.4 percent ranked seventh out of 353 lenders (top 2 percent). The top three lenders were American Express National Bank with 32.7 percent market share, JPMorgan Chase Bank, N.A. with 24.3 percent market share, and Bank of America, N.A. with 6.8 percent market share.

For small loans to farms, TDBNA's market share of 0.3 percent ranked 15th out of 22 lenders (top 69 percent). The top three lenders were JPMorgan Chase Bank, N.A. with 57.4 percent market share, Bank of America, N.A. with 9.6 percent market share, and U.S. Bank, N.A. with 9.5 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units, small businesses, and small farms.

Home Mortgage Loans

Refer to Table O in the New York MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased in low- income and moderate-income geographies exceeded the percentages of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low- income geographies approximated, and in moderate-income geographies, exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the New York MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies was near to the percentage of businesses located in those geographies and approximated the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker overall distribution of loans in both low-income and moderate-income geographies.

Small Loans to Farms

Refer to Table S in the New York MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms was overall adequate.

For the 2022-2023 analysis period, the bank did not originate any loans in low-income geographies. The percentage of small loans to farms originated or purchased in moderate-income geographies was well below the percentage of farms and the aggregate percentage of all reporting lenders located in those geographies.

For 2021, the bank's performance was stronger than the 2022-2023 analysis period due to a better overall distribution of loans in both low-income and moderate-income geographies.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the New York MMSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the New York MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans was good. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low- and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers approximated both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was stronger than the 2022-2023 analysis period due to a better distribution of loans to moderate-income borrowers compared to the aggregate performance.

Small Loans to Businesses

Refer to Table R in the New York MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker distribution of loans to small businesses compared to the demographics.

Small Loans to Farms

Refer to Table T in the New York MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes was good.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to farms with revenues of \$1 million or less was near-to the percentage of small farms in the AA and exceeded the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker distribution of loans to small farms compared to the demographics.

Community Development Lending

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test in the New York MMSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TDBNA made 988 CD loans totaling \$2.4 billion, which represented 20.1 percent of allocated tier 1 capital. Included in this total were 652 PPP loans totaling \$217.5 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, often in a leadership position. CD loans were impactful and responsive to identified community needs including affordable housing, small business lending, and support for nonprofits providing community services. By dollar volume, 53.2 percent of CD loans funded community services, 30.5 percent funded affordable housing, 9.2 percent funded revitalization and stabilization efforts, and 7.2 percent funded economic development activities.

Examples of CD loans in the AA include:

- A \$31.2 million loan to finance the new construction of a 72-unit supportive LIHTC project restricted to tenants with incomes up to 60 percent of the AMI. The project included 47 units set aside for chronically homeless and formerly incarcerated individuals receiving Section 8 housing choice vouchers or New York State Supportive Housing rental subsidies. The complex includes a community facility space for nonprofit service providers where residents can receive onsite services including job-readiness training and job placement. Other funding sources included LIHTC equity from the bank.
- A \$22.7 million loan to construct a 44-unit affordable housing project with a nonprofit healthcare facility of which 43 units are set aside for individuals earning up to 80 percent of the AMI. Additionally, eight units are supportive housing units for formerly homeless single parent families receiving Section 8 housing choice vouchers. Other funding sources included LIHTC equity from the bank.
- A \$10 million working capital line of credit to a CDFI that serves as a nonprofit microfinance organization assisting women living in poverty to better their lives through entrepreneurship. The CDFI offers microloans, training, and other support to transform communities.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, TDBNA funded 22,162 loans totaling nearly \$2 billion under the following innovative and/or flexible programs during the evaluation period in the New York MMSA.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	470	146,010
TD Home Access Mortgage	124	39,860
FNMA HomeReady Mortgage	39	8,274
FHA Mortgage	103	53,643
VA Mortgage	10	3,974
PPP	21,416	1,734,571
Total	22,162	1,986,332

INVESTMENT TEST

The institution's performance under the Investment Test in the New York MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the New York MMSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
New York MMSA	153	544,540	582	1,009,540	735	100.0	1,554,080	100.0	3	1,603

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made 104 investments totaling \$990.5 million and provided 478 grants and donations totaling \$19 million. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 12.8 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing, helping to create 2,648 units of affordable housing. By dollar volume, 94.9 percent of current period investments and donations funded affordable housing, 3.5 percent funded economic development, 0.9 percent funded community services to LMI individuals, and 0.7 percent funded revitalization/stabilization activities.

The institution made extensive use of innovative and/or complex qualified investments. CD investments included 29 direct LIHTC investments totaling \$684.2 million and two EQ2 investments, made as part of the TD Equity Fund which supports minority-owned businesses, of which \$1 million was funded during the evaluation period.

Examples of qualified investments in the AA include:

- A \$76.3 million complex LIHTC investment to fund the construction of two apartment buildings consisting of 228 mixed-income units (includes one manager unit). The investment is part of a transit-oriented redevelopment plan in a downtown corridor. Income restrictions are set below 80 percent of the AMI for 216 of the units, with the remaining 11 rentable units targeting households up to 90 percent of the AMI.
- Two grants totaling \$2 million to an economic development organization that works to build sustainable businesses in underserved communities. The funds support the organization's entrepreneurship program which provides counseling, mentoring, and training for entrepreneurs looking to start or grow their business. The majority of those served are LMI minorities.
- Two grants totaling \$500,000 to a CDFI in support of their affordable housing programs including \$250,000 towards a rent to own program in conjunction with Fannie Mae whereby single-family rental properties are converted into owner-occupied homes that will be leased to own by LMI individuals.

SERVICE TEST

The institution's performance under the Service Test in the New York MMSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the New York MMSA was good.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
New York MMSA	100.0	379	100.0	4.7	14.0	32.2	47.0	11.2	22.0	32.7	33.1

* 1.0% of the population resides within an "NA" income category.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA.

The bank's distribution of branches in low-income geographies was well below and in moderate-income geographies was below the percentage of the population living within those geographies. Examiners further considered 22 MUI adjacent branches that served low-income geographies and 43 MUI adjacent branches that served moderate-income geographies within the AA as demonstrated by branch transactions and deposit account opening activity. These MUI adjacent branches improved accessibility and had a positive impact on the retail service delivery systems conclusion.

TDBNA offers ADS including ATMs and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 915 ATMs in the AA, of which 824 were deposit-taking, including 61 in low-income geographies and 159 in moderate-income geographies. The distribution of ATMs in low-income

geographies was adequate and in moderate-income geographies was good. TDBNA provided data indicating that 83.3 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 84.8 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 62.1 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 65.6 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches*			
			(+ or -)			
			Low	Mod	Mid	Upp
New York MMSA	4	20	0	1	-6	-12

*One branch opening was in a "NA" income category.

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened four branches during the evaluation period, including three in moderate-income geographies. The bank closed 20 branches, none in low-income geographies and two in moderate-income geographies. The moderate-income closures were attributed to low customer transactions and production volumes that were lower than expected as well as a low number of households associated with the branches.

Services, including where appropriate, business hours, are tailored to meet the convenience and needs of the various portions of its AA including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including extended hours on Thursdays at 302 locations and on Fridays at all locations. The bank also offered extended hours Monday through Wednesday at 94 branches in the AA including seven low-income and 13 moderate-income branches. Of the 379 branches, 376 were open on Saturdays including all but one low-income branch and all but one moderate-income branch and 319 were open on Sundays including all low-income branches and all but one moderate-income branches. Of the 379 branches in the AA, 275 had drive-thru through facilities, including eight in low-income and 39 in moderate-income geographies. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

TDBNA is a leader in providing CD services. During the evaluation period, the bank provided 344 financial education events to 8,896 participants in the New York MMSA. Additionally, 143 bank employees provided 2,569 service hours over the evaluation period that benefitted 88 organizations through board or committee participation or professional skills assistance. The bank's assistance was responsive to identified needs in the AA for technical assistance to small businesses, homeowner education, and general financial education.

Examples of CD services in the AA include:

- Two branch managers served on the board of an area nonprofit organization that provides meals to those in need. Together they provided 129 service hours over the evaluation period.
- Bank employees led numerous financial literacy workshops in conjunction with a microfinance nonprofit organization that helps low-income entrepreneurial women start and grow their businesses.

Topics for the classes included general financial education and small business-related workshops. In total, there were 2,150 participants over the evaluation period. In addition, seven bank employees provided 232 service hours through either board membership or professional skills assistance to the same organization over the evaluation period.

- A mortgage loan officer at the bank led nine homebuyer education classes attended by 250 participants in conjunction with local neighborhood housing organizations.

Philadelphia-Camden-Wilmington, PA-NJ-DE MMSA (Philadelphia MMSA)

CRA rating for the Philadelphia MMSA⁵: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include

- good lending activity, with overall good geographic distribution of lending and excellent borrower distribution of lending;
- an excellent level of CD lending that positively impacted the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- readily accessible retail service delivery systems with consideration for MUI adjacent branches; and
- an excellent level of CD services.

Description of Institution's Operations in the Philadelphia MMSA

The AA is comprised of the entire MMSA including the Camden, NJ MD (Camden MD), the Montgomery County-Bucks County-Chester County, PA MD (Montgomery County MD), the Philadelphia, PA MD (Philadelphia MD), and the Wilmington DE-NJ, MD (Wilmington MD). Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had 129 branch locations and 330 ATMs, of which 228 were deposit-taking, within the AA. During the evaluation period, the bank made \$4.8 billion or 9.1 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

The Philadelphia MMSA represented TDBNA's largest rated area in terms of FDIC deposits and second largest when considering adjusted deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$109.1 billion in deposits in this AA, ranking second in deposit market share with 18.2 percent. However, TDBNA has a significant dollar volume (\$70.7 billion) of Charles Schwab sweep deposits held administratively in the Philadelphia MMSA which were removed from the deposit total for CRA evaluation purposes. After adjusting for these deposits, the bank had \$38.4 billion in deposits in the market, which represented 16.5 percent of the bank's adjusted deposits. The AA is served by 95 FDIC-insured financial institutions operating 1,431 branches. After the deposit adjustment, TDBNA would still rank second with a 7.3 percent deposit market share. The top competitor was Capital One N.A. with one branch and 37.5 percent market share (42.5 percent adjusted). Wells Fargo Bank, N.A. ranked third with 5.7 percent market share (6.5 percent adjusted) and 151 branches.

The following table provides a summary of the demographics, including housing and business information for the Philadelphia MMSA.

⁵ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area**Assessment Area: Philadelphia MMSA**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,535	6.7	22.4	36.5	30.9	3.4
Population by Geography	6,141,326	6.5	22.3	38.2	31.8	1.2
Housing Units by Geography	2,455,140	6.8	23.0	38.1	31.1	1.0
Owner-Occupied Units by Geography	1,525,346	4.0	18.6	41.2	35.5	0.7
Occupied Rental Units by Geography	748,813	11.4	30.1	33.5	23.6	1.4
Vacant Units by Geography	180,981	12.3	30.5	30.5	24.7	2.0
Businesses by Geography	878,299	4.8	19.4	35.5	38.3	2.0
Farms by Geography	16,304	2.7	15.9	44.3	36.5	0.7
Family Distribution by Income Level	1,466,339	21.8	17.3	20.1	40.9	0.0
Household Distribution by Income Level	2,274,159	25.2	15.6	17.2	42.0	0.0
Median Family Income MSA - 37964 Philadelphia, PA		\$68,458	Families Below Poverty Level			8.2%
Median Family Income MSA - 33874 Montgomery County-Bucks County-Chester County, PA		\$117,345	Median Gross Rent			\$1,208
Median Family Income MSA - 15804 Camden, NJ		\$100,987	Median Housing Value			\$268,908
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ		\$93,347				

Source: 2020 ACS Census and 2023 D&B Data

Due to rounding, totals may not equal 100.0

(*) The NA category consists of geographies that have not been assigned an income classification.

Camden MD

Based on information from the September 2023 Moody's Analytics report, Camden's economy is performing better than most other areas. Payroll growth has outperformed the state and the nation over the last several months with consumer services industries including leisure/hospitality and healthcare leading the charge. The unemployment rate is above the national rate due in part to an expanding labor market. Housing prices have risen consistently, with housing appreciation higher than the statewide and national rates. The area's economic drivers include healthcare, manufacturing, and logistics. Camden's economic strengths include its high industrial diversity, low costs, proximity to highways and waterways essential to trade, above-average educational attainment, and high housing affordability. Conversely, Camden has weak population growth, high crime rates, below-average worker productivity, and a lack of prime-age workers. Camden is a hub for healthcare in the region due to a concentration of hospitals and physicians' offices. Camden's aging population and expansions at local area hospitals, have supported robust payroll growth in the healthcare industry. While healthcare has been a key source of growth in higher-wage jobs, many jobs in the sector are lower-wage support positions. Overall, the share of high-wage jobs in Camden is lower than the state of New Jersey and the U.S., due to a prevalence of less lucrative industries such as logistics and retail. The largest employment sectors are education and health services, professional and business services, and retail trade. The area's largest employers include Virtua Health, McGuire-Dix Air Force Base, Cooper Health System, TD Bank Corp, Kennedy Health System, and PHH Mortgage.

Montgomery County MD

Based on information from the September 2023 Moody's Analytics report, the area economy has experienced continual above average performance. Payroll growth is faring better than the U.S. overall, and most other large metro areas in the region. Housing prices are also appreciating at a higher rate than the Northeast on average, which has led to increased single-family construction. Area economic drivers include finance and healthcare, the latter of which has been largely responsible for the recent economic gains. In 2023, healthcare expanded rapidly, contributing to one in three new jobs in the area, which is more than twice its share of total employment. Driving the demand are an aging population, high per capita income, and high rates of private health insurance coverage. The area has an outsize share of office-using employment compared to other metro areas in the U.S. These white-collar industries have experienced a strong post pandemic recovery, and payrolls are expanding at twice the rate as one year ago. The area's economic strengths include its proximity to Philadelphia, a well-educated labor force, reputable public schools, and a low poverty rate. These strengths have helped to attract new residents and businesses to the area. The MD's population growth is among the strongest for metro areas in the Northeast helped by the prevalence of remote work arrangements and a high tax burden in Philadelphia. Conversely, the area has an aging infrastructure and restrictive zoning laws that drive up costs of living in many areas. The largest employment sectors are professional and business services and education and health services. Major employers in the area include Tower Health, The Vanguard Group, Einstein Healthcare Network, Universal Health Services Inc., and Holy Redeemer Health Systems.

Philadelphia MD

Based on information from the September 2023 Moody's Analytics report, Philadelphia's economy is faring well with payrolls expanding at a faster rate than the U.S. and other large metros in the region year-over-year. The unemployment rate remains low and is closer to the national rate than it has been for some time. Economic drivers include finance, healthcare, and higher education. Philadelphia is a center for healthcare and medical research which provide stability to the area economy. Scientific research represents a large and growing share of jobs in Philadelphia. The area is home to top research universities and pharmaceutical firms, which have helped attract investment for both smaller and more established research firms. This has established the MD as one of the main destinations for National Institutes of Health grants that support high-wage jobs and provide downstream benefits to the broader economy. Other area strengths include a well-developed shipping port and international airport. Economic weaknesses include prohibitive business taxes that push businesses to relocate to surrounding areas, significant fiscal problems, and relatively weak population growth. Education and Health Services is by far the largest employment sector in the area. Major employers include University of Pennsylvania Health System, Thomas Jefferson University/TJU Health System Inc., Children's Hospital of Philadelphia, Comcast, and Drexel University. On the real estate front, housing price appreciation has slowed and lags the state and national pace. Single-family construction is down while multifamily construction is faring better. The commercial real estate market is facing challenges. The demand for office space is down due in part to elevated borrowing costs and the county's wage tax that's assessed on firms and workers. Office vacancy rates are up and asking rental rates for office and retail space are stagnant whereas other metros in the region have seen increases.

Wilmington MD

Based on information from the September 2023 Moody's Analytics report, Wilmington's economy is slowing with total employment lagging behind the Northeast and the U.S. overall. Area economic drivers include finance and logistics, both of which have posted losses. Area strengths include a healthy business climate, relatively low business costs for the Northeast, and the ability to draw workers from surrounding states. Wilmington also offers many valuable financial service jobs, with its share of

finance jobs double the national average. Major employers include Christiana Care Health System, JPMorgan Chase & Co., Bank of America Corp., AstraZeneca, University of Delaware, and Amazon. Banks and credit card providers make up the majority of the financial services jobs. While the current high interest rates are good for banks' bottom lines, high borrowing costs have hindered consumer loan demand which has led to layoffs and hiring freezes at some banks. Logistics is the area's other economic driver with transportation jobs in Wilmington nearly double the national average due to the Port of Wilmington and I-95 in close proximity. High inflation and slow wage growth have resulted in weak consumer spending and logistics demand, and while some sites have implemented cost cutting measure, the Amazon fulfillment center has maintained a steady workforce. Other perceived weaknesses include a low industrial diversity compared to other metro areas in the Northeast and an aging infrastructure that reduces Wilmington's attractiveness. In addition, Wilmington's urban core has seen reduced activity with many businesses switching to remote or hybrid work arrangements. This has resulted in lessened demand for office space pushing vacancy rates well above the 20-year average. On the housing front, single family house prices are rising faster than those in the nation after a modest correction in late 2022. Additionally, single-family permits are gaining momentum once again.

According to the BLS, the unemployment rate in the Philadelphia MMSA was 7.4 percent as of January 2021, compared to 3.3 percent in December 2023. The MMSA unemployment rate was lower than the unemployment rates in the states of New Jersey (4.5 percent) and Delaware (3.7 percent) and the national unemployment rate (3.7 percent) as of December 2023. However, the MMSA's unemployment rate was higher than the unemployment rate in the state of Pennsylvania (2.9 percent) as of December 2023.

Based on information in the above table, low-income families earned less than \$34,229 - \$58,673 and moderate-income families earned less than \$54,766 - \$93,876, depending on the MD. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MD, this calculated to a maximum monthly mortgage payment between \$856 to \$1,467 for low-income borrowers and between \$1,369 and \$2,347 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be \$1,444. Most low-income borrowers in the MMSA would be unable to afford a mortgage loan in this AA. Most moderate-income borrowers in the Philadelphia MD would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 24.8 percent from the first quarter of 2021 to the fourth quarter 2023 in the Philadelphia MD. HPI increases ranged from 33.3 percent to 48.3 percent for other MDs in the Philadelphia MMSA over the same time period. The acceleration in home prices across the MMSA worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC relied on three community contacts conducted during the evaluation period with area organizations which included two affordable housing organizations, and a membership organization consisting of CDCs and nonprofits involved in affordable housing and commercial revitalization. Community contacts indicated that the following are needs and opportunities within the bank's AA:

- Affordable housing units,

- Financial education,
- Down payment assistance programs and funding for first time homebuyers,
- Leverage community land trusts to create long term affordable housing,
- Technical assistance for small businesses,
- Unrestricted funding for community organizations to address administrative costs,
- More investment in CDFIs,
- Additional Special Purpose Credit Programs,
- Branch access with products that serve the underbanked population,
- Access to bilingual banking products and support.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing development and rehabilitation (ownership/rental),
- Basic financial education and homeownership education,
- Revitalization and stabilization of LMI geographies,
- Small business financing,
- Education and support for organizations serving small businesses.

Scope of Evaluation in the Philadelphia MMSA

Examiners completed a full-scope review for the Philadelphia MMSA. Examiners placed more emphasis on small loans to businesses than home mortgage loans in arriving at overall conclusions as they represented the majority of TDBNA's lending in this AA. Small farm lending had a negligible impact on the Lending Test rating.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PHILADELPHIA MMSA

LENDING TEST

The bank's performance under the Lending Test in the Philadelphia is rated Outstanding.

Based on a full-scope review, the bank's performance in the Philadelphia MMSA was excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Philadelphia MMSA	14,454	19,772	33	377	34,636

Dollar Volume of Loans \$(000s)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Philadelphia MMSA	4,054,742	707,042	567	1,299,422	6,061,773

TDBNA ranked second out of 95 depository institutions (top 3 percent) with a deposit market share of 18.2 percent.

For home mortgage loans, TDBNA's market share of 2.9 percent ranked sixth out of 870 lenders (top 1 percent). The top three lenders were Citizen's Bank, N.A. with 5.6 percent market share, Rocket Mortgage with 4.3 percent market share, and Wells Fargo Bank N.A. with 4.2 percent market share.

For small loans to businesses, TDBNA's market share of 2.9 percent ranked tenth out of 258 lenders (top 4 percent). The top three lenders were American Express National Bank with 29 percent market share, JPMorgan Chase Bank N.A. with 11.8 percent market share, and Capital One N.A. with 6.7 percent market share.

For small loans to farms, TDBNA's market share of 0.6 percent ranked 18th out of 29 lenders (top 63 percent). The top three lenders were JPMorgan Chase Bank N.A. with 27.9 percent market share, U.S. Bank N.A. with 16.8 percent market share, and John Deere Financial F.S.B. with 9.1 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the Philadelphia MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased in low-income geographies approximated, and in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies. The percentages of home mortgage loans originated or purchased in both low-income and moderate-income geographies exceeded the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the Philadelphia MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies was below, and in moderate-income geographies was near-to the percentage of businesses located in those geographies. The percentages of small loans to businesses originated or purchased in low-income and moderate-income geographies were near-to the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker overall performance in moderate-income geographies.

Small Loans to Farms

Refer to Table S in the Philadelphia MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of small loans to farms was poor.

For the 2022-2023 analysis period, the bank did not make any small loans to farms in low- or moderate-income geographies. Examiners considered that bank does not focus on farm lending which resulted in a low volume of farm loans in this AA and across all rating areas.

For 2021, the bank did not originate a sufficient volume of small loans to farms to conduct a meaningful analysis.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans, small loans to businesses, and small loans to farms by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Philadelphia MMSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the Philadelphia MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of low-income families in the AA and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of moderate-income families in the AA and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the Philadelphia MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker performance against the demographic comparator.

Small Loans to Farms

Refer to Table T in the Philadelphia MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

The distribution of loans to farms of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to farms with revenues of \$1 million or less exceeded both the percentage of small farms in the AA and the aggregate percentage of all reporting lenders.

For 2021, the bank did not originate a sufficient volume of small farm loans to conduct a meaningful analysis.

Community Development Lending

The institution is a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion in the Philadelphia MMSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TDBNA made 377 CD loans totaling \$1.3 billion, which represented 25.8 percent of allocated tier 1 capital. Included in this total were 263 PPP loans totaling \$79.1 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, often in a leadership position. CD loans were responsive to identified community needs including affordable housing development and community services for LMI. By dollar volume, 63.3 percent funded community services, 20.7 percent of CD loans funded affordable housing, 12.4 percent funded revitalization and stabilization efforts, and 3.6 percent funded economic development activities.

Examples of CD loans in the AA include:

- A \$17 million loan to finance construction of 12 multi-family townhome-style buildings consisting of 75 units scattered across three sites in Camden, NJ. All units are restricted to tenants earning up to 80 percent of the AMI. Other funding sources included LIHTC equity provided by the bank.
- A \$10 million loan to finance construction of a 34-unit mixed-use, supportive housing project. All units are restricted to formerly homeless individuals and supported by a project-based Section 8 HAP contract. Other funding sources included LIHTC equity from the bank and the Federal Home Loan Bank of Pittsburgh's Affordable Housing Program.
- A \$30 million loan to finance the renovation of a former hospital in a moderate-income area of Philadelphia into an integrated public health and social services campus through a coalition of hospitals and health service providers. Services include a hospital, psychiatric care services, a federally qualified health center, dental clinic, and a variety of social and health programs for low-income individuals. Other funding sources included New Markets Tax Credits (NMTCs), and grant funding from the state of Pennsylvania.

Product Innovation and Flexibility

The institution made extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, TDBNA funded 6,953 loans totaling \$611.6 million under the following innovative and/or flexible programs during the evaluation period.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	126	29,749
TD Home Access Mortgage	60	9,685
FNMA HomeReady Mortgage	23	4,448
FHA Mortgage	52	11,274
VA Mortgage	3	1,094
PPP	6,689	555,350
Total	6,953	611,600

INVESTMENT TEST

The institution's performance under the Investment Test in the Philadelphia MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Philadelphia MMSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Philadelphia MMSA	82	290,473	390	460,508	472	100.0	750,981	100.0	2	4,248

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

During the evaluation period, TDBNA made 129 investments totaling \$452.1 million and provided 261 grants and donations totaling \$8.4 million. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 14.9 percent of adjusted tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community development needs. Investments were particularly responsive to affordable housing needs, creating over 1,800 affordable housing units. By dollar volume, 93.2 percent of current period investments and donations funded affordable housing, 4.4 percent funded economic development, 1.5 percent funded revitalization and stabilization, and 0.9 percent funded community services to LMI individuals.

The institution made extensive use of innovative and/or complex qualified investments. CD investments included 22 direct LIHTC investment totaling \$244.5 million. The bank also made two EQ2 investments in CDFIs totaling \$3 million as part of the TD Equity Fund which supports minority-owned businesses.

Examples of qualified investments in the AA include:

- Three complex LIHTC investments totaling \$36.3 million supporting a three-phase affordable housing project that is part of Choice Neighborhood Implementation grant from HUD to help preserve affordable housing in a small neighborhood in North Philadelphia. The project includes construction of a mix of townhomes, flats, a four-story multifamily building, and two mixed-use buildings that include ground floor retail space. Of the 224 total units, 189 are income restricted to tenants earning up to 60 percent of the AMI. Additionally, 101 of the affordable units will receive project-based Section 8 HAP contract rental subsidies from the Philadelphia Housing Authority. TDBNA also provided construction financing for the project.
- Three grants totaling \$592,500 to a CDC to support a program that helps small business owners in Philadelphia's commercial corridors that have debts due to the COVID-19 crisis help to save their businesses through a mediation process with creditors, free technical and legal assistance, and outreach activities.
- Three grants totaling \$300,000 to a local chapter of a nationwide nonprofit organization in support of their Individual Development Accounts (IDA) program to help LMI individuals build assets through

a 3:1 matched savings program for either post-secondary education, small-business expansion, or the purchase of their first home.

SERVICE TEST

The bank's performance under the Service Test in the Philadelphia MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Philadelphia MMSA was excellent.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)*				% of Population within Each Geography**			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Philadelphia MMSA	100.0	129	100.0	3.9	17.1	35.7	41.9	6.5	22.3	38.2	31.8

*Two branches (1.6%) are in an "NA" income category.

**1.2% of the population resides within an "NA" income category.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.

The bank's distribution of branches in low-income geographies was below and in moderate-income geographies was near-to the percentage of the population living within those geographies. Examiners further considered one MUI adjacent branch that served a low-income geography and 15 MUI adjacent branches that served moderate-income geographies within the AA as demonstrated by branch transactions and deposit account opening activity. These MUI adjacent branches improved accessibility and had a positive impact on the retail service delivery systems conclusion.

TDBNA offers ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 330 ATMs in the AA, of which 228 were deposit-taking, including 23 in low-income geographies and 79 in moderate-income geographies. The distribution of ATMs in both low-income and moderate-income geographies was excellent. TDBNA provided data indicating that 83.7 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 86.4 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 60.4 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 67.8 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Philadelphia MMSA	1	11	0	-2	-2	-6

The bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened one branch in a middle-income geography. The bank closed 11 branches, including two in moderate-income geographies. The moderate-income branch closures were attributed to low customer transactions and a low number of households associated with the branches.

Services, including where appropriate, business hours, are tailored to meet the convenience and needs of the various portions of its AA including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including extended hours on Thursdays and Fridays. Eight branches, including one moderate-income branch, also had extended hours Monday through Wednesday. All 129 branches were open on Saturdays and 118 were open on Sundays including two of five low-income branches and all 22 moderate-income branches. Of the 129 branches in the AA, 117 had drive-thru facilities, including four of five in low-income geographies and 19 of 22 in moderate-income geographies. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

TDBNA is a leader in providing CD services. During the evaluation period, the bank provided 210 financial education events to 4,130 participants in the Philadelphia MMSA. Additionally, 91 bank employees provided 3,034 service hours over the evaluation period that benefitted approximately 80 organizations through board or committee participation or professional skills assistance. The bank's assistance was responsive to identified needs in the AA of financial education and small business education and technical assistance.

Examples of CD services in the AA include:

- A bank employee provided 383 hours of board service to a nonprofit organization that provides community support services targeting LMI individuals.
- Two bank employees provided five small business courses to 53 individuals at a nonprofit economic development organization focused on creating small business ownership opportunities for minority individuals. The courses focused on accessing capital and assessing a company's financial needs.
- A bank loan officer led 10 homebuyer education sessions attended by 274 LMI participants in partnership with a nonprofit CDC that provides programs focused on housing, small business services, and community programs.

Providence-Warwick, RI-MA MMSA (Providence MMSA)

CRA rating for the Providence MMSA⁶: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include

- excellent lending activity, with overall excellent geographic and borrower distribution of lending, and an adequate level of CD lending;
- an excellent level of CD investments that were responsive to identified community needs;
- accessible retail service delivery systems with consideration for MUI adjacent branches; and
- a limited level of CD services.

Description of Institution's Operations in the Providence MMSA

The AA is comprised of portions of the Providence MMSA including Bristol and Providence Counties in Rhode Island in their entirety and portions of Kent and Newport Counties in Rhode Island and Bristol County in Massachusetts. Refer to appendix A for a complete list of counties and towns reviewed.

As of year-end 2023, TDBNA had 11 branch locations and 38 ATMs, of which 23 were deposit-taking, within the AA. During the evaluation period, the bank made \$361.3 million or 0.7 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

The Providence MMSA represented TDBNA's 14th largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had approximately \$2 billion in deposits in this AA, which represented 0.9 percent of the bank's total adjusted deposits. The AA is served by 20 FDIC-insured financial institutions operating 213 branches. TDBNA ranked fifth with 5.2 percent deposit market share. The top three competitors had 68 percent of the market share and consisted of Citizens Bank, N.A. with 52 branches and 36.3 percent market share, Bank of America, N.A. with 25 branches and 24 percent market share, and Santander Bank, N.A. with 18 branches and 7.7 percent market share.

The following table provides a summary of the demographics, including housing and business information for the Providence MMSA.

⁶ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Providence MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	236	11.9	16.1	43.2	27.5	0.0
Population by Geography	1,064,485	11.0	16.3	42.9	29.6	0.0
Housing Units by Geography	439,002	10.1	16.6	44.6	28.5	0.0
Owner-Occupied Units by Geography	242,197	4.5	11.3	46.8	37.3	0.0
Occupied Rental Units by Geography	156,432	18.2	23.1	41.8	16.4	0.0
Vacant Units by Geography	40,373	12.7	22.9	41.8	22.2	0.0
Businesses by Geography	117,017	8.3	14.4	45.8	31.2	0.0
Farms by Geography	2,661	4.5	9.8	44.1	41.5	0.0
Family Distribution by Income Level	247,213	22.6	16.3	20.7	40.4	0.0
Household Distribution by Income Level	398,629	26.5	14.7	16.8	41.9	0.0
Median Family Income MSA - 39300 Providence-Warwick, RI-MA MSA		\$89,555	Median Housing Value			\$290,851
			Median Gross Rent			\$1,064
			Families Below Poverty Level			7.8%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Based on information from the January 2024 Moody's Analytics report, Providence's economy is underperforming but there are signs of improvement with job growth having picked up in late 2023. Improvements are broad based with healthcare, leisure/hospitality, and construction all performing well, while retail continues to struggle. Although the unemployment rate has ticked up recently, it is the result of an expanding labor force which is reassuring given the tight labor market. The area's key economic drivers include finance, healthcare, and state government. Approximately one in five jobs in the area is in healthcare, and while demand is strong given an older population, an undersupply of qualified workers poses challenges. Providence is a center for U.S. credit intermediaries and insurance providers and ranks in the top 25 percent of all metro areas in its share of financial services employment. The high interest rate environment is good for banks' bottom lines, but the high rates coupled with more stringent credit conditions have resulted in weakened loan demand. Insurance providers have a similar difficulty with high rates providing higher investment incomes while leading customers to look for cost savings by limiting coverage. Providence's strengths include its proximity to Boston, the presence of numerous colleges and universities, and connections among the universities, hospitals and research and development firms. The area also boasts a strong housing market. While area housing prices are increasing at a modest pace, they are outperforming the Northeast overall. Perceived weaknesses in Providence include a heavy tax burden, poor infrastructure, unequal distribution of wealth, and unfavorable demographic trends. The area's primary employment industries include education and health services, government, and professional and business services. The area's major employers include Lifespan, CVS Health Corp., Care New England, General Dynamics Electric Boat, and Citizens Financial Group Inc.

According to the U.S. BLS, the unemployment rate in the Providence MMSA was 7.7 percent as of January 2021, compared to 3.5 percent in December 2023. The Providence MMSA unemployment rate

was slightly higher than the 3.2 percent unemployment rate for the state of Massachusetts, and comparable to the 3.5 percent unemployment rate for the state of Rhode Island in December 2023.

Based on information in the above table, low-income families earned less than \$44,778 and moderate-income families earned less than \$71,644. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,119 for low-income borrowers and \$1,791 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,561. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 38.3 percent from the first quarter of 2021 to the fourth quarter of 2023. This acceleration in home prices worsened existing affordability concerns in for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC relied on two community contacts made with a regional area economic development corporation during the evaluation period. In addition, examiners relied on information from a housing research report conducted by a community foundation. The following are needs and opportunities within the bank's AA as determined by the contact and the report:

- Affordable housing units,
- Flexible mortgage loan programs and banking products,
- Down payment assistance programs for first time homebuyers,
- Homeless support and transitional housing,
- Partnering with nonprofits and CDFIs on loan projects including second look programs,
- Small business technical assistance,
- Providing funding to nonprofit organizations,
- Participating on nonprofit boards and committees to provide expertise,
- Financial education.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing (ownership/rental),
- Support nonprofits to assist with providing basic needs/services to LMI population,
- Financial education.

Scope of Evaluation in the Providence MMSA

Examiners completed a full-scope review for the Providence MMSA. Examiners placed more emphasis on small loans to businesses than home mortgage loans in arriving at overall conclusions as they represented the majority of TDBNA's lending in this AA. The bank did not originate a sufficient volume of small loans to farms to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PROVIDENCE MMSA

LENDING TEST

The bank's performance under the Lending Test in the Providence MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Providence MMSA was excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Providence MMSA	806	1,159	3	13	1,981

Dollar Volume of Loans \$(000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Providence MMSA	330,236	31,008	26	8,332	369,601

TDBNA ranked fifth out of 20 depository institutions (top 25 percent) with a deposit market share of 5.2 percent.

For home mortgage loans, TDBNA's market share of 0.8 percent ranked 31st out of 441 lenders (top 8 percent). The top three lenders were Citizen's Bank, N.A. with 11.9 percent market share, Navigant Credit Union with 6 percent market share, and Coastal Credit Union with 5.7 percent market share.

For small loans to businesses, TDBNA's market share of 0.8 percent ranked 18th out of 146 lenders (top 13 percent). The top three lenders were American Express National Bank with 23.7 percent market share, JPMorgan Chase Bank, N.A. with 10.4 percent market share, and Bank of America, N.A. with 10.3 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the Providence MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. In moderate-income geographies, the percentage of home mortgage loans originated or purchased exceeded the percentage of owner-occupied

housing units located in those geographies and approximated the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the Providence MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies was equal to the percentage of businesses located in those geographies and near-to the aggregate percentage of reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker overall distribution of loans in low-income geographies.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Providence MMSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the Providence MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate- income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate- income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the Providence MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker performance against the demographics.

Community Development Lending

The institution made an adequate level of CD loans. CD lending had a neutral impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TDBNA made 13 CD loans totaling \$8.3 million, which represented 3.2 percent of allocated tier 1 capital. Included in this total were 11 PPP loans totaling \$1.5 million that supported area businesses during the COVID-19 pandemic. By dollar volume, 82.6 percent of CD loans funded affordable housing, 15.2 percent funded revitalization and stabilization efforts, and 2.2 percent funded economic development activities.

Examples of CD loans in the AA include:

- A \$6.1 million loan to finance the purchase of three apartment buildings located in moderate- and middle-income geographies that contain 80 combined units all of which are affordable to tenants earning up to 80 percent of the AMI.
- A \$727,975 cash out, refinance loan secured by eight scattered site apartment buildings throughout the AA with 30 total units, all of which are affordable to tenants earning up to 80 percent of the AMI.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank funded 346 loans totaling \$22.8 million under the following innovative and/or flexible programs during the evaluation period.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	3	642
FNMA HomeReady Mortgage	8	1,429

FHA Mortgage	3	1,119
PPP	332	19,582
Total	346	22,772

INVESTMENT TEST

The institution's performance under the Investment Test in the Providence MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Providence MMSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Providence MMSA	9	18,134	50	18,452	59	100.0	36,586	100.0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period TDBNA made 15 investments totaling \$17.2 million and provided 35 qualifying grants and donations totaling \$1.3 million. The dollar volume of current- and prior-period investments represented 14 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs, creating 37 affordable housing units. By dollar volume, 85.5 percent of current period investments and donations funded affordable housing, 11.6 percent funded economic development efforts, and 2.9 percent funded community services to LMI individuals.

The institution made occasional use of innovative and/or complex qualified investments. CD investments included one LIHTC investment totaling \$2 million.

Examples of qualified investments in the AA include:

- A \$2 million complex LIHTC investment that supported the construction of a residential condo unit with 29 LIHTC units along with ground floor community space that will be leased to a Head Start childcare program. Six units are set aside for individuals with disabilities earning up to 30 percent of the AMI and will also receive Section 811 rental assistance from Rhode Island Housing. The remaining 23 units are restricted to tenants earning up to 60 percent of the AMI.
- A \$175,000 grant to a local development corporation to support a project to rehabilitate 32 existing affordable apartments while preserving and extending the low-income deed restrictions.

- A \$316,000 grant to a federally funded health center to support the expansion of its free clinic services to accommodate uninsured patients needing care during the COVID-19 pandemic. Most of those served are low-income immigrants who have few options for healthcare services.

SERVICE TEST

The bank's performance under the Service Test in Providence MMSA is rated Low Satisfactory.

Based on a full-scope review, the bank's performance in the Providence MMSA was adequate.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Providence MMSA	100.0	11	100.0	0.0	9.1	54.5	36.4	11.0	16.3	42.9	29.6

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.

The bank has no branches in low-income geographies. The distribution of branches in moderate-income geographies was below the percentage of the population living within those geographies. Examiners considered two MUI adjacent branches that served low-income geographies and two MUI adjacent branches that served moderate-income geographies within the AA as demonstrated by branch transactions and deposit account opening activity. These MUI adjacent branches improved accessibility and had a positive impact on the retail Service Test conclusion.

TDBNA offers ADS including ATMs and digital banking (online/mobile). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 38 ATMs in the AA, of which 23 were deposit-taking, including two in low-income geographies and nine in moderate-income geographies. The distribution of ATMs in low-income geographies was poor in and in moderate-income geographies was excellent. TDBNA provided data indicating that 85.9 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 86.7 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 67.3 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 68.6 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, are tailored to meet the convenience and needs of the various portions of its AA including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including extended hours on Thursdays and Fridays. Of the 11 branches in the AA, all were open on Saturdays

and 10 were open on Sundays including the one moderate-income branch. Of the 11 branches in the AA, eight had drive-thru facilities not including the one moderate-income branch. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

TDBNA provided a limited level of CD services. During the evaluation period, the bank provided 24 financial education events to 165 participants in the Providence MMSA. Additionally, one bank employee provided 26 service hours on the board of an area organization. The bank's assistance was responsive to identified needs in the AA for financial education.

Examples of CD services in the AA include:

- Two bank employees provided eight financial education courses targeted for a small business audience that were attended by 47 participants. The curriculum covered topics on accessing capital, assessing a company's financial needs, and developing a business plan.
- A bank employee served on the board of a community organization that transforms LMI youth into advocates and partners with the state's major leaders to create systemic reform and policy changes that improve the lives of youth across the state.

Washington-Arlington-Alexandria, DC-VA-MD MMSA (Washington MMSA)

CRA rating for the Washington MMSA⁷: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include

- excellent lending activity, with overall excellent geographic and borrower distribution of lending;
- an excellent level of CD lending that further supported the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- readily accessible retail service delivery systems with consideration for MUI adjacent branches; and
- an adequate level of CD services.

Description of Institution's Operations in the Washington MMSA

The Washington MMSA AA consists of one of two counties in the Frederick-Gaithersburg-Rockville, Md. MD (Frederick MD), and portions of the Washington-Arlington-Alexandria, DC-VA-Md. MD (Washington MD) that includes the District of Columbia (D.C.), one county in Maryland, and nine counties in Virginia. Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had 46 branch locations and 72 ATMs, all of which were deposit-taking, within the AA. During the evaluation period, the bank made \$4.7 billion or 9 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in this AA.

The Washington MMSA represented TDBNA's eighth largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$6.8 billion in deposits in this AA, which represented 2.9 percent of the bank's total adjusted deposits. The AA is served by 60 FDIC-insured financial institutions operating 1,060 branches. TDBNA ranked 10th with 2.5 percent deposit market share. The top three competitors had 53.6 percent of the market share and consisted of Capital One, N.A. with 63 branches and 24.3 percent market share, Bank of America, N.A. with 121 branches and 17.3 percent market share, and Truist Bank with 153 branches and 11.9 percent market share.

The following table provides a summary of the demographics, including housing and business information for the Washington MMSA.

⁷ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area**Assessment Area: Washington MMSA**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,231	9.3	21.4	30.6	37.0	1.7
Population by Geography	5,269,184	8.8	22.2	31.6	36.8	0.7
Housing Units by Geography	1,972,309	9.2	21.6	32.0	36.6	0.6
Owner-Occupied Units by Geography	1,143,564	4.1	17.3	33.7	44.6	0.2
Occupied Rental Units by Geography	720,516	16.7	27.9	29.8	24.6	1.1
Vacant Units by Geography	108,229	12.7	24.8	28.6	32.6	1.3
Businesses by Geography	842,077	5.1	19.4	33.4	41.2	0.8
Farms by Geography	11,504	4.1	18.7	33.6	43.4	0.2
Family Distribution by Income Level	1,190,790	21.4	16.4	19.7	42.6	0.0
Household Distribution by Income Level	1,864,080	22.8	16.0	18.9	42.3	0.0
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		\$129,092	Median Housing Value			\$501,137
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV		\$126,224	Median Gross Rent			\$1,772
			Families Below Poverty Level			5.1%

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

Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

Based on information from the November 2023 Moody's Analytics report, the Washington D.C. economy is strong with total employment having finally surpassed its pre-pandemic level. The unemployment rate remains near its record low despite an expanding labor market. The government, healthcare, and leisure/hospitality sectors are performing well while professional and tech services are struggling to gain footing. Area economic drivers include the federal government (both non-defense and defense), and high tech. Washington D.C. is a major hub for computer systems design and tech-related professional services which has helped attract investment and grown tech employment. Amazon recently brought its second headquarters to D.C. and within the past few years they have hired approximately 8,000 workers. Boeing and Raytheon have also moved their headquarters to the area. D.C. benefits from being a popular tourist destination though this also presents a weakness as the economy is exposed to downturns in tourism. Other area strengths include high per capita income and a well-educated workforce. Conversely, the area has high costs of living and doing business and high exposure to federal government. Like other metro areas, D.C.'s urban core is suffering from the loss of daytime traffic as remote work arrangements continue to keep workers from downtown. Despite some return-to-work mandates instituted by companies, transit volume and revenue are still way below pre-pandemic levels. Both retail and leisure/hospitality are struggling with the lack of consumer foot traffic. The primary employment industries in the D.C. metro include professional and business services and government. The largest employers include Naval Support Activity Washington, Joint Base Andrews-Naval Air Facility, MedStar Health, Marriott International Inc, and Inova Health Systems.

According to the U.S. BLS, the unemployment rate in the Washington MMSA was 5.6 percent as of January 2021, compared to 2.5 percent in December 2023. The Washington MMSA unemployment rate was higher than the 2.1 percent unemployment rate for the state of Maryland, slightly lower than the 2.7

percent unemployment rate for the state of Virginia and significantly lower than the 4.7 percent unemployment rate for the District of Columbia in December 2023.

Based on information in the above table, low-income families earned less than \$63,112-\$64,546 and moderate-income families earned less than \$100,979-\$103,274, depending on the MD. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MD, this calculated to a maximum monthly mortgage payment between \$1,578-\$1,614 for low-income borrowers and between \$2,524-\$2,582 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$2,690. Most low-income and moderate-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 22.7 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Washington D.C. MD. In the Frederick MD, the increase was 24.4 percent over the same time period. This acceleration in home prices worsened existing affordability concerns in the MMSA.

The OCC relied on a community contact conducted during the evaluation period with a nonprofit housing and economic development organization as well as information obtained during a Community Needs Assessment meeting in December 2023. Community contacts indicated that the following are needs within the bank's AA:

- Affordable housing development,
- Flexible mortgage loan programs,
- Down payment assistance programs for first time homebuyers,
- Access to capital for small businesses,
- Financial and digital literacy education for small businesses,
- Technical assistance and networking opportunities for small businesses,
- Funding nonprofit organizations to increase their capacity, including multiyear grant funding,
- Job training programs for at-risk youth,
- Financial education,
- Access to bilingual banking products and support.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing (ownership/rental) for LMI communities,
- Support nonprofits to assist with providing basic needs/services to LMI population,
- Support CDFIs and nonprofits that provide services to small businesses,
- Revitalization and stabilization,
- Financial education.

Scope of Evaluation in the Washington MMSA

Examiners completed a full-scope review for the Washington MMSA. Examiners placed more emphasis on home mortgage loans than small loans to businesses in arriving at overall conclusions as they represented the majority of TDBNA's lending in this AA. Small farm lending was not meaningful for analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WASHINGTON MMSA

LENDING TEST

The bank's performance under the Lending Test in the Washington MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Washington MMSA was excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Washington MMSA	8,193	5,188	5	120	13,506

Dollar Volume of Loans \$(000)					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Washington MMSA	4,511,837	168,613	257	129,705	4,810,412

TDBNA ranked 10th out of 60 depository institutions (top 17 percent) with a deposit market share of 2.5 percent.

For home mortgage loans, TDBNA's market share of 2.1 percent ranked ninth out of 826 lenders (top 2 percent). The top three lenders were Truist Bank with 5.9 percent market share, Rocket Mortgage with 4.4 percent market share, and Wells Fargo Bank, N.A. with 3.9 percent market share.

For small loans to businesses, TDBNA's market share of 0.8 percent ranked 15th out of 230 lenders (top 7 percent). The top three lenders were American Express National Bank with 29.5 percent market share, JPMorgan Chase Bank, N.A. with 15.7 percent market share, and Bank of America, N.A. with 13 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the Washington MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased in low-income and moderate-income geographies exceeded both the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the Washington MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

For the 2022-2023 analysis period, the percentages of small loans to businesses originated or purchased in low-and moderate-income geographies exceeded both the percentages of businesses in those geographies and the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Washington MMSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the Washington MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the Washington MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker distribution of small loans to businesses compared to the demographics.

Community Development Lending

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test in the Washington MMSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TDBNA made 120 loans totaling \$129.7 million, which represented 14.6 percent of allocated tier 1 capital. Included in this total were 81 PPP loans totaling \$13.4 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs including affordable housing, revitalization and stabilization, community services to LMI, and economic development. By dollar volume, 75.8 percent of CD loans funded affordable housing, 19.7 funded revitalization and stabilization efforts, 3 percent community services targeted to LMI individuals, and 1.5 percent funded economic development.

Examples of CD loans in the AA include:

- A \$14.4 million allocation of a \$28.8 million construction loan to rehabilitate an existing vacant building into a 166-unit apartment building. Fifty percent of the units are restricted to workforce housing with income limits set below 80 percent of the AMI.
- A \$9.9 million construction loan to rehabilitate a LIHTC project for senior citizens. The property consists of 80 affordable housing units restricted to tenants earning up to 60 percent of the AMI. Other sources of funding included a loan from the Virginia Department of Housing and Community Development.
- A \$300,000 renewal of a working capital line of credit to an area organization that provides housing and supportive services to the homeless and at-risk families.

Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank funded 1,603 loans totaling \$151.2 million under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	21	6,418
TD Home Access Mortgage	56	18,679
FNMA HomeReady Mortgage	25	5,443
FHA Mortgage	5	2,356
VA Mortgage	8	5,265
USDA – Rural Development Mortgage	1	369
PPP	1,487	112,637
Total	1,603	151,167

INVESTMENT TEST

The institution's performance under the Investment Test in the Washington MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Washington MMSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Washington MMSA	25	99,206	175	96,391	200	100.0	195,597	100.0	1	3,733

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

During the evaluation period, TDBNA made 18 investments totaling \$89.9 million and provided 157 grants and donations totaling \$6.5 million. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 22 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs, creating or preserving 514 affordable housing units. By dollar volume, 79.8 percent of current period investments and donations funded affordable housing, 9.5 percent funded economic development activities, 7.1 percent funded revitalization and stabilization efforts, and 3.6 percent funded community services to LMI individuals.

The institution made extensive use of innovative and/or complex qualified investments. CD investments included four direct LIHTC investments totaling \$51.9 million.

Examples of qualified investments in the AA include:

- A \$31 million complex LIHTC investment to fund the new construction of a 120-unit apartment complex whereby all units will be restricted to tenants earning up to 60 percent of the AMI. In addition, 51 units will benefit from project-based rental subsidies administered through Section 8 HAP contracts.
- A \$7.9 million investment (of which \$6.7 million was funded in the current evaluation period) in a housing initiative impact pool created to preserve and recapitalize affordable and workforce rental housing. The core objective of the initiative is to facilitate the purchase of existing affordable workforce apartment communities with the goal of preserving at least 51 percent of the units in each property as affordable to individuals earning up to 80 percent of the AMI.
- A \$250,000 grant to a housing development corporation to provide affordable housing and wraparound services to help LMI individuals and families become self-sufficient. Services include eviction prevention services and workforce development programming including education classes and vocational certifications.

SERVICE TEST

The bank's performance under the Service Test in Washington MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Washington MMSA was excellent.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population*			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Washington MMSA	100.0	46	100.0	6.5	28.3	32.6	32.6	8.8	22.2	31.6	36.8

*0.7% of the population resides within an "NA" income category.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

The bank's distribution of branches in low-income geographies was near-to and in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners further considered one upper-income adjacent branch that served a low-income geography within the AA as demonstrated by branch transactions and deposit account opening activity. This MUI adjacent branch improved accessibility and had a positive impact on the retail Service Test conclusion.

TDBNA offers ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 72 deposit taking ATMs in the AA, including four in low-income geographies and 20 in moderate-income geographies. The distribution of ATMs in low-income geographies was adequate and in moderate-income geographies was excellent. TDBNA provided data indicating that 86.9 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 89.6 percent of customers in

MUI areas. Further, bank customers in LMI areas of the AA conducted 66.2 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 72 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Washington MMSA	3	5	0	0	0	-2

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened three branches and closed five branches. No openings or closings occurred in low- or moderate-income geographies.

Services, including where appropriate, business hours, are tailored to meet the convenience and needs of the various portions of its AA including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including extended hours on Thursdays and Fridays. Of the 46 branches, only one branch, which was located in a moderate-income geography, was not open on Saturdays and 29 branches were open on Sundays including all three low-income branches and eight of 13 moderate-income branches. Of the 46 branches in the AA, 35 had drive-thru facilities, including all three in low-income geographies and 11 of 13 in moderate-income geographies. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

TDBNA provided an adequate level of CD services. During the evaluation period, the bank provided 47 financial education events to 1,623 participants in the Washington MMSA. Additionally, 13 bank employees provided 524 service hours over the evaluation period that benefitted 18 organizations through board or committee participation or professional skills assistance. The bank's assistance was responsive to identified needs in the AA of financial education for individuals and small business owners.

Examples of CD services in the AA include:

- A bank employee provided 86 hours of board service to a nonprofit organization focused on providing affordable housing for low-income individuals.
- Two bank managers collectively provided over 30 hours of small business training to 171 individuals at a nonprofit organization that offers microloans, training, and support for entrepreneurs in the AA.
- Two bank employees provided financial literacy training to 132 individuals in partnership with a nonprofit CDFI focused on affordable housing.

State of Connecticut

CRA rating for the State of Connecticut⁸: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include

- excellent lending activity, with overall excellent geographic and borrower distribution of lending;
- an excellent level of CD lending that further supported the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- overall accessible retail service delivery systems with consideration for MUI adjacent branches and positive consideration for limited-scope areas; and
- an adequate level of CD services.

Description of Institution's Operations in Connecticut

The state of Connecticut consists of five AAs including the Bridgeport-Stamford-Norwalk, CT MSA (Bridgeport MSA), the Hartford-East Hartford-Middletown, CT MSA (Hartford MSA), the New Haven-Milford, CT MSA (New Haven MSA), a portion of the Norwich-New London, CT MSA (Norwich MSA), and one non-MSA county (Litchfield) comprising the Connecticut Non-MSA (CT Non-MSA) AA. Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had 56 branch locations and 83 ATMs, of which 82 were deposit-taking, within these AAs. During the evaluation period, the bank made \$2.0 billion or 3.9 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of Connecticut represented TDBNA's fifth largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$8.9 billion in deposits in these AAs, which represented 3.8 percent of the bank's total adjusted deposits. The bank ranked fifth in deposit market share with 5.4 percent out of 51 depository institutions. The top three competitors had 55.6 percent of the market share and consisted of Bank of America N.A. with 88 branches and 23.9 percent market share, Webster Bank N.A. with 95 branches and 20 percent market share, and Manufacturers and Traders Trust Company with 138 branches and 11.7 percent market share.

Hartford MSA

The following tables provides a summary of the demographics, including housing and business information for the Hartford MSA AA.

⁸ The statewide ratings do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Hartford MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	308	13.0	16.9	40.6	26.6	2.9
Population by Geography	1,213,531	10.1	16.5	42.2	30.5	0.7
Housing Units by Geography	516,829	10.7	17.3	43.5	28.2	0.2
Owner-Occupied Units by Geography	316,870	3.0	12.2	47.9	36.9	0.0
Occupied Rental Units by Geography	160,625	23.9	26.9	36.3	12.5	0.4
Vacant Units by Geography	39,334	18.8	19.8	37.6	22.4	1.3
Businesses by Geography	178,699	9.1	15.1	45.3	29.7	0.8
Farms by Geography	5,103	4.4	9.7	46.5	39.4	0.0
Family Distribution by Income Level	305,104	22.2	16.8	20.9	40.0	0.0
Household Distribution by Income Level	477,495	25.5	15.3	17.0	42.2	0.0
Median Family Income MSA - 25540 Hartford-East Hartford-Middletown, CT MSA		\$101,543	Median Housing Value			\$247,198
			Median Gross Rent			\$1,148
			Families Below Poverty Level			6.6%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Hartford MSA AA consists of all three counties that comprise the MSA including Hartford, Middlesex, and Tolland. As of year-end 2023, TDBNA operated 22 branches and 30 ATMs, all of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$3.9 billion in deposits in the AA which comprised 1.7 percent of total bank adjusted deposits and 43.8 percent of the rated area deposits. The AA is served by 27 FDIC-insured financial institutions operating 297 branches. TDBNA had 7.4 percent deposit market share which ranked fifth among all institutions. The top competitors were Bank of America N.A. with 31 branches and 45.1 percent market share, Manufacturers and Traders Trust Company with 48 branches and 12.4 percent market share, and Webster Bank N.A. with 38 branches and 9.9 percent market share.

Based on information from the September 2023 Moody's Analytics report, the Hartford MSA's economy has stalled due to slow payroll growth and a decline in hiring in the insurance-centered finance sector which is an economic driver in the area. On a positive note, the labor force has steadied following a decline that started at the beginning of 2022. Overall, the unemployment rate is declining and is now well below the U.S. unemployment rate. Government jobs, which have a large presence in this state capitol, have been a source of strength and make the area somewhat resilient to the overall national economy. After a modest decline last summer, house prices have risen faster than the nation overall primarily due to a lack of inventory, yet housing remains relatively affordable. The MSA benefits from a well-educated labor force, above-average wages, and a lower cost of living than neighboring New York and Boston; nevertheless, the area has experienced negative net migration resulting in a flat population growth. Major employers in the area include Hartford HealthCare, Pratt &

Whitney United Technologies, University of Connecticut, The Travelers Cos. Inc., and Hartford Financial Services Group.

Hartford is a center for U.S. insurance providers and ranks among the largest in the nation in its share of employment. While the sector has benefited from high interest rates generating higher investment incomes, increasing costs for health and auto services have increased payouts and narrowed profit margins. These payouts include catastrophic events caused by severe weather conditions, causing large insurance providers in the area to experience losses. Manufacturing is also a key driver in the MSA due to the presence of aerospace manufacturer Pratt & Whitney. While the firm suffered a significant setback last year due to the recall of hundreds of its manufactured jet engines, the company remains resilient due to demand for jet engine servicing and inspections, production of replacement parts, and a reliance on niche skilled workers. The state's public sector has thrived in the last several years due to solid tax revenue growth, which has benefitted government payrolls in the Hartford MSA. The MSA relies heavily on spending by its government workers. Additionally, recent budget surpluses are replenishing underfunded pension obligations and helping issuance of tax cuts. On the downside, tax revenues largely rely on Wall Street's performance making this economic avenue volatile; however, employment in the public sector remains less cyclical and baseline benefits remain stable.

According to the U.S. BLS, the unemployment rate in the Hartford MSA was 7.6 percent as of January 2021, compared to 4 percent in December 2023. The MSA unemployment rate mirrored the statewide rate of 4 percent and was slightly higher than the national unemployment rate of 3.7 percent as of December 2023.

Based on information in the above table, low-income families earned less than \$50,772 and moderate-income families earned less than \$81,234. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,269 for low-income borrowers and \$2,031 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,327. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 36.8 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Hartford MSA. This acceleration in home prices worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC relied on information from three community contacts conducted during the evaluation period, with social service nonprofit organizations that serve LMI individuals. Community contacts indicated that the following are needs and opportunities within the bank's AA:

- Developing more livable wage job opportunities,
- Affordable housing development,
- Providing grant funding and donations to nonprofit organizations,
- Support of utility assistance and programs to enhance energy efficiency,
- Support for emergency shelters and mental health facilities,

- Homeless support and transitional housing, as well as homelessness prevention,
- Financial education, specifically targeting low-income residents,
- Awareness of products for unbanked individuals.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing (ownership/rental) for LMI communities,
- Small business lending and technical assistance,
- Support for nonprofits assisting with basic needs/services to LMI populations,
- Financial education (general and homeownership).

New Haven MSA

The following tables provides a summary of the demographics, including housing and business information for the New Haven MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: New Haven MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	199	14.6	22.6	27.1	35.2	0.5
Population by Geography	864,835	13.0	22.9	28.0	36.1	0.0
Housing Units by Geography	367,990	12.9	22.6	28.9	35.5	0.0
Owner-Occupied Units by Geography	206,810	4.3	16.5	32.3	46.9	0.0
Occupied Rental Units by Geography	125,955	25.0	31.7	24.8	18.5	0.0
Vacant Units by Geography	35,225	19.9	26.2	24.2	29.7	0.0
Businesses by Geography	133,782	11.8	18.7	27.7	41.8	0.0
Farms by Geography	3,165	7.2	15.0	26.1	51.7	0.0
Family Distribution by Income Level	208,171	22.9	16.9	19.1	41.2	0.0
Household Distribution by Income Level	332,765	25.6	15.4	16.5	42.5	0.0
Median Family Income MSA - 35300 New Haven-Milford, CT MSA		\$92,508	Median Housing Value			\$245,516
			Median Gross Rent			\$1,185
			Families Below Poverty Level			7.8%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The New Haven MSA AA consists of the one county (New Haven) that comprises the MSA. As of year-end 2023, TDBNA operated 16 branches and 27 ATMs, 26 of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$2.5 billion in deposits in the AA which comprised 1.1 percent of total bank adjusted deposits and 28.4 percent of the rated area

deposits. The AA is served by 22 FDIC-insured financial institutions operating 215 branches. TDBNA had 9.8 percent deposit market share which ranked fourth among all institutions. The top competitors were Bank of America N.A. with 21 branches and 20.3 percent market share, Wells Fargo Bank, N.A. with 23 branches and 11.7 percent market share, and Webster Bank N.A. with 27 branches and 11.1 percent market share.

Based on information from the September 2023 Moody's Analytics report, New Haven's economy is on the mend as hiring has picked up in education and healthcare sectors, both of which are economic drivers in the area. The MSA's unemployment rate has moved right below the U.S. unemployment rate, demonstrating higher structural unemployment than neighboring MSAs; however, there has been a slight increase in the size of the labor force. Home to Yale University, New Haven enjoys a large university concentration which remains a source of economic stability and economic driver for the MSA. Yale's commitment to area development is another benefit to the MSA. The University saw a record-breaking number of admitted students last year despite broader challenges in higher education including a declining student-age population. A larger student presence and an accompanying increase in university hiring provide downstream benefit to consumer industries in the area. However, the student housing shortages drive up area rents which financially burdens admitted students and residents in the area. Healthcare is also an economic driver in New Haven with the MSA's share of healthcare employment ranking in the top 50 nationally, led by the Yale New Haven Health System, the MSA's top employer. Other major employers in the area include Yale University, AT&T, Bozzuto's Inc, and Southern Connecticut State University. The area enjoys lower business costs than in neighboring New York and Boston; however, a lack of a high-tech manufacturing base, and little development outside of healthcare are weaknesses of the MSA's economy. Further, area hospitals have suffered a financial burden in recent years due to reduced federal support and elevated medical supply and labor costs.

The MSA has experienced weak demographic trends which are attributed to the departure of graduating college students, and above average costs of living and doing business, causing an exodus of residents for years. However, data indicates that the 35 to 44 age group has had some gains, suggesting that New Haven is becoming an attractive destination for young families, especially from costlier nearby metro areas such as New York City and Bridgeport. Regarding housing, despite price declines in 2022, home price appreciation was stronger than most metro areas during the first half of 2023.

According to the U.S. BLS, the unemployment rate in the New Haven MSA was 7.3 percent as of January 2021, compared to 3.7 percent in December 2023. The MSA unemployment rate was lower than the statewide rate of 4 percent and comparable to the national unemployment rate of 3.7 percent as of December 2023.

Based on information in the above table, low-income families earned less than \$46,254 and moderate-income families earned less than \$74,006. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,156 for low-income borrowers and \$1,850 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,318. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census

data. According to the FHFA HPI, home prices increased by 39.6 percent from the first quarter of 2021 to the fourth quarter of 2023 in the New Haven MSA. This acceleration in home prices worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC relied on information from two community contacts conducted during the evaluation with a nonprofit housing and neighborhood revitalization organization and a local housing authority. Community contacts indicated that the following are needs and opportunities within the bank's AA:

- Affordable housing units, including rental housing,
- Flexible mortgage loan programs,
- Down payment and closing cost assistance programs for first time homebuyers,
- Loans to renovate/repair existing homes,
- Neighborhood revitalization, specifically development of more mixed-use or commercial properties in areas lacking these properties,
- Support of utility assistance programs and programs to enhance energy efficiency,
- Improve the public transportation system, including bus routes and rail,
- Providing funding to nonprofit affordable housing organizations in order to build more or improve existing housing.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing,
- Revitalization/stabilization of LMI geographies,
- Financial education,
- Access to capital for small businesses.

Scope of Evaluation in Connecticut

Examiners selected the Hartford MSA and New Haven MSA AAs for full-scope reviews. These AAs are the largest in terms of deposits and branches in the state of Connecticut and are among the largest in terms of reportable lending activity. The Bridgeport MSA, Norwich MSA and CT Non-MSA AAs received limited-scope reviews.

In arriving at overall conclusions, the Hartford MSA AA received the most weight as it accounts for the largest share of deposits in the state of Connecticut. In determining Lending Test conclusions, examiners placed more emphasis on the loan product category that had the higher percentage of lending in the AA. For the Hartford MSA, New Haven MSA and CT Non-MSA AAs examiners placed more emphasis on small loans to businesses. In the Bridgeport MSA AA examiners placed more emphasis on home mortgage loans and in the Norwich MSA AA, there was equal emphasis placed on the two loan categories. Farm lending was not meaningful for analysis in any of the AAs in the state of Connecticut.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT

LENDING TEST

The bank's performance under the Lending Test in Connecticut is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Hartford MSA and New Haven MSA AAs was excellent.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Hartford MSA	1,479	2,553	3	47	4,082	34.6	43.8
New Haven MSA	1,001	1,903	7	31	2,942	25.0	28.4
Limited-Scope:							
Bridgeport MSA	2,135	1,975	3	21	4,134	35.1	22.6
Norwich MSA	37	38	1	1	77	0.7	1.2
CT Non-MSA	236	312	1	7	556	4.7	4.0
Total	4,888	6,781	15	107	11,791	100.00	100.00

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* \$(000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Hartford MSA	309,029	80,129	59	39,802	429,019	19.9	43.8
New Haven MSA	248,251	60,095	145	75,410	383,900	17.8	28.4
Limited-Scope:							
Bridgeport MSA	1,199,513	49,249	237	18,290	1,267,289	58.8	22.6
Norwich MSA	6,728	1,096	13	1,983	9,820	0.5	1.2
CT Non-MSA	54,745	7,083	22	2,824	64,674	3.0	4.0
Total	1,818,266	197,652	476	138,309	2,154,703	100.00	100.00

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Hartford MSA

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked fifth out of 27 depository institutions (top 19 percent) with a deposit market share of 7.4 percent.

For home mortgage loans, TDBNA's market share of 1.4 percent ranked 22nd out of 528 lenders (top 5 percent). The top three lenders were Rocket Mortgage with 4.6 percent market share, Liberty Bank with 4.4 percent market share, and American Eagle Federal Credit Union also with 4.4 percent market share.

For small loans to businesses, TDBNA's market share of 1.7 percent ranked 12th out of 141 lenders (top 9 percent). The top three lenders were American Express N.A. with 23.1 percent market share, JPMorgan Chase Bank N.A. with 10.8 percent market share, and U.S. Bank with 9.8 percent market share.

New Haven MSA

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked fourth out of 22 depository institutions (top 19 percent) with a deposit market share of 9.8 percent.

For home mortgage loans, TDBNA's market share of 1.8 percent ranked 14th out of 446 lenders (top 4 percent). The top three lenders were Citizen's Bank, N.A. with 5.3 percent market share, Rocket Mortgage with 5.1 percent market share, and Webster Bank N.A. with 3.8 percent market share.

For small loans to businesses, TDBNA's market share of 1.7 percent ranked 12th out of 125 lenders (top 10 percent). The top three lenders were American Express N.A. with 25 percent market share, JPMorgan Chase Bank, N.A. with 11.6 percent market share, and Citibank N.A. with 8.4 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs.

Hartford MSA

Home Mortgage Loans

Refer to Table O in the state of Connecticut section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased in both low-income and moderate-income geographies exceeded the percentages of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was near to, and in moderate-income geographies exceeded the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of Connecticut section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies was below the percentage of businesses located in those geographies and approximated the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Lending Gap Analysis

The OCC analyzed TDNBA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Hartford MSA.

New Haven MSA

Home Mortgage Loans

Refer to Table O in the state of Connecticut section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased in both low-income and moderate-income geographies exceeded the percentages of owner-occupied housing units located in those geographies. The percentages of home mortgage loans originated or purchased in both low-income and moderate-income geographies approximated the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of Connecticut section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies approximated and in moderate-income geographies exceeded the percentages of businesses located in those geographies. The percentages of small loans to businesses

originated or purchased in both low-income and moderate-income geographies exceeded the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Lending Gap Analysis

The OCC analyzed TDNBA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the New Haven MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Hartford MSA

Home Mortgage Loans

Refer to Table P in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low- and moderate- income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of low-income families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of moderate-income families and was near-to aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

New Haven MSA

Home Mortgage Loans

Refer to Table P in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low- and moderate- income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of low-income families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of moderate-income families and approximated aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of Connecticut section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Community Development Lending

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Hartford MSA

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test.

TDBNA made 47 CD loans totaling \$39.8 million, which represented 7.8 percent of allocated tier 1 capital. Included in this total were 38 PPP loans totaling \$10.5 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, occasionally in a leadership position. CD loans were responsive to identified community needs including affordable housing. By dollar volume, 56.1 percent of CD loans funded affordable housing, 24 percent funded revitalization and stabilization efforts, 18.3 percent funded community services, and 1.6 percent funded economic development activities.

Examples of CD loans in the AA include:

- A \$5 million loan to finance the construction of a 58-unit LIHTC housing complex in Hartford of which 46 units are restricted to tenants earning up to 60 percent of the AMI. In addition, 12 units will benefit from Section 8 project-based rental vouchers. Other funding sources include LIHTC equity provided by the bank.
- A renewal and increase from \$2 million to \$3 million of a working capital line of credit to an organization that provides services to adults with disabilities, the majority of which are LMI.
- An extension, due to the COVID pandemic, of a \$7 million construction loan to develop a 45-unit LIHTC project of which 40 units are restricted to tenants earning up to 60 percent of the AMI. Other funding sources included LIHTC equity provided by the bank.

New Haven MSA

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test.

TDBNA made 31 CD loans totaling \$75.4 million, which represented 22.9 percent of allocated tier 1 capital. Included in this total were 21 PPP loans totaling \$2.6 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, occasionally in a leadership position. CD loans were responsive to identified community needs including affordable housing. By dollar volume, 76 percent of CD loans funded affordable housing, 13.7 percent funded revitalization and stabilization efforts, and 10.3 percent funded economic development activities.

Examples of CD loans in the AA include:

- A \$17.5 million loan to finance the new construction of a 64-unit mixed-income housing development. Of the 64 units, 51 are reserved for households earning up to 60 percent of the AMI and 22 of those units are reserved for senior citizens. All affordable units benefit from project-based Section 8 HAP rental subsidies. Other funding sources included LIHTC equity provided by the bank.
- A \$4 million working capital line of credit (TDBNA's share in a \$27.5 million multi-bank loan pool) to a CDFI to support its affordable housing program. All properties in the program are in LMI geographies with rents falling within HUD's rent limits for multi-family dwellings.
- A \$14.5 million construction loan to redevelop an existing public housing community, as part of HUD's Rental Assistance Demonstration (RAD) program. As part of the redevelopment, the existing structures will be demolished and replaced with 40 new units of which 32 will be affordable for tenants earning up to 50 percent of the AMI and eight units will be market rate. Additionally, eight units will serve as supportive housing for homeless persons. Tenants in the affordable units will benefit from Section 8 project-based vouchers. A local housing authority will fund a resident services coordinator and related services for tenants. Other funding sources for the project include LIHTC equity provided by the bank.

Product Innovation and Flexibility***Hartford MSA***

The institution made extensive use of innovative and flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank funded 879 loans totaling \$84.9 million under the following innovative and/or flexible programs during the evaluation period in the Hartford MSA.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	20	4,527
TD Home Access Mortgage	6	1,233
FNMA HomeReady Mortgage	16	2,622
FHA Mortgage	8	1,868
VA Mortgage	1	312
PPP	828	74,358
Total	879	84,920

New Haven MSA

The institution made extensive use of innovative and flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank funded 714 loans totaling \$50.2 million under the following innovative and/or flexible programs during the evaluation period in the New Haven MSA.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	10	1,897
FNMA HomeReady Mortgage	6	978
FHA Mortgage	6	1,715
VA Mortgage	1	221
PPP	691	45,352
Total	714	50,163

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bridgeport MSA, Norwich MSA and CT Non-MSA AAs was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through T in the state of Connecticut section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Connecticut is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Hartford MSA and New Haven MSA AAs was excellent.

Number and Amount of Qualified Investments

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Hartford MSA	17	33,496	83	63,319	100	45.0	96,815	44.2	0	0
New Haven MSA	11	15,535	37	41,697	48	21.6	57,232	26.2	0	0
Limited-Scope:										
Bridgeport MSA	12	40,210	43	8,523	55	24.8	48,733	22.3	0	0
Norwich MSA	0	0	4	749	4	1.8	749	0.3	0	0
CT Non-MSA	0	0	11	12,439	11	5.0	12,439	5.7	0	0
CT Statewide	2	1,192	2	1,668	4	1.8	2,860	1.3	0	0
Total	42	90,433	180	128,395	222	100.0	218,828	100.0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Hartford MSA

The institution had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made 41 investments totaling \$62.7 million and provided 42 qualifying grants and donations totaling \$577,500. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 20.7 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs creating 201 affordable housing units. By dollar volume, 92.2 percent of current period investments and donations funded affordable housing, 7.1 percent funded economic development activities, and 0.7 percent funded community services to LMI individuals.

The institution made significant use of innovative and/or complex qualified investments. CD investments included two direct LIHTC investments totaling \$33.9 million.

Examples of qualified investments in the AA include:

- A \$20 million complex LIHTC investment that funded the demolition and redevelopment of a 155-unit affordable housing complex. All units will be income-restricted to tenants earning up to 60 percent of the AMI. Additionally, 38 units will receive project-based Section 8 housing vouchers.

- A \$125,000 grant that supported a COVID-19 related, homeless prevention program targeted to low-income individuals at high risk of homelessness. The program provided supportive services along with direct financial relief to over 2,000 households.
- Three grants totaling \$30,000 to an organization supporting its small business programs targeting immigrant entrepreneurs. Specifically, the organization helps immigrants develop and grow their businesses through financial literacy and technical assistance including marketing, writing business plans, accessing capital, and preparing loan and grant applications.

New Haven MSA

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made three investments totaling \$41 million and provided 34 qualifying grants and donations totaling \$712,000. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 17.3 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs creating 146 affordable units. By dollar volume, 98.9 percent of current period investments and donations funded affordable housing, 0.2 percent funded economic development activities, and 0.9 percent funded community services to LMI individuals.

The institution made extensive use of innovative and/or complex qualified investments. CD investments included three direct LIHTC investments totaling \$41 million.

Examples of qualified investments in the AA include:

- A \$16 million complex LIHTC investment for a new passive housing development with 69 multifamily units and ground floor commercial space. Of the 69 units, 55 are affordable to tenants earning up to 60 percent of the AMI and 14 are market rate units restricted to tenants earning up to 120 percent of the AMI. In addition, 14 of the affordable units are set aside as permanent supportive housing for chronically homeless individuals and families. The project will also receive rental subsidies for 20 units under a Section 8 HAP contract.
- A \$25,000 grant to a nonprofit business development center that provides LMI businesswomen with financial development strategies that includes business advising, mentorship, financial education, and networking opportunities.
- A \$175,000 grant to a nonprofit organization that provides affordable housing and wraparound services to help individuals and families with economic stability. The funding was specifically used to rehabilitate affordable housing units that require advanced professional workmanship due to their architecture and aged mechanical systems.

Broader Statewide Area

TDBNA had four qualified CD investments totaling \$2.9 million in the broader statewide area. The bank made two current period investments totaling \$1.7 million in IOLTA programs. In addition, two prior

period loan fund investments with a book value of \$1.2 million remained outstanding. These investments provided additional support for the Outstanding Investment Test rating in the state of Connecticut.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bridgeport MSA and CT Non-MSA AAs was consistent with the bank's overall performance in the full-scope areas. The bank's performance in the Norwich MSA was weaker than the overall performance in the full-scope areas due to a lower level of CD investments. Weaker performance did not impact the overall Investment Test rating for the state of Connecticut.

SERVICE TEST

The bank's performance under the Service Test Connecticut is rated High Satisfactory. Performance in the limited scope areas had a positive impact on the Service Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Hartford MSA was adequate and in the New Haven MSA was good.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography**			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Hartford MSA	43.8	22	39.3	4.5	9.1	63.6	22.7	10.1	16.5	42.2	30.5
New Haven MSA	28.4	16	28.6	12.5	6.3	37.5	43.8	13.0	22.9	28.0	36.1
Limited-Scope:											
Bridgeport MSA	22.6	14	25.0	14.3	14.3	21.4	50.0	13.5	22.2	28.0	36.2
Norwich MSA	1.2	1	1.8	0.0	0.0	100.0	0.0	0.0	0.0	48.1	51.9
CT Non-MSA	4.0	3	5.4	0.0	66.7	33.3	0.0	2.5	13.5	68.4	15.7

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** 0.7% of population in the Hartford MSA and 0.2% of population in the Bridgeport MSA resides within an "NA" income category.

Hartford MSA

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the Hartford MSA.

The bank's distribution of branches in low-income geographies was well below, and in moderate-income geographies, was below, the percentage of the population living within those geographies. Examiners considered four middle-income adjacent branches that served moderate-income areas within the AA as demonstrated by branch transactions and deposit account opening activity. These adjacent branches improved accessibility and had a positive impact on the retail Service Test conclusion.

TDBNA offered ADS including ATMs, and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 30 deposit-taking ATMs in the AA, including one in a low-income geography and three in moderate-income geographies. The distribution of ATMs in low-income geographies was poor and in moderate-income geographies was adequate. TDBNA provided data indicating that 84 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 85 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 61 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 64 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

New Haven MSA

Service delivery systems were accessible to geographies and individuals of different income levels in the New Haven MSA.

The bank's distribution of branches in low-income geographies approximated, and in moderate-income geographies was well below the percentage of the population living within those geographies. Examiners considered an upper-income adjacent branch that served a low-income area and two MUI adjacent branches that served moderate-income areas within the AA as demonstrated by branch transactions and deposit account opening activity. These MUI adjacent branches improved accessibility and had a positive impact on the retail Service Test conclusion.

TDBNA offered ADS including ATMs, and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 27 ATMs in the AA, of which 26 were deposit-taking, including three in low-income geographies and two in moderate-income geographies. The distribution of ATMs in low-income geographies was good and in moderate-income geographies was poor. TDBNA provided data indicating that 83 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 85 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 59 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 64 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Hartford MSA	0	1	0	-1	0	0
New Haven MSA	0	3	0	-1	-1	-1
Limited-Scope:						

Bridgeport MSA	0	1	0	0	-1	0
Norwich MSA	0	0	0	0	0	0
CT Non-MSA	0	1	0	-1	0	0
Total	0	6	0	-3	-2	-1

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Hartford MSA

The bank's opening and closing of branches has generally not adversely affected, the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed one branch in a moderate-income geography. The branch closure was attributed to low customer transactions and lower than expected production volume coupled with a low number of households associated with the branch.

Services, including where appropriate, business hours, are tailored to the convenience and needs of the various portions of its AA, including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including extended hours on Thursdays and Fridays. All AA branches are open on Saturdays and 17 of the 22 branches are open on Sundays, including both of the moderate-income branches. Of the 22 branches in the AA, 20 had drive-thru facilities, including both moderate-income branches. TDBNA offered traditional banking products and services at all branch locations in the AA.

New Haven MSA

The bank's opening and closing of branches has generally not adversely affected, the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed three branches including one branch in a moderate-income geography. The moderate-income branch closure was attributed to low customer transactions and lower than expected production volume coupled with a low number of households associated with the branch.

Services, including where appropriate, business hours, are tailored to the convenience and needs of the various portions of its AA, including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including extended hours on Thursdays and Fridays. All 16 AA branches were open on Saturdays and 14 branches were open on Sundays including one of two low-income branches and the only moderate-income branch. Of the 16 branches in the AA, 13 had drive-thru facilities, including the one branch in a moderate-income geography. Neither of the low-income branches has drive-up facilities; however, one branch is located in a shopping plaza and the other is in a downtown area. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

Hartford MSA

TDBNA provided an adequate level of CD services. During the evaluation period, the bank provided 32 financial education events to 447 participants in the Hartford MSA. Additionally, nine bank employees provided 291 service hours over the evaluation period that benefited 11 organizations through

board/committee participation or professional skills assistance. The bank's assistance was responsive to identified needs in the AA including, small business technical assistance and financial education.

Examples of CD services in the AA include:

- A bank vice president served on the board of an area foundation what works to address key community issues through charitable giving. The employee provided 127 service hours over the evaluation period.
- Employees provided financial education through youth programs focused on topics including basic financial education and career planning. During the evaluation period, more than 100 local youth attended these sessions.
- A bank employee led three virtual small business education programs in coordination with a local university. The programs helped to educate adults on small business ownership and the skills that guide them in becoming successful including running a profitable company and assessing financial needs. The events were attended by more than 50 participants.

New Haven MSA

TDBNA provided an adequate level of CD services. During the evaluation period, the bank provided 41 financial education events to 479 participants in the New Haven MSA. In addition, nine bank employees provided 83 service hours over the evaluation period that benefitted eight area organizations through board/committee participation or professional skills assistance. The bank's assistance was responsive an identified need in the AA for financial education.

Examples of CD services in the AA include:

- A bank employee served on the board for an area CDFI that works to create and preserve affordable housing, invest in small businesses, and support nonprofit organizations. The employee provided 40 service hours over evaluation period.
- Three bank employees taught two sessions of a small business course focused on developing a business plan to 78 attendees from a local magnet high school that offer students an academic path of study in business and finance.
- Bank employees including a mortgage loan officer and several branch managers led home buying workshops to 55 participants at LMI branch locations in the New Haven MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Norwich MSA was consistent with the bank's overall performance in the full-scope areas. The bank's performance in the Bridgeport MSA and CT Non-MSA AAs was stronger than the overall performance in the full-scope areas due to better branch distributions. Performance in the limited-scope areas had a positive impact on the overall Service Test rating in the state of Connecticut.

State of Delaware

CRA rating for the State of Delaware⁹: Outstanding

The Lending Test is rated: Outstanding,

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include

- excellent lending activity, with overall excellent geographic and borrower distribution of lending;
- an excellent level of CD investments that were responsive to identified community needs;
- reasonably accessible retail service delivery systems; and
- no CD service activities.

Description of Institution's Operations in Delaware

The state of Delaware consists of two AAs including the entire Dover, DE MSA (Dover MSA) and a portion of the Salisbury, DE MSA (Salisbury MSA). Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had two branch locations and four ATMs, all of which were deposit-taking, within these AAs. During the evaluation period, the bank made \$143.7 million or 0.3 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of Delaware represented TDBNA's smallest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$286.9 million in deposits in these AAs, which represented 0.1 percent of the bank's total adjusted deposits. The bank ranked ninth in deposit market share with 0.3 percent out of 21 depository institutions. The top three competitors had 95.2 percent of the market share and consist of Discover Bank with one branch and 91.6 percent market share, Manufacturers and Traders Trust Company with 18 branches and 2 percent market share, and PNC Bank, N.A. with 11 branches and 1.6 percent market share.

Salisbury MSA

The following tables provides a summary of the demographics, including housing and business information for the Salisbury MSA AA.

⁹ The statewide ratings do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Salisbury MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	4.3	39.1	52.2	4.3
Population by Geography	59,668	0.0	1.7	49.4	48.9	0.0
Housing Units by Geography	42,910	0.0	6.3	41.9	51.8	0.0
Owner-Occupied Units by Geography	22,772	0.0	3.6	47.9	48.5	0.0
Occupied Rental Units by Geography	3,668	0.0	3.4	43.8	52.8	0.0
Vacant Units by Geography	16,470	0.0	10.8	33.2	56.1	0.0
Businesses by Geography	7,645	0.0	4.5	51.6	43.8	0.1
Farms by Geography	214	0.0	0.5	57.9	41.6	0.0
Family Distribution by Income Level	17,163	14.3	16.0	18.6	51.2	0.0
Household Distribution by Income Level	26,440	18.7	13.1	18.0	50.2	0.0
Median Family Income MSA - 41540 Salisbury, MD-DE MSA		\$76,095	Median Housing Value			\$448,892
			Median Gross Rent			\$1,160
			Families Below Poverty Level			5.9%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

The Salisbury MSA AA consisted of a portion of Sussex County including the city of Lewes and town of Milton. As of year-end 2023, TDBNA operated one branch and two ATMs, both of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$118 million in deposits in the AA which comprised less than 0.1 percent of total bank adjusted deposits and 41.1 percent of the rated area deposits. The AA is served by 14 FDIC-insured financial institutions operating 24 branches. TDBNA had 4.7 percent deposit market share which ranked ninth among all institutions. The top three competitors had 47 percent of the market share and consist of Manufacturers and Traders Trust Company with five branches and 18.1 percent market share, Wilmington Savings Fund Society, FSB with two branches and 15.7 percent market share, and PNC Bank, N.A. with two branches and 13.2 percent market share.

Based on information from the September 2023 Moody's Analytics report, the Salisbury MSA economy has slowed after two years of solid growth. While leisure/hospitality has stalled, the manufacturing and healthcare industries are keeping the economy on track. The area is a tourist and retiree destination. Consumer spending is down with post-pandemic travel having slowed as fuel costs remain high and savings are dwindling. Manufacturing is another economic driver and source of stability for the area economy. Food manufacturing jobs in the MSA are among the highest in the nation thanks to a large presence of chicken farms and nearby processors such as Perdue Farms. While the price of chicken remains relatively high, demand is strong amid the high prices for other protein sources which bodes well for the economy. Population growth in Salisbury is robust, driven not only by senior citizens attracted to the area's beaches and favorable taxes but also by prime age workers who have helped

support the labor supply. Salisbury's above average share of senior citizens correlates to a strong demand for healthcare. The MSA's strengths include a low cost of living and undervalued housing. However, per Moody's area home prices and single-family construction are on the upswing. Weaknesses included a heavy reliance on tourism and consumer facing industries, below average per capita income, few high-wage jobs, and low level of prime age workers. Major employment sectors include leisure and hospitality and education and healthcare services. The top employers in the MSA include Peninsula Regional Medical Center, Beebe Medical Center, Salisbury University, Perdue Farms Inc, and Walmart Inc.

According to the U.S. BLS, the unemployment rate in the Salisbury MSA was 7.6 percent as of January 2021, compared to 3.5 percent in December 2023. The MSA's unemployment rate was slightly lower than both the statewide and national rates of 3.7 percent as of December 2023.

Based on information in the above table, low-income families earned less than \$38,048 and moderate-income families earned less than \$60,876. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$951 for low-income borrowers and \$1,522 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$2,410. Most low-income and moderate-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 35.5 percent from the first quarter of 2021 to the fourth quarter of 2023. This acceleration in home prices worsened existing affordability concerns in the Salisbury MSA.

The OCC relied on a community contact conducted during the evaluation period with a local housing department. The community contact indicated that the following are needs and opportunities within the bank's AA:

- Affordable Housing units, including rental housing,
- Lending to support construction of affordable housing developments,
- Providing funding to nonprofit organizations including housing organizations.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable Housing (ownership/rental) for LMI communities,
- Support for nonprofits to assist LMI populations with basic needs/services.

Scope of Evaluation in Delaware

Examiners selected one AA for a full-scope review. Examiners completed a full-scope review for the Salisbury MSA AA as it has not received a full-scope review in recent CRA evaluations. Further the AA has experienced significant deposit growth since the last CRA evaluation. The Dover MSA AA received a limited-scope review.

In arriving at overall conclusions, the Dover MSA received slightly more weight than the Salisbury MSA as it had the larger share of deposits in the state of Delaware. In determining Lending Test conclusions, examiners placed more emphasis on the loan product category that had the higher percentage of lending in the AA. In the Salisbury MSA home mortgage loans represented the majority of lending and in the Dover MSA loans to small businesses represented the majority of lending. Small loans to farms were not meaningful for analysis purposes in either AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DELAWARE

LENDING TEST

The bank's performance under the Lending Test in Delaware is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salisbury MSA AA was excellent.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Salisbury MSA	228	68	0	0	296	46.1	41.1
Limited-Scope:							
Dover MSA	128	212	1	5	346	53.9	58.9
Total	356	280	1	5	642	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans \$(000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Salisbury MSA	111,105	852	0	0	111,957	75.5	41.1
Limited-Scope:							
Dover MSA	27,635	4,085	35	4,527	36,282	24.5	58.9
Total	138,740	4,937	35	4,527	148,239	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked ninth out of 14 depository institutions (top 65 percent) with a deposit market share of 4.7 percent.

For home mortgage loans, TDBNA's market share of 1.5 percent ranked 18th out of 305 lenders (top 6 percent). The top three lenders were NVR Mortgage Finance, Inc. with 7.2 percent market share, Wells Fargo Bank, N.A. with 5.6 percent market share, and PNC Bank, N.A. with 3.9 percent market share.

For small loans to businesses, TDBNA's market share of 0.6 percent ranked 20th out of 87 lenders (top 23 percent). The top three lenders were American Express National Bank with 22.4 percent market share, JPMorgan Chase Bank, N.A. with 11.7 percent market share, and Capital One, N.A. with 8.9 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs. Conclusions are based on the bank's performance in moderate-income geographies as there were no low-income geographies in the Salisbury MSA AA during the evaluation period.

Home Mortgage Loans

Refer to Table O in the state of Delaware section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and the percentage of all reporting lenders.

For the 2021 analysis period, there were no low-income or moderate-income geographies in the AA.

Small Loans to Businesses

Refer to Table Q in the state of Delaware section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies but was below the aggregate percentage of all reporting lenders.

For the 2021 analysis period, there were no low-income or moderate-income geographies in the AA.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Salisbury MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and business of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Delaware section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low- and moderate- income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was near to the percentage of low-income families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate- income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker performance against the demographics for both low-income and moderate-income borrowers.

Small Loans to Businesses

Refer to Table R in the state of Delaware section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Community Development Lending

The institution made few, if any, CD loans.

TDBNA made no CD loans in the Salisbury MSA. Examiners considered the bank's limited presence in the market and the limited opportunities for CD lending. The absence of CD lending in the Salisbury MSA did not alter the excellent performance conclusion.

Product Innovation and Flexibility

The institution made little use of innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, TDBNA made 10 PPP loans totaling \$229,000 in the Salisbury MSA.

Loan Type	Number of Loans	Dollar Amount (\$000s)
PPP	10	229

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Dover MSA was consistent with the bank's overall performance in the full-scope area.

Refer to Tables O through T in the state of Delaware section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Delaware is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Salisbury MSA was excellent.

Number and Amount of Qualified Investments

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Salisbury MSA	0	0	9	2,669	9	47.4	2,669	50.1	0	0
Limited-Scope:										
Dover MSA	0	0	9	2,120	9	47.4	2,120	39.8	0	0
Statewide DE	0	0	1	538	1	5.2	538	10.1	0	0
Total	0	0	19	5,327	19	100.0	5,327	100.0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made four investments totaling \$2.6 million and provided five qualifying grants and donations totaling \$95,000. There were no prior period investments. The dollar volume of current period investments (excluding unfunded commitments) represented 17.3 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs creating 35 affordable housing units. By dollar volume, 99.6 percent of current period investments and donations funded affordable housing and 0.4 percent funded community services to LMI individuals.

The institution made occasional use of innovative and/or complex qualified investments. CD investments included one direct LIHTC investment totaling \$2 million.

Examples of qualified investments in the AA include:

- A \$2 million complex LIHTC investment for the new construction of a 42-unit apartment complex of which 35 units will be restricted to tenants earning up to 60 percent of the AMI. The remaining seven units will be market rate.
- Two grants totaling \$80,000 to an affordable housing organization to support a program that creates affordable homeownership opportunities for low to very low-income households in the AA.

Broader Statewide Area

During the evaluation period, TDBNA made one investment in an IOLTA program totaling \$538,088 in the broader statewide area. This investment provided additional support for the Outstanding Investment Test rating in the state of Delaware.

Conclusions for Area Receiving a Full-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Dover MSA was consistent with the bank's overall performance in the full-scope area.

SERVICE TEST

The institution's performance under the Service Test in Delaware is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Salisbury MSA was adequate.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Salisbury MSA	41.1	1	50.0	0.0	0.0	100.0	0.0	0.0	1.7	49.4	48.9
Limited-Scope:											

Dover MSA	58.9	1	50.0	0.0	0.0	0.0	100.0	0.0	19.6	54.8	25.5

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AAs. The bank has only one branch in the AA which is in a middle-income geography. Further, there are no low-income geographies in the Salisbury AA. The bank had no branches in moderate-income geographies; however, only 1.7 percent of the population resides in moderate-income areas in the AA. Further consideration was given to the bank's limited branch presence in this market.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had two deposit-taking ATMs in the AA, both of which were located in middle-income geographies. TDBNA provided data indicating that 91.8 percent of customers in moderate-income areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 88.7 percent of customers in MUI areas. Further, bank customers in moderate-income areas of the AA conducted 76.2 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 68.3 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

The bank did not open or close branches in the AA during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced, the various portions of its AA, including moderate-income geographies and/or low- and moderate-income individuals. TDBNA maintained standard weekday business hours at the one branch location in the AA including extended hours on Thursdays and Fridays. Additionally, the one branch in the AA was open on Saturdays and Sundays. TDBNA offered traditional banking products and services at this branch location including a drive-thru facility.

Community Development Services

TDBNA did not provide any CD services in the AA during the evaluation period.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Dover MSA was consistent with the bank's overall performance in the full-scope area.

State of Florida

CRA rating for the State of Florida: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include

- excellent lending activity, with overall excellent geographic and borrower distribution of lending;
- an excellent level of CD lending that further supported the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- readily accessible retail service delivery systems with consideration for MUI adjacent branches; and
- an excellent level of CD services.

Description of Institution's Operations in Florida

The state of Florida consists of 17 AAs including the entirety of Miami-Fort Lauderdale-Pompano Beach, FL MSA (Miami MSA), Cape Coral-Fort Myers, FL MSA (Cape Coral MSA); Homosassa Springs, FL MSA (Homosassa Springs MSA); Lakeland-Winter Haven, FL MSA (Lakeland MSA); North Port-Sarasota-Bradenton, FL MSA (North Port MSA); Ocala, FL MSA (Ocala MSA); Orlando-Kissimmee-Sanford, FL MSA (Orlando MSA); Palm Bay-Melbourne-Titusville, FL MSA (Palm Bay MSA); Port St. Lucie, FL MSA (Port St. Lucie MSA); Sebastian-Vero Beach, FL MSA (Sebastian MSA); and the Sebring-Avon Park, FL MSA (Sebring MSA) and five contiguous nonmetropolitan counties that comprise the Florida Non-MSA (FL Non-MSA) AA. In addition, TDBNA delineated portions of the Deltona-Daytona Beach-Ormond Beach, FL MSA (Deltona MSA); Gainesville, FL MSA (Gainesville MSA); Jacksonville, FL MSA (Jacksonville MSA); Naples-Marco Island, FL MSA (Naples MSA); and the Tampa-St. Petersburg-Clearwater, FL MSA (Tampa MSA) as AAs. Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had 168 branch locations and 468 ATMs, of which 289 were deposit-taking, within these AAs. During the evaluation period, the bank made \$7.5 billion or 14.4 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of Florida represented TDBNAs third largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$23.2 billion in deposits in the state of Florida, which represented 9.9 percent of the bank's total adjusted deposits. The bank ranked eighth in deposit market share with 3 percent out of 164 depository institutions. The top three competitors had 42.1 percent of the market share and consisted of Bank of America, N.A. with 412 branches and 21 percent market share, Wells Fargo Bank, N.A. with 454 branches and 11.5 percent market share, and Truist Bank with 409 branches and 9.6 percent market share.

Miami MSA

The following tables provides a summary of the demographics, including housing and business information for the Miami MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Miami MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,497	5.3	26.3	30.5	34.2	3.7
Population by Geography	6,138,333	4.7	28.0	31.4	34.4	1.5
Housing Units by Geography	2,548,767	4.8	27.4	30.9	35.5	1.5
Owner-Occupied Units by Geography	1,299,739	2.9	21.8	32.1	42.2	1.0
Occupied Rental Units by Geography	873,001	7.8	37.4	31.0	22.0	1.8
Vacant Units by Geography	376,027	4.5	23.5	26.3	43.6	2.2
Businesses by Geography	2,257,013	2.9	22.4	29.1	42.9	2.7
Farms by Geography	26,885	4.0	24.7	30.1	39.9	1.3
Family Distribution by Income Level	1,418,815	22.5	17.6	18.0	41.9	0.0
Household Distribution by Income Level	2,172,740	24.7	16.0	16.8	42.5	0.0
Median Family Income MD - 22744 Fort Lauderdale-Pompano Beach-Sunrise, FL		\$73,430	Median Housing Value			\$321,948
Median Family Income MD - 33124 Miami-Miami Beach-Kendall, FL		\$60,666	Median Gross Rent			\$1,449
Median Family Income MD - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL		\$79,785	Families Below Poverty Level			10.6%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Miami MSA AA consists of three MDs in their entirety that comprise the MSA including the Fort Lauderdale-Pompano Beach-Sunrise, FL MD (Fort Lauderdale MD), the Miami-Miami Beach-Kendall, FL MD (Miami MD), and the West Palm Beach-Boca Raton-Boynton Beach, FL MD (West Palm Beach MD). As of year-end 2023, TDBNA operated 81 branches and 244 ATMs, 155 of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$13 billion in deposits in the AA which comprised 5.6 percent of total bank adjusted deposits and 56 percent of rated area deposits. The AA is served by 85 FDIC-insured financial institutions operating 1,350 branches. TDBNA had 3.9 percent deposit market share which ranked eighth among all institutions. The top three competitors had 42.6 percent market share and consisted of Bank of America, N.A. with 167 branches and 17.5 percent market share, JPMorgan Chase Bank, N.A. with 178 branches and 12.8 percent market share, and Wells Fargo Bank, N.A. with 178 branches and 12.3 percent market share.

Fort Lauderdale MD

Based on information from the December 2023 Moody's Analytics report, the Fort Lauderdale MD (Broward County) economy is gaining momentum with employment growth occurring in professional services, healthcare, and construction. Key economic drivers include high tech, tourism, and logistics. Consumer industries are typically strong, benefitting from high per capita income that ranks in the top quartile in the nation. However, tourist spending is down which is hampering retail and leisure/hospitality growth and bringing it back in line with Florida overall. Fort Lauderdale also has an

outsized consumer credit industry that includes auto and credit card lenders. The area's concentration of workers in nonbank lending is nearly two times the national average. While growth in consumer credit had slowed in 2023 due to higher interest rates and tighter credit standards, conditions are improving modestly. Area strengths include strong ties to international trade via Latin America and tourism. The area's weaknesses include limited expansion opportunities due to the Atlantic Ocean to the east and the Everglades to the west as well as a highly volatile employment base. Further, Fort Lauderdale suffers from poor migration trends which hinder growth. Out migration, on a per capita basis, is among the worst in the nation with prime age workers being the main detractors. The AA's primary employment industries include professional and business services, education and health services, and retail trade. Major employers in the area include Nova Southeastern University, First Service Residential, HEICO, Spirit Airlines, and American Express.

Miami MD

Based on information from the November 2023 Moody's Analytics report, the Miami MD (Miami-Dade County) continues to be a top performer in the state and region overall. While professional and business services and manufacturing are performing well, the leisure/hospitality industry has stalled. The area is experiencing an extremely tight labor market causing the unemployment rate to trend downward past historical lows. Miami has also seen higher inflation compared to most other regional areas. Area strengths include Miami's strong ties to Latin America, and a luxury status that attracts international capital. Further, Miami is home to the world's second busiest cruise port, and therefore their shipping and distribution infrastructure is well-developed. The area's weaknesses include a high household debt burden, congested roads and airport, and an industrial structure that leaves the area economy susceptible to business cycle downturns. The area's economic drivers include logistics, tourism, and finance. Tourism has been strong over the past two years, but higher costs are causing tourists to limit their spending which has slowed the leisure/hospitality industry. In addition, the area's high housing costs and rents are pricing lower-wage workers out causing labor shortages that are also hampering growth. Miami's rental vacancy rate has increased significantly with new multifamily properties going up while high costs have pushed residents out of the MD to lower cost neighboring areas. On a positive note, the excess supply has helped ease the area's rental rates. The area's primary employment industries include professional and business services, education and health services, and retail trade. Major employers in the area include Publix Super Markets, Baptist Health South Florida, American Airlines, Jackson Health Systems, and Florida International University.

West Palm Beach MD

Based on information from the December 2023 Moody's Analytics report, the West Palm Beach MD (Palm Beach County) economy is lagging the state of Florida and U.S. overall. While finance and construction sectors have experienced gains, most other sectors have been underperforming. The MD's unemployment rate was near its historical low; however, per Moody's it was attributed to a shrinking labor force thus indicating potential weakness. The area economy is driven by tourism and finance along with being a retiree destination. During 2023, in-migration slowed in West Palm Beach from the steady increase seen since the pandemic. This is due in part to rising housing costs which have lessened the metro's affordability advantage relative to other major markets. On the tourism front, while the area saw a larger increase in visitors than other areas in Florida in 2023, the leisure and hospitality industry is leveling off. The MD's strengths include vibrant professional and business services, very high per capita income, as well as being well-positioned to expand logistics and international trade. Weaknesses include a high cost of living primarily due to high housing prices and very high employment volatility. The AA's primary employment industries include professional and business services, education and

health services, and leisure and hospitality services. Major employers in the area include Tenet Healthcare Corp, NextEra Energy/Florida Power & Light Co., Florida Atlantic University, Hospital Corp. of America, and Boca Raton Regional Hospital.

According to the U.S. BLS, the unemployment rate in the Miami MSA was 6.9 percent as of January 2021, compared to 2.4 percent in December 2023. The MSA unemployment rate compared favorably to both the statewide rate of 2.9 percent and the national unemployment rate of 3.7 percent as of December 2023.

Based on information in the above table, low-income families earned less than \$30,333-\$39,893 and moderate-income families earned less than \$48,533-\$63,828 depending on the MD. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MD, this calculated to a maximum monthly mortgage payment between \$758 and \$997 for low-income borrowers and between \$1,213 and \$1,596 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,728. Most low-income and moderate-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 58.6 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Miami MD. In the Fort Lauderdale MD, the increase was 52.1 percent and in the West Palm Beach MD it was 59.4 percent. This acceleration in home prices worsened existing affordability concerns in the Miami MSA.

The OCC relied upon three community contacts conducted during the evaluation period with an affordable housing organization, a nonprofit business organization, and a nonprofit business development center. Community contacts indicated that the following are needs and opportunities within the bank's AA:

- Developing more livable-wage job opportunities,
- Affordable housing development, including multifamily and single-family properties,
- Assistance for first time homebuyers,
- Revitalizing low-income neighborhoods,
- Small business lending, particularly SBA loans,
- Small business technical assistance, including start-up and strategic planning assistance,
- Funding financial literacy programs and events.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable multifamily rental housing for LMI, including a growing need for affordable senior housing,
- Access to capital and small business technical assistance,
- Down payment assistance, financial education, and affordable homeownership financing,
- Support for community organizations serving LMI, including grant funding.

Orlando MSA

The following tables provides a summary of the demographics, including housing and business information for the Orlando MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Orlando MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	490	4.1	28.8	35.1	30.8	1.2
Population by Geography	2,673,376	3.7	26.7	35.6	32.9	1.0
Housing Units by Geography	1,054,209	3.5	27.7	36.7	31.3	0.9
Owner-Occupied Units by Geography	553,334	1.5	22.8	37.7	37.8	0.2
Occupied Rental Units by Geography	339,923	6.2	35.3	33.7	23.1	1.8
Vacant Units by Geography	160,952	4.7	28.8	39.5	25.9	1.2
Businesses by Geography	670,550	2.4	26.4	33.3	36.9	1.1
Farms by Geography	13,030	2.2	25.7	39.6	31.9	0.5
Family Distribution by Income Level	604,893	21.3	18.0	19.2	41.4	0.0
Household Distribution by Income Level	893,257	22.5	17.3	18.7	41.5	0.0
Median Family Income MSA – 36740 Orlando-Kissimmee-Sanford, FL MSA		\$70,774	Median Housing Value			\$242,858
			Median Gross Rent			\$1,294
			Families Below Poverty Level			9.5%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Orlando MSA consists of the four counties that comprise the MSA including Lake, Orange, Osceola, and Seminole. As of year-end 2023, TDBNA operated 14 branches and 24 ATMs, all of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$1.9 billion in deposits in the AA which comprised 0.8 percent of total bank adjusted deposits and 8.3 percent of the rated area deposits. The AA is served by 47 FDIC-insured financial institutions operating 494 branches. TDBNA had 2.5 percent deposit market share which ranked eighth among all institutions. The top three competitors had 54.5 percent market share and consisted of Truist Bank with 58 branches and 21.7 percent market share, Bank of America, N.A. with 49 branches and 18.7 percent market share, and Wells Fargo Bank, N.A. with 48 branches and 14.1 percent market share.

Based on information from the November 2023 Moody's Analytics report, the Orlando MSA economy has stalled, and the slowdown is broad-based. The unemployment rate has ticked up the past several months but remains below its pre-pandemic rate. Healthcare is the one area that is performing well with job growth showing no signs of slowing. The key economic drivers in Orlando are finance, high tech, and tourism. Orlando is a preeminent tourist destination and while visitation to Disney was down

slightly as of third quarter 2023 compared to one year prior, it's still performing better than other tourist hubs. Orlando is also home to one of the nation's largest research parks, the Central Florida Research Park, which houses numerous defense and technology companies including Lockheed Martin and the Naval Air Warfare Center Training Systems Division. The heavily defense-centric tech industry has provided economic stability despite recent broader tech weaknesses. Area strengths include Orlando's natural and institutional tourism advantages, strong demographics due to in-migration, ample job opportunities in services, and abundant land for development. Weaknesses include sensitivity to national and international economic conditions, heavy dependence on low-wage jobs, and low employment diversity and high employment volatility. Orlando is among the least affordable large metros in the nation. However, per Moody's the housing market is beginning a correction as affordability issues and overvaluation have created lessened buyer demand bringing prices down and building up housing inventory. The AA's primary employment industries include professional and business services, leisure and hospitality, and education and health services. Major employers in the area include Walt Disney World Resort, Advent Health, Universal Studios Florida, Orlando Health, and Orlando International Airport.

According to the U.S. BLS, the unemployment rate in the Orlando MSA was 6.8 percent as of January 2021, compared to 3 percent in December 2023. The MSA unemployment rate was slightly higher than the statewide rate 2.9 percent and was lower than the national unemployment rate of 3.7 percent as of December 2023.

Based on information in the above table, low-income families earned less than \$35,387 and moderate-income families earned less than \$56,619. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$885 for low-income borrowers and \$1,415 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,304. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 46.6 percent from the first quarter of 2021 to the fourth quarter of 2023. This acceleration in home prices worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC relied on information from a community contact conducted during the evaluation period with an economic development organization in the area. The community contact indicated that the following are needs and opportunities within the bank's AA:

- Affordable housing units, including rental housing,
- Revitalization of LMI areas,
- Small business loans including seed capital, venture, debt, and equity financing,
- Training and technical assistance to small businesses,
- Service on boards, committees, and other volunteer opportunities.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable multifamily rental housing for LMI,
- Homeownership opportunities and down payment assistance,
- Community services for LMI individuals including support for homeless individuals and families,
- Small business financing.

Port St. Lucie MSA

The following tables provides a summary of the demographics, including housing and business information for the Port St. Lucie MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Port St. Lucie MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	111	3.6	18.9	42.3	27.9	7.2
Population by Geography	487,657	2.6	21.8	46.9	26.9	1.8
Housing Units by Geography	224,365	2.4	20.8	42.7	32.7	1.3
Owner-Occupied Units by Geography	140,534	0.8	18.3	45.2	33.9	1.8
Occupied Rental Units by Geography	42,863	7.6	31.5	42.4	18.0	0.6
Vacant Units by Geography	40,968	2.7	18.4	34.6	43.7	0.6
Businesses by Geography	109,225	3.1	20.3	42.9	32.5	1.2
Farms by Geography	3,480	3.3	24.6	39.6	29.5	3.0
Family Distribution by Income Level	121,810	18.8	19.4	20.1	41.7	0.0
Household Distribution by Income Level	183,397	23.0	16.5	18.9	41.5	0.0
Median Family Income MSA - 38940 Port St. Lucie, FL MSA		\$68,546	Median Housing Value			\$235,449
			Median Gross Rent			\$1,210
			Families Below Poverty Level			8.2%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Port St. Lucie MSA consists of the two counties that comprise the MSA including Martin and Saint Lucie. As of year-end 2023, TDBNA operated six branches and nine ATMs, all of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had approximately \$1.2 billion in deposits in the AA which comprised 0.5 percent of total bank adjusted deposits and 5 percent of rated area deposits. The AA is served by 18 FDIC-insured financial institutions operating 83 branches. TDBNA had 8.9 percent deposit market share which ranked fifth among all institutions. The top three competitors had 49.7 percent market share and consisted of Seacoast National Bank with 11 branches and 24.2 percent market share, Bank of America, N.A. with eight branches and 13.9 percent market share, and Wells Fargo Bank, N.A. with 11 branches and 11.6 percent market share.

Based on information from the December 2023 Moody's Analytics report, the Port St. Lucie MSA's economy slowed in the latter half of the year primarily attributed to weaknesses in the leisure/hospitality and retail industries. Job growth in the MSA is lagging the state and nation overall and the unemployment rate has steadily increased over the last six months. Healthcare, which is a key economic driver, is one bright spot helping to anchor the area economy. Port St. Lucie is heavily dependent on healthcare employment compared to the state and nation overall. The MSA is a retiree destination, and therefore the demand for medical services is strong and growing. The area is also a popular year-round destination for travelers given its pristine beaches and favorable weather. As such, tourism is vital to the economy. The leisure/hospitality industry employs a larger portion of workers than the U.S. overall and is a significant driver of job creation. However, the average wage of these workers is less than half the metro average and thus any spillover effects from hiring gains is small. Area strengths include a desirable climate and quality of life, strong and improving migration, a large port that can accommodate ocean bound vessels, and well above-average long term growth prospects. Weaknesses include a housing slump, reliance on retirees and tourism, high employment volatility, and below-average educational attainment. The AA's primary employment industries include education and health services, professional and business services, and retail trade. Major employers in the area include Cleveland Clinic Martin Health, Indian River State College, Lawnwood Regional Medical Center & Heart Institute, Teleperformance, and Walmart Distribution Center. On the housing front, single-family house price appreciation has been slow compared to Florida or the nation overall. However, house building permits are outpacing the state and nation.

According to the U.S. BLS, the unemployment rate in the Port St. Lucie MSA was 5.5 percent as of January 2021, compared to 3.3 percent in December 2023. The MSA unemployment rate was higher than the statewide rate 2.9 percent and was lower than the national unemployment rate 3.7 percent as of December 2023.

Based on information in the above table, low-income families earned less than \$34,273 and moderate-income families earned less than \$54,837. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$857 for low-income borrowers and \$1,371 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,264. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 54.4 percent from the first quarter of 2021 to the fourth quarter of 2023. This acceleration in home prices worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC made two community contacts during the evaluation period with a city economic development agency and an area redevelopment agency. Community contacts indicated that the following are needs and opportunities within the bank's AA:

- Affordable housing development,
- Small loans to small businesses.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable multifamily rental housing,
- Access to capital and small business technical assistance,
- Down payment assistance, financial education, and affordable homeownership financing,
- Support for organizations providing community services to LMI, including grant funding.

Scope of Evaluation in Florida

Examiners selected three AAs for full-scope reviews. They included the Miami MSA, Orlando MSA, and Port St. Lucie MSA AAs. The Miami MSA is the largest AA in the state in terms of deposits, branches, and lending activity. The Orlando MSA and Port St. Lucie MSA AAs were selected because they have not received a full-scope review in recent CRA evaluations. The Orlando MSA is also the second largest AA in the state in terms of deposit volume and deposit growth. Port St. Lucie MSA is the bank's fourth largest deposit market and fifth largest based on number of branches and lending activity in the state. The Cape Coral MSA, Deltona MSA, Gainesville MSA, Homosassa MSA, Jacksonville MSA, Lakeland MSA, Naples MSA, North Port MSA, Ocala MSA, Palm Bay MSA, Sebastian MSA, Sebring MSA, Tampa MSA, and the FL Non-MSA AAs received limited-scope reviews.

In arriving at overall conclusions, the Miami MSA AA received the most weight as it accounts for the largest share of deposits in the state of Florida. In determining Lending Test conclusions, examiners placed more emphasis on the loan product category that had the higher percentage of lending in the AA. For the Miami MSA, Port St. Lucie MSA, Deltona MSA, Lakeland MSA, Palm Bay MSA, Sebastian MSA, and FL Non-MSA, examiners placed more emphasis on small loans to businesses. In all remaining AAs, including the Orlando MSA, examiners placed more emphasis on home mortgage loans. The bank did not originate a sufficient volume of small loans to farms in any AA to conduct a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The bank's performance under the Lending Test in the state of Florida is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami MSA, Orlando MSA, and the Port St. Lucie MSA AAs was excellent.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Miami MSA	8,524	14,743	15	225	23,507	55.7	56.0

Orlando MSA	1,923	1,839	0	22	3,784	9.0	8.3
Port St. Lucie MSA	886	991	3	16	1,896	4.5	5.0
Limited-Scope:							
Cape Coral MSA	440	133	0	0	573	1.4	0.2
Deltona MSA	567	686	3	14	1,270	3.0	4.9
Gainesville MSA	412	97	1	4	514	1.2	0.8
Homosassa Springs MSA	173	53	0	0	226	0.5	0.4
Jacksonville MSA	917	442	0	22	1,381	3.3	4.2
Lakeland MSA	234	255	1	14	504	1.2	1.1
Naples MSA	459	227	0	2	688	1.6	1.2
North Port MSA	511	157	0	0	668	1.6	0.5
Ocala MSA	279	138	2	1	420	1.0	0.5
Palm Bay MSA	769	1,095	2	15	1,881	4.5	4.7
Sebastian MSA	256	274	4	2	536	1.3	1.8
Sebring MSA	51	42	0	0	93	0.2	0.4
Tampa MSA	2,019	1,690	2	22	3,733	8.9	7.2
FL Non-MSA	150	342	11	2	505	1.2	2.7
Total	18,570	23,204	44	361	42,179	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* \$(000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Miami MSA	3,382,978	517,974	965	450,977	4,352,894	52.6	56.0
Orlando MSA	679,559	57,610	0	38,099	775,268	9.4	8.3
Port St. Lucie MSA	222,398	21,944	322	26,857	271,521	3.3	5.0
Limited-Scope:							
Cape Coral MSA	161,836	7,558	0	0	169,394	2.0	0.2
Deltona MSA	135,889	18,999	83	4,498	159,469	1.9	4.9
Gainesville MSA	156,210	7,937	51	7,443	171,641	2.1	0.8
Homosassa Springs MSA	44,419	1,211	0	0	45,630	0.6	0.4
Jacksonville MSA	400,268	22,605	0	78,468	501,341	6.1	4.2

Lakeland MSA	64,958	7,752	25	46,814	119,549	1.4	1.1
Naples MSA	243,915	8,408	0	559	252,881	3.1	1.2
North Port MSA	225,641	9,591	0	0	235,232	2.8	0.5
Ocala MSA	64,243	7,990	17	105	72,355	0.9	0.5
Palm Bay MSA	212,006	37,484	5	20,199	269,694	3.3	4.7
Sebastian MSA	60,536	5,763	136	2,056	68,491	0.8	1.8
Sebring MSA	9,023	802	0	0	9,825	0.1	0.4
Tampa MSA	633,342	58,347	10	77,508	769,207	9.3	7.2
FL Non-MSA	25,961	7,818	1,054	23	34,856	0.4	2.7
Total	6,723,182	799,793	2,668	753,605	8,279,248	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Miami MSA

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked eighth out of 85 depository institutions (top 10 percent) with a deposit market share of 3.9 percent.

For home mortgage loans, TDBNA's market share of 2.1 percent ranked tenth out of 1,112 lenders (top 1 percent). The top three lenders were United Wholesale Mortgage with 8.1 percent market share, Rocket Mortgage with 5 percent market share, and Wells Fargo Bank, N.A. with 3.1 percent market share.

For small loans to businesses, TDBNA's market share of 1.1 percent ranked 13th out of 280 lenders (top 5 percent). The top three lenders were American Express National Bank with 30.3 percent market share, JPMorgan Chase Bank, N.A. with 15.7 percent market share, and Bank of America, N.A. with 15.3 percent market share.

Orlando MSA

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked eighth out of 47 depository institutions (top 18 percent) with a deposit market share of 2.5 percent.

For home mortgage loans, TDBNA's market share of 0.7 percent ranked 39th out of 999 lenders (top 4 percent). The top three lenders were United Wholesale Mortgage with 6.2 percent market share, Rocket Mortgage with 5.7 percent market share, and Wells Fargo Bank, N.A. with 3.5 percent market share.

For small loans to businesses, TDBNA's market share of 0.5 percent ranked 17th out of 197 lenders (top 9 percent). The top three lenders were American Express National Bank with 26.4 percent market share,

JPMorgan Chase Bank, N.A. with 16.8 percent market share, and Bank of America, N.A. with 13.4 percent market share.

Port St. Lucie

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked fifth out of 18 depository institutions (top 28 percent) with a deposit market share of 8.9 percent.

For home mortgage loans, TDBNA's market share of 1.2 percent ranked 22nd out of 681 lenders (top 4 percent). The top three lenders were United Wholesale Mortgage with 6.4 percent market share, Rocket Mortgage with 5.3 percent market share, and PennyMac Loan Services, LLC with 3.7 percent market share.

For small loans to businesses, TDBNA's market share of 1.4 percent ranked 15th out of 113 lenders (top 14 percent). The top three lenders were American Express National Bank with 24.7 percent market share, JPMorgan Chase Bank, N.A. with 14.2 percent market share, and Bank of America, N.A. with 10.4 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Miami MSA

Home Mortgage Loans

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased in low- income geographies was near-to the percentage of owner-occupied housing units located in those geographies and exceeded the aggregate percentage of all reporting lenders. In moderate-income geographies, the percentage of home mortgage loans originated or purchased exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

For the 2022-2023 analysis period, the percentages of small loans to businesses originated or purchased in both low-income and moderate-income geographies exceeded the percentages of businesses located in those geographies and the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Miami MSA.

Orlando MSA

Home Mortgage Loans

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased in both low-income and moderate-income geographies exceeded the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies was below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was stronger than the 2022-2023 analysis period due to a better distribution of loans in low-income geographies.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Orlando MSA.

Port St. Lucie MSA

Home Mortgage Loans

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased in both low-income and moderate-income geographies exceeded the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies approximated the percentage of businesses located in those geographies and was near-to the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Port St. Lucie MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Miami MSA

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was significantly below the percentage of those families in the AA and was near-to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers was below the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was stronger than the 2022-2023 analysis period due to a better distribution of loans to low-income borrowers compared to the aggregate performance and a better distribution of loans to moderate-income borrowers compared to the demographics.

Small Loans to Businesses

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of loans originated or purchased to businesses with revenues of \$1 million or less was near-to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 performance period due to weaker distribution of loans compared to the demographics.

Orlando MSA***Home Mortgage Loans***

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less was near-to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 performance period.

Port St. Lucie MSA

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of those families in the AA and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of those families in the AA and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Community Development Lending

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Miami MSA

The institution is a leader in making CD loans. CD lending supported the bank's excellent performance under the Lending Test in the Miami MSA.

The level of CD lending was excellent. TDBNA made 225 CD loans totaling \$451 million, which represented 26.5 percent of allocated tier 1 capital. Included in this total were 119 PPP loans totaling \$27.5 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs including affordable housing. By dollar volume, 52.6 percent of CD loans funded affordable housing, 19.2 percent funded economic development activities, 17.6 percent funded community services, and 10.6 percent funded revitalization and stabilization efforts.

Examples of CD loans in the Miami MSA include:

- A \$33 million loan to finance the construction of a 104-unit housing project. All units will be restricted to tenants with incomes up to 80 percent of the AMI and 11 units will be further restricted below 25 percent of the AMI for extremely low-income individuals. In addition, six of those units will be set aside for persons with special needs including those living with a disability, survivors of domestic violence, the homeless, and youth aging out of foster care. Other funding sources included LIHTC equity provided by the bank.
- A \$7.9 million mortgage to refinance and make improvements, including a new roof, to a shopping center in a moderate-income area of Miami that is within the city's revitalization strategy area. Tenants of the shopping center include a grocery store, dollar store, laundromat, and optometrist.
- Two renewals of a \$250,000 revolving operating line of credit to an organization that provides free home repair services for LMI homeowners in the Miami MSA.

Orlando MSA

The institution is a leader in making CD loans. CD lending supported the bank's excellent performance under the Lending Test in the Orlando MSA.

TDBNA made 22 CD loans totaling \$38.1 million, which represented 15 percent of allocated tier 1 capital. Included in this total were seven PPP loans totaling \$348,000 that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, occasionally in a leadership position. CD loans were impactful as they were responsive to identified community needs including affordable housing. By dollar volume, 52.6 percent of CD loans funded affordable housing, 36.2

percent funded economic development activities, 8.4 percent funded revitalization and stabilization efforts 2.8 percent funded community services.

Examples of CD loans in the Orlando MSA include:

- A \$16 million loan to finance the construction of an 80-unit LIHTC project for senior citizens of which all units will be restricted to tenants with incomes up to 60 percent of the AMI. Other funding sources included LIHTC equity provided by the bank.
- A \$3 million working capital line of credit to a CDFI that provides financing to nonprofit organizations and mission-based for-profit companies that develop affordable housing, supportive housing, community facilities, and economic development projects.
- An \$825,000 mortgage loan to the largest provider of permanent housing for homeless and low-income individuals in the area to acquire and convert a property into a community medical clinic and COVID-19 testing site.

Port St. Lucie MSA

The institution is a leader in making CD loans. CD lending supported the bank's excellent performance under the Lending Test in the Port St. Lucie MSA.

TDBNA made 16 CD loans totaling \$26.9 million, which represented 17.6 percent of allocated tier 1 capital. Included in this total were eight PPP loans totaling \$509,000 that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, occasionally in a leadership position. CD loans were impactful as they were responsive to identified community needs including affordable housing. By dollar volume, 66.1 percent of CD loans funded affordable housing, 33.3 percent funded economic development activities, and 0.6 percent funded revitalization and stabilization efforts.

Examples of CD loans in the Port St. Lucie MSA include:

- A \$17.8 million loan to finance the new construction of an 82-unit LIHTC property affordable to tenants with incomes up to 60 percent of the AMI. The property will also include supportive services provided by a local nonprofit. Other funding sources included LIHTC equity from the bank and public funds.
- A \$5.4 million SBA 504 loan to acquire and renovate a building to house a daycare facility.

Product Innovation and Flexibility

Miami MSA

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank funded 3,334 loans totaling \$231.1 million under the following innovative and/or flexible programs during the evaluation period in the Miami MSA.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	23	6,651

TD Home Access Mortgage	27	6,207
FNMA HomeReady Mortgage	14	2,443
FHA Mortgage	14	4,039
VA Mortgage	1	726
PPP	3,255	211,066
Total	3,334	231,132

Orlando MSA

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank funded 344 loans totaling \$18.1 million under the following innovative and/or flexible programs during the evaluation period in the Orlando MSA.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	5	866
FNMA HomeReady Mortgage	4	499
FHA Mortgage	2	772
VA Mortgage	2	767
PPP	331	15,182
Total	344	18,086

Port St. Lucie MSA

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank funded 212 loans totaling \$12.5 million under the following innovative and/or flexible programs during the evaluation period in the Port St. Lucie MSA.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	6	973
FNMA HomeReady Mortgage	5	641
FHA Mortgage	5	1,731
VA Mortgage	1	235
PPP	195	8,965
Total	212	12,545

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Deltona MSA, Gainesville MSA, Jacksonville MSA, Lakeland MSA, Naples MSA, Ocala MSA, Palm Bay MSA, Sebastian MSA, and Tampa MSA AAs was consistent with the bank's overall performance in the full-scope areas. In the Cape Coral MSA, Homosassa Springs MSA, North Port MSA, Sebring MSA, and the FL Non-MSA AAs, the bank's performance was weaker due to weaker geographic and/or borrower distributions coupled with a lower level or no CD lending. Performance differences in the limited-scope areas did not impact the overall conclusions for the state of Florida.

Refer to Tables O through T in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Florida is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami MSA, Orlando MSA, and Port St. Lucie MSA AAs was excellent.

Number and Amount of Qualified Investments

Qualified Investments**										
Assessment Area	Prior Period***		Current Period		Total				Unfunded Commitments****	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Miami MSA	31	135,181	222	149,735	253	34.6	284,916	54.5	0	0
Orlando MSA	4	10,620	72	19,282	76	10.4	29,902	5.7	0	0
Port St. Lucie MSA	1	381	15	24,392	16	2.2	24,772	4.7	0	0
Limited-Scope:										
Cape Coral MSA	1	122	11	2,972	12	1.6	3,094	0.6	0	0
Deltona MSA	2	1,757	34	8,615	36	4.9	10,372	2.0	0	0
Gainesville MSA	1	898	25	2,520	26	3.6	3,418	0.7	0	0
Homosassa Springs MSA	0	0	5	1,167	5	0.7	1,167	0.2	0	0
Jacksonville MSA	3	11,880	63	18,346	66	9.0	30,225	5.8	0	0
Lakeland MSA	1	916	9	18,256	10	1.4	19,172	3.7	0	0
Naples MSA	0	0	18	3,076	18	2.5	3,076	0.6	0	0
North Port MSA	1	415	12	3,003	13	1.8	3,418	0.7	0	0
Ocala MSA	0	0	20	1,397	20	2.7	1,397	0.3	0	0
Palm Bay MSA	3	2,814	25	21,030	28	3.8	23,844	4.6	0	0
Sebastian MSA	0	0	22	2,988	22	3.0	2,988	0.6	0	0
Sebring MSA	0	0	6	695	6	0.8	695	0.1	0	0
Tampa MSA	12	20,454	85	47,720	97	13.2	68,174	13.1	0	0
FL Non-MSA*	1	0	24	7,058	25	3.4	7,058	1.4	0	0
FL Statewide	1	10	2	4,811	3	0.4	4,821	0.9	0	0
Total	62	185,448	670	337,063	732	100.0	522,509	100.0	0	0

*FL Non-MSA prior period investment book value total is \$152

**The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

*** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

**** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Miami MSA

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made 18 investments totaling \$134.9 million and provided 204 qualifying grants and donations totaling \$14.9 million. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 16.7 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing, creating 531 affordable housing units.

By dollar volume, 84.6 percent of current period investments and donations funded affordable housing, 8 percent funded community services, 6.7 percent funded economic development activities, and 0.7 percent funded revitalization and stabilization efforts.

The institution made extensive use of innovative and/or complex qualified investments. CD investments included five direct LIHTC investments totaling \$124.2 million and one EQ2 investment totaling \$1 million as part of the TD Equity Fund which supports minority-owned businesses.

Examples of qualified investments in the AA include:

- A \$27.5 million complex LIHTC investment for the new construction of a 120- unit affordable housing apartment complex in the MSA. All units will be affordable to tenants earning up to 70 percent of the AMI with 18 units set aside for extremely low-income residents with income below 30 percent of the AMI, and nine of those units further set aside for special needs households. TDBNA also provided the construction financing for the project.
- A \$1 million innovative EQ2 investment to a CDFI and CDC, to support minority small business financing alternatives, particularly, minority and women-owned businesses that may not meet traditional banking credit standards.
- A \$125,000 grant to an organization that provides housing to veterans by providing emergency financial assistance, financial education, and case management services to veterans experiencing housing instabilities, included a one-time payment of \$1,500 to help veterans affected by COVID-19 for housing support, including rent or mortgage fees.

Orlando MSA

The institution had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made two investments totaling \$17.3 million and provided 70 qualifying grants and donations totaling \$2 million. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 11.8 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing, creating 80 affordable housing units. By dollar volume, 89 percent of current period investments and donations funded affordable

housing, 5.6 percent funded community services, 4.6 percent funded economic development activities, and 0.8 percent funded revitalization and stabilization efforts.

The institution made significant use of innovative and/or complex qualified investments. CD investments included one direct LIHTC investment totaling \$16.6 million.

Examples of qualified investments in the AA include:

- A \$16.6 million complex LIHTC investment for the construction of an 80-unit housing project for senior citizens located in the AA. All units will be income-restricted to tenants earning up to 80 percent AMI with eight units further set aside for extremely low-income residents with incomes below 33 percent AMI and four of those units set aside for individuals with special needs.
- Two grants totaling \$500,000 to an organization helping individuals achieve economic stability through employment opportunities and training in high-demand trades. The funding supported a workforce development program for individuals who were recently incarcerated, those experiencing or at-risk of homelessness, and others experiencing barriers to employment. Through the program participants receive personal coaching, job placement, transportation to job sites, financial education, and other wraparound services.
- A grant totaling \$175,000 to an organization that provides programs and services to the homeless including housing and financial assistance to individuals and families experiencing or at-risk of homelessness due to the economic downturn caused by the pandemic.

Port St. Lucie MSA

The institution had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made two investments totaling \$23.8 million and provided 13 qualifying grants and donations totaling \$544,205. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 16.2 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing, creating 164 affordable units. By dollar volume, 97.8 percent of current period investments and donations funded affordable housing and 2.2 percent funded community services.

The institution made extensive use of innovative and/or complex investments. CD investments included two direct LIHTC investments totaling \$23.8 million.

Examples of qualified investments in the AA include:

- Two complex LIHTC investments totaling \$23.8 million for an affordable housing project to be constructed in two phases consisting of 164 total units. Each phase will involve the new construction of two, four-story residential buildings with 82 units each. All units will be restricted to tenants earning up to 60 percent of the AMI, with 18 units set aside for extremely low-income

residents with incomes below 35 percent of the AMI. Additionally, 10 units are set aside for persons with special needs.

- Three grants totaling \$466,705 to a foundation that provides K-12 educational scholarships for low-income children.
- Three grants totaling \$37,500 to a nonprofit organization that provides programs and services to those living in poverty to help them achieve economic self-sufficiency. The funding supported an employment training program that serves low- to no-income individuals facing barriers to employment through workplace skills, job acquisition, career development, certifications, and job retention.

Broader Statewide Area

During the evaluation period, TDBNA had three investments totaling \$4.8 million in the broader statewide area. The bank made two current period investments totaling \$4.8 million including a \$3.1 million investment in an IOLTA program and a \$1.7 million EQ2 investment as part of the TD Equity Fund which supports minority-owned businesses. In addition, the bank had one prior period loan fund investment outstanding with a book value of \$10,000. These investments provide additional support for the Outstanding Investment Test rating in the state of Florida.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Cape Coral MSA, Deltona MSA, Gainesville MSA, Homosassa Springs MSA, Jacksonville MSA, Lakeland MSA, Naples MSA, North Port MSA, Ocala MSA, Palm Bay MSA, Sebring MSA, Tampa MSA and FL Non-MSA was consistent with the bank's overall performance in the full-scope areas. The bank's performance in the Sebastian MSA was weaker than the overall performance in the full-scope areas due to a lower level of CD investments. Weaker performance did not impact the Investment Test rating for the state of Florida.

SERVICE TEST

The bank's performance under the Service Test in state of Florida is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami MSA, Orlando MSA, and Port St. Lucie MSA AAs was excellent.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches**						Population***			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Miami MSA	56.0	81	48.0	2.5	21.0	39.5	34.6	4.7	28.0	31.4	34.4
Orlando MSA	8.3	14	8.3	0.0	42.9	21.4	35.7	3.7	26.7	35.6	32.9
Port St. Lucie MSA	5.0	6	3.6	0.0	33.3	66.7	0.0	2.6	21.8	46.9	26.9
Limited-Scope:											
Cape Coral MSA	0.2	1	0.6	0.0	0.0	100.0	0.0	2.3	23.7	46.7	26.4
Deltona MSA	4.9	7	4.2	0.0	28.6	71.4	0.0	3.1	15.4	57.5	23.9
Gainesville MSA	0.8	1	0.6	0.0	0.0	100.0	0.0	6.8	18.5	29.2	38.1
Homosassa Springs MSA	0.4	1	0.6	0.0	0.0	0.0	100.0	0.0	13.2	70.7	16.2
Jacksonville MSA	4.2	7	4.2	14.3	14.3	28.6	42.9	6.2	27.2	35.6	30.3
Lakeland MSA	1.1	2	1.2	0.0	0.0	0.0	100.0	1.0	23.7	48.3	26.0
Naples MSA	1.2	4	2.4	0.0	0.0	75.0	25.0	1.6	23.5	43.8	29.7
North Port MSA	0.5	3	1.8	0.0	0.0	66.7	33.3	2.2	22.3	43.6	31.6
Ocala MSA	0.5	1	0.6	0.0	0.0	0.0	100.0	1.4	19.4	58.3	20.0
Palm Bay MSA	4.7	8	4.8	12.5	12.5	37.5	37.5	2.6	21.4	45.0	30.5
Sebastian MSA	1.8	3	1.8	0.0	33.3	33.3	33.3	3.1	23.7	41.2	32.1
Sebring MSA	0.4	1	0.6	0.0	0.0	100.0	0.0	0.0	31.5	56.7	11.8
Tampa MSA	7.2	23	13.7	4.3	21.7	30.4	43.5	3.9	25.3	36.6	33.3
FL Non-MSA	2.7	5	3.0	0.0	0.0	100.0	0.0	0.0	16.3	61.6	22.2

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** Two branches (2.5%) in the Miami MSA are in an income “NA” category

***1.5% of population in the Miami MSA, 1.0% in the Orlando MSA, 1.8% in the Port St. Lucie MSA, 0.8% in the Cape Coral MSA, 7.5% in the Gainesville MSA, 0.7% in the Jacksonville MSA, 1.0% in the Lakeland MSA, 1.5% in the Naples MSA, 0.2% in the North Port MSA, 0.9% in the Ocala MSA, 0.4% in the Palm Bay MSA, and 1.0% in the Tampa MSA reside within “NA” income categories.

Miami MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank’s AAs.

The bank’s distribution of branches in low-income geographies was below, and in moderate-income geographies was near-to the percentage of the population living within those geographies. Examiners further considered one middle-income adjacent branch that served a low-income area and 17 MUI adjacent branches that served moderate-income areas within the AA as demonstrated by branch transactions and deposit account opening activity. These MUI adjacent branches improved accessibility and had a positive impact on the retail service delivery systems conclusion.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 244 ATMs in the AA, of which 155 were deposit-taking, including 13 in low-income geographies and 56 in moderate-income geographies. The distribution of ATMs in low-income geographies was excellent and in moderate-income geographies was good. TDBNA provided data indicating that 85 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 87.8 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 65.3 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 71.2 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Orlando MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.

The bank had no branches in low-income areas of the Orlando MSA, however examiners considered that a small percentage of the population lives in low-income geographies in the AA. The distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners considered two MUI adjacent branches that served low-income geographies within the AA as demonstrated by branch transactions and deposit account opening activity. These MUI adjacent branches improved accessibility and had a positive impact on the retail service delivery systems conclusion.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 24 deposit-taking ATMs in the AA, including 13 in moderate-income geographies. There were no ATMs in low-income geographies. The distribution of ATMs in moderate-income geographies was excellent. TDBNA provided data indicating that 89.5 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 91.3 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 73 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 77.7 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Port St. Lucie MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AAs.

The bank had no branches in low-income geographies; however, examiners considered the small percentage of the population living in low-income areas of the AA. The distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners further considered one middle-income adjacent branch that served a low-income geography within the AA as demonstrated by branch transactions and deposit account opening activity. This adjacent branch improved accessibility and had a positive impact on the retail service delivery systems conclusion.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had nine deposit-taking ATMs in the AA, including four in moderate-income geographies. The bank had no ATMs in low-income geographies. The distribution of ATMs in moderate-income geographies was excellent. TDBNA provided data indicating that 80.7 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 85.3 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 58.1 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 65 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Miami MSA	2	3	0	0	2	-3
Orlando MSA	4	2	0	0	1	1
Port St. Lucie MSA	0	1	0	-1	0	0
Limited-Scope:						
Cape Coral MSA	1	0	0	0	0	1
Deltona MSA	0	0	0	0	0	0
Gainesville MSA	0	1	0	0	0	-1
Homosassa Springs MSA	0	0	0	0	0	0
Jacksonville MSA	4	4	1	-1	1	-1
Lakeland MSA	0	2	-1	0	0	-1
Naples MSA	2	0	0	0	2	0
North Port MSA	2	0	0	0	1	1
Ocala MSA	0	0	0	0	0	0
Palm Bay MSA	0	1	0	-1	0	0
Sebastian MSA	0	0	0	0	0	0
Sebring MSA	0	0	0	0	0	0
Tampa MSA	5	0	0	1	0	4
FL Non-MSA	0	1	0	-1	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Miami MSA

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank opened two branches and closed three branches, none in low- or moderate-income geographies.

Services, including where appropriate, business hours, are tailored to the convenience and needs of the various portions of its AA, including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including

extended hours on Thursdays and Fridays. All AA branches were open on Saturdays, and 75 branches were open on Sundays, including both low-income branches and 16 of 17 moderate-income branches. Of the 81 branches in the AA, 71 had drive-thru facilities, including both low-income branches and 16 of 17 moderate-income branches. TDBNA offered traditional banking products and services at all branch locations in the AA.

Orlando MSA

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank opened four branches and closed two branches. One branch opening and one branch closure occurred in a moderate-income geography. The moderate-income branch closure was attributed to low customer transactions and lower than expected production volumes along with a low number of households associated with the branch.

Services, including where appropriate, business hours, are tailored to the convenience and needs of the various portions of its AA, including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including extended hours on Thursdays and Fridays. All AA branches were open on Saturdays, and 10 branches were open on Sundays, including five of six moderate-income branches. Of the 14 branches in the AA, all had drive-thru facilities. TDBNA offered traditional banking products and services at all branch locations in the AA.

Port St. Lucie MSA

The bank's opening and closing of branches generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed one moderate-income branch. The branch closure was attributed to low customer transactions and lower than expected production volumes along with a low number of households associated with the branch.

Services, including where appropriate, business hours, are tailored to the convenience and needs of the various portions of its AA, including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including extended hours on Thursdays and Fridays. All six branches were open on Saturdays, and four branches were open on Sundays, including the two moderate-income branches. Of the six branches in the AA, all had drive-thru facilities. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

Miami MSA

TDBNA provided an excellent level of CD services. During the evaluation period, the bank provided 212 financial education events to 5,910 participants in the Miami MSA. Additionally, 26 bank employees provided 1,112 service hours over the evaluation period that benefitted approximately 40 organizations through board or committee participation or professional skills assistance. The bank's

assistance was responsive to identified needs in the AA including financial education and small business technical assistance.

Examples of CD services in the AA include:

- Two bank employees provided 172 hours of service to a nonprofit social services and housing organization through board membership and professional skills assistance. The nonprofit provides affordable housing, homeownership support, and economic and educational opportunities.
- A bank manager provided 95 hours of board service and professional skills assistance to an area nonprofit housing organization.
- Two bank employees provided small business training through a nonprofit organization that assists women entrepreneurs build businesses and support economic mobility. The employees taught fifteen different sessions to nearly 1,100 attendees that focused on topics including developing a business plan, accessing capital, conducting a market analysis, fraud prevention, and analyzing competition.

Orlando MSA

TDBNA provided an excellent level of CD services. During the evaluation period, the bank provided 83 financial education events to 2,171 participants in the Orlando MSA. Additionally, 15 bank employees provided 281 service hours over the evaluation period that benefitted 23 organizations through board or committee participation or professional skills assistance. The bank's assistance was responsive to identified needs in the AA including small business technical assistance, and service on boards, committees, and other volunteer opportunities.

Examples of CD services in the AA include:

- Five bank employees provided approximately 67 hours of service to the local chapters of a nonprofit that builds affordable housing, revitalizes neighborhoods, and strengthens communities.
- A bank employee provided nearly 20 hours of board service to a nonprofit organization that assists Hispanic professionals and businesswomen through promotion of leadership skills and professional development.
- A bank employee led fifteen small business technical assistance courses through various area nonprofit organizations that were attended by over 300 participants. The courses included accessing capital and assessing a company's financial needs.

Port St. Lucie MSA

TDBNA provided an adequate level of CD services. During the evaluation period, the bank provided 20 financial education events to 295 participants in the Port St. Lucie MSA. Additionally, one bank employee provided three service hours on an advisory committee for an affordable housing organization. The bank's assistance was responsive to identified needs in the AA including financial education.

An example of a CD service in the AA includes:

- A branch manager provided 12 adult financial education courses benefitting over a hundred participants through a veterans' assistance organization over the evaluation period. Courses topics included credit awareness, common fraud schemes, and breaking the paycheck-to-paycheck cycle.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Cape Coral MSA, Deltona MSA, Gainesville MSA, Homosassa Springs MSA, Jacksonville MSA, Lakeland MSA, Naples MSA, North Port MSA, Ocala MSA, Palm Bay MSA, Sebastian MSA, Sebring MSA, Tampa MSA and FL Non-MSA AAs was weaker than the performance in the full-scope areas due to weaker branch distributions and/or branch closing activity. Performance differences in the limited scope areas did not impact the overall Service Test rating in the state of Florida.

State of Maine

CRA rating for the State of Maine: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include

- good lending activity, with overall good geographic distribution of lending and excellent borrower distribution of lending;
- an excellent level of CD lending that positively impacted the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- readily accessible retail service delivery systems; and
- an adequate level of CD services.

Description of Institution's Operations in Maine

The state of Maine consists of four AAs including the Bangor ME, MSA (Bangor MSA) the Lewiston-Auburn, ME MSA (Lewiston MSA), the Portland-South Portland, ME MSA (Portland MSA), and seven nonmetropolitan counties comprising the Maine Non-MSA (ME Non-MSA) AA. Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had 39 branch locations and 58 ATMs, of which 53 were deposit-taking, within these AAs. During the evaluation period, the bank made \$808.8 million or 1.6 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of Maine represented TDBNAs tenth largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$5.7 billion in deposits in these AAs, which represented 2.5 percent of the bank's total adjusted deposits. The bank ranked first in deposit market share with 14.1 percent out of 29 depository institutions. The top three institutions had 36 percent of the market share and aside from TDBNA with 38 branches, included Bangor Savings Bank with 49 branches and 11.4 percent market share, and The Camden National Bank with 46 branches and 10.5 percent market share.

Portland MSA

The following tables provides a summary of the demographics, including housing and business information for the Portland MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Portland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	149	0.7	22.1	53.0	22.1	2.0
Population by Geography	551,740	0.4	19.8	53.7	26.1	0.0
Housing Units by Geography	275,836	0.4	22.0	53.9	23.8	0.0
Owner-Occupied Units by Geography	163,073	0.1	17.7	55.2	27.0	0.0
Occupied Rental Units by Geography	63,254	1.3	29.3	49.7	19.7	0.0
Vacant Units by Geography	49,509	0.1	27.0	54.6	18.3	0.0
Businesses by Geography	66,076	0.2	20.6	54.0	25.2	0.0
Farms by Geography	2,142	0.1	18.5	55.9	25.5	0.0
Family Distribution by Income Level	139,302	18.4	18.2	24.1	39.4	0.0
Household Distribution by Income Level	226,327	23.6	16.2	19.0	41.2	0.0
Median Family Income MSA - 38860 Portland-South Portland, ME MSA		\$89,988	Median Housing Value			\$295,700
			Median Gross Rent			\$1,112
			Families Below Poverty Level			4.9%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Portland MSA AA consists of all three counties that comprise the MSA including Cumberland, Sagadahoc, and York. As of year-end 2023, TDBNA operated 20 branches and 33 ATMs, 29 of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$3.2 billion in deposits in the AA which comprised 1.4 percent of total bank adjusted deposits and 55.7 percent of the rated area deposits. The AA is served by 23 FDIC-insured financial institutions operating 188 branches. TDBNA had 15.6 percent deposit market share which ranked first among all institutions. The top competitors were Bank of America N.A. with 12 branches and 12.9 percent market share, and KeyBank N.A. with 15 branches and 8.8 percent market share.

Based on information from the September 2023 Moody's Analytics report, Portland's economy has become stagnant. Since year-end 2022, total nonfarm payrolls have deteriorated, and last year's job growth was below that of the Northeast and U.S. overall. The unemployment rate is down below its pre-pandemic level despite labor force increases. Area economic drivers include healthcare, defense, and tourism. Portland is home to a large healthcare industry, which has carried the MSA's economy and made up for the recent factory job losses. The Portland MSA has a large share of manufacturing employment with production highly concentrated in shipbuilding as the area is home to Bath Iron Works (BIW) which is one of only two manufacturers that build government naval ships. However, the area in general has an unfavorable age structure and BIW has a large share of workers at or near retirement age which may limit prospects. Portland's other strengths include a well-educated workforce and below-average employment volatility. Additionally, its coastline and urban amenities attract tourists and vacation home buyers to the area which support the leisure/hospitality industry, but also make the area heavily reliant on nonresident spending. Weaknesses include higher business costs and poor natural

population trends. The largest employment sectors include education and health services, professional and business services, and government. Major employers in the area include Maine Health, Bath Iron Works (BIW) Corporation, Hannaford Bros Company, L.L. Bean Inc. and Unum Provident. On the housing front, though growth had slowed, home appreciation was well ahead of the nation overall and had yet to undergo a correction.

According to the U.S. BLS, the unemployment rate in the Portland MSA was 4.9 percent as of January 2021, compared to 2.9 percent in December 2023. The MSA unemployment rate compared favorably to the statewide rate of 3.5 percent and the national unemployment rate of 3.7 percent as of December 2023.

Based on information in the above table, low-income families earned less than \$44,994 and moderate-income families earned less than \$71,990. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,125 for low-income borrowers and \$1,800 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,587. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 45.3 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Portland MSA. This acceleration in home prices worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC relied on information from three community contacts conducted during the evaluation period with a housing agency and two affordable housing organizations. Community contacts indicated that the following are needs and opportunities within the bank's AA:

- Affordable Housing units, including rental housing,
- Flexible mortgage loan programs,
- Outreach and financial education programs targeted to underbanked populations including immigrants,
- Funding affordable housing organizations through grants and donations,
- Financial education, including homebuyer education.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable multifamily rental housing for LMI,
- Improved access to services for LMI individuals and families including support for the homeless,
- Homeownership opportunities and downpayment assistance,
- Small business financing, education, and workforce development.

Scope of Evaluation in Maine

Examiners selected one AA for a full-scope review. Examiners completed a full-scope review for the Portland MSA AA as it is the largest AA in terms of population, branches, deposits, and lending activity. The Bangor MSA, Lewiston MSA, and the ME Non-MSA AAs received limited-scope reviews.

In arriving at overall conclusions, the Portland MSA AA received the most weight as it accounts for the largest share of deposits in the state of Maine. In determining Lending Test conclusions, examiners placed more emphasis on the loan product category that had the higher percentage of lending in the AA. For all AAs in Maine, examiners placed more emphasis small loans to businesses than home mortgage loans. Small loans to farms were not meaningful for analysis in all AAs in the state of Maine, except for the ME Non-MSA AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MAINE

LENDING TEST

The bank's performance under the Lending Test in Maine is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Portland MSA was excellent.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Portland MSA	1,821	2,148	12	47	4,028	58.3	55.7
Limited-Scope:							
Bangor MSA	250	272	3	7	532	7.7	8.1
Lewiston MSA	165	273	3	2	443	6.5	7.0
ME Non-MSA	896	956	36	12	1,900	27.5	29.2
Statewide ME	-	-	-	2	2	0.0	0.0
Total	3,132	3,649	54	70	6,905	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* \$(000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Portland MSA	473,664	65,831	138	52,868	592,501	63.2	55.7
Limited-Scope:							

Bangor MSA	36,200	7,269	163	932	44,564	4.8	8.1
Lewiston MSA	27,623	7,911	245	7,125	42,904	4.6	7.0
ME Non-MSA	165,559	22,686	1,470	3,961	193,676	20.7	29.2
Statewide ME	-	-	-	64,000	64,000	6.8	0.0
Total	703,046	103,697	2,016	128,886	937,645	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Lending levels reflect good responsiveness to AA credit needs.

TDBNA ranked first out of 23 depository institutions with a deposit market share of 15.6 percent.

For home mortgage loans, TDBNA's market share of 3.1 percent ranked sixth out of 408 lenders (top 2 percent). The top three lenders were Bangor Savings Bank with 7.3 percent market share, United Wholesale Mortgage with 4.7 percent market share, and The Camden National Bank with 3.7 percent market share.

For small loans to businesses, TDBNA's market share of 3.8 percent ranked eighth out of 98 lenders (top 9 percent). The top three lenders were American Express National Bank with 20.8 percent market share, JPMorgan Chase Bank, N.A. with 12.1 percent market share, and Capital One, N.A. with 8.8 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the state of Maine section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased in low- income and moderate-income geographies exceeded the percentages of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low- income geographies equaled and in moderate-income geographies approximated, the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of Maine section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies equaled both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies was near-to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 period.

Lending Gap Analysis

The OCC analyzed TBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Portland MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Maine section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentages of home mortgage loans originated or purchased to both low-income borrowers and moderate-income borrowers exceeded the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of Maine section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Community Development Lending

The institution is a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion in the Portland MSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TDBNA made 47 CD loans totaling \$52.9 million, which represented 12.7 percent of allocated tier 1 capital. Included in this total were 35 PPP loans totaling \$7.7 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, occasionally in a leadership position. CD loans were impactful as they were responsive to identified community needs including affordable housing and community services to LMI. By dollar volume, 33.4 percent of CD loans funded community services, 33.3 percent funded affordable housing, 31.1 percent funded revitalization and stabilization efforts, and 2.2 percent funded economic development activities.

Examples of CD loans in the AA include:

- A \$13.1 million loan to finance the new construction of a 60-unit affordable housing complex for senior citizens. Of the 60 units, 42 are set aside for tenants earning up to 80 percent of the AMI. Additionally, 14 units will benefit from project-based Section 8 rental subsidies. Other funding sources included LIHTC equity provided by the bank and public funding.
- A \$3.3 million working capital line of credit to a nonprofit organization that works to fight poverty in Cumberland County. The organization assists families in finding, securing, and/or maintaining housing and tackles issues including homelessness, mental illness, substance abuse, and domestic violence.
- An increase and nine-year extension of a term loan totaling \$9 million to a CDFI that provides business financing to a wide variety of customers and projects including small, and medium size businesses, community facilities, affordable housing projects, and mixed-use and industrial real estate.

Broader Statewide Area

During the evaluation period, TDBNA originated two CD loans totaling \$64 million within the broader statewide area. These loans provided additional support for the Outstanding Lending Test rating in the state of Maine.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank funded 650 loans totaling \$51.3 million under the following innovative and/or flexible programs during the evaluation period in the Portland MSA.

Name of Full Scope Area

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	8	1,904
FNMA HomeReady Mortgage	18	3,520
FHA Mortgage	3	1,134
VA Mortgage	1	238
PPP	620	44,461
Total	650	51,257

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bangor MSA, Lewiston MSA, and ME Non-MSA AAs was consistent with the bank's overall performance in the full-scope area.

Refer to Tables O through T in the state of Maine section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Maine is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Portland MSA AA was excellent.

Number and Amount of Qualified Investments

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Portland MSA	16	23,887	64	38,941	80	51.3	62,828	51.1	0	0
Limited-Scope:										
Bangor MSA	1	4,309	12	9,870	13	8.3	14,179	11.5	0	0
Lewiston MSA	2	5,916	8	16,024	10	6.4	21,940	17.9	0	0
ME Non-MSA	3	9,507	45	11,839	48	30.8	21,346	17.4	0	0

Statewide ME	2	1,845	3	693	5	3.2	2,538	2.1	0	0
Total	24	45,464	132	77,367	156	100.0	122,831	100.0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made 19 investments totaling \$37.2 million and provided 45 qualified grants and donations totaling \$1.7 million. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 15.1 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs, creating 187 affordable units. By dollar volume, 97.1 percent of current period investments and donations funded affordable housing activities, 1.5 percent funded economic development efforts, and 1.4 percent funded community services to LMI individuals.

The institution made extensive use of innovative and/or complex qualified investments. CD investments included four direct LIHTC investments totaling \$32.2 million.

Examples of qualified investments in the AA include:

- A \$10.3 million complex LIHTC investment for the construction of 60-unit apartment complex for LMI senior citizens. All units will be income-restricted to tenants earning up to 60 percent of the AMI with seven units being handicapped accessible and two units specifically accessible for the hearing and/or visually impaired.
- Six grants totaling \$491,000 to an area organization that helps provide quality affordable housing and other services to those in need. The grants funded several of the organization's initiatives including homeless housing and support programs, providing rental and other assistance during the COVID-19 pandemic, and providing internet access to senior citizens.
- Four grants totaling \$60,000 to an organization that helps individuals start or grow their businesses through education and mentoring programs. The funding supported the organization's free small business workshop programs.

Broader Statewide Area

During the evaluation period, TDBNA had five investments totaling \$2.5 million in the broader statewide area. Investments included three current period investments totaling \$692,556 comprised of IOLTA and Interest on Realtors' Trust Accounts (IORTA) investments totaling \$192,556 and a loan fund investment totaling \$500,000. Additionally, the bank had two prior period investments on the books totaling \$1.8 million. These investments provided additional support for the Outstanding Investment Test rating in the state of Maine.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bangor MSA, Lewiston MSA, and ME Non-MSA AAs was consistent with the bank's overall performance in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in Maine is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Portland MSA AA was excellent.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography**			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Portland MSA	55.7	20	51.3	0.0	20.0	50.0	30.0	0.4	19.8	53.7	26.1
Limited-Scope:											
Bangor MSA	8.1	5	12.8	0.0	40.0	60.0	0.0	0.0	28.0	47.4	24.6
Lewiston MSA	7.0	2	5.1	50.0	50.0	0.0	0.0	7.5	17.2	58.3	14.9
ME Non-MSA	29.2	12	30.8	0.0	25.0	66.7	8.3	0.3	14.8	66.8	17.7

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** In the Lewiston MSA 2.0% percent of the population, and in the ME Non-MSA 0.4% of the population reside within an "NA" income category.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the Portland MSA.

The bank had no branches in low-income geographies; however, less than one percent of the population resides in low-income geographies in the AA. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 33 ATMs in the AA, of which 29 were deposit-taking, including six branches in moderate-income geographies. The bank had no ATMs in low-income geographies. The distribution of ATMs in moderate-income geographies was excellent. TDBNA provided data indicating that 83.1 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 84.2 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 60.8 percent of their transactions utilizing

digital banking channels over the evaluation period, compared to 64.1 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Portland MSA	0	2	0	-1	-1	0
Limited-Scope:						
Bangor MSA	0	0	0	0	0	0
Lewiston MSA	0	1	0	0	-1	0
ME Non-MSA	0	0	0	0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The bank's opening and closing of branches has generally not adversely affected, the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, the bank opened no branches in the Portland MSA and closed two branches including one in a moderate-income geography. The moderate-income branch closure was attributed to a low number of transactions and lower than expected production volume along with a low number of households associated with the branch.

Services, including where appropriate, business hours are tailored to meet the convenience and needs of the various portions of its AA, including low- and moderate-income geographies and/or individuals. TDBNA maintained generally standard weekday business hours at its branch location in the AA including extended hours on Thursdays at 17 branches and at all branches on Fridays. Of the 20 AA branches, 19 were open on Saturdays including all four moderate-income branches and five branches were open on Sundays including two of the four branches in moderate-income geographies. Of the 20 branches in the AA, 19 had drive-thru facilities, including all four in moderate-income geographies. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

TDBNA provided an adequate level of CD services. During the evaluation period, the bank provided 18 financial education events to 125 participants in the Portland MSA. In addition, 21 bank employees provided 830 service hours over the evaluation period that benefitted 18 area organizations through board/committee participation or professional skills assistance. The bank's assistance was responsive an identified need in the AA for providing financial education.

Examples of CD services in the AA include:

- A bank employee provided 166 service hours on the board of a local food bank which works to address food insecurity in the AA through school food pantries and mobile free food distributions.
- Two bank employees provided nearly 200 service hours on the board of the local chapter of a nationwide humanitarian organization.
- A mortgage loan officer led a home buying workshop at a local nonprofit that was attended by 46 participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Bangor MSA, Lewiston MSA, and ME Non-MSA AAs was consistent with the bank's overall performance in the full-scope area.

State of Maryland

CRA rating for the State of Maryland¹⁰: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include

- excellent lending activity, with overall excellent geographic and borrower distribution of lending;
- an excellent level of CD lending that further supported the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- accessible retail service delivery systems with consideration for MUI adjacent branches; and
- an adequate level of CD services.

Description of Institution's Operations in Maryland

The state of Maryland consists of one AA which includes a portion of the Baltimore-Columbia-Towson, MD MSA (Baltimore MSA). Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had five branch locations and six ATMs, all of which were deposit-taking, in the Baltimore MSA. During the evaluation period, the bank made \$798.6 million or 1.5 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in the Baltimore MSA.

The state of Maryland represented TDBNA's third smallest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$671.5 million in deposits in the Baltimore MSA, which represented 0.3 percent of the bank's total adjusted deposits. The AA is served by 38 FDIC-insured financial institutions operating 494 branches. TDBNA ranked 13th with 0.8 percent deposit market share. The top three competitors had 59.2 percent of the market share and consisted of Bank of America, N.A. with 61 branches and 30.6 percent market share, Manufacturers and Traders Trust Company with 88 branches and 19.1 percent market share, and PNC Bank, N.A. with 56 branches and 9.5 percent market share.

Baltimore MSA

The following tables provides a summary of the demographics, including housing and business information for the Baltimore MSA AA.

¹⁰ The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Baltimore MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	666	12.0	23.7	33.3	28.4	2.6
Population by Geography	2,621,745	7.7	23.1	35.7	32.1	1.4
Housing Units by Geography	1,079,632	10.0	24.1	35.3	29.6	0.9
Owner-Occupied Units by Geography	642,346	4.6	19.0	38.4	37.6	0.4
Occupied Rental Units by Geography	340,173	15.5	32.6	32.3	17.9	1.6
Vacant Units by Geography	97,113	26.8	28.2	25.2	17.7	2.1
Businesses by Geography	382,058	6.0	21.0	36.7	35.4	0.9
Farms by Geography	6,517	2.7	14.5	36.7	45.3	0.8
Family Distribution by Income Level	625,074	22.4	17.1	20.8	39.7	0.0
Household Distribution by Income Level	982,519	25.3	15.9	17.8	41.1	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$104,637	Median Housing Value			\$297,151
			Median Gross Rent			\$1,330
			Families Below Poverty Level			6.7%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Baltimore MSA AA consists of five of seven counties that comprise the MSA including Anne Arundel, Baltimore, Baltimore City, Harford, and Howard.

Based on information from the September 2023 Moody's Analytics report, Baltimore's economy has been underperforming but, is showing small signs of improvement with monthly job additions having picked up slightly. Both healthcare and professional/business services employment have been strong this year. The area's economic drivers include healthcare, logistics and the federal government (nondefense). Baltimore relies heavily on federal government employment as the area is home to a number of agency headquarters, including the National Security Agency. While the government provides stability to the economy, recurrent government shutdowns, or even the risk of shutdowns, weigh on consumer spending as workers fear being furloughed. The Port of Baltimore, coupled with nearby interstate highways and East Coast population centers, makes the city a major logistics hub. As such the area benefits from strong transportation and distribution industries. In addition, Baltimore is a hub for cybersecurity and benefits from the presence of well-established medical research centers. Major employers in the area include Fort George G. Meade military base, Johns Hopkins University, Johns Hopkins Health System, University of Maryland Medical System, and the Aberdeen Proving Ground Army facility. Major employment sectors include Education and Health Services, Professional and Business Services, and Government. The area's perceived weaknesses include its minimal public transportation links to nearby Washington, D.C., and below-average population growth. Per Moody's, Baltimore had one of the sharpest population declines in the Northeast in 2022, and historically has experienced decades of net out-migration.

According to the U.S. BLS, the unemployment rate in the Baltimore MSA was 6.4 percent as of January 2021, compared to 2.1 percent in December 2023. The MSA unemployment rate mirrored the statewide

rate (2.1 percent) as of December 2023 and was lower than the national unemployment rate (3.7 percent).

Based on information in the above table, low-income families earned less than \$52,319 and moderate-income families earned less than \$83,710. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,308 for low-income borrowers and \$2,093 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,595. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 25.9 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Baltimore MSA. This acceleration in home prices worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC relied on information from three community contacts conducted during the evaluation period with a minority business development agency, a CDFI, and a nonprofit organization that builds and renovates homes in LMI communities. Community contacts indicated that the following are needs and opportunities within the bank's AA:

- Flexible mortgage loan programs,
- First time homebuyer programs,
- Small business loans, including micro-lending,
- Training and technical assistance to small businesses,
- Financial education,
- Providing flexible capital and funding for CDFIs,
- Providing program and operational support to nonprofit organizations.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing (ownership/rental) for LMI communities,
- Support nonprofits to assist with providing basic needs/services to LMI population,
- Small business lending and technical assistance,
- Revitalization and stabilization of LMI and other targeted areas.

Scope of Evaluation in Maryland

Examiners completed a full-scope review for the Baltimore MSA AA as it is the only AA within the state of Maryland. In determining Lending Test conclusions, examiners placed more emphasis on home mortgage loans in arriving at overall conclusions in the Baltimore MSA AA as they represented the majority of lending in the AA. Small loans to farms were not meaningful for analysis purposes.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MARYLAND

LENDING TEST

The bank's performance under the Lending Test in Maryland is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Baltimore MSA AA was excellent.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Baltimore MSA	1,939	653	2	23	2,617	100.0	100.0

Dollar Volume of Loans* \$(000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Baltimore MSA	769,513	29,037	55	19,377	817,983	100.0	100.0

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked 13th out of 38 depository institutions (top 35 percent) with a deposit market share of 0.8 percent.

For home mortgage loans, TDBNA's market share of 0.8 percent ranked 34th out of 654 lenders (top 6 percent). The top three lenders were Truist Bank with 5.2 percent market share, Rocket Mortgage with 4.7 percent market share, and PennyMac Loan Services LLC with 3.8 percent market share.

For small loans to businesses, TDBNA's market share of 0.2 percent ranked 26th out of 179 lenders (top 15 percent). The top three lenders were American Express National Bank with 25 percent market share, JPMorgan Chase Bank, N.A. with 15.8 percent market share, and Bank of America, N.A. with 13.7 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the state of Maryland section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased in both low-income and moderate-income geographies exceeded the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of Maryland section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies was well below the percentage of businesses located in those geographies and was below the aggregate percentage of reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was near-to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was stronger than the 2022-2023 analysis period due to an overall stronger distribution of loans in both low-income and moderate-income geographies.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Baltimore MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Maryland section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was near-to the percentage of low-income families and exceeded the aggregate

percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of Maryland section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was good.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less was near-to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis.

Community Development Lending

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test in the Baltimore MSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made 23 CD loans totaling \$19.4 million, which represented 22 percent of allocated tier 1 capital. Included in this total were six PPP loans totaling \$570,000 that supported area businesses during the COVID-19 pandemic. CD loans were impactful as they were responsive to identified community needs including affordable housing, economic development, and revitalization/stabilization. By dollar volume, 69.3 percent of CD loans funded affordable housing, 15.4 percent funded revitalization and stabilization efforts, and 15.3 percent funded economic development activities.

Examples of CD loans in the AA include:

- A \$3.3 million allocation (\$25.5 million total) of a commercial bridge loan to refinance a mixed-use property in a moderate-income geography prior to HUD providing permanent financing. Of the 108 residential units, 22 have rents below the LMI rental limit for the Baltimore MSA.

- A \$1.3 million loan to acquire an apartment complex consisting of 27 units in Baltimore. All of the units benefit from a project-based HUD Section 8 HAP contract.
- A \$1.3 million loan to restructure debt originally extended to finance the rehabilitation of 40 row homes as part of a historic redevelopment project to revitalize an area of Baltimore. All of the homes are occupied by individuals earning between 50 and 80 percent of the AMI.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, the bank funded 257 loans totaling \$27.9 million under the following innovative and/or flexible programs during the evaluation period.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	7	1,698
TD Home Access Mortgage	28	6,429
FNMA HomeReady Mortgage	8	1,722
FHA Mortgage	16	5,677
VA Mortgage	1	162
PPP	197	12,204
Total	257	27,892

INVESTMENT TEST

The institution's performance under the Investment Test in Maryland is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Baltimore MSA AA was excellent.

Number and Amount of Qualified Investments

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Baltimore MSA	11	19,848	23	21,755	34	97.1	41,603	99.6	1	1,000
Statewide MD	0	0	2	176	2	2.9	176	0.4	0	0
Total	11	19,848	25	21,755	36	100.0	41,779	100.0	1	1,000

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made six investments totaling \$21.6 million and provided 17 qualified grants and donations totaling \$117,123. The dollar volume of current-and prior-period

investments (excluding unfunded commitments) represented 47.3 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs, creating 141 new affordable housing units. By dollar volume, 80.7 percent of current period investments and donations funded affordable housing, 9.7 percent funded economic development activities, 9.3 percent funded revitalization and stabilization efforts, and 0.3 percent funded community services to LMI individuals.

The institution made extensive use of innovative and/or complex qualified investments. CD investments included two direct LIHTC investments totaling \$17.5 million and one EQ2 investment totaling \$1 million made as part of the TD Equity Fund which supports minority-owned businesses.

Examples of qualified investments in the AA include:

- A \$14.5 million complex LIHTC investment for the construction of a 69-unit mixed-income apartment complex that is the first phase of a six-phase redevelopment plan to transform hundreds of dilapidated public housing units to over 1,300 new mixed-income units. Of the total 69 units, 56 will be income-restricted up to 60 percent of the AMI. The remaining 13 units are market rate targeting households up to 120 percent of the AMI. Additionally, 44 units designated for very low-income households up to 50 percent of the AMI are supported by a 20-year HUD RAD contract.
- An innovative EQ2 investment totaling \$1 million to a CDFI that provides capital and technical assistance to marginalized businesses in low-income communities.
- Two grants totaling \$15,000 to an area nonprofit that provides critical home repairs and renovations to those in need. Repairs focus on health and safety issues including accessibility modifications for aging senior citizens.

Broader Statewide Area

During the evaluation period, TDBNA made two IOLTA program investments totaling \$176,019 in the broader statewide area. These investments provided further support for the Outstanding Investment Test rating in the state of Maryland.

SERVICE TEST

The bank's performance under the Service Test in Maryland is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Baltimore MSA AA was good.

Retail Banking Services

Distribution of Branch Delivery System					
Assessment Area	Deposits	Branches			Population*
	% of Rated		% of Rated	Location of Branches by Income of Geographies (%)	% of Population within Each Geography

	Area Deposits in AA	# of Bank Branches	Area Branches in AA	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Baltimore MSA	100.0	5	100.0	0.0	40.0	20.0	40.0	7.7	23.1	35.7	32.1

*1.4% of the population resides within an “NA” income category.

Service delivery systems were accessible to geographies and individuals of different income levels in the institution’s AA.

The bank did not have any branches in low-income geographies. The percentage of bank branches in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners considered one middle-income adjacent branch that served a low-income geography within the AA as demonstrated by branch transactions and deposit account opening activity. This adjacent branch improved accessibility and had a positive impact on the retail service delivery systems conclusion.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had six deposit-taking ATMs in the AA, including three in moderate-income geographies. The bank had no ATMs in low-income geographies. The distribution of ATMs in moderate-income geographies was excellent. TDBNA provided data indicating that 90 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 91.6 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 73.1 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 77.1 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank’s service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Baltimore MSA	0	2	0	0	0	-2

The institution’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed two branches, neither of which were in low- or moderate-income geographies.

Services, including where appropriate, business hours are tailored to meet the convenience and needs of the various portions of its AA, including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including extended hours on Thursdays and Fridays. All five AA branches were open on Saturdays and Sundays. Of the five branches in the AA, four had drive-thru facilities, including one of two branches in moderate-income geographies. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

TDBNA provided an adequate level of CD services. During the evaluation period the bank provided nine financial education events to 218 participants in the Baltimore MSA. Additionally, a bank employee provided eight hours of board/committee service for a CDC. The bank's assistance was responsive to an identified need for financial education.

An example of a CD service in the AA included:

- A bank loan officer led five homebuying workshops to 170 LMI individuals at an area CDC.

State of Massachusetts

CRA rating for the State of Massachusetts¹¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include

- excellent lending activity, with overall excellent geographic and borrower distribution of lending;
- an excellent level of CD lending that further supported the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- readily accessible retail service delivery systems; and
- an adequate level of CD services.

Description of Institution's Operations in Massachusetts

The state of Massachusetts consists of four AAs including the Barnstable Town, MA MSA (Barnstable Town MSA), the Pittsfield, MA MSA (Pittsfield MSA), the Springfield, MA MSA (Springfield MSA), and the Worcester, MA MSA (Worcester MSA). Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had 49 branch locations and 128 ATMs, of which 88 were deposit-taking, within these AAs. During the evaluation period, the bank made \$934.5 million or 1.8 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of Massachusetts represented TDBNA's seventh largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$6.8 billion in deposits in these AAs, which represented 2.9 percent of the bank's total adjusted deposits. The bank ranked second in deposit market share with 11.4 percent out of 50 depository institutions. The top competitor was Bank of America, N.A. with 27 branches and 12.1 percent market share. Berkshire Bank ranked third in market share with 40 branches and 8.3 percent market share.

Barnstable Town MSA

The following tables provides a summary of the demographics, including housing and business information for the Barnstable Town MSA AA.

¹¹The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Barnstable Town MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	1.8	19.3	61.4	15.8	1.8
Population by Geography	228,996	0.3	19.3	63.0	17.4	0.0
Housing Units by Geography	164,064	0.2	20.7	64.3	14.8	0.0
Owner-Occupied Units by Geography	76,319	0.0	15.9	65.9	18.2	0.0
Occupied Rental Units by Geography	19,540	1.5	28.9	59.7	9.9	0.0
Vacant Units by Geography	68,205	0.1	23.6	63.8	12.4	0.0
Businesses by Geography	32,522	0.2	21.4	62.8	15.6	0.0
Farms by Geography	1,236	0.0	19.3	65.5	15.2	0.0
Family Distribution by Income Level	59,596	19.3	19.3	20.7	40.7	0.0
Household Distribution by Income Level	95,859	23.6	16.1	18.2	42.1	0.0
Median Family Income MSA - 12700 Barnstable Town, MA MSA		\$99,410	Median Housing Value			\$454,477
			Median Gross Rent			\$1,313
			Families Below Poverty Level			4.3%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Barnstable Town MSA AA consists of the one county (Barnstable) that comprises the MSA. As of year-end 2023, TDBNA operated 11 branches and 26 ATMs, 15 of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$1.5 billion in deposits in the AA which comprised 0.6 percent of total adjusted bank deposits and 22 percent of the rated area deposits. The AA is served by 10 FDIC-insured financial institutions operating 88 branches. TDBNA had 13.1 percent deposit market share which ranked second among all institutions. The top competitor was The Cape Cod Five Cents Savings Bank with 18 branches and 32.5 percent market share. Ranking third in deposit market share was Rockland Trust Company 12 branches and 11.8 percent market share.

Based on information from the September 2023 Moody's Analytics report, the Barnstable Town economy has stalled, and is one of the weaker performers in the state. The slowdown is broad based with most industries including education and healthcare, and leisure and hospitality industries experiencing setbacks. Employment growth is weak due to a sluggish labor force leading to a steady decline in the unemployment rate from earlier in the year. Key economic drivers include healthcare, tourism, and retirees. Barnstable Town is located on Cape Cod and is a popular tourist destination. Tourism creates significant demand for leisure and hospitality, but the area's limited available workforce creates a challenge. The MSA has experienced a decline in the working-age population over the last 15 years which has reduced the labor pool. As such, the area relies heavily on workers from outside the metro to fill the service positions. In addition to the area's unfavorable age structure, population declines, and reliance on low-wage tourism and retail, Barnstable Town experiences above-average living and business costs. On the flip side, the metro benefits from its large retiree population which provides strong demand for healthcare and help support the economy. The major employment sectors in

the MSA are Leisure and Hospitality Services, Education and Health Services, and Government. Major employers in the area include Cape Cod Healthcare Inc., Woods Hole Oceanographic Institution, Steamship Authority, and Cape Cod Community College. Per Moody's housing affordability remains a challenge for the area. The metro is among the most overvalued markets in the Northeast, with housing prices having increased at an above average rate over the last two years. As many of the area's home buyers are wealthy nonresidents, and housing development is scarce, homeownership remains out of reach for many area residents.

According to the U.S. BLS, the unemployment rate in the Barnstable Town MSA was 9.7 percent as of January 2021, compared to 4.1 percent in December 2023. The MSA unemployment rate was higher than both the statewide rate (3.4 percent) and the national unemployment rate (3.7%) as of December 2023.

Based on information in the above table, low-income families earned less than \$49,705 and moderate-income families earned less than \$79,528. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,243 for low-income borrowers and \$1,988 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$2,440. Most low-income and moderate-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 45.1 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Barnstable Town MSA. This acceleration in home prices worsened existing affordability concerns for both low-income and moderate-income borrowers.

The OCC relied on a community contact conducted during the evaluation period with a county human services department. The community contact indicated that the following are needs and opportunities within the bank's AA:

- Affordable housing units, including rental housing,
- Flexible mortgage loan programs that benefit LMI individuals,
- Providing funding to nonprofit organizations.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing (ownership and rental),
- Financial education.

Springfield MSA

The following tables provides a summary of the demographics, including housing and business information for the Springfield MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Springfield MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	158	10.8	20.9	36.7	28.5	3.2
Population by Geography	699,162	8.2	20.7	35.9	32.5	2.7
Housing Units by Geography	291,991	7.8	21.9	38.1	31.9	0.3
Owner-Occupied Units by Geography	172,968	2.0	14.8	42.2	41.0	0.0
Occupied Rental Units by Geography	97,921	17.2	34.1	30.1	18.0	0.7
Vacant Units by Geography	21,102	12.0	24.4	41.1	21.6	0.9
Businesses by Geography	60,476	8.9	20.8	33.3	36.0	1.0
Farms by Geography	2,104	1.5	8.3	44.2	45.9	0.2
Family Distribution by Income Level	169,001	23.6	16.3	18.7	41.4	0.0
Household Distribution by Income Level	270,889	25.9	15.3	16.3	42.4	0.0
Median Family Income MSA - 44140 Springfield, MA MSA		\$79,907	Median Housing Value			\$231,412
			Median Gross Rent			\$944
			Families Below Poverty Level			9.7%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Springfield MSA AA consists of all three counties that comprise the MSA including Franklin, Hampden, and Hampshire. As of year-end 2023, TDBNA operated 20 branches and 58 ATMs, 41 of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$2.6 billion in deposits in the AA which comprised 1.1 percent of total adjusted bank deposits and 38 percent of the rated area deposits. The AA is served by 19 FDIC-insured financial institutions operating 186 branches. TDBNA had 12.3 percent deposit market share which ranked third among all institutions. The top two competitors were Peoples Bank with 16 branches and 13.3 percent market share, and Bank of America, N.A. with 10 branches and 12.3 percent market share.

Based on information from the September 2023 Moody's Analytics report, the Springfield economy, while well behind the U.S. overall, is in line with the Northeast region which has experienced slow growth. Healthcare and government, which are Springfield's main economic drivers, have seen lackluster job growth and other industries including professional and business services and manufacturing have experienced job losses. While the unemployment rate is below the pre-pandemic rate, it's at least partially attributed to a steadily contracting labor force. Springfield relies heavily on healthcare employment and the industry provides stability to the area economy. The area's providers cater to an aging population which provides a steady demand for services. However, population declines in Springfield and surrounding areas make it difficult to find staff that are qualified to fill these positions. The MSA's cold climate and lack of high paying jobs are contributing to the outmigration of residents. Per Moody's the metro's population has dropped six of the last eight years. The persistent out-migration of locals, particularly younger adults, also hurts consumer spending industries such as leisure/hospitality, personal services, and construction. In addition to healthcare, Springfield relies

heavily on higher education, both public and private, for employment. The area is home to UMass Amherst and numerous private colleges. While private institutions have fully recovered from the pandemic the area's public universities have not. There is a shrinking pool of young college-aged adults in Massachusetts and the Northeast overall, which limit enrollment at the area's colleges and universities and put a damper on demand in the education sector. One positive for the area is its relatively affordable housing for New England. While home prices have grown at an above average rate in 2023 in Springfield, they have not gone as high above their pre-pandemic level as the nation overall. Major employers in the MSA include Baystate Health, MassMutual Financial Group, Smith & Wesson, General Dynamics Advanced Info Systems, and C&S Wholesale Grocers Inc. The major employment sectors are education and health services and government.

According to the U.S. BLS, the unemployment rate in the Springfield MSA was 8.2 percent as of January 2021, compared to 3.7 percent in December 2023. The MSA unemployment rate was slightly above than the statewide rate (3.4 percent) and mirrored the national unemployment rate (3.7 percent) as of December 2023.

Based on information in the above table, low-income families earned less than \$39,954 and moderate-income families earned less than \$63,926. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$999 for low-income borrowers and \$1,598 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,242. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 34.7 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Springfield MSA. This acceleration in home prices worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC relied on two community contacts conducted during the evaluation period with representatives from a CDFI and a CDC focused on small businesses. Community contacts indicated that the following are needs and opportunities within the bank's AA:

- Affordable Housing units, including rental housing,
- Small loans to businesses particularly business start-up loans,
- More flexibility in small business lending, including loan terms and underwriting criteria,
- Small business training and technical assistance,
- Partnering with CDFIs to provide small business lending programs,
- Providing funding to nonprofit organizations including food banks.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing (ownership and rental),
- Access to capital for small businesses,

- Support for nonprofits that provide basic needs/services to LMI populations,
- Financial education (general and homeownership).

Scope of Evaluation in Massachusetts

Examiners selected two AAs for full-scope reviews. Examiners completed a full-scope review for the Springfield MSA because it is the largest AA within the rating area based on deposits, and second largest in terms of lending activity. Examiners also selected the Barnstable Town MSA AA as it has not received a full-scope review in recent CRA evaluations. The Pittsfield MSA and Worcester MSA AAs received limited scope reviews.

In arriving at overall conclusions, the Springfield MSA AA received the most weight as it accounts for the largest share of deposits in the state of Massachusetts. In determining Lending Test conclusions, examiners placed more emphasis on the loan product category that had the higher percentage of lending in the AA. For all AAs in Massachusetts, examiners placed more emphasis on small loans to businesses than home mortgage loans. Small loans to farms were not meaningful for analysis purposes.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

The bank's performance under the Lending Test in Massachusetts is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Barnstable Town MSA and Springfield MSA AAs was excellent.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Barnstable Town MSA	764	926	7	26	1,723	24.3	22.0
Springfield MSA	952	1,439	5	27	2,423	34.2	38.0
Limited-Scope:							
Pittsfield MSA	159	253	0	10	422	6.0	8.3
Worcester MSA	1,048	1,445	2	25	2,520	35.6	31.7
Total	2,923	4,063	14	88	7,088	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* \$(000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits

Full-Scope:							
Barnstable Town MSA	295,849	28,310	90	26,196	350,445	31.4	22.0
Springfield MSA	180,015	45,076	106	58,367	283,564	25.4	38.0
Limited-Scope:							
Pittsfield MSA	42,959	8,223	0	8,124	59,306	5.3	8.3
Worcester MSA	281,229	52,527	103	90,598	424,457	38.0	31.7
Total	800,052	134,136	299	183,285	1,117,772	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Barnstable Town MSA

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked second out of 10 depository institutions (top 20 percent) with a deposit market share of 13.1 percent.

For home mortgage loans, TDBNA's market share of 2.3 percent ranked seventh out of 406 lenders (top 2 percent). The top three lenders were Cape Cod Five Cents Savings Bank with 23 percent market share, Citizen's Bank, N.A. with 8.5 percent market share, and Rockland Trust Company with 3.9 percent market share.

For small loans to businesses, TDBNA's market share of 2.8 percent ranked ninth out of 91 lenders (top 10 percent). The top three lenders were American Express National Bank with 27 percent market share, JPMorgan Chase Bank, N.A. with 10.1 percent market share, and Capital One, N.A. with 9 percent market share.

Springfield MSA

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked third out of 19 depository institutions (top 16 percent) with a deposit market share of 12.3 percent.

For home mortgage loans, TDBNA's market share of 2 percent ranked 15th out of 394 lenders (top 4 percent). The top three lenders were Citizen's Bank, N.A. with 4.9 percent market share, Peoples Bank with 4.7 percent market share, and Florence Bank with 4.5 percent market share.

For small loans to businesses, TDBNA's market share of 2.7 percent ranked 11th out of 116 lenders (top 10 percent). The top three lenders were American Express National Bank with 21.8 percent market

share, JPMorgan Chase Bank, N.A. with 11.1 percent market share, and Citibank, N.A. with 10 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs. Examiners generally placed more weight on performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and businesses.

Barnstable Town MSA

Home Mortgage Loans

Refer to Table O in the state of Massachusetts section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and approximated the aggregate percentage of all reporting lenders. There were no owner-occupied housing units located in low-income geographies in the AA during the 2022-2023 analysis period.

The bank's 2021 performance was consistent with the performance in the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of Massachusetts section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was adequate.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies equaled the percentage of businesses in those geographies and exceeded the aggregate distribution of loans. The percentage of small loans to businesses originated or purchased in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was stronger than the 2022-2023 analysis period due to better overall performance in moderate-income geographies.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Barnstable Town MSA.

Springfield MSA

Home Mortgage Loans

Refer to Table O in the state of Massachusetts section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and was near-to the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the performance in the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of Massachusetts section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies was near-to the percentage of businesses in those geographies and approximated the aggregate distribution of loans. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Springfield MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Barnstable Town MSA

Home Mortgage Loans

Refer to Table P in the state of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers approximated the percentage of moderate-income families and exceeded the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker distribution of loans to low-income borrowers compared to the demographics and aggregate performance.

Small Loans to Businesses

Refer to Table R in the Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Springfield MSA

Home Mortgage Loans

Refer to Table P in the state of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of moderate-income families and approximated the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of Massachusetts section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less exceeded both the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Community Development Lending

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Barnstable Town MSA

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test in the Barnstable Town MSA.

TDBNA made 26 CD loans totaling \$26.2 million, which represented 13.3 percent of allocated tier 1 capital. Included in this total were 23 PPP loans totaling \$8.4 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, occasionally in a leadership position. CD loans were impactful as they were responsive to an identified community need for affordable housing. By dollar volume, 65.3 percent of CD loans funded affordable housing, 30.1 percent funded revitalization and stabilization efforts, 2.8 percent funded community services targeted to LMI individuals and 1.8 percent funded economic development activities.

Examples of CD loans in the AA include:

- A \$15.9 million loan to finance the new construction of a 48-unit senior housing complex of which all units are restricted to individuals earning up to 60 percent of the AMI and 16 units will benefit from project-based HUD section 8 rental subsidies. The project also includes storefront retail space to be leased by a housing corporation which will provide supportive services to the residents. Other funding sources included LIHTC equity provided by TDBNA.
- A \$1.2 million loan to refinance a mixed-use affordable housing project consisting of 18 townhouses and two artist studios for LMI tenants. All units are restricted to individuals earning up to 60 percent of the AMI. The property is managed by a nonprofit that provides affordable housing opportunities to year-round residents of Cape Cod.
- A \$725,000 loan to finance the purchase of an office building for a nonprofit organization that provides special education and therapeutic services to individuals with developmental and

intellectual disabilities, the majority of which are LMI.

Springfield MSA

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test in the Springfield MSA.

TDBNA made 27 CD loans totaling \$58.4 million, which represented 17.2 percent of allocated tier 1 capital. Included in this total were 20 PPP loans totaling \$9.7 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, occasionally in a leadership position. CD loans were impactful as they were responsive to identified community needs including affordable housing, and community services. By dollar volume, 76.6 percent of CD loans funded affordable housing, 16.5 percent funded revitalization and stabilization efforts, 5.7 percent funded community services targeted to LMI individuals and 1.2 percent funded economic development activities.

Examples of CD loans in the AA include:

- An \$18.2 million loan to finance the new construction of a 62-unit mixed-income housing development of which 47 units are restricted to tenants earning less than 80 percent of the AMI. In addition, 20 of the affordable units will receive project-based HUD rental subsidies. Further, 10 units are set aside as workforce housing for persons earning up to 100 percent of the AMI. Other funding sources included LIHTC equity provided by TDBNA.
- A \$12.5 million construction loan to renovate a former school building into a 42-unit LIHTC apartment complex. All the units are restricted to tenants earning up to 80 percent of the AMI and 15 units will benefit from project-based rental subsidies. Other funding sources include LIHTC equity and HTCs, provided by TDBNA.
- A \$2.3 million loan to acquire a property to be used as a mental health clinic by a nonprofit community behavioral and mental health agency. The organization provides comprehensive mental health services, crisis intervention, substance use disorder treatment, and housing support for individuals experiencing homelessness.

Product Innovation and Flexibility

Barnstable Town MSA

The bank used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, TDBNA funded 297 loans totaling \$29.2 million under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	7	2,738
FNMA HomeReady Mortgage	1	186
FHA Mortgage	1	338
VA Mortgage	2	290
PPP	286	25,669
Total	297	29,221

Springfield MSA

The bank used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, TDBNA funded 415 loans totaling \$41.3 million under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	11	2,274
FNMA HomeReady Mortgage	6	1,100
FHA Mortgage	11	2,767
VA Mortgage	5	1,125
PPP	382	34,017
Total	415	41,283

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Pittsfield MSA and Worcester MSA AAs was consistent with the bank's overall performance under the Lending Test in the full-scope areas. Refer to Tables O through T in the state of Massachusetts section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Massachusetts is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Barnstable Town MSA and Springfield MSA AAs was excellent.

Number and Amount of Qualified Investments

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Barnstable Town MSA	5	11,433	26	15,827	31	18.7	27,260	20.9	0	0
Springfield MSA	8	10,935	49	27,892	57	34.3	38,827	29.7	0	0
Limited-Scope:										
Pittsfield MSA	4	11,080	7	528	11	6.6	11,608	8.9	0	0
Worcester MSA	10	19,382	54	29,021	64	38.6	48,403	37.0	0	0
Statewide MA	2	2,101	1	2,520	3	1.8	4,621	3.5	1	741
Total	29	54,931	137	75,788	166	100.0	130,719	100.0	1	741

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Barnstable Town MSA

The institution had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made 17 investments totaling \$15.8 million and provided nine qualified grants and donations totaling \$76,295. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 13.9 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs, creating 48 affordable housing units. By dollar volume, 99.6 percent of current period investments and donations funded affordable housing and 0.4 percent funded community services to LMI individuals.

The institution made significant use of innovative and/or complex investments to support CD investments included initiatives. CD investments included one direct LIHTC investment totaling \$10.4 million.

Examples of qualified investments in the AA include:

- A \$10.4 million complex LIHTC investment for the construction of a 48-unit apartment complex for LMI senior citizens. All units will be income-restricted up to 60 percent AMI with 16 units receiving project-based rental subsidies targeted to seniors with incomes below 30 percent of the AMI. In addition, five units will be handicapped accessible. The building will include a retail space occupied by a housing corporation which will provide supportive services to the residents.
- Three grants totaling \$40,000 to a nonprofit organization to support its housing stability program for vulnerable residents. The program provides financial assistance for rent and mortgage payments, and access to shelter and security deposits for needy families.
- A \$5,000 grant to a nonprofit organization to support the creation of videos focused on financial literacy topics including budgeting, savings, credit rebuilding and first-time homebuyers. The videos were posted on the organization's website and YouTube channel.

Springfield MSA

The institution had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made 11 investments totaling \$27.3 million and provided 38 qualified grants and donations totaling \$610,000. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 11.5 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs, creating 99 affordable

housing units. By dollar volume, 98.7 percent of current period investments and donations funded affordable housing, 1.1 percent funded community services to LMI individuals, and 0.2 percent funded economic development activities.

The institution made significant use of innovative and/or complex investments to support CD investments included initiatives. CD investments included two direct LIHTC investments totaling \$24.6 million.

Examples of qualified investments in the AA include:

- A \$13.4 million complex LIHTC investment for the acquisition and renovation of a former school located in the AA to create a 42-unit housing complex along with a community resource center for the provision of support services for the residents. All 42 units are income-restricted at or below 60 percent AMI. In addition, 15 units targeting extremely low-income individuals earning less than 30 percent AMI will receive rental subsidies through the Massachusetts Department of Housing.
- Three grants totaling \$70,000 to support a nonprofit's home repair and safe and healthy home program. The program provides critical repairs, modifications, and rehabilitation of the homes for low-income families with children, the elderly, military veterans, and people living with disabilities.
- Four grants totaling \$35,000 to a nonprofit organization in support of their financial literacy program that includes multiple initiatives to help low-income individuals manage their money and access financial tools, resources, and support for year-round financial success. They also provide free tax preparation, one-on-one financial coaching sessions, interest free small dollar loans for unexpected needs, and a savings incentive program which combines financial counseling and workshops with a matched deposit program.

Broader Statewide Area

During the evaluation period, TDBNA had three investments totaling \$4.6 million in the broader statewide area. The bank made one current period investment totaling \$2.5 million in an IOLTA program and had two prior period loan fund investments outstanding with a book value of \$2.1 million. These investments provided further support for the Outstanding Investment Test rating in the state of Massachusetts.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Pittsfield MSA and Worcester MSA AAs was consistent with the bank's overall performance in the full-scope areas.

SERVICE TEST

The institution's performance under the Service Test in Massachusetts is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Barnstable Town MSA and Springfield MSA AAs was excellent.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population**			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Barnstable Town MSA	22.0	11	22.4	0.0	27.3	63.6	9.1	0.3	19.3	63.0	17.4
Springfield MSA	38.0	20	40.8	10.0	45.0	35.0	10.0	8.2	20.7	35.9	32.5
Limited-Scope:											
Pittsfield MSA	8.3	4	8.2	25.0	0.0	25.0	50.0	2.6	19.5	52.8	25.0
Worcester MSA	31.7	14	28.6	14.3	28.6	50.0	7.1	10.5	15.3	41.8	31.5

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

**2.7% of the population in the Springfield MSA, and 0.9% of the population in the Worcester MSA reside within an "NA" income category.

Barnstable Town MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the AA.

The bank had no branches in low-income geographies; however, less than one percent of the population resides within low-income geographies. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 26 ATMs in the AA, of which 15 were deposit-taking, including ten in moderate-income geographies. There were no ATMs in low-income geographies. The distribution of ATMs in moderate-income geographies was excellent. TDBNA provided data indicating that 80.2 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 81.7 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 54.8 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 59.6 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Springfield MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the AA.

The bank's distribution of branches in both low-income and moderate-income geographies exceeded the percentages of the population living within those geographies.

TDBNA offered ADS including ATMs, and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 58 ATMs in the AA, of which 41 were deposit-taking, including five in low-income geographies and 23 in moderate-income geographies. The distribution of ATMs in both low-income and moderate-income geographies was excellent. TDBNA provided data indicating that 79.2 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 81.7 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 53.3 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 59.6 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings*						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Barnstable Town MSA	0	1	-1	0	0	0
Springfield MSA	0	0	0	0	0	0
Limited-Scope:						
Pittsfield MSA	0	1	0	0	-1	0
Worcester MSA	0	0	0	0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Barnstable Town MSA

The institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed the only branch in a low-income geography. The branch closure was attributed to low customer transactions, lower than expected production volume, and a low number of households associated with the branch.

Services, including where appropriate, business hours are tailored to meet the convenience and needs of the various portions of its AA, including low- and moderate-income geographies and/or individuals. The bank offered standard weekday business hours at all branches including extended hours on Thursdays and Fridays. All 11 AA branches were open on Saturdays, and 10 branches were open on Sundays including all three moderate-income branches. Of the 11 branches in the AA, nine had drive-thru facilities, including two of three branches in moderate-income geographies. TDBNA offered traditional banking products and services at all branch locations in the AA.

Springfield MSA

The bank did not open or close branches during the evaluation period in this AA.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of the AA, particularly low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA except for one

branch in a low-income area with reduced hours of 10:00 a.m. to 4:00 p.m. Monday through Thursday and 10:00 a.m. to 5:00 p.m. on Friday. This branch, known as the Mason Square store, was set to close in 2020; however, instead of closing the branch, the bank opted to instead reduce the hours of operations. Of the 20 AA branches, all but one low-income (Mason Square) branch were open on Saturdays and all but three branches were open on Sundays including both of the low-income branches and one moderate-income branch. Of the 20 branches in the AA, 10 had drive-thru facilities, including three in moderate-income geographies and none in low-income geographies. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

Barnstable Town MSA

TDBNA provided an adequate level of CD services. During the evaluation period, the bank provided 18 financial education events attended by 57 participants in the Barnstable Town MSA. Additionally, two bank employees provided 22 service hours over the evaluation period that benefitted three organizations through board or committee participation. The bank's assistance was responsive to an identified need for financial education.

Examples of CD services in the AA include:

- A bank employee provided 15 hours of board/committee service to a nonprofit that helps LMI women build pathways to stability and self-sufficiency through career support, mentoring, legal services, and small business assistance.
- A bank employee led 11 small business training courses at two local chambers of commerce that were attended by 41 individuals. Courses included topics such as accessing capital, analyzing competition, assessing financial needs, and fraud prevention.

Springfield MSA

TDBNA provided an adequate level of CD services. During the evaluation period, the bank provided 46 financial education events attended by 659 participants in the Springfield MSA. Additionally, six bank employees provided 138 service hours over the evaluation period that benefitted seven organizations through board or committee participation or professional skills assistance. The bank's assistance was responsive to identified needs in the AA for financial education (general and homebuyer) and small business training.

Examples of CD services in the AA include:

- A bank manager provided 73 hours of board services to the local chapter of a charity organization that partners with public and private entities and other nonprofits to provide needed community services and promote economic mobility.
- A bank employee led eight small business education courses attended by 38 individuals in partnership with an economic development organization that works with minority-owned small

businesses. Courses topics included assessing a company's financial needs and running a profitable company.

- A bank loan officer led three homebuyer education classes attended by 91 participants in partnership with an area affordable housing organization.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Worcester MSA AA was consistent with the bank's overall performance in the full-scope areas. In the Pittsfield MSA, the bank's performance under the Service Test was weaker due to weaker branch distribution in moderate-income areas. Performance differences in the limited scope areas did not impact the Service Test rating for the state of Massachusetts.

State of New Hampshire

CRA rating for the State of New Hampshire¹²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include

- good lending activity, with overall good geographic distribution of lending and excellent borrower distribution of lending;
- an excellent level of CD lending that had a positive impact on the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- readily accessible retail service delivery systems; and
- an overall adequate level of CD services.

Description of Institution's Operations in New Hampshire

The state of New Hampshire consists of two AAs including the Manchester-Nashua, NH MSA (Manchester MSA) and six contiguous nonmetropolitan counties comprising the New Hampshire Non-MSA (NH Non-MSA) AA. Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had 34 branch locations and 50 ATMs, of which 46 were deposit-taking, within these AAs. During the evaluation period, the bank made \$685.1 million or 1.3 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of New Hampshire represented TDBNAs sixth largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$7.5 billion in deposits in these AAs, which represented 3.2 percent of the bank's total adjusted deposits. The bank ranked first in deposit market share with 23.5 percent out of 33 depository institutions. The top two competitors had 34.2 percent of the market share and consisted of Citizens Bank, N.A. with 33 branches and 19.4 percent market share and Bank of America, N.A. with 10 branches and 14.9 percent market share.

Manchester MSA

The following tables provides a summary of the demographics, including housing and business information for the Manchester MSA AA.

¹² The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Manchester MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	103	8.7	20.4	43.7	26.2	1.0
Population by Geography	422,937	7.1	20.1	41.0	31.8	0.0
Housing Units by Geography	172,201	7.7	21.6	41.9	28.8	0.0
Owner-Occupied Units by Geography	107,043	1.9	13.7	46.1	38.3	0.0
Occupied Rental Units by Geography	55,800	18.4	35.7	33.0	12.9	0.0
Vacant Units by Geography	9,358	10.3	27.8	47.2	14.7	0.0
Businesses by Geography	52,104	8.4	16.8	40.5	33.9	0.4
Farms by Geography	1,438	3.3	10.8	47.3	38.6	0.1
Family Distribution by Income Level	105,324	19.7	18.8	22.8	38.7	0.0
Household Distribution by Income Level	162,843	23.6	16.3	18.4	41.7	0.0
Median Family Income MSA - 31700 Manchester-Nashua, NH MSA		\$103,238	Median Housing Value			\$276,606
			Median Gross Rent			\$1,219
			Families Below Poverty Level			5.0%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Manchester MSA AA consists of the one county (Hillsborough) that comprises the MSA. As of year-end 2023, TDBNA operated 19 branches and 22 ATMs, all of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$3.5 billion in deposits in the AA which comprised 1.5 percent of total adjusted bank deposits and 46.8 percent of the rated area deposits. The AA is served by 22 FDIC-insured financial institutions operating 95 branches. TDBNA had 22.9 percent deposit market share which ranked third among all institutions. The top competitors were Citizens Bank, N.A with 17 branches and 29.5 percent market share and Bank of America, N.A. with seven branches and 23.1 percent market share.

Based on information from the September 2023 Moody's Analytics report, Manchester's economy is underperforming in comparison to the Northeast region. Payroll growth has been slow, and the financial services industry, which is a key driver of the economy, has not held on to its first quarter gains. Other economic drivers in Manchester include high tech and defense-related manufacturing. BAE Systems Electronic Solutions which is the metro's largest manufacturer and also one of the area's largest employers, benefits from steady demand from the U.S. and NATO partners. Manufacturing helps provide a stable, yet slow-growing employment base. The top employment sectors are education and health services, professional and business services, and manufacturing. Other major employers include DeMoulas & Market Basket, Walmart Inc., Fidelity Investments, and Hannaford. The region is also a financial center with securities-related employment accounting for a large share of jobs in the region, comparable to the likes of Boston and New York. The area's insurance firms have benefitted from higher interest rates and policy premiums, but rising costs for parts and services are expected to inflate claims disbursements and hurt insurers' bottom lines. Further, volatility in the equity and bond markets

reduces investors' return on assets and dissuades individual investors. Healthcare growth is a bright spot for the economy. The area has an above-average share of residents aged 65 and older thanks to its draw as a retiree destination, which provide a steady demand for healthcare services. Other area strengths include a highly educated workforce, above-average incomes, favorable tax laws, a high quality of life, and a friendly business climate that appeals to entrepreneurs. Conversely, Manchester has high energy and housing costs in relative to the U.S. Further, the metro has experienced slow population growth relative to the nation.

According to the U.S. BLS, the unemployment rate in the Manchester MSA was 4.7 percent as of January 2021, compared to 2.6 percent in December 2023. The MSA unemployment rate mirrored the statewide rate (2.6 percent) as of December 2023 and was well below the national unemployment rate (3.7 percent).

Based on information in the above table, low-income families earned less than \$51,619 and moderate-income families earned less than \$82,590. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,290 for low-income borrowers and \$2,065 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,485. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 36.9 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Manchester MSA. This acceleration in home prices worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC reviewed the 2020-2024 HUD consolidated plan for the city of Manchester to understand area needs and opportunities. The plan identified the following needs within the bank's AA:

- Affordable housing,
- Tenant based rental assistance,
- Revitalization of city infrastructure, buildings etc.,
- Increase employment opportunities,
- Independent and assisted living facilities and support services for the elderly,
- Homeless prevention, support, and transitional housing,
- Homeowner education and counseling,
- Enhancements to the public transportation system, including bus routes and rail,
- Flexible and affordable childcare options for working parents.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable multifamily rental housing,
- Homeownership opportunities and rehabilitation of existing affordable housing,
- Community services for LMI populations, including childcare.

NH Non-MSA

The following tables provides a summary of the demographics, including housing and business information for the NH Non-MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: NH Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	133	0.0	17.3	63.9	18.8	0.0
Population by Geography	478,259	0.0	16.6	63.5	19.9	0.0
Housing Units by Geography	257,124	0.0	17.5	65.7	16.8	0.0
Owner-Occupied Units by Geography	138,072	0.0	14.7	65.6	19.7	0.0
Occupied Rental Units by Geography	51,883	0.0	26.5	61.3	12.2	0.0
Vacant Units by Geography	67,169	0.0	16.2	69.4	14.4	0.0
Businesses by Geography	60,267	0.0	17.1	62.6	20.2	0.0
Farms by Geography	2,561	0.0	11.3	68.9	19.8	0.0
Family Distribution by Income Level	121,620	18.6	18.3	23.7	39.5	0.0
Household Distribution by Income Level	189,955	23.7	15.2	18.5	42.6	0.0
Median Family Income MSA - Non-MSAs - NH		\$85,473	Median Housing Value			\$237,074
			Median Gross Rent			\$1,049
			Families Below Poverty Level			5.2%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The NH Non-MSA AA consists of six contiguous nonmetropolitan counties including Belknap, Carroll, Cheshire, Grafton, Merrimack, Sullivan. As of year-end 2023, TDBNA operated 15 branches and 28 ATMs, 24 of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$4.0 billion in deposits in the AA which comprised 1.7 percent of total bank adjusted deposits and 53.2 percent of the rated area deposits. The AA is served by 24 FDIC-insured financial institutions operating 169 branches. TDBNA had 22.7 percent deposit market share which ranked first among all institutions. The top competitors were Citizens Bank, N.A. with 17 branches and 9.8 percent market share, Bank of New Hampshire with 16 branches and 9.4 percent market share, and Mascoma Bank with 14 branches and 8.4 percent market share.

According to the January 2024 Moody's Analytics report, New Hampshire overall is making steady progress helped by the manufacturing and education and healthcare industries. While the statewide unemployment rate trended upward since the summer, it is still one of the lowest in the nation. Housing prices have accelerated at a faster rate than nationally, and single-family permitting is above its five-year average. The state of New Hampshire benefits from low taxes, high per capita income, and low poverty rates. The state has a highly skilled workforce and below-average employment volatility. Conversely, the state experiences high energy costs and a weak public sector.

Belknap County is located in New Hampshire's Lakes Region on the western shores of Lake Winnepesaukee, the largest lake in the state. The county's population is approximately 65,000 and 8.8 percent of households live below the poverty level. There are no low-income geographies and four moderate-income geographies in the county. The area benefits from tourism with residents and visitors increasing in the spring and summer months due to lake recreation. In addition, the Belknap mountains on the shore of the lake are home to a popular ski resort and numerous hiking trails. The top five industries in the Lakes Region include hospitality, healthcare, construction/trade, manufacturing, and finance. The county's largest employers in the county include Concord Hospital-Laconia, New Hampshire Ball Bearings, Titeflex Aerospace, and local government offices. According to the U.S. BLS, the unemployment rate in Belknap County was 5.3 percent as of January 2021, compared to 2.6 percent in December 2023. The county's unemployment rate mirrored the statewide rate (2.6) percent and was lower than the national rate of 3.7 percent as of December 2023.

Carroll County is also located in New Hampshire's Lakes Region bordered by Lake Winnepesaukee to the south, the White Mountain National Forest to the north and the state of Maine to the east. The county's population is approximately 50,000 and 9.2 percent of households live below the poverty level. There are no low-income geographies and three moderate-income geographies in the county. Tourism is the county's primary economic driver as the area is home to several ski areas and Conway, the main economic hub in the county, also provides access to the White Mountains. The largest employers in county include Huggins Hospital, Memorial Hospital, Walmart Supercenter, Cranmore Mountain Resort, Camp Cody, King Pine Ski Area and local government offices. According to the U.S. BLS, the unemployment rate in Carroll County was 5.2 percent as of January 2021, compared to 2.9 percent in December 2023. The county's unemployment rate was slightly above the statewide rate of 2.6 percent and below than the national rate of 3.7 percent as of December 2023.

Cheshire County is located in the far southwestern corner of the state bordering Vermont and Massachusetts. The county's population is approximately 76,000 and 8.9 percent of households live below the poverty level. There are no low-income geographies and three moderate-income geographies in the county. The county is home to Mt. Monadnock, which is among the most hiked mountains in the country, along with several state parks, ski resorts and hiking trails. As such, tourism is a primary economic driver along with manufacturing. The largest employers in county include C&S Wholesale Grocers Inc., EMD Group, Millipore Sigma (a manufacturer of laboratory instruments), Cheshire Medical Center, Timken Aerospace (a manufacturer of ball bearings for aerospace applications), and UNFI Distribution Center. According to the U.S. BLS, the unemployment rate in Cheshire County was 4.9 percent in January 2021, compared to 2.7 percent in December 2023. The county's unemployment rate was comparable to the statewide rate of 2.6 percent and below the national rate of 3.7 percent as of December 2023.

Grafton County is located in west central New Hampshire, bordering Vermont. The population is approximately 90,000 and 11.3 percent of households live below the poverty level. There are no low-income geographies and six moderate-income geographies in the county. The area is home to Dartmouth College, an Ivy league University, and Plymouth State University. The county is heavily rural, with about half of the land area being the White Mountain National Forest. The Appalachian trail also passes through the county. Tourism is a primary driver of the area economy as outdoor recreation activities are abundant. The largest employers in the county include Dartmouth Hitchcock Medical Center, Hypertherm Inc. (manufacturer), Plymouth State University, Loon Mountain Resort, Tom Tom North America Inc (GPS navigation systems & services), Waterville Valley Resort, and Fujifilm Dimatix (printer cartridges wholesaler). According to the U.S. BLS, the unemployment rate in Grafton

County was 4.2 percent as of January 2021, compared to 2.2 percent in December 2023. The county's unemployment rate is below the statewide rate (2.6 percent) and well below than the national rate of 3.7 percent as of December 2023.

Merrimack County is located in the central portion of the state and is the third largest county by land area in New Hampshire. The population is approximately 154,000 making it the third most populous county in the state and 7.4 percent of households live below the poverty level. There are no low-income geographies and three moderate-income geographies in the county. The largest city is Concord, which is also the state capital. The county is home to many local colleges and universities. Similar to other counties in New Hampshire, Merrimack County offers an abundance of outdoor recreational activities including winter sports, hiking, lakes, and numerous state parks. The largest employers in the county are the University System of New Hampshire, Concord Hospital, New Hampshire Motor Speedway, GE Aviation, Mt. Sunapee Resort, Pats Peak ski resort, New Hampshire Hospital and state government offices. According to the U.S. BLS, the unemployment rate in Merrimack County was 4.4 percent as of January 2021, compared to 2.2 percent in December 2023. The county's unemployment rate is below the statewide rate (2.6 percent) and well below than the national rate of 3.7 percent as of December 2023.

Sullivan County is located on the western edge of New Hampshire, bordering Vermont. The population is approximately 43,000, making it the third least populous in the state. There are 10.5 percent of households living below the poverty level in Sullivan County. The county has no low-income geographies and four moderate-income geographies. The county is part of the Sugar River Region offering a wealth of natural resources including lakes, rivers, mountains and forests and abundant recreational activities including hiking and biking trails, winter sports, and water sports making it a year-round destination. The largest employers in the county include Ruger Firearms, Whelen Engineering Co (electric equipment manufacturer), Walmart Supercenter, West Central Behavioral Center, and Carroll Concrete Co. According to the U.S. BLS, the unemployment rate in Sullivan County was 4.2 percent as of January 2021, compared to 2.3 percent in December 2023. The county's unemployment rate is below the statewide rate (2.6 percent) and well below than the national rate of 3.7 percent as of December 2023.

Based on information in the above table, low-income families earned less than \$42,737 and moderate-income families earned less than \$68,378. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,068 for low-income borrowers and \$1,709 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the NH Non-MSA median housing value would be \$1,273. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

The OCC relied on information from a community contact made during the evaluation period with a nonprofit housing and redevelopment organization serving the AA. In addition, examiners reviewed a community needs assessment for Belknap and Merrimack counties completed by a local community agency. Based on this information, the following are needs and opportunities within the bank's AA:

- Affordable rental housing, including senior housing options,
- Development of affordable houses for sale,
- Participation in LIHTC programs,

- Rental and mortgage assistance programs,
- Support of utility assistance programs,
- Programs for housing repairs and weatherization,
- Homeless support and transitional housing,
- Improving access to high-speed internet and technology,
- Creating technical school, trade school, or other job training options,
- Affordable and quality childcare.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable multifamily rental housing,
- Housing for homeless individuals,
- Homeownership opportunities and preservation of existing affordable housing,
- Community services for LMI populations, including childcare and transportation.

Scope of Evaluation in New Hampshire

Examiners completed a full-scope review for both the Manchester MSA and the NH Non-MSA AAs. Rated area deposits and lending activity are relatively even across these AAs, with no one AA holding a substantial share of deposits in New Hampshire.

In arriving at overall conclusions, examiners placed slightly more weight on the NH Non-MSA AA as it accounts for the larger share of deposits in the state of New Hampshire. In determining Lending Test conclusions, examiners placed more emphasis on the product category that had the higher percentage of lending in the AA, which for both the AAs was small loans to businesses. Small loans to farms were not meaningful for analysis purposes.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW HAMPSHIRE

LENDING TEST

The bank's performance under the Lending Test in New Hampshire is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Manchester MSA and NH Non-MSA AAs was excellent.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Manchester MSA	1,252	1,952	12	37	3,253	50.1	46.8

NH Non-MSA	1,344	1,835	17	41	3,237	49.8	53.2
Statewide NH	-	-	-	4	4	0.1	0.0
Total	2,596	3,787	29	82	6,494	100.0	100.0

Dollar Volume of Loans* \$(000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Manchester MSA	269,438	67,579	631	47,560	385,208	42.6	46.8
NH Non-MSA	288,832	58,190	386	49,823	397,231	43.9	53.2
Statewide NH	-	-	-	122,000	122,000	13.5	0.0
Total	558,270	125,769	1,017	219,383	904,439	100.0	100.0

Manchester MSA

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked third out of 22 depository institutions (top 14 percent) with a deposit market share of 22.9 percent.

For home mortgage loans, TDBNA's market share of 3.3 percent ranked eighth out of 361 lenders (top 3 percent). The top three lenders were Citizen's Bank, N.A. with 9.4 percent market share, St. Mary's Bank CU with 6.3 percent market share, and Rocket Mortgage with 4.9 percent market share.

For small loans to businesses, TDBNA's market share of 4.7 percent ranked seventh out of 110 lenders (top 7 percent). The top three lenders were American Express National Bank with 24.9 percent market share, JPMorgan Chase Bank, N.A. with 13.7 percent market share, and Capital One, N.A. with 9.1 percent market share.

NH Non-MSA

Lending levels reflect good responsiveness to AA credit needs.

TDBNA ranked first out of 24 depository institutions with a deposit market share of 22.7 percent.

For home mortgage loans, TDBNA's market share of 3.1 percent ranked ninth out of 406 lenders (top 3 percent). The top three lenders were Citizen's Bank, N.A. with 7.1 percent market share, Rocket Mortgage with 5.8 percent market share, and Meredith Village Savings Bank with 5.2 percent market share.

For small loans to businesses, TDBNA's market share of 4.1 percent ranked eighth out of 111 lenders (top 8 percent). The top three lenders were American Express National Bank with 20.2 percent market

share, JPMorgan Chase Bank, N.A. with 13.2 percent market share, and Capital One, N.A. with 9.7 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. In the Manchester MSA AA, examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses. In the NH Non-MSA AA, there were no low-income geographies, so conclusions were based solely on performance in moderate-income geographies.

Manchester MSA

Home Mortgage Loans

Refer to Table O in the state of New Hampshire section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased in low-income geographies equaled, and in moderate-income geographies exceeded, the percentages of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was below, and in moderate-income geographies equaled, the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of New Hampshire section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies was below, and in moderate-income geographies was near-to, the percentages of businesses located in those geographies. The percentage of small loans to businesses originated or purchased in low-income geographies was near-to, and in moderate-income geographies equaled, the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Manchester MSA.

NH Non-MSA***Home Mortgage Loans***

Refer to Table O in the state of New Hampshire section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased in moderate-income geographies was near-to both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker performance against both the demographics and aggregate comparator.

Small Loans to Businesses

Refer to Table Q in the state of New Hampshire section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in moderate-income geographies was near-to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was stronger than the 2022-2023 analysis period due to stronger performance against both the demographics and aggregate comparator.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the NH Non-MSA AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Manchester MSA***Home Mortgage Loans***

Refer to Table P in the state of New Hampshire section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentage of those families in the AA. The percentage of home mortgage loans originated or purchased to low-income borrowers exceeded, and to moderate-income borrowers equaled, the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of New Hampshire section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

NH Non-MSA

Home Mortgage Loans

Refer to Table P in the state of New Hampshire section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentages of those families in the AA. The percentages of home mortgage loans originated or purchased to both low-income and moderate-income borrowers exceeded the aggregate percentages of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker performance against the demographics and aggregate comparator for moderate-income borrowers.

Small Loans to Businesses

Refer to Table R in the state of New Hampshire section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Community Development Lending

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Manchester MSA

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test in the Manchester MSA.

TDBNA made 37 CD loans totaling \$47.6 million, which represented 10.3 percent of allocated tier 1 capital. Included in this total were 24 PPP loans totaling \$4 million that supported area businesses during the COVID-19 pandemic. CD loans were impactful as they were responsive to identified community needs including affordable housing and community services. By dollar volume, 57.6 percent of CD loans funded affordable housing, 35.2 percent funded community services, 6.2 percent funded revitalization and stabilization efforts, and 1 percent funded economic development activities.

Examples of CD loans in the AA include:

- An \$8.4 million draw on a warehouse line to an affordable housing agency to provide equity bridge financing for the construction of a 216-unit LIHTC apartment complex. The project replaced an aging 48-unit public housing project that was in disrepair. Of the 216 units, 206 are affordable to tenants earning up to 80 percent of the AMI.
- A \$4 million renewal of a working capital line of credit to an organization that provides services to developmentally disabled individuals. The organization receives the majority of its revenue from the state of New Hampshire Medicaid Program.
- A \$5 million renewal of a working capital line of credit to an affordable housing agency that provides financial and technical assistance, finances single and multifamily housing, and provides programs that promote affordable housing opportunities.

NH Non-MSA

The institution is a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion in the NH Non-MSA.

TDBNA made 41 CD loans totaling \$49.8 million, which represented 9.5 percent of allocated tier 1 capital. Included in this total were 28 PPP loans totaling \$1.8 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, occasionally in a leadership position. CD loans were impactful as they were responsive to identified community needs including affordable housing and community services. By dollar volume, 82.4 percent of CD loans funded affordable housing, 14.1 percent funded community services, 2.1 percent funded revitalization and stabilization efforts, and 1.4 percent funded economic development activities.

Examples of CD loans in the AA include:

- A \$7.5 million loan to finance the new construction of a 39-unit affordable housing development of which all units are restricted to households earning up to 60 percent of the AMI. In addition, four units are reserved as supportive housing under HUD's Section 811 program for households earning up to 30 percent of the AMI and having a household member suffering from mental illness. Other funding sources included LIHTC equity provided by TDBNA.
- A \$7.8 million draw on a warehouse line to construct an 84-unit affordable housing complex of which all units are restricted to tenants earning up to 60 percent of the AMI. Other funding sources include LIHTC equity provided by TDBNA.
- A \$1.5 million renewal of a working capital line of credit to one of the largest mental health facilities in New Hampshire. The facility provides mental health services to individuals and families, with the majority patient service fees obtained from the New Hampshire sponsored Medicaid program.

Broader Statewide Area

During the evaluation period, TDBNA originated four CD loans totaling \$122 million within the broader statewide area. These loans provided additional support for the Outstanding Lending Test rating in the state of New Hampshire.

Product Innovation and Flexibility

Manchester MSA

The bank used innovative and flexible lending practices in order to serve AA credit needs. As shown in the table below, TDBNA funded 562 loans totaling \$38.3 million under the following innovative and flexible programs during the evaluation period.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	7	1,354
FNMA HomeReady Mortgage	8	1,377
FHA Mortgage	2	396
VA Mortgage	2	1,026
PPP	543	34,169
Total	562	38,322

NH Non-MSA

The bank used innovative and flexible lending practices in order to serve AA credit needs. As shown in the table below, TDBNA funded 491 loans totaling \$35.7 million under the following innovative and flexible programs during the evaluation period.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	11	2,188
FNMA HomeReady Mortgage	17	3,155
FHA Mortgage	2	554
VA Mortgage	1	600
USDA- Rural Development Mortgage	1	273
PPP	459	28,890
Total	491	35,660

INVESTMENT TEST

The institution's performance under the Investment Test in New Hampshire is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Manchester MSA and NH Non-MSA AAs was excellent.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Manchester MSA	7	16,621	61	54,764	68	45.6	71,385	46.5	0	0
NH Non-MSA	12	23,204	65	56,764	77	51.7	79,968	52.1	0	0
Statewide NH	1	500	3	1,573	4	2.7	2,073	1.4	0	0
Total	20	40,325	129	113,101	149	100.0	153,426	100.0	0	0

* Prior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Manchester MSA

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made 19 investments totaling \$53.9 million and provided 42 qualified grants and donations totaling \$862,400. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 15.5 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs, creating 278 affordable housing units. By dollar volume, 99.4 percent of current period investments and donations funded affordable housing, 0.5 percent funded community services, and 0.1 percent funded revitalization and stabilization efforts.

The institution made extensive use of innovative and/or complex qualified investments. CD investments included three direct LIHTC investments totaling \$46.9 million.

Examples of qualified investments in the AA include:

- A \$29.4 million complex LIHTC investment for the new construction of a 142-unit affordable housing complex located on two different sites in Manchester. All of the units will be income restricted at or below 60 percent AMI. Thirty units (restricted at 50 percent AMI) will target formerly homeless veterans and will benefit from project-based Veteran Affairs (VA) Support Housing assistance. Additionally, another six units (restricted at 30 percent AMI) will benefit from project-based rental vouchers.
- A \$250,000 grant to a nonprofit organization that provides affordable housing and wraparound services to LMI individuals. Funding supported the organization's efforts to ensure tenant financial stability during the pandemic, by providing rental assistance to individuals that lost their jobs and were having difficulty paying their rents.
- Two grants totaling \$35,000 to an area charity for its food bank program that provides low-income households with nutritious meals via food pantries, soup kitchens, and programs for children and seniors.

NH Non-MSA

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made 43 investments totaling \$56.3 million and provided 22 qualified grants and donations totaling \$450,100. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 15.3 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs, creating 219 affordable housing units. By dollar volume, 95.7 percent of current period investments and donations funded affordable housing, 4 percent funded revitalization and stabilization efforts, and less than 1 percent funded community services to LMI individuals and economic development activities.

The institution made extensive use of innovative and/or complex qualified investments. CD investments included three direct LIHTC investments totaling \$32.6 million.

Examples of qualified investments in the AA include:

- A \$12.7 million complex LIHTC investment for the new construction of a 96-unit affordable housing complex whereby all units will be income restricted at or below 60 percent of the AMI. Five units (restricted at 30 percent AMI) will be designated for permanent supportive housing for individuals transitioning from homelessness and will be subsidized with a project-based Section 8 HAP contract.
- A \$2.3 million NMTC equity investment to construct a 48-bed emergency homeless shelter which centralized and increased the organization's capacity to provide shelter and supportive services.
- Three grants totaling \$30,000 to support a program through a local hospital that provides dental care to children, adults and seniors that are low-income, uninsured, and receiving Medicaid.

Broader Statewide Area

During the evaluation period, TDBNA had four investments totaling \$2.1 million in the broader statewide area. The bank made three current period investments totaling \$1.6 million including an innovative EQ2 investment totaling \$500,000 made as part of the TD Equity Fund which supports minority-owned businesses and two IOLTA investments totaling \$1.1 million. In addition, one loan fund investment with a book value of \$500,000 remained outstanding. These investments provided additional support for the Outstanding Investment Test rating in the state of New Hampshire.

SERVICE TEST

The institution's performance under the Service Test in New Hampshire is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Manchester MSA AA was good and, in the NH Non-MSA AA was excellent.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Manchester MSA	46.8	19	55.9	10.5	21.1	42.1	26.3	7.1	20.1	41.0	31.8
NH Non-MSA	53.2	15	44.1	0.0	20.0	46.7	33.3	0.0	16.6	63.5	19.9

Manchester MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.

The bank's distribution of branches in both low-income and moderate-income geographies exceeded the percentage of the population living within those geographies.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 22 deposit-taking ATMs in the AA, including three in low-income geographies and five in moderate-income geographies. The distribution of ATMs in both low-income and moderate-income geographies was excellent. TDBNA provided data indicating that 81.6 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 83.6 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 69.2 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 64.4 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

NH Non-MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.

The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. There were no low-income geographies in the AA.

TDBNA offered ADS including ATMs, and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 28 ATMs in the AA, of which 24 were deposit-taking, including four in moderate-income geographies. The distribution of ATMs in moderate-income geographies was good. TDBNA provided data indicating that 83.4 percent of customers in moderate-income areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 83.2 percent of customers in MUI areas. Further, bank customers in moderate-income areas of the AA conducted 62.6 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 64.1 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Manchester MSA	0	1	0	0	0	-1
NH Non-MSA	0	3	0	-2	0	-1

Manchester MSA

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed one branch in an upper-income geography.

Services, including where appropriate, business hours, are tailored to meet the convenience and needs of the various portions of its AA, including low- and moderate-income geographies and/or individuals.

TDBNA generally maintained standard weekday business hours at its branch locations in the AA including extended hours on Thursdays at 15 branches and Fridays at all branches. All 19 branches were open on Saturdays, and 12 were open on Sundays including both low-income branches and three of four moderate-income branches. Of the 19 branches in the AA, all had drive-thru facilities. TDBNA offered traditional banking products and services at all branch locations in the AA.

NH Non-MSA

The institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed three branches, including two in moderate-income geographies. The moderate-income branch closures were attributed to low customer transactions and lower than expected production volume, along with a low number of households associated with the branches. Despite the closures the bank maintained an excellent branch distribution.

Services, including where appropriate, business hours, are tailored to meet the convenience and needs of the various portions of its AA, including low- and moderate-income geographies and/or individuals. TDBNA maintained generally standard weekday business hours at its branch locations in the AA including extended hours on Thursdays at 12 branches (including all three moderate-income branches) and Fridays at all branches. All 15 branches were open on Saturdays, and 10 were open on Sundays including the three moderate-income branches. Of the 15 branches in the AA, all had drive-thru facilities. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

Manchester MSA

TDBNA provided a limited level of CD services. During the evaluation period, the institution provided 28 financial education events to 122 participants in the Manchester MSA. Additionally, four bank employees provided 104 hours of service activity to three organizations through board or committee participation or professional skills assistance. The bank's assistance was responsive to identified needs in the AA for homeowner education and community services for LMI populations.

Examples of CD services in the AA include:

- A bank manager served 50 hours on a committee with a nonprofit organization, charged with developing scholarship plans for LMI members and fundraising activities.
- A bank employee provided 49 total hours of professional skills assistance over the course of the evaluation period to a nonprofit organization that works to improve the quality of lives of those in the community.
- A branch manager led four general financial education events attended by 45 individuals at a nonprofit organization that works with people with disabilities and disadvantaged youth.

NH Non-MSA

TDBNA provided a good level of CD services. During the evaluation period, the institution provided 24 financial education events to 377 participants in the NH Non-MSA. Additionally, nine employees provided 238 hours of service activity to 11 organizations through board or committee participation or professional skills assistance. The bank's assistance was responsive to an identified need in the AA for community services for LMI populations.

Examples of CD services in the AA include:

- A bank employee served on the board of an area economic development agency providing 50 hours of service over the evaluation period.
- A bank employee served on a board committee for a CDFI that finances housing cooperatives and provides small business and childcare provider loans. The employee provided 11 hours of service over the evaluation period.
- Two bank employees provided general financial education regarding breaking the paycheck-to-paycheck cycle and common fraud schemes to 40 individuals over the course of four events at a local library.

State of New Jersey

CRA rating for the State of New Jersey¹³: Outstanding

The Lending Test is rated: Outstanding,

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include

- excellent lending activity, with overall excellent geographic and borrower distribution of lending;
- an excellent level of CD lending in the Atlantic City MSA which further supported the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- readily accessible retail service delivery systems with consideration for MUI adjacent branches; and
- an overall adequate level of CD services.

Description of Institution's Operations in New Jersey

The state of New Jersey consists of four AAs including the Atlantic City-Hammonton, NJ MSA (Atlantic City MSA), the Ocean City, NJ MSA (Ocean City MSA), the Trenton-Princeton, NJ MSA (Trenton MSA), and the Vineland-Bridgeton, NJ MSA (Vineland MSA). Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had 23 branch locations and 50 ATMs, of which 42 were deposit-taking, within these AAs. During the evaluation period, the bank made \$1 billion or 1.9 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of New Jersey represented TDBNAs 12th largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$5.1 billion in deposits in these AAs, which represented 2.2 percent of the bank's total adjusted deposits. The bank ranked second in deposit market share with 13.4 percent out of 36 depository institutions. The top competitor in the market was Bank of America N.A. with 25 branches and 19.5 percent market share. Wells Fargo Bank, N.A. ranked third in market share with 19 branches and 11.9 percent market share.

Atlantic City MSA

The following tables provides a summary of the demographics, including housing and business information for the Atlantic City MSA AA.

¹³ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Atlantic City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	74	9.5	18.9	43.2	25.7	2.7
Population by Geography	274,534	7.7	17.9	48.9	24.7	0.7
Housing Units by Geography	128,472	8.3	16.4	47.4	26.9	1.0
Owner-Occupied Units by Geography	67,657	2.8	12.0	54.1	30.9	0.1
Occupied Rental Units by Geography	33,446	19.7	27.7	37.4	12.3	3.0
Vacant Units by Geography	27,369	7.9	13.5	43.0	35.0	0.6
Businesses by Geography	34,409	7.9	16.4	47.2	28.1	0.3
Farms by Geography	945	2.1	13.0	61.6	23.2	0.1
Family Distribution by Income Level	66,993	22.6	16.9	18.6	41.8	0.0
Household Distribution by Income Level	101,103	25.7	16.1	15.5	42.7	0.0
Median Family Income MSA - 12100 Atlantic City-Hammonton, NJ MSA		\$78,974	Median Housing Value			\$228,961
			Families Below Poverty Level			10.1%
			Median Gross Rent			\$1,100
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Atlantic City MSA AA consists of the one county (Atlantic) that comprises the MSA. As of year-end 2023, TDBNA operated eight branches and 20 ATMs, 17 of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$1.9 billion in deposits in the AA which comprised 0.8 percent of total bank adjusted deposits and 37.6 percent of the rated area deposits. The AA is served by 12 FDIC-insured financial institutions operating 46 branches. TDBNA had 26.9 percent deposit market share which ranked first among all institutions. The top competitors were OceanFirst Bank N.A. with six branches and 22.1 percent market share, and Bank of America N.A. with seven branches and 18.7 percent market share.

Based on information from the September 2023 Moody's Analytics report, Atlantic City's economy is gaining momentum having just passed its pre-pandemic employment peak. Health services are driving recent gains, while the outsize leisure and hospitality industry has not shown meaningful progress. The area labor force shrunk over the summer and the unemployment rate is increasing, moving higher above the state and national rates. The primary economic driver in Atlantic City is tourism with the Jersey Shore and casinos, attracting visitors to the area. While the number of visitors was up the past two summers, in 2023 Atlantic City saw a return to more normal visitor numbers as consumers face higher prices and less spending power. Atlantic City is the gambling hub of the East Coast and while casino revenues are up from a year ago, the industry landscape is changing as online and sports gambling become more popular and detract from in-person gambling. Further, Atlantic City faces regional competition as the East Coast is saturated with casinos. The metro has the highest share of people in leisure/hospitality employment than any other large metro with over 100,000 residents. Most service jobs are seasonal and low-wage, and the area has few high paying service jobs. Other weaknesses include negative net migration and falling population, with many prime-age workers leaving the area.

due to a lack of job opportunities outside of the low-wage leisure/hospitality industry. The area has a large share of retirees which increase demand for health services; however, a shortage of qualified health workers has slowed hiring in this high wage field, which in turn spills over into consumer spending. Major employment sectors include leisure and hospitality services, and education and health services. Major employers in the MSA include the Federal Aviation Administration, Shore Medical Center, Borgata Hotel Casino & Spa, Hotel at Bally's Atlantic City, Hard Rock Hotel & Casino and several other hotels and resorts.

According to the U.S. BLS, the unemployment rate in the Atlantic City MSA was 12.5 percent as of January 2021, compared to 6.3 percent in December 2023. The MSA unemployment rate was higher than both the statewide rate of 4.5 percent and the national unemployment rate of 3.7 percent as of December 2023.

Based on information in the above table, low-income families earned less than \$39,487 and moderate-income families earned less than \$63,179. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$987 for low-income borrowers and \$1,579 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,229. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 50.8 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Atlantic City MSA. This acceleration in home prices worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC contacted a community development organization in April 2024. The contact indicated that the following are needs and opportunities within the bank's AA:

- Affordable housing units, including rental housing,
- Flexible mortgage loan programs,
- First time homeowner programs including down payment assistance.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing (owner and rental) for LMI communities,
- Rehabilitation of affordable housing stock,
- Financial education for individuals and small business owners,
- Revitalization and stabilization of LMI geographies,
- Support for small businesses.

Ocean City MSA

The following tables provides a summary of the demographics, including housing and business information for the Ocean City MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Ocean City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	3.0	6.1	45.5	42.4	3.0
Population by Geography	95,263	3.7	5.9	53.0	37.4	0.0
Housing Units by Geography	99,394	5.4	4.0	44.8	45.7	0.0
Owner-Occupied Units by Geography	31,723	2.2	5.6	52.5	39.7	0.0
Occupied Rental Units by Geography	8,947	8.9	7.9	56.5	26.6	0.0
Vacant Units by Geography	58,724	6.7	2.5	38.9	51.8	0.0
Businesses by Geography	15,591	5.8	2.9	45.4	45.9	0.0
Farms by Geography	455	1.8	4.4	53.6	40.2	0.0
Family Distribution by Income Level	27,085	19.7	18.1	21.7	40.5	0.0
Household Distribution by Income Level	40,670	24.7	15.8	18.2	41.3	0.0
Median Family Income MSA - 36140 Ocean City, NJ MSA		\$87,716	Median Housing Value			\$486,874
			Median Gross Rent			\$1,178
			Families Below Poverty Level			7.5%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Ocean City MSA AA consists of the one county (Cape May) that comprises the MSA. As of year-end 2023, TDBNA operated four branches and eight ATMs, five of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$842.7 million in deposits in the AA which comprised 0.4 percent of total bank adjusted deposits and 16.7 percent of the rated area deposits. The AA is served by 11 FDIC-insured financial institutions operating 42 branches. TDBNA had 20.6 percent deposit market share which ranked second among all institutions. The top competitor was Sturdy Savings Bank with 13 branches and 24 percent market share. OceanFirst Bank, N.A. ranked third in deposit market share with three branches and 15.4 percent market share.

Based on information from the September 2023 Moody's Analytics report, the area economy has stalled since midyear. However, despite some recent job losses, Ocean City still appears to be one of the strongest performers in the Northeast in terms of year-over-year payroll growth. The area unemployment rate while on the rise, is largely attributed to an expanding labor force. Ocean City's economic drivers include tourism and defense. The MSA benefits from being proximate to Northeast population centers and boasts well developed coastal towns and infrastructure that are advantageous for tourism. Tourism has fully recovered from the pandemic with visitor numbers holding steady and 2023 revenues higher than a year ago. Not surprisingly, the leisure and hospitality industry, with its low-wage jobs, accounts for an outsize share of area employment. Area weaknesses include a concentration of low-paying industries, business costs, low educational attainment, and a highly seasonal labor market.

The area also has experienced a declining population, and an increase in the share of retirees. The aging population increases demand for healthcare services which powers job growth in the higher-wage healthcare industry. The area's major employment sectors include leisure and hospitality services, government, and retail trade. The largest employers include Morey Organization LLC, U.S. Coast Guard, and Cape Regional Medical Center. Regarding housing, Ocean City's housing market is significantly overvalued; however, single-family house prices have stabilized. Increasing interest rates have reduced buyer demand, leading to a slowdown in new construction by homebuilders.

According to the U.S. BLS, the unemployment rate in the Ocean City MSA was 14.2 percent as of January 2021, compared to 10 percent in December 2023. The MSA unemployment rate was considerably higher than both the statewide rate of 4.5 percent and the national unemployment rate of 3.7 percent as of December 2023.

Based on information in the above table, low-income families earned less than \$43,858 and moderate-income families earned less than \$70,173. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,096 for low-income borrowers and \$1,754 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$2,614. Most low-income and moderate-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 55.9 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Ocean City MSA. This acceleration in home prices worsened existing affordability concerns for low-income and moderate-income borrowers.

The OCC relied on information from two community contacts conducted during and after the evaluation period with an economic development agency and an affordable housing agency. Community contacts indicated that the following are needs and opportunities within the bank's AA:

- Affordable Housing units, including rental housing,
- Participation in LIHTC programs,
- Financial literacy education,
- Small business education and technical assistance,
- More creative loan or line of credit programs for small businesses who require capital investments,
- Partnering with nonprofit organizations on longer term projects,
- Revitalization of the downtown area.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing (owner and rental) for LMI communities,
- Affordable mortgage products,
- Rehabilitation of afford housing stock,
- Basic financial education.

Scope of Evaluation in New Jersey

Examiners selected the Atlantic City MSA and Ocean City MSA AAs for full-scope reviews. The Atlantic City MSA is the largest AA in the state in terms of deposits, branches, and lending activity. The Ocean City MSA AA has not received a full-scope review in recent CRA evaluations, and TDBNA has a large deposit market share in this AA. The Trenton MSA and Vineland MSA AAs received limited-scope reviews.

In arriving at overall conclusions, the Atlantic City MSA received the most weight as it accounts for the largest share of deposits in the state of New Jersey. In determining Lending Test conclusions, examiners placed more emphasis on the loan product category that had the higher percentage of lending in the AA. For the Ocean City MSA, examiners placed more emphasis on home mortgage loans. In the Atlantic City MSA, Trenton MSA and Vineland MSA AAs, examiners placed more emphasis on small loans to businesses. Small loans to farms were not meaningful for analysis purposes.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW JERSEY

LENDING TEST

The bank's performance under the Lending Test in New Jersey is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Atlantic City MSA and Ocean City MSA AAs was excellent.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Atlantic City MSA	976	1,450	5	30	2,461	39.4	37.6
Ocean City MSA	741	562	2	6	1,311	21.0	16.7
Limited-Scope:							
Trenton MSA	815	1,046	1	20	1,882	30.1	34.6
Vineland MSA	165	417	3	14	599	9.6	11.1
Statewide NJ	-	-	-	1	1	0.0	0.0
Total	2,697	3,475	11	71	6,254	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* \$(000)

Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Atlantic City MSA	255,906	37,302	378	22,933	316,518	28.6	37.6
Ocean City MSA	361,594	18,183	43	2,154	381,975	34.5	16.7
Limited-Scope:							
Trenton MSA	266,536	32,321	10	29,960	328,827	29.7	34.6
Vineland MSA	23,935	8,408	305	44,811	77,459	7.0	11.1
Statewide NJ	-	-	-	2,000	2,000	0.2	0.0
Total	907,971	96,214	736	101,858	1,106,779	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Atlantic City MSA

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked first out of 12 depository institutions with a deposit market share of 26.9 percent.

For home mortgage loans, TDBNA's market share of 4.5 percent ranked fifth out of 372 lenders (top 2 percent). The top three lenders were Greentree Mortgage Company L.P. with 5.2 percent market share, Wells Fargo Bank, N.A. with 4.9 percent market share, and Rocket Mortgage with 4.8 percent market share.

For small loans to businesses, TDBNA's market share of 5.1 percent ranked sixth out of 97 lenders (top 7 percent). The top three lenders were American Express National Bank with 23.5 percent market share, Bank of America, N.A. with 10.3 percent market share, and JPMorgan Chase Bank, N.A. with 7.9 percent market share.

Ocean City MSA

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked second out of 11 depository institutions (top 19 percent) with a deposit market share of 20.6 percent.

For home mortgage loans, TDBNA's market share of 3.6 percent ranked fifth out of 358 lenders (top 2 percent). The top three lenders were Wells Fargo Bank, N.A. with 5.6 percent market share, Citizen's Bank, N.A. with 4.8 percent market share, and Republic First Bank with 4.6 percent market share.

For small loans to businesses, TDBNA's market share of 3.4 percent ranked eighth out of 83 lenders (top 10 percent). The top three lenders were American Express National Bank with 29.9 percent market share, JPMorgan Chase Bank, N.A. with 10.7 percent market share, and Bank of America, N.A. with 7.7 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs.

Atlantic City MSA

Home Mortgage Loans

Refer to Table O in the state of New Jersey section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased in both low-income and moderate-income geographies exceeded both the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of New Jersey section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies was near-to both the percentage of businesses in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker overall distribution of small loans to businesses in moderate-income geographies.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Atlantic City MSA.

Ocean City MSA

Home Mortgage Loans

Refer to Table O in the state of New Jersey section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased in low-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and was below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was near-to the percentage of owner-occupied housing units located in those geographies and exceeded the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was stronger than the 2022-2023 analysis period due to stronger distribution of loans in moderate-income geographies compared to the demographics and stronger distribution of loans in low-income geographies compared to the aggregate performance.

Small Loans to Businesses

Refer to Table Q in the state of New Jersey section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was well below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was stronger than the 2022-2023 analysis period due to an overall stronger distribution of loans in moderate-income geographies.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Ocean City MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Atlantic City MSA

Home Mortgage Loans

Refer to Table P in the state of New Jersey section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of New Jersey section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Ocean City MSA

Home Mortgage Loans

Refer to Table P in the state of New Jersey section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers approximated the percentage of moderate-income families and exceeded the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker performance against the demographics for both low-income and moderate-income borrowers.

Small Loans to Businesses

Refer to Table R in the state of New Jersey section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Community Development Lending

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Atlantic City MSA

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test.

TDBNA made 30 CD loans totaling \$22.9 million, which represented 9.2 percent of allocated tier 1 capital. Included in this total were 18 PPP loans totaling \$4.8 million that supported area businesses during the COVID-19 pandemic. CD loans were impactful as they were responsive to identified community needs including revitalization and stabilization of LMI areas and support for small businesses. By dollar volume, 64.9 percent of CD loans funded economic development activities, 22.3 percent funded revitalization and stabilization efforts and 12.8 percent funded community services.

Examples of CD loans in the AA include:

- A renewal of a \$1 million working capital line of credit to a CDFI that provides funding towards economic and community development activities in Atlantic County.
- A \$150,000 SBA 7a line of credit for a newly constructed childcare center offering a Head Start program targeting low-income families. The line will be used for operating costs.
- Four credit facilities totaling \$2.5 million, including three renewals of a working line of credit and one mortgage refinance, to a nonprofit organization that offers support services to people with intellectual and developmental disabilities.

Ocean City MSA

The institution made an adequate level of CD loans. CD lending had a neutral impact on the Lending Test conclusion in the Ocean City MSA.

TDBNA made six CD loans totaling \$2.2 million which represented 2 percent of allocated tier 1 capital. Included in this total were four PPP loans totaling \$504,460 that supported area businesses during the COVID-19 pandemic and two SBA 504 construction loans to expand an owner-occupied property. By dollar volume, 100 percent of CD loans funded economic development activities.

Broader Statewide Area

During the evaluation period, TDBNA originated one CD loan totaling \$2 million within the broader statewide area. This loan provided additional support for the Outstanding Lending Test rating in the state of New Jersey.

Product Innovation and Flexibility

Atlantic City MSA

The bank used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, TDBNA funded 437 loans totaling \$30.1 million under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	9	1,218
FHA Mortgage	2	550
VA Mortgage	1	70
PPP	425	28,291
Total	437	30,129

Ocean City MSA

The bank used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, TDBNA funded 193 loans totaling \$12.6 million under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	4	546
VA Mortgage	1	140
PPP	188	11,952
Total	193	12,638

Conclusions for Areas Receiving a Limited-Scope Review

Based on limited-scope reviews, the bank's performance under the Lending Test in the Trenton MSA and Vineland MSA AAs was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through T in the state of New Jersey section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in New Jersey is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Atlantic City MSA and Ocean City MSA AAs was excellent.

Number and Amount of Qualified Investments

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments* **	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Atlantic City MSA	5	23,141	24	19,667	29	29.3	42,808	26.4	0	0
Ocean City MSA	2	7,283	17	4,863	19	19.2	12,146	7.5	0	0
Limited-Scope:										
Trenton MSA	3	26,427	27	24,472	30	30.3	50,899	31.4	0	0
Vineland MSA	2	13,959	13	23,781	15	15.2	37,740	23.2	0	0
Statewide NJ	4	3,341	2	15,326	6	6.1	18,667	11.5	1	120
Total	16	74,151	83	88,109	99	100.0	162,260	100.0	1	120

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Atlantic City MSA

The institution had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made 10 investments totaling \$19.2 million and provided 14 qualified grants and donations totaling \$485,000. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 17.2 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing, creating 126 affordable units. By dollar volume, 99 percent of current period investments and donations funded affordable housing and 1 percent funded community services to LMI individuals.

The institution made significant use of innovative and/or complex qualified investments. CD investments included one direct LIHTC investment totaling \$15.9 million.

Examples of qualified investments in the AA include:

- A \$15.9 million complex LIHTC investment for the rehabilitation of an existing 126-unit affordable housing complex. All units will be income restricted at or below 80 percent AMI. Additionally, 95 of the units will benefit from HUD RAD contracts and the remaining 31 units will benefit from project-based Section 8 rental assistance.

- Three grants totaling \$290,000 to support a nonprofit organization that provides affordable housing and support services to assist LMI individuals and families with economic stability. The funding specifically supported programs addressing homelessness, housing instability, eviction prevention, and assisting formerly incarcerated individuals.
- A \$25,000 grant to a nonprofit organization to support a program that provides low-cost or free prenatal and postnatal services in addition to medical services and education, and access to free equipment and accessories such as car seats and cribs to LMI individuals and families.

Ocean City MSA

The institution had an excellent level of qualified CD investment and grants, though rarely in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made 17 MBS investments totaling \$4.9 million. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 11 percent of tier 1 capital allocated to the AA.

The institution exhibited adequate responsiveness to credit and community economic development needs. By dollar volume, 100 percent of current period investments funded affordable housing activities.

The institution did not use innovative or complex investments in the current period.

Broader Statewide Area

During the evaluation period, TDBNA made two current period investments totaling \$15.3 million in the broader statewide area. Current period investments included an innovative EQ2 investment totaling \$2 million made as part of the TD Equity Fund which supports minority-owned businesses and \$13.3 million invested in IOLTA programs. In addition, TDBNA had four prior period investments outstanding with a book value of \$3.3 million. These investments provided additional support to the Outstanding Investment Test rating in the state of New Jersey.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Trenton MSA and Vineland MSA AAs was consistent with the bank's overall performance in the full-scope areas.

SERVICE TEST

The bank's performance under the Service Test in New Jersey is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Atlantic City MSA AA was excellent, and in the Ocean City MSA AA was adequate.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population**			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Atlantic City MSA	37.6	8	34.8	12.5	12.5	62.5	12.5	7.7	17.9	48.9	24.7
Ocean City MSA	16.7	4	17.4	0.0	0.0	50.0	50.0	3.7	5.9	53.0	37.4
Limited-Scope:											
Trenton MSA	34.6	8	34.8	12.5	25.0	37.5	25.0	13.4	23.5	29.9	32.8
Vineland MSA	11.1	3	13.0	0.0	33.3	0.0	66.7	11.6	14.6	38.4	30.3

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

**0.7% of the population in the Atlantic City MSA, 0.4% of the population in the Trenton MSA, and 5.2% percent of the population in the Vineland MSA reside within an "N/A" income category.

Atlantic City MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA.

The bank's distribution of branches in low-income geographies exceeded and in moderate-income geographies was near-to the percentage of the population living within those geographies. Examiners further considered one middle-income adjacent branch that served a moderate-income area within the AA as demonstrated by branch transactions and deposit account opening activity. This adjacent branch improved accessibility and had a positive impact on the retail service delivery systems conclusion.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 20 ATMs in the AA, of which 17 were deposit-taking, including three each in low- and moderate-income geographies. The distribution of ATMs in low-income geographies was excellent and in moderate-income geographies was good. TDBNA provided data indicating that 80.8 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 84.3 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 51.3 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 61.7 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Ocean City MSA

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.

The bank had no branches in low- or moderate-income geographies. However, examiners considered the low volume of branches in the AA. Further, there is one middle-income adjacent branch that served a low-income geography within the AA as demonstrated by branch transactions and deposit account

opening activity that improved accessibility and had a positive impact on the retail service delivery systems conclusion.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had eight ATMs in the AA, of which five were deposit-taking. The bank had no ATMs in low- or moderate-income geographies. TDBNA provided data indicating that 84.7 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 84.4 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 54.5 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 60.2 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Atlantic City MSA	0	0	0	0	0	0
Ocean City MSA	0	0	0	0	0	0
Limited Scope:						
Trenton MSA	0	1	0	0	0	-1
Vineland MSA	0	0	0	0	0	0

Atlantic City MSA

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, are tailored to meet the convenience and needs of the various portions of its AA, including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations including extended hours on Thursdays and Fridays. All eight AA branches were open on Saturdays and seven, including the one low-income branch and one moderate-income branch, were open on Sundays. Of the eight branches in the AA, all had drive-thru through facilities. TDBNA offered traditional banking products and services at all branch locations in the AA.

Ocean City MSA

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of the AA, including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours including extended hours on Thursdays and Fridays at all AA branches. All branches were open on Saturdays and two of four branches were open on Sundays. Of the four branches in the AA, all had drive-thru facilities. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

Atlantic City MSA

TDBNA provided an adequate level of CD services. During the evaluation period, the bank provided 12 financial education events to 227 participants in the Atlantic City MSA. Additionally, four bank employees provided 64 service hours over the evaluation period that benefited four organizations through board/committee participation. The bank's assistance was responsive to an identified need in the AA for financial education.

Examples of CD services in the AA include:

- A bank employee led a small business financial education class to 50 participants that covered developing a business plan.
- A mortgage loan officer led a homebuying workshop in conjunction with an area social service provider that was attended by 22 participants.
- A bank employee served on the board of a CDFI that facilitates neighborhood revitalization efforts in the area. The employee provided 40 service hours over the evaluation period.

Ocean City MSA

TDBNA provided a limited level of CD services. During the evaluation period, the bank provided four financial education events to 24 participants in the Ocean City MSA. Bank employees did not provide any board/committee participation or professional skills assistance over the evaluation period. The bank's assistance was responsive to an identified need in the AA for financial education.

Ann example of CD services in the AA include:

- A mortgage loan officer led three homebuying workshops in conjunction with an affordable housing nonprofit and a social service provider that were attended by 22 participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Trenton MSA and Vineland MSA AAs was consistent with the bank's overall performance in the full-scope areas.

State of New York

CRA rating for the State of New York¹⁴: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include

- good lending activity, with overall good geographic distribution of lending and excellent borrower distribution of lending;
- an excellent level of CD lending in the Poughkeepsie MSA which had a positive impact on the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- readily accessible retail service delivery systems; and
- a limited level of CD services.

Description of Institution's Operations in New York

The state of New York consists of five AAs including portions of the Albany-Schenectady-Troy, NY MSA (Albany MSA), the Glens Falls, NY MSA (Glen Falls MSA), portions of the Kingston, NY MSA (Kingston MSA), the Poughkeepsie-Newburgh-Middletown, NY (Poughkeepsie MSA), and three nonmetropolitan counties along with a portion of another nonmetropolitan county that comprised the New York Non-MSA (NY Non-MSA) AA. Refer to appendix A for a complete list of counties and towns reviewed.

As of year-end 2023, TDBNA had 31 branch locations and 42 ATMs, of which 40 were deposit-taking, within these AAs. During the evaluation period, the bank made \$479.3 million or 0.9 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of New York represented TDBNAs 11th largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$5.1 billion in deposits in these AAs, which represented 2.2 percent of the bank's total adjusted deposits. The bank ranked fourth in deposit market share with 7.2 percent out of 45 depository institutions. The top three competitors had 41.4 percent of the market share and consisted of Citizens Bank N.A. with 25 branches and 19.3 percent market share, KeyBank N.A. with 65 branches and 14.8 percent market share, and Bank of America N.A. with 23 branches and 7.3 percent market share.

Glens Falls MSA

The following tables provides a summary of the demographics, including housing and business information for the Glens Falls AA.

¹⁴ The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Glens Falls MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	44	2.3	9.1	72.7	15.9	0.0
Population by Geography	127,039	1.5	7.1	74.5	16.9	0.0
Housing Units by Geography	69,681	1.3	9.0	72.1	17.6	0.0
Owner-Occupied Units by Geography	38,010	0.7	8.1	71.3	19.8	0.0
Occupied Rental Units by Geography	15,078	4.1	6.8	80.0	9.1	0.0
Vacant Units by Geography	16,593	0.2	12.9	66.9	20.0	0.0
Businesses by Geography	12,956	3.3	9.6	70.3	16.9	0.0
Farms by Geography	744	0.8	7.1	83.3	8.7	0.0
Family Distribution by Income Level	32,605	19.2	19.1	20.8	40.8	0.0
Household Distribution by Income Level	53,088	23.1	16.3	19.5	41.1	0.0
Median Family Income MSA - 24020 Glens Falls, NY MSA		\$77,435	Median Housing Value			\$190,632
			Families Below Poverty Level			5.9%
			Median Gross Rent			\$903
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Glen Falls MSA AA consists of the two counties (Warren and Washington) that comprise the MSA. As of year-end 2023, TDBNA operated seven branches and nine ATMs, all of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$809 million in deposits in the AA which comprised 0.3 percent of total adjusted bank deposits and 16 percent of the rated area deposits. The AA is served by 10 FDIC-insured financial institutions operating 42 branches. TDBNA had 21.6 percent deposit market share which ranked second among all institutions. The top competitor was Glen Falls National Bank and Trust Company with 17 branches and 57.3 percent market share. Trustco Bank ranked third in market share with six branches and 4.9 percent market share.

Based on information from the September 2023 Moody's Analytics report, Glens Falls' economy has struggled this year, and is still far off from a full recovery. Nonfarm payrolls have seen minimal growth, lagging behind both the state of New York and the U.S. economy. Key industries such as leisure/hospitality and manufacturing are declining, while healthcare and the public sector have partially offset some of the losses. The unemployment rate has remained stable while the labor force has weakened. Hourly earnings have remained stagnant in the Glens Falls MSA while elsewhere in the state and country they are steadily growing, thus widening the income gap. Single-family home prices are rising faster than the national average, mainly due to low inventories and sluggish construction activity. Economic drivers in Glens Falls include manufacturing, tourism, and retirees. Glens Falls benefits from its proximity to attractions like the Adirondacks and Lake George. As such the area is heavily dependent on consumer spending and the leisure/hospitality industry which makes up an above average share of area employment. As such Glen Falls is reliant on low-paying consumer industries. The area also faces persistent out-migration, an inability to retain educated workers, and below-average educational attainment. Another perceived weakness is the area's exposure to secularly declining paper

manufacturing. On a positive note, the healthcare industry has performed well and is a source of stability to the area economy. Given the large and growing retiree population in Glen Falls, there is a steady demand for healthcare services. Several area hospitals have recently expanded, adding high paying healthcare jobs which provide spillover benefit to the broader economy. The largest employment sectors in Glens Falls include government, leisure and hospitality services, and education and health services. Major employers in the area include Glens Falls Hospital, BD Becton Dickinson, Finch Paper LLC, Hudson Headwaters Health Network, and Angle Dynamics/Navilyst Medical.

According to the U.S. BLS, the unemployment rate in the Glen Falls MSA was 6.6 percent as of January 2021, compared to 4.4 percent in December 2023. The MSA unemployment rate mirrored the statewide rate (4.4 percent) as of December 2023, but was higher than the national unemployment rate of 3.7 percent.

Based on information in the above table, low-income families earned less than \$38,718 and moderate-income families earned less than \$61,948. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$968 for low-income borrowers and \$1,549 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,023. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 39.6 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Glens Falls MSA. This acceleration in home prices worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC relied on information contained within a Community Needs Assessments for Warren and Washington Counties for 2022. Based on these assessments, the following are needs and opportunities within the bank's AA:

- Affordable Housing units, including rental housing,
- Homeowner education and counseling including foreclosure prevention,
- Financing or other funding for home repairs and weatherization,
- Expanded public transportation, including bus routes and rail,
- Training and workforce development,
- Access to quality and affordable childcare,
- Financial literacy education.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing (ownership/rental) for LMI communities,
- Small business economic development,
- Community services for LMI populations,
- Financial literacy education.

Poughkeepsie MSA

The following tables provides a summary of the demographics, including housing and business information for the Poughkeepsie MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Poughkeepsie MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	174	8.6	13.2	55.7	20.7	1.7
Population by Geography	697,221	8.9	13.7	55.6	21.3	0.5
Housing Units by Geography	265,425	7.4	14.3	57.6	20.7	0.0
Owner-Occupied Units by Geography	163,533	2.9	10.1	60.6	26.5	0.0
Occupied Rental Units by Geography	76,990	16.5	22.3	51.5	9.7	0.0
Vacant Units by Geography	24,902	9.2	17.0	56.7	17.1	0.1
Businesses by Geography	89,312	11.5	12.7	53.5	22.2	0.0
Farms by Geography	2,963	2.4	10.2	60.5	26.9	0.0
Family Distribution by Income Level	163,814	21.4	17.4	21.5	39.7	0.0
Household Distribution by Income Level	240,523	25.4	15.2	17.6	41.9	0.0
Median Family Income MSA - 39100 Poughkeepsie-Newburgh-Middletown, NY MSA		\$100,123	Median Housing Value			\$279,344
			Median Gross Rent			\$1,294
			Families Below Poverty Level			6.9%
Source: 2020 ACS Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Poughkeepsie MSA AA consists of the two counties (Dutchess and Orange) that comprise the MSA. As of year-end 2023, TDBNA operated 10 branches and 16 ATMs, all of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$2.2 billion in deposits in the AA which comprised 0.7 percent of total bank deposits and 43.5 percent of the rated area deposits. The AA is served by 27 FDIC-insured financial institutions operating 163 branches. TDBNA had 11.8 percent deposit market share which ranked second among all institutions. The top competitor was JPMorgan Chase Bank N.A. with 22 branches and 19.8 percent market share. Citizens Bank N.A. ranked third in market share with seven branches and 11.3 percent market share.

Based on information from the September 2023 Moody's Analytics report, the area economy is not faring well, and weakness is broad-based across industries. Area payrolls are still more than 5 percent below pre-pandemic levels and while the unemployment rate is below its pre-pandemic level, it is the result of a reduction in the labor supply versus real job growth. The housing market is one bright spot for the economy with housing prices accelerating at a faster rate than the state and national averages. The area benefits from being a bedroom community to New York City and its relatively low living costs which attract commuters. Historically, nearly a third of workers in the area have commuted to the city for work, but with the shift to remote work in recent years, the area's lower cost of living and high

quality of life have attracted more prime working age residents. Economic drivers include manufacturing, healthcare, and the area's many colleges and universities. The university presence which includes Vassar, Bard and Marist Colleges helps provide the area with a highly educated workforce. Healthcare employs more than a fourth of all area workers, which is the second largest concentration in the state. Healthcare demand is solid with the community being older on average than other metros; however, a shortage of available workers has hampered job growth. Manufacturing is another key industry. The area's factory sector is dominated by computer semiconductor manufacturing due to the presence of IBM and ON Semiconductor, a large semiconductor supplier. The industry provides high-paying jobs to the area, but it is also a volatile and competitive industry which is a potential weakness to the economy. The area's top employers include Nuvance Health, IBM, Vassar Brothers Medical Center, Bard College, MidHudson Regional Hospital, and The Culinary Institute of America.

According to the U.S. BLS, the unemployment rate in Dutchess County was 5.9 percent as of January 2021, and in Orange County was 6.3 percent. This compared to 3.6 percent and 3.8 percent respectively in December 2023. The unemployment rates in both counties that comprise the MSA were lower than the statewide rate of 4.4 percent as of December 2023 and were comparable to the national unemployment rate of 3.7 percent.

Based on information in the above table, low-income families earned less than \$50,062 and moderate-income families earned less than \$80,098. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,252 for low-income borrowers and \$2,002 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,500. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 37.9 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Poughkeepsie MSA. This acceleration in home prices worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC relied on information from a community contact conducted during the evaluation period with an economic development center. The community contact indicated that the following are needs and opportunities within the bank's AA:

- Small businesses loans particularly lending to start-up businesses,
- Training and technical assistance to small businesses,
- Partnering with CDFIs for lending and investment opportunities.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing for LMI populations,
- Small business economic development,
- Revitalization/stabilization of LMI areas,

- Community Services targeted to LMI populations.

Scope of Evaluation in New York

Examiners selected two AAs for full-scope reviews. Examiners completed a full-scope review for the Poughkeepsie MSA as it is the largest AA in the state in terms of deposits, branches, and lending activity. Examiners also selected the Glens Falls MSA AA for a full-scope review as it has not received a full-scope review in recent CRA evaluations. The Albany MSA, Kingston MSA, and the NY Non-MSA AAs received limited scope reviews.

In arriving at overall conclusions, the Poughkeepsie MSA received the most weight as it accounts for the largest share of deposits in the state of New York. In determining Lending Test conclusions, examiners placed more emphasis on the loan product category that had the higher percentage of lending in the AA. In the Albany MSA, Glens Falls MSA, Poughkeepsie MSA, and NY Non-MSA AAs examiners placed more emphasis on small loans to businesses. For the Kingston MSA AA, examiners placed more emphasis on home mortgage loans. Small loans to farms had negligible impact on the conclusions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

The bank's performance under the Lending Test in New York is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Glens Falls MSA AA was good, and in the Poughkeepsie MSA AA was excellent.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Glens Falls MSA	249	324	12	5	590	13.9	16.0
Poughkeepsie MSA	782	1,149	3	21	1,955	45.9	43.5
Limited-Scope:							
Albany MSA	293	452	2	12	759	17.8	24.3
Kingston MSA	62	52	0	2	116	2.7	1.7
NY Non-MSA	339	473	9	15	836	19.6	14.6
Statewide NY	-	-	-	2	2	0.0	0.0
Total	1,725	2,450	26	57	4,258	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* \$(000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Glens Falls MSA	38,156	10,560	465	1,094	50,275	8.7	16.0
Poughkeepsie MSA	202,152	47,729	47	44,369	294,297	50.7	43.5
Limited-Scope:							
Albany MSA	67,555	17,047	71	2,656	87,330	15.1	24.3
Kingston MSA	19,721	2,007	0	2,316	24,044	4.1	1.7
NY Non-MSA	61,554	12,006	196	49,138	122,894	21.2	14.6
Statewide NY	-	-	-	1,290	1,290	0.2	0.0
Total	389,138	89,349	779	100,863	580,130	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Glens Falls MSA

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked second out of 10 depository institutions (top 20 percent) with a deposit market share of 21.6 percent.

For home mortgage loans, TDBNA's market share of 2.6 percent ranked ninth out of 171 lenders (top 6 percent). The top three lenders were Glens Falls National Bank with 12.9 percent market share, Homestead Funding Corp. with 9.3 percent market share, and Rocket Mortgage with 6.5 percent market share.

For small loans to businesses, TDBNA's market share of 3.4 percent ranked tenth out of 68 lenders (top 15 percent). The top three lenders were American Express National Bank with 20 percent market share, JPMorgan Chase Bank N.A. with 12.3 percent market share, and Synchrony Bank with 8.9 percent market share.

Poughkeepsie MSA

Lending levels reflect good responsiveness to AA credit needs.

TDBNA ranked second out of 27 depository institutions (top 8 percent) with a deposit market share of 11.8 percent.

For home mortgage loans, TDBNA's market share of 1.5 percent ranked 16th out of 324 lenders (top 5 percent). The top three lenders were Hudson Valley Credit Union with 12.4 percent market share, Rocket Mortgage with 6.7 percent market share, and United Wholesale Mortgage with 5 percent market share.

For small loans to businesses, TDBNA's market share of 1.3 percent ranked 14th out of 126 lenders (top 12 percent). The top three lenders were American Express National Bank with 29.5 percent market

share, JPMorgan Chase Bank N.A. with 19.7 percent market share, and Capital One N.A. with 6.6 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AAs. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Glens Falls MSA

Home Mortgage Loans

Refer to Table O in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good.

For the 2022-2023 analysis period, the bank did not originate or purchase home mortgage loans in low-income geographies; however, less than one percent of owner-occupied units in the AA are located in low-income geographies. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker overall distribution of loans in moderate-income geographies. There were no low-income geographies in the AA during the 2021 period.

Small Loans to Businesses

Refer to Table Q in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was adequate.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies was significantly below both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was stronger than the 2022-2023 analysis period. This was due to their being no low-income geographies in the 2021 period.

Lending Gap Analysis

The OCC analyzed TDBNA geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Glens Falls MSA.

Poughkeepsie MSA

Home Mortgage Loans

Refer to Table O in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased in both low-income and moderate-income geographies exceeded the percentages of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in low-income geographies was equal to and in moderate-income geographies exceeded the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated or purchased in moderate-income geographies was near-to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was stronger than the 2022-2023 analysis period due to better overall performance in moderate-income geographies.

Lending Gap Analysis

The OCC analyzed TDBNA geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Poughkeepsie MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Glens Falls MSA

Home Mortgage Loans

Refer to Table P in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was near-to the percentage of low-income families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less equaled the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Poughkeepsie MSA

Home Mortgage Loans

Refer to Table P in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of moderate-income families and approximated the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker performance against the demographic comparator.

Community Development Lending

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Glens Falls MSA

The institution made a low level of CD loans. CD lending had a neutral impact on the Lending Test conclusion in the Glens Falls MSA.

TDBNA made five CD loans totaling \$1.1 million, which represented 1 percent of allocated tier 1 capital. Included in this total were four PPP loans totaling \$94,000 that supported area businesses during the COVID-19 pandemic and one renewal of a working capital line of credit to an organization that provides vocational training, clinical services, and employment services for persons who are disabled, economically disadvantaged, or elderly. By dollar volume, 91.4 percent of CD loans funded community services, 6.7 percent funded economic development activities, and 1.9 percent funded revitalization and stabilization efforts.

Poughkeepsie MSA

The institution is a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion in the Poughkeepsie MSA.

TDBNA made 21 CD loans totaling \$44.4 million, which represented 15.4 percent of allocated tier 1 capital. Included in this total were 14 PPP loans totaling \$5.2 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, occasionally in a leadership position. CD loans were impactful as they were responsive to identified community needs including economic development and affordable housing. By dollar volume, 45.6 percent of CD loans funded

economic development activities, 36.5 percent of funded affordable housing, 14.5 percent funded revitalization and stabilization efforts, and 3.4 percent funded community services.

Examples of CD loans in the AA include:

- A \$16.2 million commercial mortgage to construct an 80-unit LIHTC property of which 75 units are restricted for tenants with incomes up to 80 percent of the AMI. Additionally, there are 12 adapted units for those with either mobility, hearing, or vision impairments. Other funding sources included LIHTC equity provided by TDBNA.
- A renewal of a \$1.5 million working capital line of credit to a nonprofit organization. The line of credit was initially used to bridge the timing of receiving federal and state HTC's for a project to transform a building located in an Opportunity Zone and low-income geography into a new home for the organization's arts and early literacy academy. The project was part of the City's Downtown Revitalization Initiative in 2021.

Broader Statewide Area

During the evaluation period, TDBNA originated two CD loans totaling \$1.3 million within the broader statewide area. These loans provided additional support for the Outstanding Lending Test rating in the state of New York.

Product Innovation and Flexibility

Glens Falls MSA

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, TDBNA made 111 loans totaling \$6.6 million under the following innovative and/or flexible programs during the evaluation period.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	1	160
FNMA HomeReady Mortgage	1	98
FHA Mortgage	5	1,079
PPP	106	5,347
Total	113	6,684

Poughkeepsie MSA

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, a TDBNA funded 288 loans totaling \$28.4 million under the following innovative and/or flexible programs during the evaluation period.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	5	998
FNMA HomeReady Mortgage	2	535

FHA Mortgage	7	1,905
PPP	274	25,032
Total	288	28,470

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Albany MSA, Kingston MSA, and Non-MSA NY AAs was consistent with the bank's overall performance in the full-scope areas.

Refer to Tables O through T in the state of New York section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in New York is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Glens Falls MSA and Poughkeepsie MSA AAs was excellent.

Number and Amount of Qualified Investments

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Glens Falls MSA	2	790	17	6,953	19	15.1	7,743	3.9	0	0
Poughkeepsie MSA	14	69,945	12	34,330	26	20.6	104,275	52.4	0	0
Limited-Scope:										
Albany MSA	11	21,507	29	20,217	40	31.8	41,724	20.9	0	0
Kingston MSA	3	14,045	6	1,130	9	7.1	15,175	7.6	0	0
NY Non-MSA	5	14,457	22	3,122	27	21.4	17,579	8.8	0	0
Statewide NY	2	631	3	12,095	5	4.0	12,726	6.4	1	3,874
Total	37	121,375	89	77,847	126	100.0	199,222	100.0	1	3,874

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Glens Falls MSA

The institution had an excellent level of qualified CD investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made 14 investments totaling \$6.8 million and provided three qualifying grants and donations totaling \$177,000. The dollar volume of current-and prior-period

investments (excluding unfunded commitments) represented 7.3 percent of tier 1 capital allocated to the AA.

The institution exhibited good responsiveness to credit and community economic development needs. By dollar volume, 66.7 percent of current period investments and donations funded revitalization and stabilization efforts, 30.8 percent funded affordable housing, and 2.5 percent funded community services to LMI individuals.

The institution did not use innovative or complex investments in the current period.

Examples of qualified investments in the AA include:

- A \$4.6 million NMTC equity investment that funded the construction of two contiguous healthcare facilities located in a low-income geography operated by a Federally Qualified Community Health Center that services much of the rural, medically underserved region. One facility will be a primary care clinic and the second will serve as a Program of All-inclusive Care for the Elderly (PACE) Center which is a community-based alternative to nursing home care.
- A \$175,000 grant to a nonprofit organization that provides affordable housing and wraparound services to assist individuals and families with economic stability. Services provided include financial management and job search skills. Recipients of services are LMI individuals that are at-risk of homelessness.

Poughkeepsie MSA

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made four investments totaling \$34.2 million and provided eight qualifying grants and donations totaling \$160,000. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 36.2 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs, creating 128 affordable housing units. By dollar volume, 98.5 percent of current period investments and donations funded affordable housing, 1.4 percent funded economic development, and 0.1 percent funded community services to LMI individuals.

The institution made extensive use of innovative and/or complex qualified investments. CD investments included three direct LIHTC investments totaling \$33.7 million.

Examples of qualified investments in the AA include:

- A \$15.4 million complex LIHTC investment that funded the new construction of 75-unit affordable housing complex of which 52 units are restricted to tenants at or below 80 percent AMI, 22 are market rate units, and one is a superintendent unit. Additionally, nine of the affordable units are set aside for special needs tenants with supportive services also available onsite to these tenants in coordination with a local nonprofit organization.

- A \$125,000 grant to an organization that develops and preserves affordable housing and provides support services to help families obtain housing. The funding specifically supported low-income households impacted by COVID-19 with short-term financial assistance.
- Three grants totaling \$15,000 to an organization that helps provide critical home repairs and accessibility modifications for low-income homeowners.

Broader Statewide Area

During the evaluation period, TDBNA made three investments totaling \$12.1 million in the broader statewide area. These investments consisted of an SBIC investment totaling \$1.1 million, a \$10 million investment in IOLTA programs, and an innovative EQ2 investment totaling \$1 million made as part of the TD Equity Fund which supports minority-owned businesses. The bank also had two prior period loan fund investments outstanding with a book value of \$631,228. These investments provided additional support for the bank's Outstanding Investment Test rating in the state of New York.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Albany MSA, Kingston MSA, and NY Non-MSA AAs was consistent with the bank's overall performance in the full-scope areas.

SERVICE TEST

The institution's performance under the Service Test in New York is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Glens Falls MSA and Poughkeepsie MSA AAs was good.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches**						Population***			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Glens Falls MSA	16.0	7	22.6	0.0	14.3	71.4	14.3	1.5	7.1	74.5	16.9
Poughkeepsie MSA	43.5	10	32.3	20.0	30.0	20.0	30.0	8.9	13.7	55.6	21.3
Limited-Scope:											
Albany MSA	24.3	7	22.6	0.0	14.3	57.1	14.3	8.1	13.7	46.0	30.3
Kingston MSA	1.7	1	3.2	0.0	0.0	100.0	0.0	0.0	24.0	62.1	11.0
NY Non-MSA	14.6	6	19.4	0.0	33.3	66.7	0	0.0	12.2	59.3	26.9

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

**In the Albany MSA, the bank has one branch (14.3%) in a “NA” income geography.

***0.5% of the population in the Poughkeepsie MSA, 1.9% of the population in the Albany MSA, 2.9% of the population in the Kingston MSA, and 1.5% of the population in the NY Non-MSA AA resides within a “NA” income category.

Glens Falls MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank’s AA.

There were no branches in low-income geographies; however, only 1.5 percent of the population resides within low-income geographies in the AA. The bank’s distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. Examiners further considered one middle-income adjacent branch that served a low-income area within the AA as demonstrated by branch transactions and deposit account opening activity. This adjacent branch improved accessibility and had a positive impact on the retail service delivery systems conclusion.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had nine deposit-taking ATMs in the AA, including one in a moderate-income geography. There were no ATMs in low-income geographies. The distribution of ATMs in moderate-income geographies was excellent. TDBNA provided data indicating that 76.7 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 78.4 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 46.2 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 51.2 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank’s service delivery systems.

Poughkeepsie MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank’s AA.

The bank’s distribution of branches in both low-income and moderate-income geographies exceeded the percentages of the population living within those geographies.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 16 deposit-taking ATMs in the AA, including three in low-income geographies and four in moderate-income geographies. The distribution of ATMs in both low-income and moderate-income geographies was excellent. TDBNA provided data indicating that 81.5 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 85.5 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 57.7 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 67.2 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank’s service delivery systems.

Distribution of Branch Openings/Closings*			
Assessment Area			Net change in Location of Branches

	# of Branch Openings	# of Branch Closings	(+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Glens Falls MSA	0	2	0	0	-1	-1
Poughkeepsie MSA	0	1	0	0	-1	0
Limited-Scope:						
Albany MSA	0	0	0	0	0	0
Kingston MSA	0	0	0	0	0	0
NY Non-MSA	0	0	0	0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Glens Falls MSA

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed two branches, neither of which were in low- or moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, including low- and moderate-income geographies and/or individuals. TDBNA maintained generally standard weekday business hours at its branch locations in the AA including extended hours on Thursdays at six branches (including the one moderate-income branch) and on Fridays at all branches. All AA branches were open on Saturdays, and none were open on Sundays. Of the seven branches in the AA, six had drive-thru facilities, including the one moderate-income branch. TDBNA offered traditional banking products and services at all branch locations in the AA.

Poughkeepsie MSA

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed one branch in a middle-income geography.

Services, including where appropriate, business hours are tailored to meet the convenience and needs of the various portions of its AA, including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch location in the AA including extended hours on Thursdays and Fridays. All 10 branches were open on Saturdays and seven branches were open on Sundays including one of two low-income branches and all three moderate-income branches. Of the 10 branches in the AA, eight had drive-thru facilities, including all five in low- and moderate-income geographies. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

Glens Falls MSA

TDBNA provided a limited level of CD services. During the evaluation period, the bank provided seven financial education events to 20 participants in the Glens Falls MSA. The bank's assistance was responsive to an identified need in the AA for financial literacy education.

Examples of CD services in the AA include:

- A bank employee led two small business courses attended by four individuals at a public library.
- A bank employee led two financial education courses covering common fraud schemes to avoid that was attended by four individuals.

Poughkeepsie MSA

TDBNA provided a limited level of CD services. During the evaluation period, the bank provided 27 financial education events to 510 participants in the Poughkeepsie MSA. Additionally, four bank employees provided 24 service hours over the evaluation period that benefitted an area nonprofit organization through board or committee participation or professional skills assistance. The bank's assistance was responsive to identified needs in the AA for financial literacy education and small business education.

Examples of CD services in the AA include:

- Four bank employees led six homebuyer and financial literacy education training events that were attended by 117 individuals at a nonprofit affordable housing organization located in a low-income geography.
- A bank employee led five small business courses that focused on topics including developing a business plan, assessing a company's financial needs, and accessing capital. The courses were attended by 69 participants.
- A branch manager led an adult financial education class at a local nonprofit that was attended by 50 individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the NY-Non MSA AA was consistent with the bank's overall performance in the full-scope areas. The bank's performance in the Albany MSA and Kingston MSA AAs was weaker than the overall performance in the full-scope areas due to weaker branch distributions. Performance differences in the limited-scope areas did not impact the overall Service Test rating in the state of New York.

State of North Carolina

CRA rating for the State of North Carolina¹⁵: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include

- excellent lending activity, with overall excellent geographic and borrower distribution of lending;
- an excellent level of CD lending that further supported the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- accessible retail service delivery systems; and
- a good level of CD services.

Description of Institution's Operations in North Carolina

The state of North Carolina consists of four AAs including portions of the Asheville, NC MSA (Asheville MSA), and the Hickory-Lenoir-Morganton, NC MSA (Hickory MSA), the entire Wilmington, NC MSA (Wilmington MSA), and five contiguous nonmetropolitan counties comprising the North Carolina Non-MSA (NC Non-MSA) AA. Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had 11 branch locations and 11 ATMs, all of which were deposit-taking, within these AAs. During the evaluation period, the bank made \$426.8 million or 0.8 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of North Carolina represented TDBNA's 15th largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$1.1 billion in deposits in these AAs, which represented 0.5 percent of the bank's total adjusted deposits. The bank ranked eighth in deposit market share with 3.6 percent out of 33 depository institutions. The top three competitors had 57.4 percent of the market share and consisted of Live Oak Banking Company with one branch and 31.9 percent market share, First-Citizens Bank & Trust Company with 31 branches and 13.2 percent market share, and Wells Fargo Bank, N.A. with 26 branches and 12.3 percent market share.

Asheville MSA

The following tables provides a summary of the demographics, including housing and business information for the Asheville MSA AA.

¹⁵ The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Asheville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	95	1.1	17.9	54.7	25.3	1.1
Population by Geography	385,733	1.2	18.4	56.6	23.8	0.0
Housing Units by Geography	184,068	1.1	17.3	56.8	24.7	0.0
Owner-Occupied Units by Geography	103,525	0.9	14.9	56.9	27.2	0.0
Occupied Rental Units by Geography	51,367	1.7	22.5	57.0	18.9	0.0
Vacant Units by Geography	29,176	0.9	16.5	56.4	26.2	0.0
Businesses by Geography	61,534	0.9	19.2	54.8	25.2	0.0
Farms by Geography	1,979	0.9	17.8	58.9	22.4	0.0
Family Distribution by Income Level	94,063	19.2	18.0	21.8	41.0	0.0
Household Distribution by Income Level	154,892	22.4	16.8	17.7	43.1	0.0
Median Family Income MSA – 11700 Asheville, NC MSA		\$71,595	Median Housing Value			\$268,546
			Median Gross Rent			\$993
			Families Below Poverty Level			6.9%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Asheville MSA AA consists of two (Buncombe and Henderson) of four counties that comprise the MSA. TDBNA removed Haywood County from the Asheville MSA AA in 2022 after closing the last branch in the county in April 2021. As of year-end 2023, TDBNA operated six branches and six ATMs, all of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$627.9 million in deposits in the AA which comprised 0.3 percent of total bank adjusted deposits and 55.4 percent of the rated area deposits. The AA is served by 21 FDIC-insured financial institutions operating 88 branches. TDBNA had 6.2 percent deposit market share which ranked seventh among all institutions. The top three competitors had 51.1 percent of the market share and consisted of First Citizens Bank & Trust Company with 17 branches and 20.7 percent market share, Wells Fargo Bank, N.A. with 13 branches and 16.6 percent market share, and Truist Bank with seven branches and 13.8 percent market share.

Based on information from the December 2023 Moody's Analytics report, the Asheville economy is slowing. Job growth stalled in the second half of the year and is below regional and state levels. The unemployment rate which steadily decreased since 2021 is now inching upwards due to small gains in the labor force. Economic drivers in Asheville include tourism, manufacturing, and healthcare. The largest employment sectors are education and health services and leisure and hospitality services. Major employers include Ingles Markets Inc., Walmart Inc., A-B Tech, Biltmore Workforce Management Inc., and Blue Ridge Paper Products Inc. The area benefits from its proximity to some of the country's most visited national parks, the Great Smoky Mountains National Park and the Blue Ridge Parkway. The two national parks saw near record number of visitors in 2022; however, high interest rates and a slowing U.S. economy will negatively impact tourism and related consumer spending for the area. Asheville has a low cost of living, desirable climate, and a high quality of life which make it an attractive place to

settle for retirees and younger adults as well. The area has an above average share of senior citizens which provide a strong demand for healthcare services, while a steady supply of younger workers enables the area providers to fill healthcare positions. In addition to being a regional healthcare hub, Asheville also benefits from a low cost of doing business, above average educational attainment, and favorable migration patterns. Conversely, area weaknesses include a high dependence on tourism, low wages in public and private services, and significantly overvalued housing. The area has seen above average house price appreciation over the past year, which coupled with rising interest rates have further worsened home affordability.

According to the U.S. BLS, the unemployment rate in the Asheville MSA was 5.7 percent as of January 2021, compared to 2.5 percent in December 2023. The MSA unemployment rate was lower than both the statewide rate (3.2 percent) and the national unemployment rate (3.7 percent) as of December 2023.

Based on information in the above table, low-income families earned less than \$35,798 and moderate-income families earned less than \$57,276. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$895 for low-income borrowers and \$1,432 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,442. Most low-income and moderate-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 46.6 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Asheville MSA. This acceleration in home prices worsened existing affordability concerns for low-income and moderate-income borrowers.

The OCC reviewed the 2020-2024 HUD consolidated plan for the city of Asheville to understand area needs and opportunities. The plan identified the following needs within the bank's AA:

- Developing new affordable housing units specifically for LMI households,
- Preserving existing affordable housing stock,
- Providing affordable and accessible housing for homeless and special needs households,
- Neighborhood revitalization,
- Assisting low-income individuals and minorities start and grow businesses,
- Improving food security and access to healthy food,
- Providing funding to organizations that support affordable housing and employment opportunities.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing (ownership/rental),
- Development and /or preservation and rehabilitation of existing housing stock,
- Partnering with CDFIs and nonprofits who provide loan and technical assistance to small businesses and start-ups,
- Grants and other support for organizations providing community services to LMI individuals.

Scope of Evaluation in North Carolina

Examiners selected one AA for a full-scope review. Examiners completed a full-scope review for the Asheville MSA AA as it is the largest AA within the rating area in terms of population, deposits, and lending activity. The Hickory MSA, the Wilmington MSA, and NC Non-MSA AAs received limited-scope reviews.

In arriving at overall conclusions, the Asheville MSA received the most weight as it accounts for the largest share of deposits in the state of North Carolina. In determining Lending Test conclusions, examiners placed more emphasis on the loan product category that had the higher percentage of lending in the AA. In the Asheville MSA and the NC Non-MSA AAs, small loans to businesses received more weight. In the Hickory MSA and Wilmington MSA AAs home mortgage loans represented the majority of the loans and received the most weight. Small loans to farms were not meaningful for analysis purposes.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in North Carolina is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Asheville MSA was excellent.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Asheville MSA	481	526	2	16	1025	56.0	55.4
Limited-Scope:							
Hickory MSA	58	42	1	0	101	5.5	4.1
Wilmington MSA	296	150	0	2	448	24.5	29.6
NC Non-MSA	122	132	0	2	256	14.0	11.1
Statewide NC	-	-	-	1	1	0.1	0.0
Total	957	850	3	21	1,831	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* \$(000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits

Full-Scope:							
Asheville MSA	188,579	22,592	45	17,083	228,299	50.2	55.4
Limited-Scope:							
Hickory MSA	19,646	1,734	11	0	21,391	4.7	4.1
Wilmington MSA	135,857	8,943	0	992	145,792	32.0	29.6
NC Non-MSA	43,480	5,928	0	119	49,527	10.9	11.1
Statewide NC	-	-	-	10,000	10,000	2.2	0.0
Total	387,562	39,197	56	28,194	455,009	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked seventh out of 21 depository institutions (top 34 percent) with a deposit market share of 6.2 percent.

For home mortgage loans TDBNA's market share of 1.1 percent ranked 24th out of 496 lenders (top 5 percent). The top three lenders were State Employees Credit Union with 11.7 percent market share, Movement Mortgage, LLC with 5.6 percent market share, and Rocket Mortgage with 5.1 percent market share.

For small loans to businesses, TDBNA's market share of 1.2 percent ranked 15th out of 101 lenders (top 15 percent). The top three lenders were American Express National Bank with 22.1 percent market share, JPMorgan Chase Bank, N.A. with 9.52 percent market share, and Synchrony Bank with 9.46 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Home Mortgage Loans

Refer to Table O in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased in both low-income and moderate-income geographies exceeded both the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies was below both the percentage of businesses in those geographies and the aggregate distribution of loans. However, less than 1 percent of businesses are located in low-income geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeded both the percentage of businesses in those geographies and the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Asheville MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was well below the percentage of low-income families and exceeded the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased to moderate-income borrowers equaled the percentage of moderate-income families and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less was near-to the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to a weaker distribution of small loans to businesses compared to the demographic comparator.

Community Development Lending

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test in the Asheville MSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending was excellent. TDBNA made 16 CD loans totaling \$17.1 million, which represented 20.8 percent of allocated tier 1 capital. Included in this total were 11 PPP loans totaling \$1.3 million that supported area businesses during the COVID-19 pandemic. CD loans were impactful as they were responsive to an identified community need for providing basic community services to LMI. By dollar volume, 73.2 percent of CD loans funded community services targeted to LMI individuals, 19.2 percent funded affordable housing, 5.9 percent funded revitalization and stabilization efforts, and 1.8 percent funded economic development activities.

Examples of CD loans in the AA include:

- A \$4 million increase of a working capital line of credit to a nonprofit healthcare organization whose mission is to support educational activities and services focused on primary care in rural and underserved communities with the goal of recruiting, training, and retaining healthcare professionals.
- Two renewals of a \$2 million working capital line of credit to a foundation that works with nonprofits and government agencies to assist the most vulnerable communities in Western North Carolina with needs such as elder care essentials, youth development, and emergency shelter and food assistance.

Broader Statewide Area

During the evaluation period, TDBNA originated one CD loan totaling \$10 million within the broader statewide area. This loan provided additional support for the Outstanding Lending Test rating in the state of North Carolina.

Product Innovation and Flexibility

The bank used innovative and/or flexible lending practices in order to serve AA credit needs. As shown in the table below, TDBNA made 177 loans totaling \$16.4 million under the following innovative and/or flexible programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	6	1,924
FNMA HomeReady Mortgage	1	35
FHA Mortgage	3	1,047
VA Mortgage	1	139
PPP	166	13,300
Total	177	16,445

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Wilmington MSA and NC Non-MSA AAs was consistent with the bank's overall performance in the full-scope area. The bank's performance under the Lending Test in the Hickory MSA was weaker than the bank's overall performance in the full-scope area due to a weaker borrower distribution of lending and no CD lending activities. Performance differences in the limited-scope areas did not impact the overall conclusions for the state of North Carolina.

Refer to Tables O through T in the state of North Carolina section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in North Carolina is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Asheville MSA AA was excellent.

Number and Amount of Qualified Investments

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Asheville MSA	4	11,720	37	8,380	41	69.5	20,100	62.3	0	0
Limited-Scope:										
Hickory MSA	0	0	2	487	2	3.4	487	1.5	0	0
Wilmington MSA	1	2,048	2	7,287	3	5.1	9,335	28.9	0	0
NC Non-MSA	1	991	11	1,164	12	20.3	2,155	6.7	0	0
Statewide NC	0	0	1	197	1	1.7	197	0.6	0	0
Total	6	14,759	53	17,515	59	100.0	32,274	100.0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 *** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made four investments totaling \$7.9 million and provided 33 qualifying grants and donations totaling \$460,200. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 24.4 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing, creating 60 affordable housing units. By dollar volume, 96.4 percent of current period investments and donations funded affordable housing, 2.4 percent funded community services to LMI individuals, and 1.3 percent funded economic development activities.

The institution made significant use of innovative and/or complex qualified investments. CD investments included one direct LIHTC investment totaling \$6.9 million.

Examples of qualified investments in the AA include:

- A \$6.8 million complex LIHTC investment for the construction of a 60-unit senior housing complex. All units are income restricted to tenants earning up to 80 percent of the AMI.
- A \$100,000 grant to a nonprofit organization to support a green economy jobs program geared towards LMI individuals. Participants complete field service work and classroom training along with professional development workshops. Upon graduation, participants are prepared to enter the workforce in green jobs or further pursue their education in the field.
- A \$125,000 grant to a nonprofit organization in support of their COVID-19 rental assistance program which provided rental payments for LMI individuals facing eviction or homelessness.

Broader Statewide Area

During the evaluation period, TDBNA made one IOLTA program investment totaling \$197,337 in the broader statewide area. This investment provided additional support for the Outstanding Investment Test rating in the state of North Carolina.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Hickory MSA, Wilmington MSA, and NC Non-MSA AAs was consistent with the bank's overall performance in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in North Carolina is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Asheville MSA AA was good.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population**			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Asheville MSA	55.4	6	54.5	0.0	66.7	33.3	0.0	1.2	18.4	56.6	23.8
Limited-Scope:											
Hickory MSA	4.1	1	9.1	0.0	100.0	0.0	0.0	0.0	17.7	75.9	6.4
Wilmington MSA	29.6	2	18.2	50.0	0.0	0.0	50.0	3.6	27.2	37.8	29.4
NC Non-MSA	11.0	2	18.2	0.0	50.0	50.0	0.0	0.0	14.3	77.7	8.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** In the Wilmington MSA 1.9% of the population resides within an "NA" income category.

Service delivery systems were accessible to geographies and individuals of different income levels in the bank's AA.

The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. The bank had no branches in low-income geographies; however, only 1.2 percent of the population lives in the two low-income geographies within the bank's AA.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had six deposit-taking ATMs in the AA, including four in moderate-income geographies. The bank had no ATMs in low-income geographies. The distribution of ATMs in moderate-income geographies was excellent. TDBNA provided data indicating that 81 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 84.5 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 51.3 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 58.8 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Asheville MSA	0	1	0	-1	0	0
Limited-Scope:						
Hickory MSA	0	0	0	0	0	0

Wilmington MSA	0	0	0	0	0	0
NC Non-MSA	0	1	0	0	0	-1

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed one branch in a moderate-income geography. The branch closure was attributed to low customer transactions and lower than expected production volume, along with a low number of households associated with the branch. Despite the closure, the bank maintains an excellent branch distribution in moderate-income geographies.

Services, including where appropriate, business hours did not vary in a way that inconvenienced the various portions of its AA particularly low- and moderate-income geographies and/or individuals. TDBNA maintained standard business hours at all branch locations in the AA including extended hours on Thursdays and Fridays. All six AA branches were open on Saturdays, and none were open on Sundays. Of the six branches, all had drive-thru facilities. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

TDBNA provided a good level of CD services. During the evaluation period, the bank provided 13 financial education events to nearly 300 participants in the Asheville MSA. Additionally, five bank employees provided 163 service hours over the evaluation period that benefited 10 organizations through board/committee participation or professional skills assistance. The bank's assistance was responsive to an identified need in the AA for small business technical assistance.

Examples of CD services in the AA include:

- A bank vice president served on the board of an organization that provides community support services including workforce development, education, job training programs, housing services and youth services targeting LMI individuals. The employee provided 25 service hours over the evaluation period.
- A bank employee led nine small business workshops utilizing a small business curriculum to approximately 100 participants in conjunction with an area Small Business Development Center. The curriculum topics included accessing capital, developing a business plan, running a profitable company, assessing a company's financial needs, and credit awareness.
- A bank employee led a small business workshop utilizing a small business curriculum to 150 participants in conjunction with an area economic development organization. The curriculum topics included accessing capital and assessing a company's financial needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Hickory MSA, Wilmington MSA, and NC Non MSA was consistent with the bank's overall performance in the full-scope area.

State of South Carolina

CRA rating for the State of South Carolina¹⁶: Outstanding

The Lending Test is rated: Outstanding,

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include

- good lending activity, with overall excellent geographic and borrower distribution of lending;
- an excellent level of CD lending that further supported the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- overall accessible retail service delivery systems;
- an overall excellent level of CD services; and
- weaker performance in the limited-scope areas that negatively impacted the Service Test rating.

Description of Institution's Operations in South Carolina

The state of South Carolina consists of nine AAs as of the end of the evaluation period. They included a portion of the Augusta, SC MSA (Augusta MSA), the Charleston-North Charleston, SC MSA (Charleston MSA), a portion of the Columbia, SC MSA (Columbia MSA), a portion of the Florence, SC MSA (Florence MSA), the Greenville-Anderson, SC MSA (Greenville MSA), the Hilton Head Island-Bluffton, SC MSA (Hilton Head MSA), the Myrtle Beach-Conway-North Myrtle Beach, SC MSA (Myrtle Beach MSA), the Spartanburg, SC MSA (Spartanburg MSA), and four nonmetropolitan counties comprising the South Carolina Non-MSA (SC Non-MSA) AA. In addition, the Charlotte MSA was an AA within the state of South Carolina for 2021 and 2022 prior to becoming a new rating area (Charlotte MMSA) in 2023 when the bank opened a branch in the North Carolina portion of the MMSA. Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had 57 branch locations and 81 ATMs, of which 64 were deposit-taking, within these AAs. During the evaluation period, the bank made \$3.1 billion or 6 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of South Carolina represented TDBNAs ninth largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$6.4 billion in deposits in these AAs, which represented 2.9 percent of the bank's total adjusted deposits. The bank ranked sixth in deposit market share with 5.9 percent out of 66 depository institutions. The top three competitors had 44.8 percent of the market share and consisted of Bank of America, N.A. with 61 branches and 16.4 percent market share, Wells Fargo Bank, N.A. with 86 branches and 15.9 percent market share, and Truist Bank with 84 branches and 12.5 percent market share.

Columbia MSA

The following tables provides a summary of the demographics, including housing and business information for the Columbia MSA AA.

¹⁶ The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Columbia MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	208	4.8	25.0	37.0	29.8	3.4
Population by Geography	775,541	3.1	23.2	39.2	31.4	3.1
Housing Units by Geography	330,737	3.3	25.6	40.3	29.9	0.9
Owner-Occupied Units by Geography	200,181	1.7	19.9	41.5	36.2	0.7
Occupied Rental Units by Geography	95,810	5.9	35.1	38.1	19.6	1.3
Vacant Units by Geography	34,746	4.9	32.5	39.4	22.0	1.1
Businesses by Geography	123,377	2.9	23.3	37.0	35.3	1.5
Farms by Geography	3,029	1.8	22.2	42.6	32.9	0.6
Family Distribution by Income Level	188,045	22.3	16.5	19.4	41.9	0.0
Household Distribution by Income Level	295,991	23.5	15.8	17.9	42.8	0.0
Median Family Income MSA - 17900 Columbia, SC MSA		\$71,993	Median Housing Value			\$170,670
			Median Gross Rent			\$976
			Families Below Poverty Level			10.4%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Columbia MSA AA consists of three of the six counties that comprise the MSA including Kershaw, Lexington, and Richland. As of year-end 2023, TDBNA operated 12 branches and 14 ATMs, 13 of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$1.1 billion in deposits in the AA which comprised 0.5 percent of total bank adjusted deposits and 17.4 percent of the rated area deposits. The AA is served by 25 FDIC-insured financial institutions operating 152 branches. TDBNA had 4.2 percent deposit market share which ranked sixth among all institutions. The top three competitors had 65.1 percent of the market share and consisted of Bank of America, N.A. with 14 branches and 31.7 percent market share, Wells Fargo Bank, N.A. with 16 branches and 20.8 percent market share, and Truist Bank with 18 branches and 12.5 percent market share.

Based on information from the December 2023 Moody's Analytics report, the Columbia MSA's economy has gained momentum with job growth having increased to more than two times the national average in the last quarter of 2023. Professional and business services and the healthcare industry are leading the charge in job creation, while the outside public sector has experienced job cuts. The unemployment rate has remained below the state average, despite the recent influx of workers to the labor pool. The area has high employment diversity and high economic vitality with above-average growth prospects. Key economic drivers include government, defense, and finance, namely the insurance sector. Columbia is the state capital of South Carolina and home to Fort Jackson, a major U.S. Army training facility, and the University of South Carolina. These institutions provide stability to the economy and support for spillover consumer industries. Government is the largest employment sector with nearly 20 percent of area workers are employed in the public sector, followed by professional and business services, and education and health services. Major employers in the area include Prisma Health

Midlands, BlueCross BlueShield of SC, Lexington Medical Center, and the University of South Carolina. Other area economic strengths include favorable demographic trends, a highly educated population, and high housing affordability. Perceived weaknesses include susceptibility to government budgetary constraints (state and federal), high poverty and low per capita income, and below-average rental affordability.

According to the U.S. BLS, the unemployment rate in the Columbia MSA was 4.6 percent as of January 2021, compared to 2.9 percent in December 2023. The MSA unemployment rate was lower than both the statewide rate (3 percent) and the national unemployment rate (3.7 percent) as of December 2023.

Based on information in the above table, low-income families earned less than \$35,997 and moderate-income families earned less than \$57,594. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$900 for low-income borrowers and \$1,440 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$916. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 41.8 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Columbia MSA. This acceleration in home prices worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC reviewed the 2020-2024 HUD consolidated plan for the city of Columbia to understand area needs and opportunities. The plan identified the following needs within the bank's AA:

- Expanding and improving public infrastructure and facilities,
- Preserving and developing affordable housing (rental and homeowner),
- Providing vital services to LMI households,
- Providing supportive services for the disabled and other vulnerable individuals,
- Providing for increased economic opportunities, specifically support to new and expanding businesses.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing inventory, including owner-occupied, multi-family and rental units,
- Small business loans including SBA financing, start-up financing, and micro loans.

Greenville MSA

The following tables provides a summary of the demographics, including housing and business information for the Greenville MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Greenville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	231	5.6	26.8	40.7	26.0	0.9
Population by Geography	928,195	4.2	22.3	41.2	31.8	0.6
Housing Units by Geography	390,288	4.5	24.0	41.2	29.6	0.7
Owner-Occupied Units by Geography	243,770	2.9	20.0	43.1	33.7	0.4
Occupied Rental Units by Geography	106,958	7.7	30.6	37.1	23.1	1.4
Vacant Units by Geography	39,560	5.4	30.8	40.5	22.4	1.1
Businesses by Geography	127,707	3.8	18.6	36.1	40.4	1.1
Farms by Geography	3,498	2.9	22.0	44.5	30.0	0.7
Family Distribution by Income Level	234,435	20.9	18.0	20.2	40.9	0.0
Household Distribution by Income Level	350,728	23.8	16.5	17.6	42.1	0.0
Median Family Income MSA - 24860 Greenville-Anderson, SC MSA		\$71,958	Median Housing Value			\$183,639
			Median Gross Rent			\$906
			Families Below Poverty Level			8.8%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The Greenville MSA AA consists of all four counties that comprise the MSA including Anderson, Greenville, Laurens, and Pickens. As of year-end 2023, TDBNA operated 17 branches and 22 ATMs, 19 of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$2.4 billion in deposits in the AA which comprised 1 percent of total bank adjusted deposits and 38 percent of the rated area deposits. The AA is served by 39 FDIC-insured financial institutions operating 233 branches. TDBNA had 9.3 percent deposit market share which ranked fourth among all institutions. The top three competitors had 39.4 percent market share and consisted of Truist Bank with 25 branches and 15.6 percent market share, Wells Fargo Bank, N.A. with 23 branches and 13.4 percent market share, and Bank of America, N.A. with 15 branches and 10.4 percent market share.

Based on information from the December 2023 Moody's Analytics report, Greenville's economy is not performing as well as other areas in the state. Job growth is lagging the state and national averages and while the unemployment rate has remained below 3 percent, it's primarily due to a shrinking labor force. Layoffs in the leisure and hospitality and professional and business services industries have cancelled out gains in other sectors. Area economic drivers include manufacturing, logistics, and retirees. Greenville's large factory base, expanding population, and inland port make it a significant logistics center for the Southeast. Logistics employment has increased at an above-average rate in the past several years as investment in the industry has surged. Greenville is also home to Clemson University which is one of the metro's largest employers. Clemson's increasing enrollment numbers have required the university to add more faculty and staff, furthering job gains. The university presence helps stabilize area employment and attracts investors. Additionally, the university provides the area with a pool of highly skilled workers. Other area strengths include low business costs and a low unionization rate,

which encourage investment. In addition, the area benefits from an increasing population, and improving educational attainment. Weaknesses include high employment volatility, a rising share of low-paying service jobs, and high share of old-line manufacturing. The area's largest employment sectors are professional and business services, government, and manufacturing. Major employers include Prisma Health, Michelin North America, Clemson University, and Milliken & Company.

According to the U.S. BLS, the unemployment rate in the Greenville MSA was 4.4 percent in January 2021, compared to 2.8 percent in December 2023. The MSA unemployment rate was lower than the statewide rate (3 percent) and the national unemployment rate (3.7 percent) as of December 2023.

Based on information in the above table, low-income families earned less than \$35,979 and moderate-income families earned less than \$57,566. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$899 for low-income borrowers and \$1,439 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$986. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners further considered the increase in home prices across the evaluation period as a result of the COVID-19 pandemic and historically low interest rate environment that was not captured by census data. According to the FHFA HPI, home prices increased by 48.2 percent from the first quarter of 2021 to the fourth quarter of 2023 in the Greenville MSA. This acceleration in home prices worsened existing affordability concerns for low-income borrowers and created new affordability concerns for moderate-income borrowers.

The OCC relied on information from a community contact conducted during the evaluation period with a nonprofit regional economic development organization. The community contact indicated that the following are needs and opportunities within the bank's AA:

- Affordable housing development,
- Investment in area infrastructure,
- Small business access to capital,
- Training and technical assistance to small businesses.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable housing (owner-occupied) for LMI communities,
- Development and preservation of existing affordable rental housing stock,
- Small business lending, specifically micro loans,
- Small business technical assistance,
- Capital and operational funding for CDFIs and other nonprofits providing basic needs to LMI.

Scope of Evaluation in South Carolina

Examiners selected two AAs for full-scope reviews. Examiners completed a full-scope review for the

Greenville MSA as it is the largest AA within the rating area based on population, deposits, and number of branches. The Greenville MSA AA was third largest in terms of lending activity. Examiners also selected the Columbia MSA AA for a full-scope review, as it is the second largest AA within the rating area based on deposits and third largest based on population. The Columbia MSA AA is fourth largest in terms of lending activity. The Augusta MSA, Charleston MSA, Charlotte MSA (2021-2022) Florence MSA, Hilton Head MSA, Myrtle Beach MSA, Spartanburg MSA, and SC Non-MSA AAs received limited scope reviews.

In arriving at overall conclusions, the Greenville MSA received the most weight as it accounts for the largest share of deposits in the state of South Carolina. In determining Lending Test conclusions, examiners placed more emphasis on the loan product category that had the higher percentage of lending in the AA. For all AAs except for the Florence MSA and the Spartanburg MSA, examiners placed more emphasis on home mortgage loans. In the Florence MSA and Spartanburg MSA more emphasis was placed on small loans to businesses. Small loans to farms were not meaningful for analysis purposes.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in South Carolina is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Columbia MSA and the Greenville MSA AAs was excellent.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Columbia MSA	890	567	4	18	1,479	14.1	16.3
Greenville MSA	1,110	1,087	6	23	2,226	21.2	35.6
Limited-Scope:							
Augusta MSA	315	31	1	3	350	3.3	1.2
Charleston MSA	1,739	382	0	16	2,137	20.3	6.4
Charlotte MSA (2021-2022)	150	79	0	0	229	2.2	6.2
Florence MSA	29	59	0	3	91	0.9	1.4
Hilton Head MSA	1,671	390	0	4	2,065	19.6	8.2
Myrtle Beach MSA	701	383	3	13	1,100	10.5	14.4

Spartanburg MSA	163	175	0	4	342	3.3	3.9
SC Non-MSA	285	205	3	4	497	4.7	6.3
Total	7,053	3,358	17	88	10,516	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* \$(000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
Columbia MSA	217,067	24,120	105	27,135	268,427	8.2	16.3
Greenville MSA	277,294	60,188	88	67,785	405,355	12.4	35.6
Limited-Scope:							
Augusta MSA	84,707	2,165	7	863	87,742	2.7	1.2
Charleston MSA	957,199	26,313	0	33,871	1,017,383	31.0	6.4
Charlotte MSA (2021-2022)	43,627	3,465	0	0	47,092	1.4	6.2
Florence MSA	4,814	1,697	0	25,281	31,792	1.0	1.4
Hilton Head MSA	1,062,573	14,577	0	786	1,077,936	32.9	8.2
Myrtle Beach MSA	149,995	9,538	255	28,921	188,709	5.8	14.4
Spartanburg MSA	26,636	7,887	0	3,055	37,578	1.1	3.9
SC Non-MSA	108,471	9,098	210	135	117,913	3.6	6.3
Total	2,932,383	159,048	665	187,832	3,279,928	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Columbia MSA

Lending levels reflect excellent responsiveness to AA credit needs.

TDBNA ranked sixth out of 25 depository institutions (top 24 percent) with a deposit market share of 4.2 percent.

For home mortgage loans, TDBNA's market share of 1.3 percent ranked 25th out of 571 lenders (top 5 percent). The top three lenders were Guild Mortgage Company LLC with 5.6 percent market share, Rocket Mortgage with 4.8 percent market share, and Palmetto Citizens Federal Credit Union with 4 percent market share.

For small loans to businesses, TDBNA's market share of 0.6 percent ranked 21st out of 127 lenders (top 17 percent). The top three lenders were American Express National Bank with 23.5 percent market

share, Bank of America, N.A. with 8.4 percent market share, and First Citizens Bank and Trust with 8.3 percent market share.

Greenville MSA

Lending levels reflect good responsiveness to AA credit needs.

TDBNA ranked fourth out of 39 depository institutions (top 11 percent) with a deposit market share of 9.3 percent.

For home mortgage loans, TDBNA's market share of 1.1 percent ranked 23rd out of 594 lenders (top 4 percent). The top three lenders were Rocket Mortgage with 6.1 percent market share, Truist Bank with 4.2 percent market share, and PennyMac Loan Services, LLC with 3.5 percent market share.

For small loans to businesses, TDBNA's market share of 1.2 percent ranked 17th out of 124 lenders (top 14 percent). The top three lenders were American Express National Bank with 23.5 percent market share, JPMorgan Chase Bank, N.A. with 10 percent market share, and Bank of America, N.A. with 8.4 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AAs. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units and small businesses.

Columbia MSA

Home Mortgage Loans

Refer to Table O in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased in low-income geographies approximated, and in moderate-income geographies exceeded, the percentage of owner-occupied housing units located in those geographies. The percentage of home mortgage loans originated or purchased in both low-income and moderate-income geographies exceeded the aggregate percentages of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker loan distribution in moderate-income geographies compared to the demographics.

Small Loans to Businesses

Refer to Table Q in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies equaled, and in moderate-income geographies exceeded, the percentage of businesses located in those geographies. The percentages of small loans to businesses originated or purchased in both low-income and moderate-income geographies exceeded the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Columbia MSA.

Greenville MSA

Home Mortgage Loans

Refer to Table O in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased in both low-income and moderate-income geographies exceeded the percentages of owner-occupied housing units located in those geographies and the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table Q in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in low-income geographies was near-to both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies originated or purchased exceeded both the percentage of businesses located in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was stronger than the 2022-2023 analysis period due to stronger lending performance in low-income geographies.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the Greenville MSA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes.

Columbia MSA

Home Mortgage Loans

Refer to Table P in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was near-to, and to moderate-income borrowers exceeded, the percentages of those families in the AA. The percentages of home mortgage loans originated or purchased to both low-income and moderate-income borrowers exceeded the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Greenville MSA

Home Mortgage Loans

Refer to Table P in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was excellent. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income and moderate-income borrowers.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased to low-income borrowers was below, and to moderate-income borrowers exceeded, the percentages of those families in the AA. The percentages of home mortgage loans originated or purchased to both low-income and moderate-income borrowers exceeded the aggregate percentages of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Small Loans to Businesses

Refer to Table R in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Community Development Lending

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Columbia MSA

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test.

TDBNA made 18 CD loans totaling \$27.1 million, which represented 18.7 percent of allocated tier 1 capital. Included in this total were nine PPP loans totaling \$2.1 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, occasionally in a leadership position. CD loans were impactful as they were responsive to identified community needs including affordable housing and lending to small businesses. By dollar volume, 54.2 percent of CD loans funded affordable housing, 38.4 percent funded economic development activities, and 7.3 percent funded revitalization and stabilization efforts.

Examples of CD loans in the AA include:

- A \$13.7 million loan to finance the construction of a 56-unit LIHTC multifamily housing project of which all units are restricted to senior citizens with incomes up to 60 percent of the AMI. Other funding sources include LIHTC equity provided by TDBNA.
- A renewal of a \$500,000 loan to an organization that serves the needs of the homeless and low-income individuals. The loan was originally used to rehabilitate and expand 98 units of affordable housing for low-income and formerly homeless households.

Greenville MSA

The institution is a leader in making CD loans. CD lending further supported the bank's excellent performance under the Lending Test.

The level of CD lending was excellent. TDBNA made 23 CD loans totaling \$67.8 million, which represented 21.4 percent of allocated tier 1 capital. Included in this total were 14 PPP loans totaling \$3.6 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, often in a leadership position. CD loans were impactful as they were responsive to identified community needs including affordable housing, small business lending, and community services. By dollar volume, 87 percent of CD loans funded affordable housing, 7.5 percent funded community services to LMI individuals, 5.2 percent funded revitalization and stabilization efforts, and 0.3 percent funded economic development activities.

Examples of CD loans in the AA include:

- A \$21.2 million loan for the new construction of an 88-unit LIHTC property. All 88 units are restricted to tenants earning up to 60 percent of the AMI. In addition, 19 units will receive project-based Section 8 HAP rental subsidies. Further, nine units are set aside for those with physical impairments or accessibility constraints. Other funding sources included LIHTC equity provided by TDBNA.
- A \$500,000 line of credit to a CDC to develop affordable housing for low-income individuals. The loan funds were used to acquire properties for rehabilitation.
- A renewal of a \$5 million working capital line of credit to a nonprofit organization that provides services primarily to LMI individual including job placement and training programs.

Product Innovation and Flexibility

Columbia MSA

The bank used innovative and flexible lending practices in order to serve AA credit needs. As shown in the table below, TDBNA funded 262 loans totaling \$21.4 million under the following innovative and flexible programs during the evaluation period.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	25	4,026
FNMA HomeReady Mortgage	15	2,305

FHA Mortgage	15	3,224
VA Mortgage	7	1,680
USDA- Rural Development Mortgage	1	69
PPP	199	10,107
Total	262	21,411

Greenville MSA

The bank used innovative and flexible lending practices in order to serve AA credit needs. As shown in the table below, TDBNA funded 273 loans totaling \$23.3 million under the following innovative and flexible programs during the evaluation period.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	11	1,741
FNMA HomeReady Mortgage	10	1,198
FHA Mortgage	4	860
VA Mortgage	1	328
PPP	247	19,200
Total	273	23,327

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Augusta MSA, Charleston MSA, Myrtle Beach MSA, and Spartanburg MSA AAs was consistent with the bank's overall performance in the full-scope areas. The bank's performance in the Charlotte MSA (2021-2022), Florence MSA, Hilton Head MSA, and SC Non-MSA AAs was weaker than the bank's overall performance due to weaker borrower and/or geographic distributions, and in the Charlotte MSA (2021-2022) and SC Non-MSA AAs, a lack of CD lending. Performance differences in the limited-scope areas did not impact the overall conclusion for the state of South Carolina.

Refer to Tables O through T in the state of South Carolina section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in South Carolina is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Columbia MSA and Greenville MSA AAs was excellent.

Number and Amount of Qualified Investments

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Columbia MSA	5	12,834	25	10,355	30	13.6	23,189	14.7	0	0
Greenville MSA	10	26,352	37	30,626	47	21.3	56,978	36.1	0	0
Limited-Scope:										
Augusta MSA	0	0	7	1,136	7	3.2	1,136	0.7	0	0
Charleston MSA	7	15,656	50	9,345	57	25.8	25,001	15.9	0	0
Charlotte MSA	2	283	3	3,032	5	2.3	3,315	2.1	0	0
Florence MSA	2	7,033	6	971	8	3.6	8,004	5.1	0	0
Hilton Head MSA	1	235	21	4,880	22	10.0	5,115	3.2	0	0
Myrtle Beach MSA	1	84	9	13,968	10	4.5	14,052	8.9	0	0
Spartanburg MSA	2	4,058	6	5,798	8	3.6	9,856	6.3	0	0
SC Non-MSA	5	3,588	17	2,538	22	10.0	6,126	3.9	0	0
Statewide SC	1	200	4	4,646	5	2.3	4,846	3.1	0	0
Total	36	70,323	185	87,295	221	100.0	157,618	100.0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Columbia MSA

The institution had an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made four investments totaling \$10.2 million and provided 21 qualifying grants and donations totaling \$181,667. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 16 percent of tier 1 capital allocated to the AA.

The bank exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing, creating 56 affordable housing units. By dollar volume, 98.4 percent of current period investments and donations funded affordable housing and 1.6 percent funded community services to LMI individuals.

The institution made significant use of innovative and/or complex investments to support CD investments included initiatives. CD investments included one direct LIHTC investment totaling \$8.9 million.

Examples of qualified investments in the AA include:

- A \$8.9 million complex LIHTC investment for the new construction of 56 residential units consisting of one- two- and three- bedroom units within single garden style buildings, located in Columbia. All units will be income restricted to tenants earning up to 60 percent of the AMI.

- A \$25,000 grant to a nonprofit charity organization to support a program that provides uninsured adults and children with free dental and vision care services.
- Three grants totaling \$43,500 to a community service organization to support its social service programs that focus on improving the lives of low-income families, senior citizens, and at-risk youths. Funds specifically supported their financial literacy education and mentoring programs targeting youth and their families.

Greenville MSA

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made three investments totaling \$29.6 million and provided 34 qualifying grants and donations totaling \$1 million. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 18 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing, creating 250 affordable housing units. By dollar volume, 98.8 percent of current period investments and donations funded affordable housing and 1.2 percent funded community services to LMI individuals.

The institution made extensive use of innovative and/or complex investments to support CD investments included initiatives. CD investments included three direct- LIHTC investments totaling \$29.6 million.

Examples of qualified investments in the AA include:

- A \$13.1 million complex LIHTC investment for the new construction of an 88-unit complex consisting of one- two- and three-bedroom units within two garden-style buildings. All units will be income restricted to tenants earning up to 60 percent of the AMI. Additionally, 19 units will benefit from project-based rental subsidies.
- A \$250,000 grant to a nonprofit organization that provides affordable housing and support services to assist individuals with economic stability. Funds supported a program that targets LMI families with children living in hotels who agree to participate in coaching and case management, providing them with connections to job training, childcare, financial management, and other financial resources.
- A \$175,000 grant to a nonprofit organization that supports military veterans with resources and opportunities. Funds were used to provide stable housing for veterans, specifically through rental assistance funds, property rehabilitation, and case management for LMI Veterans.

Broader Statewide Area

During the evaluation period, TDBNA made four investments totaling \$4.6 million in the broader statewide area. Current period investments included three innovative EQ2 investments totaling \$4 million made as part of the TD Equity Fund which supports minority-owned businesses, and an IOLTA investment totaling \$645,901. The bank also had one loan fund investment outstanding from the prior

period with a book value of \$200,000. These investments provided additional support to the bank's Outstanding Investment Test rating in the state of South Carolina.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Augusta MSA, Charleston MSA, Charlotte MSA (2021-2022), Florence MSA, Hilton Head MSA, Myrtle Beach MSA, Spartanburg MSA, and SC Non-MSA AAs was consistent with the bank's overall performance in the full-scope areas.

SERVICE TEST

The institution's performance under the Service Test in South Carolina is rated High Satisfactory. Weaker performance in the limited-scope areas negatively impacted the overall Service Test conclusion.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Columbia MSA was good and in the Greenville MSA was excellent.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population**			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:											
Columbia MSA	17.4	12	21.1	0.0	25.0	33.3	41.7	3.1	23.2	39.2	31.4
Greenville MSA	38.0	17	29.8	5.9	23.5	41.2	29.4	4.2	22.3	41.2	31.8
Limited-Scope:											
Augusta MSA	1.3	1	1.8	0.0	0.0	100.0	0.0	3.1	21.0	53.1	21.7
Charleston MSA	6.8	7	12.3	14.3	0.0	57.1	28.6	6.0	25.0	33.8	34.3
Florence MSA	1.5	2	3.5	0.0	0.0	100.0	0.0	1.9	16.4	45.8	35.9
Hilton Head MSA	8.8	5	8.8	20.0	0.0	60.0	20.0	3.6	22.1	50.0	23.4
Myrtle Beach MSA	15.4	7	12.3	14.3	28.6	42.9	14.3	3.6	20.4	62.9	13.2
Spartanburg MSA	4.1	1	1.8	0.0	0.0	0.0	100.0	4.2	15.0	54.9	24.7
SC Non-MSA	6.8	5	8.8	0.0	20.0	40.0	40.0	0.0	15.6	51.2	33.2

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

**3.1% of the population in the Columbia MSA, 0.6% of the population in the Greenville MSA, 1.1% of the population in the Augusta MSA, 0.9% of the population in the Charleston MSA, 0.9% of the population in the Hilton Head MSA, and 1.2 percent of the population in the Spartanburg MSA reside within an income "NA" category.

Columbia MSA

Service delivery systems were accessible to geographies and individuals of different income levels in the institution's AA. There were no branches in low-income geographies. The bank's distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

TDBNA offered ADS including ATMs, and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 14 ATMs in the AA, of which 13 were deposit-taking, including three in moderate-income geographies. There were no ATMs in low-income geographies. The distribution of ATMs in moderate-income geographies was excellent. TDBNA provided data indicating that 83.7 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 86.7 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 54.1 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 65.1 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Greenville MSA

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA. The bank's distribution of branches in both low-income and moderate-income geographies exceeded the percentages of the population living within those geographies.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 22 ATMs in the AA, of which 19 were deposit-taking, including one in a low-income geography and five in moderate-income geographies. The distribution of ATMs in both low-income and moderate-income geographies was excellent. TDBNA provided data indicating that 81 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 86.3 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 52.9 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 64.3 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
Columbia MSA	0	0	0	0	0	0
Greenville MSA	0	1	0	-1	0	0
Limited-Scope:						
Augusta MSA	0	0	0	0	0	0
Charleston MSA	2	1	1	0	0	0
Florence MSA	0	0	0	0	0	0
Hilton Head MSA	0	0	0	0	0	0
Myrtle Beach MSA	0	0	0	0	0	0
Spartanburg MSA	0	0	0	0	0	0

SC Non-MSA	0	0	0	0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Columbia MSA

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AAs, including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including extended hours on Thursdays and Fridays. All branches were open on Saturdays, and none were open on Sundays. Of the 12 branches in the AA, 10 had drive-thru facilities, including two of three branches in moderate-income geographies. TDBNA offered traditional banking products and services at all branch locations in the AA.

Greenville MSA

The bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed one branch in a moderate-income geography. The branch closure was attributed to low customer transactions and lower than expected production volume, along with a low number of households associated with the branch. Despite the closure the bank maintained an excellent branch distribution in moderate-income geographies.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, including low- and moderate-income geographies and/or individuals. TDBNA maintained standard weekday business hours at all branch locations in the AA including extended hours on Thursdays and Fridays. All branches were open on Saturdays, and none were open on Sundays. Of the 17 branches in the AA, 16 had drive-thru facilities, including all five branches in low- and moderate-income geographies. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

Columbia MSA

TDBNA provided a relatively high level of CD services. During the evaluation period, the bank provided 21 financial education events to 440 participants in the Columbia MSA. Additionally, 11 bank employees provided 162 service hours over the evaluation period that benefitted 12 organizations through board or committee participation or professional skills assistance.

Examples of CD services in the AA include:

- A bank employee provided 65 hours of board service and professional skills assistance to a nonprofit affordable housing organization.

- Two bank employees collectively provided 38 hours of board service to a nonprofit organization that provides community services to LMI individuals and/or in LMI geographies.
- A bank employee led six homebuyer workshops throughout the evaluation period in conjunction with various nonprofit organizations that serve LMI individuals. The classes were attended by nearly 100 participants.

Greenville MSA

TDBNA is a leader in providing CD services. During the evaluation period, the bank provided 105 financial education events to 1,291 participants in the Greenville MSA. Additionally, 18 bank employees provided 562 service hours over the evaluation period that benefitted 19 organizations through board or committee participation or professional skills assistance. The bank's assistance was responsive to an identified need in the AA for small business technical assistance.

Examples of CD services in the AA include:

- Four bank employees collectively provided over 240 hours of board service and professional skills assistance to a nonprofit organization focused on providing community services to LMI individuals.
- Four bank employees collectively led 40 financial literacy education classes to 375 individuals at a nonprofit organization focused on community services to LMI individuals. Topics covered included budgeting, common fraud schemes, credit awareness, identity protection and homebuying.
- A bank employee led 15 small business education courses at a local nonprofit that provides support to entrepreneurs including training and mentorship. The courses which covered topics including developing a business plan, conducting a market analysis, assessing a company's financial needs, and running a profitable company, were attended by 229 participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Myrtle Beach MSA and SC Non-MSA AAs was consistent with the bank's performance in the full-scope areas. The bank's performance in the Augusta MSA, Charleston MSA, Florence MSA, Hilton Head MSA, and Spartanburg MSA AAs was weaker than the bank's overall performance in the full-scope areas due to weaker branch distributions. Performance differences in the limited-scope areas negatively impacted the overall Service Test rating in the state of South Carolina.

State of Vermont

CRA rating for the State of Vermont: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include

- good lending activity, with overall good geographic and borrower distribution of lending;
- an excellent level of CD lending that positively impacted the Lending Test rating;
- an excellent level of CD investments that were responsive to identified community needs;
- readily accessible retail service delivery systems in the full-scope AA; and
- a limited level of CD services.

Description of Institution's Operations in Vermont

The state of Vermont consists of two AAs including the Burlington-South Burlington, VT MSA (Burlington MSA) and eight nonmetropolitan counties comprising the Vermont Non-MSA (VT Non-MSA) AA. Refer to appendix A for a complete list of counties reviewed.

As of year-end 2023, TDBNA had 23 branch locations and 43 ATMs, of which 35 were deposit-taking, within these AAs. During the evaluation period, the bank made \$323.6 million or 0.6 percent of its total dollar volume of home mortgage loans, small loans to businesses, and small loans to farms in these AAs.

The state of Vermont represented TDBNAs 13th largest rated area in terms of deposits. Based on June 30, 2023, FDIC summary of deposit information, TDBNA had \$3.6 billion in deposits in these AAs, which represented 1.6 percent of the bank's total adjusted deposits. The bank ranked second in deposit market share with 21.6 percent out of 23 depository institutions. The top competitor was Manufacturers and Traders Trust Company with 35 branches and 23.4 percent market share. Community Bank, N.A. ranked third with 26 branches and 8.1 percent market share.

VT Non-MSA

The following tables provides a summary of the demographics, including housing and business information for the VT Non-MSA AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: VT Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	116	0.0	12.9	67.2	19.0	0.9
Population by Geography	344,955	0.0	14.4	67.1	17.9	0.5
Housing Units by Geography	200,424	0.0	14.0	67.3	17.2	1.5
Owner-Occupied Units by Geography	104,561	0.0	12.3	68.8	18.6	0.3
Occupied Rental Units by Geography	39,540	0.0	21.9	60.2	17.4	0.5
Vacant Units by Geography	56,323	0.0	11.7	69.4	14.4	4.5
Businesses by Geography	52,300	0.0	14.7	60.4	24.1	0.8
Farms by Geography	3,142	0.0	9.5	69.9	20.3	0.3
Family Distribution by Income Level	85,733	20.3	18.4	22.2	39.1	0.0
Household Distribution by Income Level	144,101	25.0	16.0	18.4	40.6	0.0
Median Family Income VT Non -MSA		\$77,189	Median Housing Value			\$220,028
			Median Gross Rent			\$893
			Families Below Poverty Level			7.3%
Source: 20X20 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.						

The VT Non-MSA AA consists of eight counties including four contiguous counties in northeast Vermont (Caledonia, Lamoille, Orleans, Washington) and four contiguous counties in southern Vermont (Bennington, Rutland, Windham, Windsor). As of year-end 2023, TDBNA operated 14 branches and 21 ATMs, 16 of which were deposit taking, in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2023, TDBNA had \$1.8 billion in deposits in the AA which comprised 0.8 percent of total bank adjusted deposits and 49.8 percent of the rated area deposits. The AA is served by 18 FDIC-insured financial institutions operating 126 branches. TDBNA had 19.8 percent deposit market share which ranked first among all institutions. The other top competitors in the market were Manufacturers and Traders Trust Company with 24 branches and 13.4 percent market share and Union Bank with nine branches and 9.1 percent market share.

According to the January 2024 Moody's Analytics report, Vermont's economy is improving from a recent slump with leisure and hospitality services being the primary driving force. The state's unemployment rate remains low despite a rapidly expanding labor force. Vermont's economy is heavily dependent on tourism with winter sports being the primary draw for visitors who mostly drive in from neighboring Mid-Atlantic states. Vermont benefits from a highly educated population and low crime rates. Conversely, the state has restrictive land-use laws that hinder development, as well as high business costs. The state's demographic trends are not favorable leading to an aging labor force. Population growth has been lackluster as net-migration has not been enough to offset natural population losses. As younger adults leave the state the seniors become an increasingly larger share of the population.

Northeast Vermont

Caledonia County is located near the northeastern corner of the state, bordering the state of New Hampshire. The county's population totaled approximately 30,000 and 12.8 percent of households live below the poverty level. There are no low-income census geographies and three moderate-income census geographies in the county. The area has numerous outdoor recreation and tourist attractions including skiing and a multi-use trail system for hiking, biking, Nordic skiing, and snowshoeing. Major employment sectors included education and healthcare services, retail trade, and manufacturing. According to the U.S. BLS, the unemployment rate in Caledonia County was 5.4 percent as of January 2021, compared to 2.3 percent in December 2023. The county's unemployment rate was comparable to the statewide rate of 2.2 percent and lower than national rate of 3.7 percent as of December 2023.

Lamoille County is located northcentral portion of the state. The county has no low-or moderate-income geographies; however, a majority of the geographies have been designated as underserved due to their remote and/or rural nature. The county's population totaled approximately 26,000 and 11 percent of the population is below the poverty level. There are numerous outdoor recreation and tourist attractions as Lamoille County is home to Vermont's highest peak, Mount Mansfield, world-class ski resorts, the longest rail trail in New England, and numerous lakes and rivers. The area is home to several higher education institutions including Vermont State University-Johnson, Northern Vermont University, and Community College of Vermont (Morrisville campus). Tourism along with healthcare are the most prominent industries, followed by higher education and manufacturing. The area's largest employers include Stowe Mountain Resort, Copley Health Systems, Smugglers' Notch Resort, and Northern Vermont University. According to the U.S. BLS, the unemployment rate in Lamoille County was 5.8 percent as of January 2021, compared to 2.3 percent in December 2023. The county's unemployment rate was comparable to the statewide rate of 2.2 percent and lower than the national rate of 3.7 percent as of December 2023.

Orleans County is located in the northcentral portion of the state, along the Canadian border. Orleans County has no low-income census geographies and three moderate-income geographies. Additionally, six area geographies have been designated underserved due to their remote and/or rural nature. Orleans County is located between the eastern and western ranges of the Green Mountains. The county's population totaled approximately 27,000 and 14 percent of households live below the poverty level. Similar to other counties in the "Northeast Kingdom" of Vermont, Orleans County offers numerous outdoor recreation activities including skiing, hiking, biking, and water sports. Lake Willoughby, Vermont's deepest lake is in the county as is Jay Peak, a four-season resort near the Canadian border. Tourism is the primary industry and major employment sectors include education and healthcare services, retail trade, and manufacturing. According to the U.S. BLS, the unemployment rate in Orleans County was 6.5 percent as of January 2021, compared to 3.2 percent in December 2023. The county's unemployment rate was higher than the statewide rate of 2.2 percent and lower than national rate of 3.7 percent as of December 2023.

Washington County is located in the northcentral portion of the state. The county has no low-income geographies and only one moderate-income geography. The county's population totaled approximately 60,000 and 9.9 percent of households live below the poverty level. Montpelier is the county seat as well as the state capital of Vermont. Barre, known as the granite capital of the world, is the largest town in the county. The area is home to the largest operating deep hole granite quarry in the world. Like the other counties in the "Northern Kingdom" Washington County offers outdoor recreation activities that bring tourists to the area including skiing, hiking, biking and water sports. Major employment sectors included education and healthcare services, retail trade, and professional and waste management services. According to the U.S. BLS, the unemployment rate in Washington County was 4.2 percent as

of January 2021, compared to 1.8 percent in December 2023. The county's unemployment rate was lower than both the statewide rate of 2.2 percent and national rate of 3.7 percent as of December 2023.

Southern Vermont

Bennington County comprises the southwest corner of the state, bordering the states of New York and Massachusetts. The county has no low-income geographies and only one moderate-income geography. The county's population totaled approximately 37,000 and 12.6 percent of households live below the poverty level. A large portion of the eastern side of the county includes the Green Mountain National Forest and the county offers many recreational activities including hiking along the Long Trail, the nation's oldest long distance hiking trail that begins in the region, along with skiing, and fly fishing on the Battenkill River. Bennington is also home to several colleges including Bennington College, Southern Vermont College and Northeastern Baptist College. Major employment sectors included education and healthcare services, retail trade, and manufacturing. The area's largest employers include Southwestern Vermont Medical Center, Vermont Veterans' Home, Bennington College, and the Southwestern Vermont Supervisory Union. According to the U.S. BLS, the unemployment rate in Bennington County was 6.1 percent as of January 2021, compared to 2.7 percent in December 2023. The county's unemployment rate was higher than the statewide rate of 2.2 percent but lower than the national rate of 3.7 percent as of December 2023.

Rutland County is located in the southwestern area of the state, bordering New York. The county is the second largest in the state by total area and a large portion of the county includes the Green Mountain National Forest. The county's population totaled approximately 60,000, making it the second largest in the state, and 11.8 percent of households live below the poverty level. Like other areas in Vermont, Rutland County has much to offer in terms of outdoor recreation including the Northeast's largest ski area (Killington) that offers year-round activities. The county is also home to Lake Bomoseen, the largest lake completely within the state's borders that draws anglers to the region. In addition to the Green Mountains, the Taconic range of the Appalachians runs through the western edge of the county and south into New York. The Taconics are the slate producing region of Vermont and there are numerous slate quarrying operations in the county. Rutland County is also home to the largest underground marble quarry in the world. Major employment sectors included education and healthcare services, retail trade, as well as manufacturing. Major employers in the county include Rutland Regional Medical Center, GE Aerospace, Killington Ski Resort, Green Mountain Power, Casella Waste Systems, and The Vermont country Store. According to the U.S. BLS, the unemployment rate in Rutland County was 5.8 percent as of January 2021, compared to 2.3 percent in December 2023. The county's unemployment rate was comparable to the statewide rate of 2.2 percent and lower than national rate of 3.7 percent as of December 2023.

Windham County is located in the southeast corner of the state, bordering Massachusetts and New Hampshire. The county's population totaled approximately 46,000 and 13.4 percent of households live below the poverty level. There are no low-income geographies and two moderate-income geographies in the county. The Green Mountain National Forest lies on the western edge of the county. The county is home to Stratton peak, the tallest in southern Vermont. Similar to other regions in Vermont, tourism is a primary economic driver. Windham county has much to offer in terms of outdoor recreation activity including skiing, hiking and biking, and water recreation activities. Major employment sectors included education and healthcare services, retail trade, and manufacturing. According to the U.S. BLS, the unemployment rate in Windham County was 6.5 percent as of January 2021, compared to 2.3 percent in December 2023. The county's unemployment rate was comparable to the statewide rate of 2.2 percent and lower than the national rate of 3.7 percent as of December 2023.

Windsor County is located in the on the eastern edge of the state, bordering New Hampshire. Windsor county has no low-income geographies and two moderate-income geographies. The county's population totaled approximately 58,000 and 10.7 percent of households live below the poverty level. Similar to other regions in Vermont, tourism is a primary economic driver. The county is part of the Connecticut River Valley and is home to a number of state parks which offer hiking and biking trails. Vermont's only national park, the Marsh-Billings-Rockefeller National Historic Park is located in Woodstock and there are several ski resorts in the area as well. Windsor County is also part of the cheesemaking region of the state. Major employment sectors included education and healthcare services, retail trade, and manufacturing. According to the U.S. BLS, the unemployment rate in Windsor County was 5 percent as of January 2021, compared to 1.9 percent in December 2023. The county's unemployment rate was lower than both the statewide rate of 2.2 percent and the national rate of 3.7 percent as of December 2023.

Based on information in the above table, low-income families earned less than \$38,595 and moderate-income families earned less than \$61,751. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$965 for low-income borrowers and \$1,544 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,181. Most low-income borrowers would be unable to afford a mortgage loan in this AA.

The OCC relied on information from two community contacts conducted during the evaluation period, with a community and economic development agency and a nonprofit affordable housing organization. Community contacts indicated that the following are needs and opportunities within the bank's AA:

- Affordable housing units, including rental housing,
- Flexible mortgage loan programs including participation in second-lien, shared equity lending programs,
- Funding for home repairs and improvements,
- Independent and assisted living facilities for seniors,
- Homeless support and transitional housing,
- Funding to nonprofit organizations including grants and low-interest capital,
- Investment in affordable housing development including LIHTC programs,
- Homebuyer education.

Additionally, TDBNA identified the following community needs through their annual needs assessment discussions with community-based organizations:

- Affordable multifamily rental housing,
- Homeownership opportunities and financial education,
- Workforce development, small business support, and community services for LMI populations in rural areas.

Scope of Evaluation in Vermont

Examiners selected one AA for a full-scope review. Examiners completed a full-scope review for the VT Non-MSA AA as it has not received a full-scope review in recent CRA evaluations. While the rated area deposits are relatively even across the AAs, with no one AA holding a substantial share of deposits, the VT Non-MSA AA has the largest number of branches and majority of the lending activity in the state. The Burlington MSA received a limited-scope review.

Both AAs in the state of Vermont were weighted equally in determining conclusions as they have equal deposit share. In arriving at Lending Test conclusions, examiners placed more emphasis on the loan product category that had the higher percentage of lending in the AA. For both AAs, examiners placed more emphasis on small loans to businesses than home mortgage loans. The bank did not originate a sufficient volume of small loans to farms for meaningful analysis in either AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VERMONT

LENDING TEST

The bank's performance under the Lending Test in Vermont is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the VT Non-MSA AA was excellent.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
VT Non-MSA	545	689	6	28	1,268	54.0	49.8
Limited-Scope:							
Burlington MSA	323	711	6	33	1,073	45.6	50.2
Statewide VT	-	-	-	9	9	0.4	0.0
Total	868	1,400	12	70	2,350	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* \$(000)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope:							
VT Non-MSA	155,794	26,084	157	33,099	215,134	35.9	49.8
Limited-Scope:							
Burlington MSA	116,122	25,390	89	75,994	217,594	36.3	50.2
Statewide VT	-	-	-	166,805	166,805	27.8	0.0
Total	271,916	51,474	246	275,898	599,533	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Lending levels reflect good responsiveness to AA credit needs.

TDBNA ranked first out of 18 depository institutions with a deposit market share of 19.8 percent.

For home mortgage loans, TDBNA's market share of 2 percent ranked 13th out of 267 lenders (top 2 percent). The top three lenders were Rocket Mortgage with 8 percent market share, Northcountry Federal Credit Union with 6.7 percent market share, and Mascoma Bank with 6.6 percent market share.

For small loans to businesses, TDBNA's market share of 2.1 percent ranked 10th out of 95 lenders (top 11 percent). The top three lenders were American Express National Bank with 23 percent market share, JPMorgan Chase Bank, N.A. with 13.7 percent market share, and Capital One, N.A. with 11.8 percent market share.

Distribution of Loans by Income Level of the Geography

The bank exhibited a good geographic distribution of loans in its AA. There were no low-income geographies in the AA, so conclusions are based on the bank's performance in moderate-income geographies.

Home Mortgage Loans

Refer to Table O in the state of Vermont section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was good.

For the 2022-2023 analysis period, the percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker overall distribution of loans in moderate-income geographies.

Small Loans to Businesses

Refer to Table Q in the state of Vermont section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was good.

For the 2022-2023 analysis period, the percentage of small loans to businesses originated or purchased in moderate-income geographies was near-to the percentage of businesses located in those geographies and approximated the aggregate percentage of all reporting lenders.

For 2021, the bank's performance was weaker than the 2022-2023 analysis period due to weaker distribution of loans compared to the demographic comparator.

Lending Gap Analysis

The OCC analyzed TDBNA's geographic lending patterns of home mortgage loans and small loans to businesses by mapping loan originations and purchases throughout the AA. Examiners did not identify any unexplained conspicuous lending gaps in the VT Non-MSA AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

Refer to Table P in the state of Vermont section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was adequate. Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for low-income borrowers.

For the 2022-2023 analysis period, the percentages of home mortgage loans originated or purchased to low-income borrowers was well below, and to moderate-income borrowers was near-to, the percentages of those families in the AA. The percentages of home mortgage loans originated or purchased to both low- income and moderate-income borrowers was near-to the aggregate percentages of all reporting lenders.

The bank's 2021 performance was weaker than the 2022-2023 analysis period due to a weaker distribution of lending to low-income borrowers as compared to the demographics and aggregate performance.

Small Loans to Businesses

Refer to Table R in the state of Vermont section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The distribution of loans to businesses of different sizes was excellent.

For the 2022-2023 analysis period, the percentage of small loans originated or purchased to businesses with revenues of \$1 million or less approximated the percentage of small businesses in the AA and exceeded the aggregate percentage of all reporting lenders.

The bank's 2021 performance was consistent with the 2022-2023 analysis period.

Community Development Lending

The institution is a leader in making CD loans. CD lending had a positive impact on the Lending Test conclusion in the VT Non-MSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

TDBNA made 28 CD loans totaling \$33.1 million, which represented 13.9 percent of allocated tier 1 capital. Included in this total were 15 PPP loans totaling \$1.3 million that supported area businesses during the COVID-19 pandemic. The bank utilized complex CD loans, occasionally in a leadership position. CD loans were impactful as they were responsive to identified community needs including affordable housing and community services to LMI. By dollar volume, 63 percent of CD loans funded affordable housing, 14.2 percent funded economic development activities, 13.7 percent funded revitalization and stabilization efforts, and 9.1 percent funded community services.

Examples of CD loans in the AA include:

- A \$7.2 million loan to finance the new construction of a 25-unit mixed-income LIHTC property. Of the 25 units, 19 are set aside for individuals earning up to 80 percent of the AMI and six units are income-restricted up to 100 percent of the AMI. In addition, six units are reserved for individuals exiting from or at-risk of homelessness with support services also available through a local nonprofit supportive housing organization. Further, eight units will receive project-based Section 8 rental subsidies. Other funding sources included LIHTC equity provided by TDBNA.
- A \$13.2 million draw on a construction line of credit for the new construction of a 42-unit mixed-income housing project. Of the 42 units, 30 are set aside for tenants earning up to 60 percent of the AMI. In addition, eight units will be targeted to formerly homeless households with supportive services available onsite and eight of those units will receive rental subsidies.
- A \$1.5 million guidance line of credit to a CDFI to support its down payment assistance lending program.

Broader Statewide Area

During the evaluation period, TDBNA originated nine CD loans totaling \$166.8 million within the broader statewide area. These loans provided additional support for the Outstanding Lending Test rating in the state of Vermont.

Product Innovation and Flexibility

The institution used innovative and/or flexible lending practices in order to serve AA credit needs. During the evaluation period, TDBNA funded 229 loans totaling \$22.6 million among the various flexible lending products available in the VT Non-MSA.

Loan Type	Number of Loans	Dollar Amount (\$000s)
TD Right Step Mortgage®	3	447
FNMA HomeReady Mortgage	2	355
FHA Mortgage	1	201
VA Mortgage	1	205
PPP	222	21,351
Total	229	22,559

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Burlington MSA was consistent with the bank's overall performance in the full-scope area.

Refer to Tables O through T in the state of Vermont section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The institution's performance under the Investment Test in Vermont is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope review, the bank's performance in the VT Non-MSA AA was excellent.

Number and Amount of Qualified Investments

Qualified Investments*										
Assessment Area	Prior Period**		Current Period		Total				Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
VT Non-MSA	10	14,784	59	25,438	69	48.3	40,222	51.5	0	0
Limited-Scope:										
Burlington MSA	9	13,309	61	20,724	70	49.0	34,033	43.6	0	0
Statewide VT	0	0	4	3,863	4	2.8	3,863	4.9	0	0
Total	19	28,093	124	50,025	143	100.0	78,118	100.0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

*** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The institution had an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

During the evaluation period, TDBNA made 33 investments totaling \$24.5 million and provided 26 qualifying grants and donations totaling \$933,445. The dollar volume of current-and prior-period investments (excluding unfunded commitments) represented 16.9 percent of tier 1 capital allocated to the AA.

The institution exhibited excellent responsiveness to credit and community economic development needs. Investments were particularly responsive to affordable housing needs, creating 85 units of affordable housing. By dollar volume, 99.3 percent of current period investments and donations funded affordable housing, 0.6 percent funded economic development activities, and 0.1 percent funded community services.

The institution made extensive use of innovative and/or complex qualified investments. CD investments included three direct LIHTC investments totaling \$17.6 million.

Examples of qualified investments in the AA include:

- A \$4.4 million complex LIHTC investment for the acquisition and conversion of a former hotel into a 40-unit apartment complex consisting of 39 affordable housing units restricted to tenants earning up to 60 percent of the AMI and a manager unit. Additionally, 12 units, are reserved for individuals and families experiencing homelessness or at-risk of homelessness with four of the units exclusively targeted to veterans. These units will also benefit from rental subsidies through Vermont State Housing Authority.
- A \$175,000 grant to a nonprofit affordable housing organization for its program focused on housing rehabilitation and renewable energy updates. The funds specifically supported the rehabilitation of two affordable housing developments which included new roofs outfitted with solar panels.
- A \$150,000 disaster relief grant to a community foundation to provide critical funding to communities impacted by flooding in the AA in 2023. The funds were used to provide clean drinking water, food, transitional housing, and financial counseling to affected individuals and also assisted businesses as they cleaned and prepared to reopen, among other identified needs.

Broader Statewide Area

During the evaluation period, TDBNA made four investments totaling \$3.9 million in the broader statewide area. Investments included two IOLTA program investments totaling \$250,661 and two state tax credit program investments totaling \$3.6 million. These investments provided additional support for the bank's Outstanding Investment Test rating in the state of Vermont.

Conclusions for Area Receiving Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Burlington MSA was consistent with the bank's overall performance in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in state of Vermont is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the VT Non-MSA AA was good.

Retail Banking Services

Distribution of Branch Delivery System*											
Assessment Area	Deposits	Branches						Population**			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography**			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp

Full-Scope:											
VT Non-MSA	49.8	14	60.9	0.0	35.7	28.6	35.7	0.0	14.4	67.1	17.9
Limited-Scope:											
Burlington MSA	50.2	9	39.1	0.0	11.1	55.6	33.3	2.3	18.5	58.5	19.7

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

**0.5% of the population in the VT Non-MSA AA and 1.0% of the population in the Burlington MSA resides within an "NA" income category.

Service delivery systems were readily accessible to geographies and individuals of different income levels in the bank's AA. The distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies. There are no low-income geographies within the bank's AA.

TDBNA offered ADS including ATMs and digital banking channels (online and mobile banking). These systems provided additional delivery availability and access to banking services to both retail and business customers. TDBNA had 21 ATMs in the AA, of which 16 were deposit-taking, including seven in moderate-income geographies. The distribution of ATMs in moderate-income geographies was excellent. TDBNA provided data indicating that 80.9 percent of customers in LMI areas of the AA interacted with the bank utilizing digital banking channels during the evaluation compared, compared with 84.1 percent of customers in MUI areas. Further, bank customers in LMI areas of the AA conducted 55.9 percent of their transactions utilizing digital banking channels over the evaluation period, compared to 64.2 percent for customers in MUI areas. ADS had a positive impact on the accessibility of the bank's service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full-Scope:						
VT Non-MSA	0	1	0	0	0	-1
Limited-Scope:						
Burlington MSA	0	1	0	0	-1	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to low- and moderate-income individuals. The bank opened no branches during the evaluation period and closed one branch in an upper-income geography.

Services, including where appropriate, business hours, did not vary in a way that inconvenienced the various portions of its AA, particularly moderate-income geographies and/or low- and moderate-income individuals. TDBNA maintained standard business hours at all branch locations in the AA including extended hours on Fridays. Twelve branches were open on Saturdays including all five moderate-income branches. No branches were open on Sundays. Of the 14 branches in the AA, nine had drive-thru facilities, including three in moderate-income geographies. TDBNA offered traditional banking products and services at all branch locations in the AA.

Community Development Services

TDBNA provided a limited level of CD services. During the evaluation period, the bank provided 14 financial education events to 41 participants in the VT Non-MSA AA. Additionally, two bank employees provided 48 service hours over the evaluation period that benefitted two organizations through board or committee participation. The bank's assistance was responsive to an identified need for financial education, specifically homebuyer education.

Examples of CD services in the AA include:

- A bank employee provided 38 hours of board service to a nonprofit housing organization whose mission is to provide safe, decent, and perpetually affordable housing options for limited income residents.
- Three area branch managers collectively provided 10 homebuyer education courses over the evaluation period that were attended by 26 LMI participants.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Burlington MSA was weaker than the bank's overall performance in the full-scope area due to a weaker branch distribution. Performance differences in the limited scope area did not impact the overall Service Test rating the state of Vermont.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	January 1, 2021 to December 31, 2023	
Bank Products Reviewed:	Home mortgage, small business, small farm, Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSAs		
Allentown-Bethlehem-Easton, PA-NJ	Full-Scope	PA: Lehigh and Northampton Counties NJ: Warren County
Boston-Cambridge-Newton, MA-NH	Full-Scope	MA: Essex, Middlesex, Norfolk, Plymouth, Suffolk Counties NH: Rockingham and Strafford Counties
Charlotte-Concord-Gastonia, NC-SC (2023)	Full-Scope	NC: Mecklenburg County SC: Lancaster and York Counties
New York-Newark-Jersey City, NY-NJ	Full-Scope	NJ: Bergen, Essex, Hudson, Hunterdon, Middlesex, Monmouth, Morris, Ocean, Passaic, Somerset, Sussex, and Union Counties NY: Bronx, Kings, Nassau, New York, Putnam, Queens, Richmond, Rockland, Suffolk, and Westchester Counties
Philadelphia-Camden-Wilmington, PA-NJ-DE	Full-Scope	DE New Castle County NJ: Burlington, Camden, Gloucester and Salem Counties PA: Bucks, Chester, Delaware, Montgomery, and Philadelphia Counties
Providence-Warwick, RI-MA	Full-Scope	MA: Bristol County (Partial) including City of Attleboro and Towns of Easton, Mansfield, North Attleboro, Norton, Rehoboth and Seekonk RI: Bristol County, Kent County (Partial) including the City of Warwick and Town of West Warwick; Newport (Partial) including the City of Newport and Towns of Jamestown, Middletown, Portsmouth, Providence County
Washington-Arlington-Alexandria, DC-VA-MD	Full-Scope	DC: District of Columbia MD: Montgomery and Prince George's Counties

		VA: Arlington, Fairfax, Loudon, and Prince William Counties; Alexandria City, Fairfax City, Falls Church City, Manassas City, and Manassas Park City
State		
Connecticut		
Bridgeport-Stamford-Norwalk MSA	Limited-Scope	Fairfield County
Hartford-East Hartford-Middletown MSA	Full-Scope	Harford, Middlesex, and Tolland Counties
New Haven-Milford MSA	Full-Scope	New Haven County
Norwich-New London MSA	Limited-Scope	New London (Partial) including the towns of Colchester and Lebanon
CT Non-MSA	Limited-Scope	Litchfield County
Delaware		
Dover MSA	Limited-Scope	Kent County
Salisbury MSA	Full-Scope	Sussex County (Partial) including the city of Lewes and town of Milton
Florida		
Cape Coral-Fort Myers MSA	Limited Scope	Lee County
Delton-Daytona Beach-Ormond Beach MSA	Limited-Scope	Volusia County
Gainesville MSA	Limited-Scope	Alachua County
Homosassa Springs MSA	Limited-Scope	Citrus County
Jacksonville MSA	Limited-Scope	Duval and Saint Johns County
Lakeland-Winter Haven MSA	Limited-Scope	Polk County
Miami-Fort Lauderdale-Pompano Beach MSA	Full-Scope	Broward, Miami-Dade and Palm Beach Counties
Naples-Marco Island MSA	Limited-Scope	Collier County (Partial) including the cities of Naples and Everglades; the unincorporated communities of Chokoloskee, East Naples, Golden Gate, Island Walk, Ley Resort, Lely, Naples Manor, Naples Park, Ochopee, Pelican Bay, Pine Ridge, Plantation Island, Veronica Walk, Vineyards
North Port-Sarasota-Bradenton MSA	Limited-Scope	Manatee and Sarasota Counties
Ocala MSA	Limited-Scope	Marion County
Orlando-Kissimmee-Sanford MSA	Full-Scope	Lake Orange, Osceola, and Seminole Counties
Palm Bay-Melbourne-Titusville MSA	Limited-Scope	Brevard County
Port St Lucie MSA	Full Scope	Martin and Saint Lucie Counties
Sebastian-Vero Beach MSA	Limited Scope	Indian River County
Sebring-Avon Park MSA	Limited Scope	Highlands County
Tampa-St. Petersburg-Clearwater MSA	Limited-Scope	Hillsborough, Pasco, and Pinellas Counties
FL Non-MSA	Limited Scope	Bradford, Columbia, Putnam, Suwannee and Union Counties
Maine		
Bangor MSA	Limited-Scope	Penobscot County
Lewiston-Auburn MSA	Limited-Scope	Androscoggin County
Portland-South Portland MSA	Full-Scope	Cumberland, Sagadahoc, and York Counties
ME Non-MSA	Limited-Scope	Aroostook, Franklin, Hancock, Kennebec, Knox, Lincoln, Oxford, Somerset and Waldo Counties
Maryland		
Baltimore-Columbia-Towson MSA	Full-Scope	Anne Arundel, Baltimore, Harford, and Howard Counties; Baltimore City
Massachusetts		
Barnstable Town MSA	Full-Scope	Barnstable County

Pittsfield MSA	Limited-Scope	Berkshire County
Springfield MSA	Full-Scope	Franklin, Hampden and Hampshire Counties
Worcester MSA	Limited-Scope	Worcester County
New Hampshire		
Manchester-Nashua MSA	Full-Scope	Hillsborough County
NH Non-MSA	Full-Scope	Belknap, Carroll, Cheshire, Grafton, Merrimack, and Sullivan Counties
New Jersey		
Atlantic City-Hammonton MSA	Full-Scope	Atlantic County
Ocean City MSA	Full-Scope	Cape May County
Trenton-Princeton MSA	Limited-Scope	Mercer County
Vineland-Bridgeton MSA	Limited-Scope	Cumberland County
New York		
Albany-Schenectady-Troy MSA	Limited-Scope	Albany County, Rensselaer County (Partial including Towns of East Greenbush, North Greenbush, Rensselaer and Schodack), Saratoga County, Schenectady County (Partial including City of Schenectady and Towns of Glenville, Niskayuna, and Rotterdam)
Glens Falls MSA	Full-Scope	Warren and Washington County
Kingston MSA	Limited-Scope	Ulster County (Partial including City of Kingston and Towns of Esopus, Hurley, Marbletown, Rosendale, Saugerties, Ulster and Woodstock)
Poughkeepsie-Newburgh-Middletown MSA	Full-Scope	Dutchess and Orange Counties
NY Non-MSA	Limited-Scope	Clinton County, Columbia County, Essex County (Partial) including town of Chesterfield, and Sullivan County
North Carolina		
Asheville	Full-Scope	Buncombe and Henderson Counties
Hickory-Lenoir-Morganton	Limited-Scope	Burke County
Wilmington	Limited-Scope	New Hanover and Pender Counties
NC Non-MSA	Limited-Scope	McDowell, Mitchell, Polk, Rutherford and Yancey Counties
South Carolina		
Augusta MSA	Limited-Scope	Aiken County
Charleston-North Charleston MSA	Limited-Scope	Berkeley, Charleston and Dorchester Counties
Charlotte MSA (2021-2022)	Limited-Scope	York County
Columbia MSA	Full-Scope	Kershaw, Lexington and Richland Counties
Florence MSA	Limited-Scope	Florence County
Greenville-Anderson MSA	Full-Scope	Anderson, Greenville, Laurens and Pickens Counties
Hilton Head Island-Bluffton MSA	Limited-Scope	Beaufort and Jasper Counties
Myrtle Beach-Conway-North Myrtle Beach MSA	Limited-Scope	Horry County
Spartanburg MSA	Limited-Scope	Spartanburg County
SC Non-MSA	Limited-Scope	Georgetown, Marion, Newberry, Oconee Counties
Vermont		
Burlington-South Burlington MSA	Limited-Scope	Chittenden, Franklin and Grand Isle Counties
VT Non-MSA	Full-Scope	Bennington, Caledonia, Lamoille, Orleans, Rutland, Washington, Windham and Windsor Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS TD Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
	Outstanding	Outstanding	High Satisfactory	Outstanding
MMSA or State:				
Allentown-Bethlehem-Easton, PA-NJ MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Boston-Cambridge-Newton, MA-NH MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Charlotte-Concord-Gastonia, NC-SC MMSA	Outstanding	Outstanding	Outstanding	Outstanding
New York-Newark-Jersey City, NY-NJ MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Philadelphia-Camden-Wilmington, PA-NJ-DE MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Providence-Warwick, RI-MA MMSA	Outstanding	Outstanding	Low Satisfactory	Outstanding
Washington-Arlington-Alexandria, DC-VA-MD MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Connecticut	Outstanding	Outstanding	High Satisfactory	Outstanding
Delaware	Outstanding	Outstanding	Low Satisfactory	Outstanding
Florida	Outstanding	Outstanding	Outstanding	Outstanding
Maine	Outstanding	Outstanding	Outstanding	Outstanding
Maryland	Outstanding	Outstanding	High Satisfactory	Outstanding
Massachusetts	Outstanding	Outstanding	Outstanding	Outstanding
New Hampshire	Outstanding	Outstanding	Outstanding	Outstanding
New Jersey	Outstanding	Outstanding	Outstanding	Outstanding
New York	Outstanding	Outstanding	High Satisfactory	Outstanding
North Carolina	Outstanding	Outstanding	High Satisfactory	Outstanding
South Carolina	Outstanding	Outstanding	High Satisfactory	Outstanding
Vermont	Outstanding	Outstanding	High Satisfactory	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: An 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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5

million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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) 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.

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.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Allentown MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Allentown MMSA	488	109,945,955	100.0	23,983	2.4	4.3	4.2	13.4	20.1	16.3	42.5	29.9	40.2	41.7	45.7	39.3	0.0	0.0	0.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Allentown MMSA	210	51,472,791	100.0	38,789	2.8	3.3	3.2	12.9	17.6	13.2	41.5	35.2	39.1	42.7	43.8	44.6	0.0	0.0	0.0
Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022-23

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Allentown MMSA	488	109,945,955	100.0	23,983	20.0	13.9	8.3	17.7	18.9	20.4	20.9	19.1	22.6	41.4	45.3	33.2	0.0	2.9	15.5

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Allentown MMSA	210	51,472,791	100.0	38,789	20.1	15.2	6.9	17.6	27.1	17.9	20.9	15.2	22.4	41.3	41.9	35.6	0.0	0.5	17.3

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Allentown MMSA	660	13,913	100.0	19,257	6.6	8.8	4.7	19.2	15.9	17.7	36.4	36.1	37.1	37.8	39.2	40.0	0.0	0.0	0.5

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Allentown MMSA	362	12,194	100.0	20,236	7.1	3.0	5.2	15.9	17.4	15.1	37.1	28.5	38.1	39.9	51.1	41.0	0.0	0.0	0.6

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Allentown MMSA	660	13,913	100.0	19,257	90.6	85.5	54.6	2.8	12.9	6.6	1.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Allentown MMSA	362	12,194	100.0	20,236	88.6	80.1	49.2	3.6	14.9	7.8	5.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Allentown MMSA	1	1	100.0	124	1.2	0.0	0.0	8.6	0.0	2.4	42.7	100.0	51.2	47.6	0.0	45.6	0.0	0.0	0.8

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Allentown MMSA	1	131	100.0	159	1.8	0.0	0.0	7.1	0.0	1.2	42.5	100.0	44.5	48.6	0.0	50.6	0.0	0.0	3.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Allentown MMSA	1	1	100.0	124	97.3	100.0	66.4	1.4	0.0	1.2	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Allentown MMSA	1	131	100.0	159	97.4	0.0	61.6	1.5	0.0	1.1	100.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Boston MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Boston MMSA	6,507	3,207,624,135	100.0	136,544	3.3	4.6	4.4	15.0	17.4	15.6	42.8	35.9	41.8	38.4	41.4	37.5	0.5	0.6	0.6
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Boston MMSA	4,509	2,302,790,613	100.0	292,839	3.3	4.0	4.1	14.9	18.4	15.2	45.8	34.1	44.0	35.8	43.2	36.6	0.1	0.2	0.1
Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Boston MMSA	6,507	3,207,624,135	100.0	136,544	22.5	7.6	7.4	16.6	20.8	18.9	20.2	19.7	22.7	40.7	50.8	38.1	0.0	1.1	12.9

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2021**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Boston MMSA	4,509	2,302,790,613	100.0	292,839	23.3	5.9	5.6	16.4	18.8	18.0	19.7	17.0	22.6	40.6	56.9	39.8	0.0	1.4	13.9

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Boston MMSA	5,465	130,081	100.0	137,460	6.2	6.0	6.0	15.4	15.4	16.4	35.8	45.5	38.0	41.2	32.5	38.0	1.4	0.6	1.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Boston MMSA	3,963	188,866	100.0	159,697	6.9	5.1	7.0	15.5	15.9	16.5	38.9	46.6	39.8	38.4	32.3	36.0	0.4	0.1	0.6

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Boston MMSA	5,465	130,081	100.0	137,460	89.6	84.6	47.5	3.8	14.0	6.6	1.5

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Boston MMSA	3,963	188,866	100.0	159,697	87.5	76.2	42.7	4.8	18.3	7.7	5.5

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Boston MMSA	18	146	100.0	294	3.2	0.0	2.4	14.3	5.6	11.6	43.7	55.6	40.5	38.2	38.9	44.2	0.5	0.0	1.4

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Boston MMSA	19	663	100.0	364	3.5	0.0	2.3	12.3	5.3	11.3	47.1	36.8	42.2	37.0	57.9	43.6	0.1	0.0	0.6

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-2023**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Boston MMSA	18	146	100.0	294	96.5	88.9	67.0	1.8	0.0	1.7	11.1

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Boston MMSA	19	663	100.0	364	95.9	84.2	58.4	2.3	5.3	1.8	10.5

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Charlotte MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Charlotte MMSA	357	191,561,513	100.0	61,093	2.6	1.1	2.9	19.7	26.1	18.6	30.8	22.7	28.3	46.3	49.0	48.8	0.7	1.1	1.4

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Charlotte MMSA	357	191,561,513	100.0	61,093	20.0	6.2	5.8	17.0	17.1	16.2	18.8	16.0	20.8	44.2	60.2	44.5	0.0	0.6	12.6

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Charlotte MMSA	110	5,760	100.0	52,418	4.9	8.2	4.7	23.0	19.1	22.3	24.1	24.5	24.5	45.8	43.6	46.2	2.3	4.5	2.3

Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2023**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Charlotte MMSA	110	5,760	100.0	52,418	92.3	83.6	52.4	2.1	15.5	5.7	0.9

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2023**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Charlotte MMSA	0	0	100.0	143	3.9	0.0	1.4	23.2	0.0	18.9	32.3	0.0	42.7	39.6	0.0	36.4	1.0	0.0	0.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2023**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Charlotte MMSA	0	0	100.0	143	97.2	0.0	55.2	1.3	0.0	1.4	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

New York MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
New York MMSA	23,500	9,726,872,963	100.0	340,670	3.0	3.9	4.0	14.3	15.7	15.1	37.8	32.3	36.9	44.5	47.7	43.6	0.4	0.4	0.5

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
New York MMSA	12,168	5,916,428,913	100.0	627,162	2.9	3.2	3.6	13.3	15.0	13.2	37.1	31.1	35.8	46.6	50.6	47.3	0.1	0.1	0.1

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
New York MMSA	23,500	9,726,872,963	100.0	340,670	24.4	4.9	4.8	15.8	14.9	15.0	17.8	19.0	21.2	41.9	59.4	43.7	0.0	1.8	15.3

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2021**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
New York MMSA	12,168	5,916,428,913	100.0	627,162	25.2	4.4	3.3	15.5	14.1	13.1	17.2	17.2	21.2	42.2	61.7	47.9	0.0	2.5	14.5

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
New York MMSA	41,678	952,071	100.0	738,464	8.1	6.8	7.3	17.2	19.1	16.9	30.4	36.6	31.1	41.9	36.1	42.0	2.4	1.4	2.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
New York MMSA	31,485	1,303,937	100.0	807,840	7.5	5.7	7.0	17.2	16.2	17.0	29.7	32.9	30.1	44.4	44.5	44.5	1.1	0.7	1.4

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
New York MMSA	41,678	952,071	100.0	738,464	93.4	84.8	48.9	2.6	13.5	4.0	1.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
New York MMSA	31,485	1,303,937	100.0	807,840	91.2	75.0	37.3	3.6	19.7	5.3	5.3

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
New York MMSA	30	574	100.0	956	4.5	0.0	3.4	15.1	3.3	10.6	34.9	33.3	33.2	44.5	63.3	50.0	1.0	0.0	2.9

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
New York MMSA	41	1,888	100.0	943	3.9	2.4	1.1	14.9	17.1	10.7	34.1	36.6	30.9	46.8	43.9	55.6	0.3	0.0	1.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
New York MMSA	30	574	100.0	956	97.5	86.7	64.6	1.4	13.3	1.1	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
New York MMSA	41	1,888	100.0	943	97.0	80.5	61.4	1.8	17.1	1.2	2.4

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Philadelphia MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography
2022-23

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Philadelphia MMSA	9,821	2,674,856,848	100.0	184,850	4.0	3.8	3.4	18.6	22.8	19.1	41.2	33.9	40.6	35.5	39.0	36.2	0.7	0.4	0.6

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography
2021

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Philadelphia MMSA	4,633	1,379,885,472	100.0	316,393	3.6	3.1	2.1	18.3	21.5	16.0	41.9	34.3	42.2	36.2	41.1	39.7	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Philadelphia MMSA	9,821	2,674,856,848	100.0	184,850	21.8	13.4	9.2	17.3	24.2	20.2	20.1	19.3	21.8	40.9	40.2	32.4	0.0	2.8	16.4

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2021**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Philadelphia MMSA	4,633	1,379,885,472	100.0	316,393	22.0	11.9	7.0	17.2	21.1	17.7	20.0	17.2	21.3	40.8	46.7	35.7	0.0	3.1	18.2

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Philadelphia MMSA	10,790	291,325	100.0	161,961	4.8	3.2	3.6	19.4	17.1	18.5	35.5	41.3	37.6	38.3	37.3	38.2	2.0	1.1	2.1

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Philadelphia MMSA	8,982	415,717	100.0	178,766	4.5	3.0	3.5	19.3	14.5	17.9	37.4	40.2	39.6	38.4	42.0	38.1	0.5	0.3	0.8

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Philadelphia MMSA	10,790	291,325	100.0	161,961	91.9	83.6	48.6	2.8	14.0	5.3	2.4

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Philadelphia MMSA	8,982	415,717	100.0	178,766	90.1	76.0	42.6	3.6	19.1	6.3	5.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Philadelphia MMSA	20	287	100.0	680	2.7	0.0	1.0	15.9	0.0	15.7	44.3	65.0	50.9	36.5	35.0	30.4	0.7	0.0	2.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Philadelphia MMSA	13	280	100.0	800	2.1	0.0	0.6	14.1	7.7	18.0	46.4	23.1	48.4	37.2	69.2	31.2	0.1	0.0	1.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Philadelphia MMSA	20	287	100.0	680	96.4	100.0	61.0	2.2	0.0	1.4	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Philadelphia MMSA	13	280	100.0	800	95.7	69.2	61.2	2.8	23.1	1.5	7.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Providence MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Providence MMSA	478	218,978,891	100.0	33,854	4.5	7.3	5.6	11.3	13.2	13.6	46.8	39.5	46.8	37.3	40.0	33.9	0.1	0.0	0.1
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Providence MMSA	328	111,256,902	100.0	60,069	4.8	6.4	5.3	10.9	17.1	11.7	42.0	28.0	40.7	42.1	47.6	42.1	0.2	0.9	0.2
Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022-23

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Providence MMSA	478	218,978,891	100.0	33,854	22.6	7.7	6.7	16.3	22.0	21.4	20.7	19.7	26.0	40.4	48.1	33.7	0.0	2.5	12.1

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Providence MMSA	328	111,256,902	100.0	60,069	23.8	10.4	5.0	16.0	22.6	19.1	19.1	16.2	24.7	41.0	49.1	35.9	0.0	1.8	15.3

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Providence MMSA	721	13,146	100.0	26,821	8.3	8.3	9.4	14.4	20.0	15.4	45.8	42.6	42.0	31.2	29.0	32.6	0.4	0.1	0.5

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Providence MMSA	438	17,862	100.0	30,358	9.7	6.8	10.8	17.4	19.2	16.6	34.8	38.6	35.2	37.4	34.5	36.8	0.7	0.9	0.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Providence MMSA	721	13,146	100.0	26,821	89.5	83.1	50.8	3.7	16.0	6.8	1.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Providence MMSA	438	17,862	100.0	30,358	87.1	72.6	42.9	4.9	19.0	7.9	8.4

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Providence MMSA	0	0	100.0	98	4.5	0.0	6.3	9.8	0.0	10.3	44.1	0.0	28.7	41.5	0.0	54.6	0.1	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Providence MMSA	3	26	100.0	96	5.1	0.0	4.2	10.5	66.7	4.2	34.4	0.0	33.5	49.8	33.3	58.1	0.1	0.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Providence MMSA	0	0	100.0	98	97.3	0.0	77.0	1.4	0.0	1.3	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Providence MMSA	3	26	100.0	96	97.0	100.0	68.1	1.6	0.0	1.4	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Washington MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Washington MMSA	5,545	3,005,409,442	100.0	153,185	4.1	5.4	4.5	17.3	20.9	16.9	33.7	23.3	34.6	44.6	50.2	43.8	0.2	0.2	0.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Washington MMSA	2,648	1,506,427,872	100.0	362,941	3.9	5.9	3.9	16.0	22.4	14.3	33.7	21.4	32.6	46.2	49.9	48.9	0.2	0.4	0.2

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Washington MMSA	5,545	3,005,409,442	100.0	153,185	21.4	10.1	8.2	16.4	22.0	19.5	19.7	16.3	22.0	42.6	51.3	34.7	0.0	0.4	15.7

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2021**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Washington MMSA	2,648	1,506,427,872	100.0	362,941	21.9	12.2	6.4	16.1	20.7	16.1	19.6	14.0	20.7	42.5	52.2	35.7	0.0	0.8	21.1

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Washington MMSA	3,076	74,515	100.0	157,552	5.1	6.2	4.8	19.4	21.6	18.3	33.4	35.4	33.8	41.2	36.4	42.5	0.8	0.4	0.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Washington MMSA	2,112	94,098	100.0	167,718	4.9	6.5	4.8	18.2	19.7	17.9	32.9	33.7	33.3	43.5	39.7	43.3	0.6	0.3	0.6

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Washington MMSA	3,076	74,515	100.0	157,552	91.2	85.9	51.6	2.8	12.5	6.0	1.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Washington MMSA	2,112	94,098	100.0	167,718	89.4	75.0	47.3	3.8	16.1	6.8	8.8

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Washington MMSA	2	11	100.0	275	4.1	0.0	2.1	18.7	0.0	10.6	33.6	0.0	26.8	43.4	100.0	57.4	0.2	0.0	3.2

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Washington MMSA	3	246	100.0	290	4.2	0.0	1.0	16.9	33.3	6.8	33.3	33.3	26.0	45.5	33.3	63.2	0.2	0.0	3.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Washington MMSA	2	11	100.0	275	96.3	100.0	57.0	1.9	0.0	1.8	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Washington MMSA	3	246	100.0	290	95.3	66.7	59.8	2.7	33.3	2.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Connecticut

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Hartford MSA	900	175,381,840	29.7	34,268	3.0	3.3	4.4	12.2	15.7	13.5	47.9	38.7	46.1	36.9	42.3	36.0	0.0	0.0	0.1
New Haven MSA	687	158,426,400	22.7	22,194	4.3	4.8	5.3	16.5	18.8	19.0	32.3	28.4	31.7	46.9	48.0	44.0	0.0	0.0	0.0
Bridgeport MSA	1,275	653,520,982	42.1	26,462	5.6	7.0	5.8	17.1	19.6	17.3	33.8	21.5	31.2	43.4	51.8	45.7	0.0	0.1	0.1
Norwich MSA	21	3,180,114	0.7	808	0.0	0.0	0.0	0.0	0.0	0.0	50.1	23.8	46.0	49.9	76.2	54.0	0.0	0.0	0.0
CT Non-MSA	146	28,576,140	4.8	5,837	0.9	0.0	1.4	10.7	14.4	12.7	72.7	71.2	71.1	15.7	14.4	14.8	0.0	0.0	0.0
Total	3,029	1,019,085,476	100.0	89,569	3.9	5.0	4.8	14.4	17.9	15.8	41.7	30.6	39.7	39.9	46.5	39.6	0.0	0.0	0.1
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Hartford MSA	579	133,647,133	31.1	59,114	3.7	7.9	4.1	10.9	15.2	10.2	42.5	35.8	41.2	42.8	41.1	44.6	0.0	0.0	0.0
New Haven MSA	314	89,824,526	16.9	37,442	4.3	5.7	3.9	16.7	20.4	15.7	33.9	29.9	32.9	45.0	43.9	47.4	0.0	0.0	0.0
Bridgeport MSA	860	545,992,165	46.3	48,644	5.1	2.9	4.1	16.1	15.2	14.6	34.6	22.9	32.5	44.2	59.0	48.8	0.0	0.0	0.0
Norwich MSA	16	3,548,298	0.9	1,428	0.0	0.0	0.0	0.0	0.0	0.0	11.3	6.3	9.8	88.7	93.8	90.2	0.0	0.0	0.0
CT Non-MSA	90	26,169,029	4.8	9,512	0.4	0.0	0.4	15.9	20.0	16.4	61.3	48.9	60.8	22.5	31.1	22.4	0.0	0.0	0.0
Total	1,859	799,181,152	100.0	156,140	4.0	4.8	3.8	14.1	16.2	13.2	39.2	29.2	37.4	42.7	49.8	45.6	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Hartford MSA	900	175,381,840	29.7	34,268	22.2	14.9	11.3	16.8	23.0	26.0	20.9	20.7	22.7	40.0	40.1	27.3	0.0	1.3	12.8
New Haven MSA	687	158,426,400	22.7	22,194	22.9	13.5	6.9	16.9	22.0	23.0	19.1	23.1	23.5	41.2	39.9	32.0	0.0	1.5	14.6
Bridgeport MSA	1,275	653,520,982	42.1	26,462	25.1	5.9	8.4	15.1	23.0	18.4	17.7	13.7	18.2	42.0	55.8	42.0	0.0	1.6	13.0
Norwich-New London	21	3,180,114	0.7	808	13.5	28.6	5.8	15.0	9.5	21.7	19.3	28.6	28.3	52.2	28.6	33.5	0.0	4.8	10.6
CT Non-MSA	146	28,576,140	4.8	5,837	19.1	17.1	13.7	18.9	26.0	26.2	23.4	24.7	21.9	38.6	30.8	26.5	0.0	1.4	11.8
Total	3,029	1,019,085,476	100.0	89,569	23.0	11.0	9.4	16.4	22.8	23.0	19.6	18.6	21.6	40.9	46.2	32.8	0.0	1.5	13.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2021**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Hartford MSA	579	133,647,133	31.1	59,114	22.3	20.4	9.8	16.5	23.8	22.7	20.7	19.2	22.5	40.5	34.2	29.4	0.0	2.4	15.6
New Haven MSA	314	89,824,526	16.9	37,442	23.5	13.1	5.6	16.4	21.7	20.9	18.9	24.8	23.5	41.2	36.9	35.5	0.0	3.5	14.6
Bridgeport MSA	860	545,992,165	46.3	48,644	24.6	4.4	6.2	15.6	18.0	17.5	17.8	12.7	19.1	42.0	63.4	44.9	0.0	1.5	12.3
Norwich MSA	16	3,548,298	0.9	1,428	9.6	6.3	3.2	11.8	18.8	18.1	24.6	37.5	24.9	54.0	37.5	36.5	0.0	0.0	17.2
CT Non-MSA	90	26,169,029	4.8	9,512	18.2	18.9	10.0	19.4	25.6	23.2	23.1	22.2	22.0	39.3	30.0	30.0	0.0	3.3	14.8
Total	1,859	799,181,152	100.0	156,140	22.9	11.6	7.6	16.4	20.8	20.6	19.6	17.4	21.7	41.1	48.0	35.8	0.0	2.2	14.3

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Hartford MSA	1,496	33,165	38.6	32,474	9.1	6.3	6.7	15.1	17.2	14.6	45.3	45.7	46.9	29.7	30.3	30.5	0.8	0.5	1.3
New Haven MSA	1,018	22,518	26.3	23,591	11.8	11.1	8.4	18.7	20.2	17.2	27.7	31.5	28.6	41.8	37.1	45.4	0.0	0.0	0.4
Bridgeport MSA	1,153	19,670	29.8	36,607	11.4	10.1	9.0	21.0	25.0	20.7	24.5	28.6	26.9	43.1	36.3	43.1	0.1	0.0	0.4
Norwich MSA	23	322	0.6	485	0.0	0.0	0.0	0.0	0.0	0.0	56.7	69.6	56.1	43.3	30.4	43.9	0.0	0.0	0.0
CT Non-MSA	184	3,226	4.7	6,119	3.4	1.6	2.5	10.2	20.1	9.3	67.6	60.3	68.4	18.8	17.9	18.9	0.0	0.0	0.9
Total	3,874	78,901	100.0	99,276	10.3	8.4	7.7	17.8	20.4	17.0	34.4	37.7	36.7	37.2	33.3	37.9	0.3	0.2	0.7
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
TD BANK N.A. (10000024096) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Hartford MSA	1,057	46,964	36.4	37,798	10.7	12.3	9.0	12.9	13.6	12.8	39.8	41.1	41.1	36.2	32.9	36.3	0.3	0.1	0.8
New Haven MSA	885	37,577	30.4	27,924	11.6	8.7	8.9	16.9	16.5	15.6	31.8	41.4	33.3	39.4	33.3	41.7	0.3	0.1	0.5
Bridgeport MSA	822	29,579	28.3	43,507	11.2	10.2	9.8	18.0	18.0	17.0	28.3	33.9	30.5	42.5	37.8	42.4	0.0	0.0	0.3
Norwich MSA	15	774	0.5	542	0.0	0.0	0.0	0.0	0.0	0.0	25.2	33.3	27.7	74.8	66.7	72.3	0.0	0.0	0.0
CT Non-MSA	128	3,857	4.4	7,033	1.4	1.6	1.0	17.9	16.4	16.2	57.3	49.2	59.1	23.4	32.8	22.8	0.0	0.0	0.9
Total	2,907	118,751	100.0	116,804	10.5	10.1	8.8	16.0	15.8	14.9	34.5	39.5	36.7	38.8	34.6	39.1	0.2	0.1	0.6

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Hartford MSA	1,496	33,165	38.6	32,474	90.1	88.4	51.3	2.9	10.6	7.0	1.0
New Haven MSA	1,018	22,518	26.3	23,591	91.3	86.4	52.1	2.7	12.2	6.1	1.4
Bridgeport MSA	1,153	19,670	29.8	36,607	92.3	86.9	52.3	2.5	11.2	5.2	1.9
Norwich MSA	23	322	0.6	485	92.7	100.0	55.3	1.6	0.0	5.7	0.0
CT Non-MSA	184	3,226	4.7	6,119	91.4	87.5	54.2	2.6	12.5	5.9	0.0
Total	3,874	78,901	100.0	99,276	91.3	87.5	52.2	2.7	11.2	6.0	1.3

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Hartford MSA	1,057	46,964	36.4	37,798	87.9	74.8	44.1	3.7	18.3	8.3	6.9
New Haven MSA	885	37,577	30.4	27,924	89.2	76.5	44.5	3.5	18.5	7.3	5.0
Bridgeport MSA	822	29,579	28.3	43,507	90.5	78.2	44.5	3.3	14.1	6.2	7.7
Norwich MSA	15	774	0.5	542	92.4	66.7	50.7	1.9	26.7	5.7	6.7
CT Non-MSA	128	3,857	4.4	7,033	89.6	83.6	47.3	3.4	12.5	7.0	3.9
Total	2,907	118,751	100.0	116,804	89.3	76.6	44.9	3.5	17.0	7.2	6.4

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Hartford MSA	1	10	12.5	167	4.4	0.0	1.2	9.7	0.0	4.8	46.5	100.0	48.8	39.4	0.0	44.6	0.0	0.0	0.6
New Haven MSA	5	99	62.5	73	7.2	0.0	1.4	15.0	0.0	4.1	26.1	20.0	23.3	51.7	80.0	71.2	0.0	0.0	0.0
Bridgeport MSA	2	33	25.0	84	13.6	0.0	6.0	23.1	50.0	9.5	27.0	0.0	31.0	36.2	50.0	53.6	0.1	0.0	0.0
Norwich MSA	0	0	0.0	18	0.0	0.0	1.5	0.0	0.0	4.5	63.8	0.0	56.7	36.2	0.0	35.8	0.0	0.0	1.5
CT Non-MSA	0	0	0.0	113	0.9	0.0	0.0	6.1	0.0	2.7	64.1	0.0	59.3	28.9	0.0	38.1	0.0	0.0	0.0
Total	8	142	100.0	455	7.7	0.0	1.8	14.9	12.5	5.0	37.7	25.0	45.5	39.7	62.5	47.3	0.0	0.0	0.4

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Hartford MSA	2	49	28.6	156	3.9	0.0	1.3	8.9	0.0	3.2	41.1	0.0	31.0	46.1	100.0	63.9	0.0	0.0	0.6
New Haven MSA	2	46	28.6	78	6.4	0.0	1.3	14.5	50.0	2.6	27.5	0.0	25.0	51.5	50.0	71.1	0.0	0.0	0.0
Bridgeport MSA	1	204	14.3	85	12.9	0.0	6.0	21.2	100.0	9.5	29.2	0.0	33.3	36.8	0.0	51.2	0.0	0.0	0.0
Norwich MSA	1	13	14.3	20	0.0	0.0	1.8	0.0	0.0	3.6	9.1	0.0	37.5	90.9	100.0	57.1	0.0	0.0	0.0
CT Non-MSA	1	22	14.3	85	0.2	0.0	0.0	11.2	0.0	4.8	63.1	0.0	63.1	25.5	100.0	32.1	0.0	0.0	0.0
Total	7	334	100.0	424	7.0	0.0	2.0	14.3	28.6	4.6	36.2	0.0	37.1	42.5	71.4	56.0	0.0	0.0	0.2

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Hartford MSA	1	10	12.5	167	97.3	100.0	70.2	1.3	0.0	1.4	0.0
New Haven MSA	5	99	62.5	73	97.3	100.0	71.2	1.4	0.0	1.3	0.0
Bridgeport MSA	2	33	25.0	84	98.0	50.0	70.2	1.1	50.0	0.9	0.0
Norwich MSA	--	--	--	18	96.7	--	82.1	1.0	--	2.4	--
CT Non-MSA	--	--	--	113	98.5	--	64.6	0.6	--	0.9	--
Total	8	142	100.0	455	97.7	87.5	70.7	1.2	12.5	1.2	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Hartford MSA	2	49	28.6	156	96.9	100.0	59.4	1.7	0.0	1.3	0.0
New Haven MSA	2	46	28.6	78	97.1	100.0	53.9	1.7	0.0	1.2	0.0
Bridgeport MSA	1	204	14.3	85	97.6	0.0	57.1	1.5	100.0	0.9	0.0
Norwich MSA	1	13	14.3	20	96.3	100.0	51.8	1.8	0.0	1.8	0.0
CT Non-MSA	1	22	14.3	85	98.6	100.0	69.0	1.0	0.0	0.5	0.0
Total	7	334	100.0	424	97.4	85.7	58.9	1.6	14.3	1.1	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Delaware

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Salisbury MSA	127	56,857,268	56.2	4,510	0.0	0.0	0.0	3.6	5.5	2.7	47.9	41.7	48.6	48.5	52.8	48.7	0.0	0.0	0.0
Dover MSA	99	20,428,101	43.8	7,413	0.0	0.0	0.0	17.2	34.3	15.6	56.6	42.4	58.6	26.2	23.2	25.8	0.0	0.0	0.0
Total	226	77,285,369	100.0	11,923	0.0	0.0	0.0	12.8	18.1	10.7	53.7	42.0	54.8	33.5	39.8	34.5	0.0	0.0	0.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Salisbury MSA	101	54,247,285	77.7	7,943	0.0	0.0	0.0	0.0	0.0	0.0	72.0	53.5	68.2	28.0	46.5	31.8	0.0	0.0	0.0
Dover MSA	29	7,207,013	22.3	12,338	0.7	0.0	0.6	11.5	24.1	9.8	72.6	55.2	68.2	15.2	20.7	21.3	0.0	0.0	0.0
Total	130	61,454,298	100.0	20,281	0.5	0.0	0.4	8.2	5.4	6.0	72.4	53.8	68.2	18.9	40.8	25.4	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022-23

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Salisbury MSA	127	56,857,268	56.2	4,510	14.3	10.2	3.7	16.0	17.3	10.3	18.6	11.0	15.7	51.2	59.8	56.8	0.0	1.6	13.4
Dover MSA	99	20,428,101	43.8	7,413	20.6	15.2	4.0	17.5	23.2	16.5	21.7	19.2	26.4	40.2	39.4	32.2	0.0	3.0	21.0
Total	226	77,285,369	100.0	11,923	18.9	12.4	3.9	17.1	19.9	14.1	20.8	14.6	22.3	43.2	50.9	41.5	0.0	2.2	18.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Salisbury MSA	101	54,247,285	77.7	7,943	12.7	5.9	2.4	18.2	11.9	9.1	19.9	7.9	15.0	49.3	74.3	58.8	0.0	0.0	14.7
Dover MSA	29	7,207,013	22.3	12,338	21.6	10.3	3.6	16.6	27.6	15.0	21.7	13.8	21.4	40.1	48.3	30.4	0.0	0.0	29.5
Total	130	61,454,298	100.0	20,281	19.5	6.9	3.2	17.0	15.4	12.7	21.3	9.2	18.9	42.3	68.5	41.6	0.0	0.0	23.7

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Salisbury MSA	47	529	24.4	2,422	0.0	0.0	0.0	4.5	8.5	14.2	51.6	53.2	58.7	43.8	38.3	25.8	0.1	0.0	1.2
Dover MSA	146	1,893	75.6	4,681	0.0	0.0	0.0	37.3	34.9	40.4	45.7	45.2	40.5	16.5	19.9	18.6	0.5	0.0	0.4
Total	193	2,422	100.0	7,103	0.0	0.0	0.0	26.6	28.5	25.4	47.7	47.2	51.0	25.4	24.4	22.7	0.3	0.0	0.9

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Salisbury MSA	21	323	24.1	2,464	0.0	0.0	0.0	0.0	0.0	5.9	68.6	66.7	71.8	31.4	33.3	21.5	0.0	0.0	0.7
Dover MSA	66	2,192	75.9	4,275	17.3	4.5	22.7	13.4	13.6	12.2	57.3	63.6	52.6	12.0	18.2	12.0	0.0	0.0	0.4
Total	87	2,515	100.0	6,739	11.4	3.4	9.3	8.8	10.3	8.5	61.2	64.4	64.0	18.6	21.8	17.6	0.0	0.0	0.6

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Salisbury MSA	47	529	24.4	2,422	89.1	87.2	52.3	2.9	12.8	8.0	0.0
Dover MSA	146	1,893	75.6	4,681	86.2	89.7	50.2	3.3	9.6	10.4	0.7
Total	193	2,422	100.0	7,103	87.2	89.1	51.4	3.2	10.4	9.6	0.5
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											
TD BANK N.A. (10000024096) excluded from Aggregate											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Salisbury MSA	21	323	24.1	2,464	88.2	95.2	46.9	3.2	4.8	8.6	0.0
Dover MSA	66	2,192	75.9	4,275	84.5	77.3	46.7	3.7	18.2	11.7	4.5
Total	87	2,515	100.0	6,739	85.8	81.6	46.8	3.5	14.9	10.7	3.4
Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											
TD BANK N.A. (10000024096) excluded from Aggregate											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Salisbury MSA	0	0	0.0	8	0.0	0.0	0.0	0.5	0.0	15.7	57.9	0.0	80.6	41.6	0.0	3.7	0.0	0.0	0.0
Dover MSA	1	35	100.0	63	0.0	0.0	0.0	16.2	0.0	9.7	59.8	0.0	75.8	24.0	100.0	14.5	0.0	0.0	0.0
Total	1	35	100.0	71	0.0	0.0	0.0	12.2	0.0	13.5	59.3	0.0	78.8	28.4	100.0	7.6	0.0	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Salisbury MSA	0	0	0.0	13	0.0	0.0	0.0	0.0	0.0	6.3	79.3	0.0	89.8	20.7	0.0	3.9	0.0	0.0	0.0
Dover MSA	0	0	0.0	72	1.3	0.0	5.6	11.1	0.0	6.9	79.8	0.0	84.7	7.8	0.0	2.8	0.0	0.0	0.0
Total	0	0	0.0	85	1.0	0.0	2.0	8.3	0.0	6.5	79.7	0.0	87.9	11.1	0.0	3.5	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Salisbury MSA	--	--	--	8	96.7	--	60.2	1.4	--	1.9	--
Dover MSA	1	35	100.0	63	97.5	100.0	46.8	1.4	0.0	1.1	0.0
Total	1	35	100.0	71	97.3	100.0	55.3	1.4	0.0	1.3	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Salisbury MSA	--	--	--	13	96.2	--	63.8	1.9	--	1.9	--
Dover MSA	--	--	--	72	96.9	--	44.4	1.6	--	1.5	--
Total	--	--	--	85	96.7	--	56.8	1.7	--	1.6	--

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Florida

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Miami MSA	6,003	2,275,184,515	46.4	157,580	2.9	2.5	2.4	21.8	26.2	20.3	32.1	23.0	32.2	42.2	47.4	43.9	1.0	0.9	1.1
Orlando MSA	1,295	424,780,473	10.0	88,206	1.5	2.1	1.3	22.8	25.5	18.4	37.7	31.9	41.3	37.8	40.5	38.7	0.2	0.0	0.2
Port St Lucie MSA	599	144,129,268	4.6	23,707	0.8	1.5	0.7	18.3	20.5	17.3	45.2	43.2	54.2	33.9	33.9	26.3	1.8	0.8	1.5
Cape Coral MSA	345	124,652,937	2.7	34,761	1.0	1.4	0.9	17.1	21.4	18.1	49.6	38.6	50.2	32.1	38.0	30.2	0.2	0.6	0.6
Deltona MSA	383	90,909,847	3.0	22,583	1.8	1.8	1.5	12.0	16.2	9.8	58.2	47.0	57.7	28.0	35.0	31.1	0.0	0.0	0.0
Gainesville MSA	260	97,253,066	2.0	7,230	4.4	4.2	2.7	14.6	20.4	15.1	28.2	19.2	26.6	51.8	55.4	53.8	0.9	0.8	1.8
Homosassa Springs MSA	109	26,152,452	0.8	7,029	0.0	0.0	0.0	13.5	19.3	11.5	68.7	51.4	69.8	17.8	29.4	18.7	0.0	0.0	0.0
Jacksonville MSA	679	312,414,115	5.3	53,434	4.3	6.2	3.0	21.6	28.4	20.3	36.0	23.3	39.9	37.6	41.8	36.2	0.5	0.3	0.5
Lakeland MSA	155	44,921,349	1.2	33,343	1.0	1.3	0.7	20.0	18.1	16.7	47.0	46.5	48.5	31.2	33.5	33.3	0.8	0.6	0.7
Naples MSA	308	159,124,652	2.4	11,626	0.5	2.3	0.9	18.9	24.4	18.7	41.2	38.3	44.8	37.8	33.8	33.9	1.6	1.3	1.6
North Port MSA	394	176,370,948	3.0	37,189	1.2	0.5	0.5	18.1	14.5	14.9	46.7	38.8	41.9	33.8	45.4	42.0	0.2	0.8	0.7
Ocala MSA	162	39,145,181	1.3	16,586	0.3	1.2	0.3	16.7	16.0	11.4	61.7	58.0	70.3	20.3	24.1	17.4	1.1	0.6	0.6
Palm Bay MSA	484	138,610,612	3.7	26,771	0.8	1.0	0.9	18.4	18.6	19.4	45.6	39.9	45.7	34.6	39.9	33.4	0.5	0.6	0.6
Sebastian MSA	140	32,647,986	1.1	6,680	1.8	2.9	1.4	17.9	17.9	21.6	43.2	38.6	42.4	37.1	40.7	34.6	0.0	0.0	0.0

Sebring MSA	33	5,467,814	0.3	3,292	0.0	0.0	0.0	21.0	24.2	22.6	66.5	63.6	62.6	12.5	12.1	14.8	0.0	0.0	0.0
Tampa MSA	1,475	440,315,031	11.4	113,069	1.6	2.5	1.7	23.1	27.5	20.9	37.7	28.1	36.0	37.2	41.2	41.0	0.5	0.7	0.5
FL Non-MSA	104	19,202,017	0.8	5,036	0.0	0.0	0.0	15.7	18.3	11.6	64.1	66.3	66.0	20.2	15.4	22.4	0.0	0.0	0.0
Total	12,928	4,551,282,263	100.0	648,122	1.9	2.4	1.6	20.5	24.5	18.6	40.2	29.5	41.4	36.7	42.9	37.7	0.6	0.7	0.7

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Miami MSA	2,521	1,107,793,156	44.7	256,368	2.6	2.9	2.1	23.2	27.4	19.0	32.9	19.9	32.5	41.2	49.4	46.0	0.2	0.4	0.4
Orlando MSA	628	254,778,258	11.1	145,974	1.0	1.6	0.9	21.1	29.5	16.5	39.1	30.6	40.9	38.8	38.4	41.7	0.0	0.0	0.0
Port St Lucie MSA	287	78,268,981	5.1	35,515	1.6	1.4	0.7	13.0	17.8	10.2	54.4	38.7	57.1	30.9	42.2	32.0	0.0	0.0	0.0
Cape Coral MSA	95	37,182,805	1.7	55,151	2.1	0.0	1.4	18.6	10.5	19.6	44.2	30.5	44.7	35.1	58.9	34.3	0.0	0.0	0.0
Deltona MSA	184	44,978,917	3.3	34,822	0.9	1.1	0.4	14.2	14.1	11.4	59.9	48.9	57.2	25.0	35.9	31.0	0.0	0.0	0.0
Gainesville MSA	152	58,956,786	2.7	10,703	2.4	2.6	2.6	14.9	13.2	9.8	37.5	27.6	38.8	44.6	56.6	47.8	0.6	0.0	1.0
Homosassa Springs MSA	64	18,266,744	1.1	9,218	0.0	0.0	0.0	20.1	17.2	17.8	62.7	71.9	59.5	17.3	10.9	22.6	0.0	0.0	0.0
Jacksonville MSA	238	87,853,562	4.2	81,202	4.5	4.6	2.0	20.4	24.8	14.7	35.5	21.4	32.9	39.7	49.2	50.4	0.0	0.0	0.0
Lakeland MSA	79	20,036,951	1.4	44,261	1.3	1.3	0.6	17.3	34.2	12.9	58.8	48.1	63.7	22.6	16.5	22.8	0.0	0.0	0.0
Naples MSA	151	84,789,953	2.7	20,086	0.6	0.0	0.8	19.4	25.8	19.4	47.0	44.4	54.4	33.0	29.8	25.4	0.0	0.0	0.0
North Port MSA	117	49,270,469	2.1	30,992	0.5	0.9	0.2	16.1	21.4	12.7	55.9	38.5	54.8	27.6	39.3	32.4	0.0	0.0	0.0
Ocala MSA	117	25,098,171	2.1	21,317	0.6	0.0	0.1	14.5	19.7	10.7	69.6	57.3	70.7	15.3	23.1	18.4	0.0	0.0	0.0
Palm Bay MSA	285	73,395,429	5.1	39,883	1.6	2.8	1.0	21.1	32.3	20.3	43.5	33.3	42.6	33.8	31.6	36.1	0.0	0.0	0.0
Sebastian MSA	116	27,887,999	2.1	10,214	1.4	1.7	0.7	13.4	23.3	12.6	54.1	48.3	58.7	31.1	26.7	27.9	0.0	0.0	0.0
Sebring MSA	18	3,555,177	0.3	4,745	0.0	0.0	0.0	4.5	11.1	2.9	76.6	66.7	73.8	18.9	22.2	23.3	0.0	0.0	0.0
Tampa MSA	544	193,026,825	9.6	176,487	2.1	3.7	1.9	20.2	25.2	15.9	38.2	26.5	35.7	39.4	44.5	46.4	0.1	0.2	0.1

FL Non MSA	46	6,758,904	0.8	6,347	1.2	0.0	1.1	12.9	13.0	9.7	69.8	78.3	70.0	16.0	8.7	19.2	0.0	0.0	0.0
Total	5,642	2,171,899,086	100.0	983,285	2.0	2.4	1.4	20.0	25.4	16.3	41.8	28.8	41.6	36.2	43.3	40.5	0.1	0.2	0.1

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022-23

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Miami MSA	6,003	2,275,184,515	46.4	157,580	22.5	2.5	3.1	17.6	10.6	9.2	18.0	17.4	16.7	41.9	68.0	53.1	0.0	1.5	18.0
Orlando MSA	1,295	424,780,473	10.0	88,206	21.3	5.4	4.1	18.0	22.2	13.3	19.2	15.1	21.8	41.4	55.9	44.1	0.0	1.4	16.8
Port St Lucie MSA	599	144,129,268	4.6	23,707	18.8	7.2	4.9	19.4	21.4	15.1	20.1	23.7	24.5	41.7	45.7	36.7	0.0	2.0	18.8
Cape Coral MSA	345	124,652,937	2.7	34,761	19.3	4.1	4.6	19.0	22.6	16.1	20.8	14.5	21.7	40.9	55.7	42.6	0.0	3.2	15.0
Deltona MSA	383	90,909,847	3.0	22,583	19.3	8.6	5.0	19.0	22.2	15.8	21.8	21.7	23.6	39.9	45.4	39.6	0.0	2.1	16.0
Gainesville MSA	260	97,253,065	2.0	7,230	18.6	6.2	4.9	16.5	23.1	15.9	18.9	13.5	20.8	46.0	56.9	41.2	0.0	0.4	17.2
Homosassa Springs MSA	109	26,152,452	0.8	7,029	18.9	6.4	7.1	18.7	22.9	18.1	22.7	21.1	23.7	39.6	47.7	36.7	0.0	1.8	14.4
Jacksonville MSA	679	312,414,115	5.3	53,434	21.9	9.6	5.8	18.5	20.6	15.7	19.2	15.3	20.7	40.4	53.0	39.0	0.0	1.5	18.8
Lakeland MSA	155	44,921,349	1.2	33,343	19.5	6.5	2.4	19.3	20.0	11.3	20.4	16.8	23.6	40.7	50.3	40.7	0.0	6.5	22.0
Naples MSA	308	159,124,652	2.4	11,626	21.1	2.6	4.6	17.8	14.0	12.3	20.2	13.6	17.6	40.9	67.2	52.5	0.0	2.6	13.0
North Port MSA	394	176,370,948	3.0	37,189	18.8	6.3	5.7	19.6	17.8	15.1	20.4	14.2	20.9	41.2	59.4	44.9	0.0	2.3	13.4
Ocala MSA	162	39,145,181	1.3	16,586	18.0	7.4	5.2	19.8	24.7	16.7	22.1	16.7	23.5	40.2	48.1	37.4	0.0	3.1	17.2
Palm Bay MSA	484	138,610,612	3.7	26,771	20.0	13.8	6.5	18.5	20.9	16.0	20.2	19.6	22.1	41.3	44.2	38.3	0.0	1.4	17.2
Sebastian MSA	140	32,647,986	1.1	6,680	19.0	8.6	5.7	18.6	18.6	17.1	21.5	24.3	21.6	40.9	46.4	40.3	0.0	2.1	15.3
Sebring MSA	33	5,467,814	0.3	3,292	19.8	15.2	6.3	18.6	15.2	17.4	22.8	21.2	22.4	38.8	48.5	34.8	0.0	0.0	19.1
Tampa MSA	1,475	440,315,031	11.4	113,069	20.8	6.2	5.0	17.9	22.2	14.4	19.1	17.4	21.2	42.2	53.6	44.0	0.0	0.6	15.3
FL Non-MSA	104	19,202,017	0.8	5,036	18.8	5.8	3.5	20.1	26.0	15.8	20.5	19.2	23.6	40.7	47.1	42.9	0.0	1.9	14.3
Total	12,928	4,551,282,263	100.0	648,122	21.0	4.9	4.4	18.2	16.3	13.3	19.3	17.3	20.6	41.5	59.8	44.8	0.0	1.6	16.9

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Miami MSA	2,521	1,107,793,156	44.7	256,368	23.1	2.6	2.4	17.0	13.8	9.5	17.7	15.2	18.0	42.2	66.8	52.1	0.0	1.6	18.0
Orlando MSA	628	254,778,258	11.1	145,974	21.5	6.4	3.7	18.1	20.1	13.3	19.2	13.9	20.0	41.2	58.3	43.5	0.0	1.4	19.5
Port St Lucie MSA	287	78,268,981	5.1	35,515	19.8	8.0	3.6	18.7	24.0	15.6	19.9	16.0	22.1	41.6	50.2	39.0	0.0	1.7	19.8
Cape Coral MSA	95	37,182,805	1.7	55,151	20.7	1.1	3.8	18.5	5.3	15.5	19.7	8.4	19.9	41.1	84.2	44.2	0.0	1.1	16.6
Deltona MSA	184	44,978,917	3.3	34,822	19.9	12.0	5.2	19.2	28.3	16.5	20.4	13.0	21.2	40.5	45.1	38.1	0.0	1.6	19.1
Gainesville MSA	152	58,956,786	2.7	10,703	23.4	3.3	4.2	15.4	14.5	13.1	18.2	12.5	20.1	43.0	69.7	47.1	0.0	0.0	15.5
Homosassa Springs MSA	64	18,266,744	1.1	9,218	18.2	6.3	4.4	19.4	14.1	13.9	22.5	10.9	19.7	39.9	67.2	42.6	0.0	1.6	19.4
Jacksonville MSA	238	87,853,562	4.2	81,202	22.7	10.9	4.5	17.0	20.6	13.7	19.5	14.7	19.1	40.7	50.8	40.8	0.0	2.9	21.9
Lakeland MSA	79	20,036,951	1.4	44,261	20.4	7.6	3.0	18.3	35.4	13.5	21.4	17.7	23.4	39.8	35.4	35.2	0.0	3.8	24.9
Naples MSA	151	84,789,953	2.7	20,086	20.1	5.3	3.5	18.3	17.2	12.8	19.7	9.9	17.5	41.9	66.2	53.9	0.0	1.3	12.4
North Port MSA	117	49,270,469	2.1	30,992	17.5	6.8	5.6	19.2	16.2	16.0	21.9	10.3	20.4	41.4	63.2	44.9	0.0	3.4	13.2
Ocala MSA	117	25,098,171	2.1	21,317	19.3	6.8	3.7	19.5	26.5	14.7	21.6	13.7	21.6	39.7	50.4	39.1	0.0	2.6	20.9
Palm Bay MSA	285	73,395,429	5.1	39,883	20.2	13.0	6.6	18.6	27.4	17.0	20.6	20.7	20.0	40.6	37.2	35.9	0.0	1.8	20.4
Sebastian MSA	116	27,887,999	2.1	10,214	20.6	12.1	7.2	18.6	26.7	19.6	18.6	18.1	20.3	42.2	41.4	36.8	0.0	1.7	16.1
Sebring MSA	18	3,555,177	0.3	4,745	16.6	11.1	3.6	20.3	33.3	13.2	21.6	16.7	20.9	41.4	38.9	41.0	0.0	0.0	21.3
Tampa MSA	544	193,026,825	9.6	176,487	21.3	11.4	4.4	17.6	19.1	14.6	18.8	13.6	19.9	42.3	54.4	42.9	0.0	1.5	18.2
FL Non-MSA	46	6,758,904	0.8	6,347	23.2	6.5	3.0	17.0	15.2	13.0	18.8	23.9	21.9	41.0	50.0	43.5	0.0	4.3	18.6
Total	5,642	2,171,899,086	100.0	983,285	21.7	5.9	3.8	17.7	17.9	13.2	19.0	14.8	19.7	41.6	59.7	44.5	0.0	1.7	18.8

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Miami MSA	9,324	297,956	62.4	371,167	2.9	3.0	2.9	22.4	25.7	21.8	29.1	30.5	29.5	42.9	39.0	43.1	2.7	1.9	2.7
Orlando MSA	1,283	38,562	8.6	105,913	2.4	1.3	1.9	26.4	30.5	24.8	33.3	32.7	33.6	36.9	33.5	38.3	1.1	2.0	1.4
Port St Lucie MSA	663	11,330	4.4	18,202	3.1	2.9	3.5	20.3	24.1	19.4	42.9	45.2	43.1	32.5	26.8	32.4	1.2	0.9	1.6
Cape Coral MSA	92	4,129	0.6	28,785	2.2	1.1	1.9	22.4	17.4	22.2	46.2	37.0	46.7	28.6	44.6	28.5	0.7	0.0	0.8
Deltona MSA	434	8,842	2.9	16,156	3.9	4.1	4.0	17.3	13.8	16.2	52.8	54.6	52.0	26.0	27.4	27.4	0.0	0.0	0.4
Gainesville MSA	52	3,488	0.3	6,672	4.7	5.8	4.1	18.3	17.3	18.2	29.8	40.4	29.0	44.0	32.7	45.7	3.2	3.8	3.0
Homosassa Springs MSA	44	1,004	0.3	3,492	0.0	0.0	0.0	14.0	15.9	14.3	68.6	54.5	67.4	17.4	29.5	17.8	0.0	0.0	0.5
Jacksonville MSA	303	14,148	2.0	39,864	5.6	4.3	5.3	23.4	18.8	20.0	35.8	42.9	35.9	33.1	32.7	36.7	2.1	1.3	2.1
Lakeland MSA	164	4,360	1.1	17,791	0.9	0.6	0.7	24.1	24.4	23.5	45.6	40.9	45.3	28.6	31.7	29.3	0.8	2.4	1.2
Naples MSA	160	4,642	1.1	14,177	1.3	1.9	2.2	15.6	15.0	15.7	43.6	51.3	45.9	38.3	31.9	35.1	1.3	0.0	1.1
North Port MSA	125	5,838	0.8	31,284	1.3	0.0	1.0	15.9	14.4	14.7	46.0	40.8	44.9	36.5	44.0	38.8	0.3	0.8	0.6
Ocala MSA	93	4,867	0.6	9,672	1.3	0.0	1.1	19.5	20.4	20.0	56.6	50.5	57.3	21.9	26.9	20.1	0.8	2.2	1.5
Palm Bay MSA	666	17,784	4.5	16,348	2.8	2.0	2.7	20.5	24.8	20.0	41.3	39.8	39.9	34.9	33.5	36.5	0.5	0.0	0.9
Sebastian MSA	192	2,748	1.3	5,590	2.2	1.6	1.5	22.7	21.4	23.2	38.8	43.8	39.0	36.1	33.3	35.4	0.2	0.0	1.0
Sebring MSA	35	696	0.2	2,029	0.0	0.0	0.0	29.6	25.7	29.8	57.5	74.3	56.6	12.4	0.0	12.4	0.4	0.0	1.2
Tampa MSA	1,077	32,284	7.2	105,415	3.1	2.8	3.2	20.4	22.8	20.9	32.3	31.4	33.2	42.3	42.4	40.5	1.9	0.6	2.2

FL Non-MSA	226	3,573	1.5	4,219	0.0	0.0	0.0	16.0	13.7	14.8	64.1	70.4	64.4	19.9	15.9	19.8	0.0	0.0	1.0
Total	14,933	456,251	100.0	796,776	2.8	2.7	2.7	22.1	24.7	21.3	34.3	34.3	34.6	38.9	36.8	39.3	1.9	1.5	2.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Miami MSA	5,419	220,018	65.5	395,476	4.1	5.1	4.4	22.2	25.7	23.4	28.3	28.6	28.5	44.1	39.3	42.3	1.2	1.3	1.4
Orlando MSA	556	19,048	6.7	103,416	1.7	2.5	1.8	26.1	29.7	24.8	35.1	36.3	35.4	37.1	31.5	37.7	0.0	0.0	0.4
Port St Lucie MSA	328	10,614	4.0	17,512	3.1	4.0	2.8	18.6	18.9	18.7	48.9	49.7	48.8	29.4	27.4	29.2	0.1	0.0	0.5
Cape Coral MSA	41	3,429	0.5	27,526	2.9	2.4	2.5	22.8	31.7	23.7	41.0	22.0	40.5	33.1	43.9	32.8	0.1	0.0	0.6
Deltona MSA	252	10,157	3.0	15,992	2.6	2.8	2.4	20.8	23.8	21.2	52.4	54.4	50.3	24.2	19.0	25.6	0.0	0.0	0.5
Gainesville MSA	45	4,449	0.5	6,639	7.1	11.1	7.6	17.4	8.9	15.9	35.3	28.9	34.6	39.1	46.7	40.4	1.1	4.4	1.4
Homosassa Springs MSA	9	207	0.1	3,365	0.0	0.0	0.0	16.8	0.0	14.2	62.2	77.8	62.9	21.0	22.2	22.4	0.0	0.0	0.5
Jacksonville MSA	139	8,457	1.7	39,970	5.1	3.6	5.0	22.1	25.9	21.4	30.7	26.6	29.1	42.0	43.9	44.2	0.0	0.0	0.3
Lakeland MSA	91	3,392	1.1	16,199	3.8	2.2	4.2	19.7	17.6	19.4	54.2	62.6	55.1	22.3	17.6	20.6	0.0	0.0	0.8
Naples MSA	67	3,766	0.8	14,507	2.2	3.0	3.0	16.3	17.9	12.7	43.2	28.4	39.8	38.4	50.7	44.2	0.0	0.0	0.4
North Port MSA	32	3,753	0.4	18,415	0.6	0.0	0.5	19.4	25.0	18.1	45.9	15.6	44.3	34.2	59.4	36.7	0.0	0.0	0.4
Ocala MSA	45	3,123	0.5	9,210	1.8	0.0	1.7	16.6	24.4	16.1	63.4	55.6	65.3	18.2	20.0	16.1	0.0	0.0	0.9
Palm Bay MSA	429	19,700	5.2	16,731	2.7	1.4	2.4	23.2	31.7	23.2	39.0	39.6	38.2	35.0	27.3	35.8	0.1	0.0	0.5
Sebastian MSA	82	3,015	1.0	5,516	6.4	2.4	7.0	13.7	18.3	14.5	47.1	53.7	44.8	32.7	25.6	32.6	0.2	0.0	1.1
Sebring MSA	7	106	0.1	1,905	0.0	0.0	0.0	7.8	0.0	9.7	75.2	85.7	72.3	16.6	14.3	17.0	0.5	0.0	1.1
Tampa MSA	613	26,063	7.4	107,176	4.3	7.8	4.7	19.7	22.0	19.5	33.1	31.5	33.5	42.6	38.2	41.8	0.3	0.5	0.6

FL Non-MSA	116	4,245	1.4	4,051	2.9	4.3	3.2	12.4	18.1	12.6	68.8	65.5	68.6	16.0	12.1	14.6	0.0	0.0	1.0
Total	8,271	343,542	100.0	803,606	3.6	4.7	3.8	21.7	25.2	22.0	34.3	32.8	33.7	39.8	36.4	39.5	0.6	0.9	0.9

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Miami MSA	9,324	297,956	62.4	371,167	94.6	82.6	52.1	1.4	16.2	4.0	1.3
Orlando MSA	1,283	38,562	8.6	105,913	93.8	81.7	52.5	1.3	16.3	4.8	2.0
Port St Lucie MSA	663	11,330	4.4	18,202	93.9	90.2	52.8	1.3	8.4	4.8	1.4
Cape Coral MSA	92	4,129	0.6	28,785	93.6	90.2	52.2	1.5	9.8	4.9	0.0
Deltona-Daytona Beach MSA	434	8,842	2.9	16,156	93.4	86.6	53.9	1.5	10.8	5.1	2.5
Gainesville MSA	52	3,488	0.3	6,672	91.2	76.9	48.3	1.9	23.1	6.9	0.0
Homosassa Springs MSA	44	1,004	0.3	3,492	93.2	86.4	55.8	1.4	11.4	5.5	2.3
Jacksonville MSA	303	14,148	2.0	39,864	92.8	81.2	50.0	1.7	16.2	5.4	2.6
Lakeland MSA	164	4,360	1.1	17,791	93.2	87.8	54.0	1.5	10.4	5.3	1.8
Naples MSA	160	4,642	1.1	14,177	93.8	81.9	51.0	1.6	16.9	4.6	1.3
North Port MSA	125	5,838	0.8	31,284	93.5	82.4	53.8	1.6	16.8	4.9	0.8
Ocala MSA	93	4,867	0.6	9,672	93.1	81.7	51.1	1.5	17.2	5.4	1.1
Palm Bay MSA	666	17,784	4.5	16,348	92.7	81.8	53.7	1.7	15.3	5.6	2.9
Sebastian MSA	192	2,748	1.3	5,590	92.9	94.8	51.5	1.8	4.2	5.3	1.0
Sebring MSA	35	696	0.2	2,029	93.3	77.1	54.4	1.4	20.0	5.3	2.9
Tampa MSA	1,077	32,284	7.2	105,415	93.6	83.6	52.0	1.6	14.1	4.8	2.3
FL Non-MSA	226	3,573	1.5	4,219	91.1	92.0	53.2	1.6	5.8	7.3	2.2
Total	14,933	456,251	100.0	796,776	93.9	83.3	52.2	1.5	15.1	4.6	1.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2021

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Miami MSA	5,419	220,018	65.5	395,476	94.4	74.6	42.5	1.9	17.9	3.7	7.6
Orlando MSA	556	19,048	6.7	103,416	93.4	79.3	45.2	1.8	13.1	4.8	7.6
Port St Lucie MSA	328	10,614	4.0	17,512	93.5	81.7	44.3	1.8	14.6	4.8	3.7
Cape Coral MSA	41	3,429	0.5	27,526	93.2	87.8	45.8	2.0	12.2	4.8	0.0
Deltona MSA	252	10,157	3.0	15,992	93.0	78.2	49.5	1.9	13.1	5.0	8.7
Gainesville MSA	45	4,449	0.5	6,639	90.4	77.8	43.6	2.5	22.2	7.1	0.0
Homosassa Springs MSA	9	207	0.1	3,365	92.8	88.9	52.1	1.8	0.0	5.4	11.1
Jacksonville MSA	139	8,457	1.7	39,970	92.1	74.8	43.0	2.3	18.0	5.6	7.2
Lakeland MSA	91	3,392	1.1	16,199	92.5	82.4	44.7	2.1	11.0	5.4	6.6
Naples MSA	67	3,766	0.8	14,507	93.4	85.1	46.7	2.1	10.4	4.5	4.5
North Port MSA	32	3,753	0.4	18,415	93.2	59.4	49.9	2.1	34.4	4.7	6.3
Ocala MSA	45	3,123	0.5	9,210	92.6	73.3	46.9	2.1	24.4	5.3	2.2
Palm Bay MSA	429	19,700	5.2	16,731	92.1	79.7	46.8	2.2	12.1	5.7	8.2
Sebastian MSA	82	3,015	1.0	5,516	92.6	73.2	45.3	2.3	18.3	5.1	8.5
Sebring MSA	7	106	0.1	1,905	93.1	71.4	49.9	1.9	14.3	5.1	14.3
Tampa MSA	613	26,063	7.4	107,176	92.9	77.3	46.3	2.2	16.0	4.9	6.7
FL Non-MSA	116	4,245	1.4	4,051	90.2	77.6	43.0	2.2	14.7	7.6	7.8
Total	8,271	343,542	100.0	803,606	93.6	76.0	44.2	2.0	16.7	4.4	7.3

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Miami MSA	8	680	30.8	867	4.0	0.0	2.4	24.7	25.0	12.0	30.1	25.0	27.7	39.9	50.0	55.8	1.3	0.0	2.1
Orlando MSA	0	0	0.0	267	2.2	0.0	0.4	25.7	0.0	15.8	39.6	0.0	38.8	31.9	0.0	42.1	0.5	0.0	2.9
Port St Lucie MSA	1	3	3.8	119	3.3	0.0	1.7	24.6	100.0	19.3	39.6	0.0	41.2	29.5	0.0	37.0	3.0	0.0	0.8
Cape Coral MSA	0	0	0.0	109	2.1	0.0	0.9	22.5	0.0	9.1	48.7	0.0	48.2	26.5	0.0	40.9	0.2	0.0	0.9
Deltona MSA	1	1	3.8	74	2.7	0.0	1.3	13.9	0.0	13.3	57.4	100.0	56.0	26.0	0.0	28.0	0.0	0.0	1.3
Gainesville MSA	0	0	0.0	72	4.9	0.0	1.3	18.4	0.0	18.7	27.8	0.0	32.0	48.2	0.0	42.7	0.7	0.0	5.3
Homosassa Springs MSA	0	0	0.0	30	0.0	0.0	0.0	10.5	0.0	10.0	74.7	0.0	80.0	14.8	0.0	10.0	0.0	0.0	0.0
Jacksonville MSA	0	0	0.0	117	5.5	0.0	5.1	25.1	0.0	17.9	38.9	0.0	43.6	29.0	0.0	29.1	1.6	0.0	4.3
Lakeland MSA	1	25	3.8	138	0.9	0.0	0.0	23.6	0.0	16.5	48.3	100.0	59.7	26.2	0.0	19.4	1.2	0.0	4.3
Naples MSA	0	0	0.0	34	1.3	0.0	9.8	27.1	0.0	11.5	47.0	0.0	37.7	23.7	0.0	39.3	1.0	0.0	1.6
North Port MSA	0	0	0.0	104	2.0	0.0	0.0	21.3	0.0	1.0	45.0	0.0	41.9	31.3	0.0	56.2	0.4	0.0	1.0
Ocala MSA	0	0	0.0	151	0.9	0.0	0.0	24.0	0.0	19.2	47.1	0.0	40.4	26.5	0.0	40.4	1.4	0.0	0.0
Palm Bay MSA	2	5	7.7	50	2.7	0.0	3.9	24.4	50.0	9.8	41.4	0.0	29.4	29.9	50.0	54.9	1.6	0.0	2.0
Sebastian-Vero Beach MSA	4	136	15.4	45	4.0	0.0	2.2	28.0	25.0	19.6	37.4	0.0	34.8	30.4	75.0	39.1	0.3	0.0	4.3
Sebring MSA	0	0	0.0	40	0.0	0.0	0.0	27.8	0.0	21.4	55.9	0.0	54.8	15.4	0.0	19.0	0.8	0.0	4.8
Tampa MSA	2	10	7.7	316	2.8	0.0	0.9	26.3	0.0	20.6	37.3	100.0	43.3	32.9	0.0	33.0	0.6	0.0	2.2
FL Non-MSA	7	895	26.9	129	0.0	0.0	0.0	13.4	14.3	9.4	65.3	28.6	71.1	21.3	57.1	18.8	0.0	0.0	0.8
Total	26	1,755	100.0	2,662	2.9	0.0	1.7	23.9	23.1	14.4	39.8	30.8	40.0	32.4	46.2	41.8	0.9	0.0	2.2

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2021

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Miami MSA	7	285	38.9	849	5.1	0.0	3.0	25.2	0.0	10.5	29.6	0.0	30.6	39.7	100.0	54.3	0.4	0.0	1.5
Orlando MSA	0	0	0.0	273	1.2	0.0	0.0	25.0	0.0	11.8	41.1	0.0	46.8	32.5	0.0	38.6	0.2	0.0	2.9
Port St Lucie MSA	2	319	11.1	115	3.4	50.0	0.0	25.0	0.0	22.1	46.0	50.0	45.1	25.6	0.0	32.7	0.0	0.0	0.0
Cape Coral MSA	0	0	0.0	103	3.2	0.0	0.9	26.6	0.0	19.8	46.4	0.0	45.3	23.8	0.0	31.1	0.0	0.0	2.8
Deltona MSA	2	82	11.1	79	1.4	0.0	0.0	18.0	50.0	18.3	57.8	50.0	45.1	22.7	0.0	30.5	0.0	0.0	6.1
Gainesville MSA	1	51	5.6	70	3.9	0.0	0.0	13.7	0.0	22.2	49.4	100.0	48.6	32.7	0.0	25.0	0.3	0.0	4.2
Homosassa Springs MSA	0	0	0.0	13	0.0	0.0	0.0	19.0	0.0	0.0	62.9	0.0	100.0	18.1	0.0	0.0	0.0	0.0	0.0
Jacksonville MSA	0	0	0.0	95	4.5	0.0	1.1	21.9	0.0	16.8	37.4	0.0	47.4	36.2	0.0	34.7	0.0	0.0	0.0
Lakeland MSA	0	0	0.0	121	2.6	0.0	0.8	17.9	0.0	10.6	59.6	0.0	62.6	19.9	0.0	24.4	0.0	0.0	1.6
Naples MSA	0	0	0.0	39	2.2	0.0	8.1	23.5	0.0	25.8	54.1	0.0	37.1	20.1	0.0	25.8	0.0	0.0	3.2
North Port MSA	0	0	0.0	42	0.7	0.0	0.0	18.8	0.0	11.9	52.7	0.0	40.5	27.7	0.0	47.6	0.0	0.0	0.0
Ocala MSA	2	17	11.1	151	1.0	0.0	0.6	17.8	0.0	14.2	67.7	50.0	69.7	13.5	50.0	11.6	0.0	0.0	3.9
Palm Bay MSA	0	0	0.0	54	3.6	0.0	0.0	25.5	0.0	16.4	42.8	0.0	49.1	28.1	0.0	32.7	0.0	0.0	1.8
Sebastian MSA	0	0	0.0	41	2.4	0.0	0.0	24.3	0.0	36.6	53.0	0.0	34.1	20.1	0.0	29.3	0.3	0.0	0.0
Sebring MSA	0	0	0.0	49	0.0	0.0	0.0	3.9	0.0	4.1	72.7	0.0	73.5	22.5	0.0	22.4	0.9	0.0	0.0
Tampa MSA	0	0	0.0	266	3.4	0.0	2.2	22.9	0.0	18.9	37.6	0.0	35.6	36.0	0.0	41.9	0.1	0.0	1.5
FL Non-MSA	4	159	22.2	139	1.4	0.0	0.0	10.3	25.0	4.4	73.7	75.0	87.5	14.6	0.0	7.4	0.0	0.0	0.7
Total	18	913	100.0	2,499	3.2	5.6	1.6	22.8	11.1	13.9	42.2	38.9	44.7	31.6	44.4	37.9	0.2	0.0	1.9

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Miami MSA	8	680	30.8	867	97.4	75.0	73.3	1.2	25.0	1.4	0.0
Orlando MSA	--	--	--	267	96.8	--	62.6	1.2	--	2.0	--
Port St Lucie MSA	1	3	3.8	119	97.2	100.0	84.0	1.2	0.0	1.6	0.0
Cape Coral MSA	--	--	--	109	97.5	--	76.4	0.9	--	1.6	--
Deltona MSA	1	1	3.8	74	97.7	100.0	70.7	0.7	0.0	1.6	0.0
Gainesville MSA	--	--	--	72	96.9	--	68.0	1.3	--	1.8	--
Homosassa Springs MSA	--	--	--	30	97.9	--	70.0	0.2	--	1.9	--
Jacksonville MSA	--	--	--	117	97.6	--	56.4	0.9	--	1.6	--
Lakeland MSA	1	25	3.8	138	96.6	100.0	69.8	1.6	0.0	1.8	0.0
Naples MSA	--	--	--	34	97.0	--	73.8	1.8	--	1.2	--
North Port MSA	--	--	--	104	97.2	--	74.3	1.3	--	1.5	--
Ocala MSA	--	--	--	151	97.4	--	64.9	0.9	--	1.7	--
Palm Bay MSA	2	5	7.7	50	97.8	100.0	72.5	0.7	0.0	1.5	0.0
Sebastian MSA	4	136	15.4	45	96.1	100.0	71.7	2.3	0.0	1.5	0.0
Sebring-Avon Park MSA	--	--	--	40	93.6	--	52.4	3.5	--	2.9	--
Tampa MSA	2	10	7.7	316	97.1	50.0	63.9	1.1	50.0	1.7	0.0
FL Non-MSA	7	895	26.9	129	96.5	57.1	53.1	1.1	28.6	2.4	14.3
Total	26	1,755	100.0	2,662	97.2	76.9	68.8	1.2	19.2	1.6	3.8

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Miami MSA	7	285	38.9	849	97.5	100.0	68.3	1.5	0.0	0.9	0.0
Orlando MSA	--	--	--	273	97.1	--	64.3	1.7	--	1.2	--
Port St Lucie MSA	2	319	11.1	115	97.1	0.0	66.4	1.8	100.0	1.1	0.0
Cape Coral MSA	--	--	--	103	97.7	--	64.2	1.3	--	1.0	--
Deltona MSA	2	82	11.1	79	98.3	50.0	74.4	0.9	0.0	0.8	50.0
Gainesville MSA	1	51	5.6	70	96.6	0.0	61.1	1.9	0.0	1.5	100.0
Homosassa Springs MSA	--	--	--	13	99.3	--	61.5	0.3	--	0.4	--
Jacksonville MSA	--	--	--	95	97.9	--	57.9	1.2	--	0.9	--
Lakeland MSA	--	--	--	121	96.9	--	63.4	2.0	--	1.1	--
Naples MSA	--	--	--	39	96.8	--	67.7	2.2	--	1.1	--
North Port MSA	--	--	--	42	97.8	--	69.0	1.4	--	0.8	--
Ocala MSA	2	17	11.1	151	98.3	100.0	69.0	1.1	0.0	0.6	0.0
Palm Bay MSA	--	--	--	54	98.4	--	63.6	1.0	--	0.6	--
Sebastian MSA	--	--	--	41	96.1	--	70.7	2.8	--	1.1	--
Sebring MSA	--	--	--	49	93.5	--	51.0	4.6	--	2.0	--
Tampa MSA	--	--	--	266	97.5	--	60.0	1.5	--	1.1	--
FL Non-MSA	4	159	22.2	139	97.1	50.0	56.6	1.6	25.0	1.2	25.0
Total	18	913	100.0	2,499	97.5	66.7	65.1	1.5	16.7	1.0	16.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Maine

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Portland MSA	1,133	281,657,010	56.7	19,856	0.1	0.2	0.2	17.7	18.3	18.5	55.2	47.4	55.4	27.0	34.2	25.9	0.0	0.0	0.0
Bangor MSA	164	22,984,459	8.2	4,180	0.0	0.0	0.0	26.4	29.3	22.2	49.1	42.7	48.9	24.5	28.0	28.9	0.0	0.0	0.0
Lewiston MSA	117	19,696,171	5.9	3,248	0.6	1.7	2.5	13.2	19.7	17.3	68.3	53.0	63.6	17.4	25.6	15.8	0.5	0.0	0.8
ME Non-MSA	584	111,087,403	29.2	14,618	0.2	0.0	0.3	13.9	17.6	12.1	67.4	61.5	66.5	18.4	20.9	20.7	0.2	0.0	0.4
Total	1,998	435,425,043	100.0	41,902	0.2	0.2	0.4	16.8	19.1	16.5	60.4	51.5	59.3	22.5	29.3	23.6	0.1	0.0	0.2
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2021

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Portland MSA	688	192,007,088	60.7	36,469	0.9	1.2	1.7	16.4	18.9	18.0	60.5	49.7	58.1	22.3	30.2	22.3	0.0	0.0	0.0
Bangor MSA	86	13,215,727	7.6	6,087	0.0	0.0	0.0	13.4	17.4	9.9	61.0	59.3	58.5	25.3	23.3	31.4	0.3	0.0	0.2
Lewiston MSA	48	7,926,638	4.2	5,319	2.5	6.3	4.6	5.7	6.3	5.4	76.3	77.1	74.2	15.5	10.4	15.7	0.0	0.0	0.0
ME Non-MSA	312	61,785,340	27.5	21,102	0.0	0.0	0.0	5.3	4.2	4.6	76.8	69.9	73.8	17.9	26.0	21.6	0.0	0.0	0.0
Total	1,134	274,934,793	100.0	68,977	0.5	1.0	1.2	10.6	14.2	12.2	68.5	57.1	64.2	20.3	27.7	22.4	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022-23

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Portland MSA	1,133	281,657,010	56.7	19,856	18.4	9.3	7.2	18.2	22.2	19.5	24.1	20.9	22.9	39.4	41.4	39.9	0.0	6.2	10.5
Bangor MSA	164	22,984,459	8.2	4,180	19.0	9.8	9.0	19.5	29.9	21.0	21.1	22.0	22.0	40.4	32.3	31.5	0.0	6.1	16.6
Lewiston MSA	117	19,696,171	5.9	3,248	19.6	11.1	6.6	18.6	22.2	22.6	21.9	17.9	26.9	39.9	33.3	27.6	0.0	15.4	16.2
ME Non-MSA	584	111,087,403	29.2	14,618	19.0	10.4	6.1	18.2	22.8	17.0	21.6	19.7	22.1	41.2	43.5	44.6	0.0	3.6	10.2
Total	1,998	435,425,043	100.0	41,902	18.8	9.8	7.0	18.4	23.0	19.0	22.6	20.5	22.8	40.2	40.8	39.7	0.0	6.0	11.5

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEKKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2021**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Portland MSA	688	192,007,088	60.7	36,469	20.7	9.2	6.8	17.8	18.3	19.6	21.8	20.6	22.3	39.7	44.2	36.3	0.0	7.7	15.0
Bangor MSA	86	13,215,727	7.6	6,087	21.1	2.3	4.2	17.7	24.4	15.0	20.5	17.4	20.9	40.7	54.7	39.2	0.0	1.2	20.7
Lewiston MSA	48	7,926,638	4.2	5,319	22.4	6.3	4.9	15.7	25.0	19.6	23.0	12.5	24.9	39.0	29.2	27.9	0.0	27.1	22.6
ME Non-MSA	312	61,785,340	27.5	21,102	19.8	6.7	3.9	18.0	17.9	15.1	20.8	16.3	20.3	41.4	56.1	45.8	0.0	2.9	14.8
Total	1,134	274,934,793	100.0	68,977	20.5	7.8	5.6	17.7	19.0	17.8	21.3	18.9	21.8	40.5	47.6	38.8	0.0	6.7	16.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Portland MSA	1,276	29,912	56.3	15,059	0.2	0.3	0.2	20.6	17.7	19.5	54.0	50.5	51.5	25.2	31.4	27.8	0.0	0.0	1.0
Bangor MSA	174	3,327	7.7	3,464	0.0	0.0	0.0	21.3	17.2	19.1	55.4	61.5	48.7	23.3	21.3	31.5	0.0	0.0	0.8
Lewiston MSA	175	5,316	7.7	2,119	16.6	5.1	6.9	17.7	18.9	15.9	46.5	46.3	54.7	18.1	28.6	20.9	1.1	1.1	1.6
ME Non-MSA	641	12,865	28.3	11,612	0.2	0.3	0.1	14.9	12.9	12.6	63.8	72.9	63.6	20.5	13.9	21.3	0.6	0.0	2.4
Total	2,266	51,420	100.0	32,254	1.2	0.7	0.6	18.5	16.4	16.7	57.1	57.4	55.8	22.9	25.5	25.4	0.3	0.1	1.5

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2021

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Portland MSA	872	35,919	63.1	16,394	2.6	1.5	2.6	26.1	25.1	23.3	50.2	51.6	50.6	21.2	21.8	22.8	0.0	0.0	0.7
Bangor MSA	98	3,942	7.1	3,780	0.0	0.0	0.0	19.8	10.2	13.1	50.0	62.2	56.6	29.1	27.6	29.8	1.0	0.0	0.5
Lewiston MSA	98	2,595	7.1	1,962	16.1	23.5	11.9	7.6	6.1	5.5	64.1	56.1	67.3	12.2	14.3	14.2	0.0	0.0	1.1
ME Non-MSA	315	12,064	22.8	12,350	0.0	0.0	0.0	5.3	7.0	4.3	75.9	77.5	73.0	18.8	15.6	21.7	0.0	0.0	1.0
Total	1,383	54,520	100.0	34,486	2.3	2.6	1.9	16.6	18.6	14.3	60.5	58.6	60.4	20.5	20.2	22.7	0.1	0.0	0.8

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2022-23

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Portland MSA	1,276	29,912	56.3	15,059	89.4	87.5	48.2	3.4	10.7	7.2	1.8
Bangor MSA	174	3,327	7.7	3,464	83.8	81.0	52.6	4.8	15.5	11.4	3.4
Lewiston MSA	175	5,316	7.7	2,119	85.1	89.1	52.3	5.1	10.3	9.8	0.6
ME Non-MSA	641	12,865	28.3	11,612	86.5	88.8	53.9	3.6	9.2	9.8	2.0
Total	2,266	51,420	100.0	32,254	87.6	87.5	51.0	3.7	10.6	8.7	1.9

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2021

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Portland MSA	872	35,919	63.1	16,394	84.6	78.6	42.2	5.3	16.1	10.0	5.4
Bangor MSA	98	3,942	7.1	3,780	78.6	81.6	44.0	6.6	15.3	14.8	3.1
Lewiston MSA	98	2,595	7.1	1,962	79.5	80.6	41.9	7.4	14.3	13.1	5.1
ME Non-MSA	315	12,064	22.8	12,350	82.0	82.5	45.0	5.3	13.3	12.7	4.1
Total	1,383	54,520	100.0	34,486	82.7	79.8	43.4	5.6	15.3	11.7	4.9

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2022-23

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Portland MSA	6	35	26.1	135	0.1	0.0	0.0	18.5	16.7	21.6	55.9	33.3	57.5	25.5	50.0	20.9	0.0	0.0	0.0
Bangor MSA	3	163	13.0	76	0.0	0.0	0.0	16.9	66.7	13.3	57.8	33.3	62.7	25.3	0.0	24.0	0.0	0.0	0.0
Lewiston MSA	0	0	0.0	24	5.7	0.0	0.0	12.0	0.0	16.7	63.2	0.0	75.0	18.7	0.0	8.3	0.3	0.0	0.0
ME Non-MSA	14	751	60.9	588	0.2	0.0	0.0	14.2	14.3	9.8	69.5	85.7	71.8	16.0	0.0	17.1	0.1	0.0	1.4
Total	23	949	100.0	823	0.4	0.0	0.0	16.0	21.7	12.2	62.7	65.2	68.7	20.8	13.0	18.1	0.1	0.0	1.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%
TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2021

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Portland MSA	6	103	19.4	204	1.0	0.0	2.0	14.9	0.0	12.1	62.0	50.0	62.6	22.2	50.0	23.2	0.0	0.0	0.0
Bangor MSA	0	0	0.0	80	0.0	0.0	0.0	10.4	0.0	7.5	64.6	0.0	85.0	24.9	0.0	7.5	0.0	0.0	0.0
Lewiston MSA	3	245	9.7	26	2.6	0.0	0.0	3.9	0.0	4.3	77.3	100.0	69.6	16.3	0.0	26.1	0.0	0.0	0.0
ME Non-MSA	22	719	71.0	1,241	0.0	0.0	0.0	4.3	4.5	2.5	78.5	86.4	77.4	17.2	9.1	19.9	0.0	0.0	0.3
Total	31	1,067	100.0	1,551	0.5	0.0	0.3	8.8	3.2	4.0	70.9	80.6	75.7	19.7	16.1	19.8	0.0	0.0	0.3

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2022-23

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Portland MSA	6	35	26.1	135	96.9	83.3	63.4	1.9	0.0	1.2	16.7
Bangor MSA	3	163	13.0	76	94.6	66.7	42.7	4.0	33.3	1.4	0.0
Lewiston MSA	--	--	--	24	97.3	--	66.7	2.7	--	0.0	--
ME Non-MSA	14	751	60.9	588	97.4	57.1	70.1	1.6	35.7	1.0	7.1
Total	23	949	100.0	823	96.9	65.2	66.4	2.0	26.1	1.1	8.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Portland MSA	6	103	19.4	204	95.7	100.0	60.1	2.6	0.0	1.7	0.0
Bangor MSA	--	--	--	80	93.6	--	40.0	4.9	--	1.4	--
Lewiston MSA	3	245	9.7	26	96.1	66.7	52.2	3.4	33.3	0.4	0.0
ME Non-MSA	22	719	71.0	1,241	97.2	63.6	49.6	2.1	31.8	0.7	4.5
Total	31	1,067	100.0	1,551	96.2	71.0	50.5	2.7	25.8	1.1	3.2

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Maryland

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Baltimore MSA	1,175	431,490,053	100.0	81,027	4.6	7.6	4.9	19.0	26.3	19.0	38.4	26.9	38.6	37.6	38.1	37.0	0.4	1.1	0.5
Total	1,175	431,490,053	100.0	81,027	4.6	7.6	4.9	19.0	26.3	19.0	38.4	26.9	38.6	37.6	38.1	37.0	0.4	1.1	0.5

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Baltimore MSA	764	338,023,348	100.0	163,443	5.4	7.1	3.4	18.7	24.0	15.4	37.1	23.0	38.2	38.8	45.8	43.0	0.1	0.1	0.1
Total	764	338,023,348	100.0	163,443	5.4	7.1	3.4	18.7	24.0	15.4	37.1	23.0	38.2	38.8	45.8	43.0	0.1	0.1	0.1

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Baltimore MSA	1,175	431,490,053	100.0	81,027	22.4	18.6	10.5	17.1	24.3	20.9	20.8	13.4	20.6	39.7	43.2	28.7	0.0	0.5	19.4
Total	1,175	431,490,053	100.0	81,027	22.4	18.6	10.5	17.1	24.3	20.9	20.8	13.4	20.6	39.7	43.2	28.7	0.0	0.5	19.4

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2021**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Baltimore MSA	764	338,023,348	100.0	163,443	23.0	19.2	7.7	17.2	21.5	18.5	19.6	9.4	19.1	40.2	49.1	30.5	0.0	0.8	24.3
Total	764	338,023,348	100.0	163,443	23.0	19.2	7.7	17.2	21.5	18.5	19.6	9.4	19.1	40.2	49.1	30.5	0.0	0.8	24.3

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Baltimore MSA	369	14,724	100.0	69,574	6.0	2.2	4.1	21.0	17.6	16.9	36.7	41.5	38.2	35.4	38.8	39.9	0.9	0.0	0.9
Total	369	14,724	100.0	69,574	6.0	2.2	4.1	21.0	17.6	16.9	36.7	41.5	38.2	35.4	38.8	39.9	0.9	0.0	0.9

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Baltimore MSA	284	14,313	100.0	75,272	6.6	6.3	5.1	18.7	19.7	16.2	36.5	35.2	37.6	37.5	38.0	40.3	0.6	0.7	0.8
Total	284	14,313	100.0	75,272	6.6	6.3	5.1	18.7	19.7	16.2	36.5	35.2	37.6	37.5	38.0	40.3	0.6	0.7	0.8

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Baltimore MSA	369	14,724	100.0	69,574	91.4	77.2	52.2	2.6	20.1	6.0	2.7
Total	369	14,724	100.0	69,574	91.4	77.2	52.2	2.6	20.1	6.0	2.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Baltimore MSA	284	14,313	100.0	75,272	89.1	73.6	46.0	3.5	18.7	7.4	7.7
Total	284	14,313	100.0	75,272	89.1	73.6	46.0	3.5	18.7	7.4	7.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Baltimore MSA	1	17	100.0	286	2.7	0.0	1.4	14.5	0.0	9.6	36.7	100.0	31.6	45.3	0.0	55.7	0.8	0.0	1.7
Total	1	17	100.0	286	2.7	0.0	1.4	14.5	0.0	9.6	36.7	100.0	31.6	45.3	0.0	55.7	0.8	0.0	1.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Baltimore MSA	1	38	100.0	256	2.4	0.0	1.5	14.1	0.0	3.9	36.0	0.0	40.2	47.3	100.0	52.9	0.1	0.0	1.5
Total	1	38	100.0	256	2.4	0.0	1.5	14.1	0.0	3.9	36.0	0.0	40.2	47.3	100.0	52.9	0.1	0.0	1.5

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Baltimore MSA	1	17	100.0	286	96.7	0.0	57.0	1.8	100.0	1.6	0.0
Total	1	17	100.0	286	96.7	0.0	57.0	1.8	100.0	1.6	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Baltimore MSA	1	38	100.0	256	95.7	100.0	55.2	2.5	0.0	1.8	0.0
Total	1	38	100.0	256	95.7	100.0	55.2	2.5	0.0	1.8	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Massachusetts

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Barnstable MSA	464	171,026,125	25.4	11,180	0.0	0.0	0.0	15.9	18.1	18.2	65.9	64.7	63.6	18.2	17.2	18.2	0.0	0.0	0.0
Springfield MSA	602	108,406,654	32.9	17,482	2.0	3.0	3.7	14.8	24.4	19.3	42.2	38.7	40.5	41.0	33.9	36.5	0.0	0.0	0.1
Pittsfield MSA	101	26,557,080	5.5	3,765	0.3	0.0	1.0	15.4	21.8	17.4	56.5	55.4	55.5	27.8	22.8	26.1	0.0	0.0	0.0
Worcester MSA	662	165,183,082	36.2	26,525	2.8	5.7	4.8	11.3	17.8	13.2	47.7	40.5	45.3	38.1	35.8	36.5	0.1	0.2	0.2
Total	1,829	471,172,941	100.0	58,952	1.9	3.1	3.3	13.5	20.3	16.2	49.3	46.9	48.0	35.2	29.7	32.3	0.0	0.1	0.1

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2021

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Barnstable Town MSA	300	124,823,193	27.4	21,571	0.4	0.7	0.5	10.8	14.0	12.0	72.0	68.7	71.1	16.7	16.7	16.5	0.0	0.0	0.0
Springfield MSA	350	71,608,466	32.0	26,726	4.3	6.3	5.9	12.0	14.0	13.5	38.7	35.1	37.3	45.0	44.6	43.4	0.0	0.0	0.0
Pittsfield MSA	58	16,402,156	5.3	4,864	3.1	0.0	3.9	10.2	6.9	7.9	55.5	39.7	52.6	31.2	53.4	35.6	0.0	0.0	0.0
Worcester MSA	386	116,045,483	35.3	47,598	2.9	3.9	4.1	13.0	19.2	12.7	43.6	31.1	40.6	40.4	45.9	42.6	0.1	0.0	0.1
Total	1,094	328,879,298	100.0	100,759	3.0	3.6	3.8	12.1	15.4	12.5	47.3	43.1	46.8	37.6	37.8	36.9	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Barnstable MSA	464	171,026,125	25.4	11,180	19.3	9.3	9.0	19.3	18.5	17.4	20.7	18.1	18.8	40.7	53.0	45.3	0.0	1.1	9.6
Springfield MSA	602	108,406,654	32.9	17,482	23.6	15.4	7.6	16.3	25.9	26.8	18.7	23.3	24.6	41.4	33.2	28.1	0.0	2.2	13.0
Pittsfield MSA	101	26,557,080	5.5	3,765	19.7	13.9	7.9	17.8	26.7	21.1	22.1	14.9	22.9	40.4	42.6	38.6	0.0	2.0	9.4
Worcester MSA	662	165,183,082	36.2	26,525	22.0	12.4	6.8	16.5	23.9	22.5	19.9	21.5	25.1	41.6	40.5	32.8	0.0	1.8	12.8
Total	1,829	471,172,941	100.0	58,952	22.1	12.7	7.5	16.9	23.3	22.7	19.7	20.8	23.6	41.3	41.4	34.2	0.0	1.8	12.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Barnstable Town MSA	300	124,823,193	27.4	21,571	19.1	3.0	3.7	18.7	17.3	13.3	23.0	14.7	19.1	39.2	64.0	51.9	0.0	1.0	11.9
Springfield MSA	350	71,608,466	32.0	26,726	24.2	11.4	6.1	16.1	27.7	22.4	18.5	22.3	23.4	41.2	36.3	31.5	0.0	2.3	16.7
Pittsfield MSA	58	16,402,156	5.3	4,864	21.3	12.1	9.0	17.6	10.3	18.7	20.5	20.7	19.6	40.6	55.2	39.2	0.0	1.7	13.6
Worcester MSA	386	116,045,483	35.3	47,598	22.1	10.6	5.7	16.3	19.7	19.7	20.0	22.8	23.9	41.6	45.9	35.0	0.0	1.0	15.8
Total	1,094	328,879,298	100.0	100,759	22.4	8.9	5.5	16.6	21.1	19.0	19.9	20.3	22.5	41.0	48.3	37.9	0.0	1.5	15.1

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Barnstable MSA	546	11,268	22.3	8,600	0.2	0.2	0.1	21.4	13.2	21.7	62.8	74.4	61.6	15.6	12.3	15.0	0.0	0.0	1.6
Springfield MSA	874	21,045	35.7	14,299	8.9	7.1	7.6	20.8	28.0	20.0	33.3	34.4	33.9	36.0	30.1	37.3	1.0	0.3	1.1
Pittsfield MSA	150	2,551	6.1	2,982	22.6	10.0	9.7	12.1	19.3	12.2	43.3	38.0	51.8	22.1	32.7	23.7	0.0	0.0	2.5
Worcester MSA	879	22,238	35.9	18,958	10.1	10.4	7.7	14.3	19.2	13.0	41.1	42.5	41.4	33.8	27.1	37.0	0.7	0.8	1.0
Total	2,449	57,102	100.0	44,839	9.1	6.9	6.3	17.4	21.0	16.8	42.5	46.5	43.6	30.4	25.2	31.9	0.6	0.4	1.3

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Barnstable Town MSA	380	17,042	23.5	9,611	7.4	6.6	6.4	13.5	13.7	12.9	64.7	67.6	66.6	14.5	12.1	12.7	0.0	0.0	1.4
Springfield MSA	565	24,031	35.0	16,040	12.9	13.5	11.8	14.4	17.3	14.0	33.0	31.9	32.9	39.0	37.2	40.6	0.7	0.2	0.8
Pittsfield MSA	103	5,672	6.4	2,700	14.2	16.5	10.8	6.5	10.7	7.0	41.8	38.8	40.2	37.4	34.0	40.5	0.0	0.0	1.5
Worcester MSA	566	30,289	35.1	19,602	7.3	12.4	7.0	15.8	18.4	14.3	34.0	32.0	33.2	40.1	33.4	43.2	2.7	3.9	2.3
Total	1,614	77,034	100.0	47,953	9.7	11.6	8.7	14.2	16.4	13.5	39.6	40.8	40.2	35.1	29.7	36.1	1.4	1.4	1.6

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Barnstable MSA	546	11,268	22.3	8,600	90.3	85.7	47.9	2.9	11.2	6.8	3.1
Springfield MSA	874	21,045	35.7	14,299	87.1	88.8	51.9	3.9	9.7	9.1	1.5
Pittsfield MSA	150	2,551	6.1	2,982	88.6	87.3	47.6	3.4	12.7	8.0	0.0
Worcester MSA	879	22,238	35.9	18,958	88.3	86.9	50.6	3.7	11.8	8.0	1.3
Total	2,449	57,102	100.0	44,839	88.3	87.3	50.3	3.6	11.0	8.1	1.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Barnstable Town MSA	380	17,042	23.5	9,611	88.4	77.1	38.4	3.6	17.1	8.0	5.8
Springfield MSA	565	24,031	35.0	16,040	85.0	79.5	44.1	4.7	16.3	10.3	4.2
Pittsfield MSA	103	5,672	6.4	2,700	84.5	79.6	42.7	4.7	16.5	10.8	3.9
Worcester MSA	566	30,289	35.1	19,602	86.0	74.9	42.0	4.6	19.8	9.3	5.3
Total	1,614	77,034	100.0	47,953	86.0	77.3	42.0	4.5	17.7	9.5	5.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Barnstable MSA	0	0	0.0	51	0.0	0.0	0.0	19.3	0.0	8.9	65.5	0.0	67.9	15.2	0.0	14.3	0.0	0.0	8.9
Springfield MSA	2	64	100.0	126	1.5	0.0	0.8	8.3	0.0	3.1	44.2	50.0	49.6	45.9	50.0	43.4	0.2	0.0	3.1
Pittsfield MSA	0	0	0.0	35	6.5	0.0	0.0	5.2	0.0	0.0	58.3	0.0	52.5	30.0	0.0	35.0	0.0	0.0	12.5
Worcester MSA	0	0	0.0	113	2.7	0.0	0.0	7.1	0.0	2.7	47.2	0.0	52.2	42.7	0.0	45.1	0.2	0.0	0.0
Total	2	64	100.0	325	2.1	0.0	0.3	9.8	0.0	3.6	50.9	50.0	53.8	37.1	50.0	38.2	0.1	0.0	4.1

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Barnstable Town MSA	7	90	58.3	99	2.4	0.0	0.0	10.4	14.3	10.5	74.7	57.1	74.7	12.5	28.6	11.6	0.0	0.0	3.2
Springfield MSA	3	42	25.0	126	2.6	0.0	0.8	5.7	0.0	4.0	39.0	33.3	42.4	52.8	66.7	51.2	0.0	0.0	1.6
Pittsfield MSA	0	0	0.0	27	2.1	0.0	0.0	4.2	0.0	7.4	48.4	0.0	40.7	45.4	0.0	51.9	0.0	0.0	0.0
Worcester MSA	2	103	16.7	119	2.4	0.0	0.9	8.8	0.0	4.3	39.2	50.0	49.6	49.2	50.0	45.3	0.3	0.0	0.0
Total	12	235	100.0	371	2.4	0.0	0.5	7.6	8.3	6.0	46.8	50.0	53.0	43.0	41.7	39.0	0.1	0.0	1.4

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Barnstable MSA	--	--	--	51	96.3	--	71.4	1.7	--	2.0	--
Springfield MSA	2	64	100.0	126	96.8	100.0	62.0	1.8	0.0	1.4	0.0
Pittsfield MSA	--	--	--	35	96.9	--	70.0	1.8	--	1.3	--
Worcester MSA	--	--	--	113	96.8	--	62.8	1.7	--	1.5	--
Total	2	64	100.0	325	96.7	100.0	64.8	1.7	0.0	1.5	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Barnstable Town MSA	7	90	58.3	99	95.3	71.4	36.8	2.3	0.0	2.5	28.6
Springfield MSA	3	42	25.0	126	96.6	100.0	52.0	2.0	0.0	1.5	0.0
Pittsfield MSA	--	--	--	27	96.1	--	59.3	2.5	--	1.4	--
Worcester MSA	2	103	16.7	119	96.5	100.0	48.7	1.8	0.0	1.7	0.0
Total	12	235	100.0	371	96.2	83.3	47.5	2.0	0.0	1.7	16.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

New Hampshire

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Manchester MSA	806	163,937,762	47.8	13,421	1.9	1.9	3.1	13.7	16.4	16.4	46.1	40.8	43.5	38.3	40.9	37.0	0.0	0.0	0.0
NH Non-MSA	879	175,502,129	52.2	14,913	0.0	0.0	0.0	14.7	12.3	14.2	65.6	64.1	65.4	19.7	23.7	20.4	0.0	0.0	0.0
Total	1,685	339,439,891	100.0	28,334	0.8	0.9	1.4	14.2	14.2	15.2	57.1	52.9	55.0	27.9	31.9	28.3	0.0	0.0	0.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Manchester MSA	446	105,499,908	49.0	26,016	2.2	2.9	3.4	14.6	17.0	14.9	44.2	37.9	42.1	39.0	42.2	39.6	0.0	0.0	0.0
NH Non-MSA	465	113,329,997	51.0	24,561	0.0	0.0	0.0	13.3	7.7	10.7	64.3	65.6	63.5	22.4	26.7	25.7	0.0	0.0	0.0
Total	911	218,829,905	100.0	50,577	0.9	1.4	1.8	13.8	12.3	12.8	55.6	52.0	52.5	29.6	34.2	32.9	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022-23

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Manchester MSA	806	163,937,762	47.8	13,421	19.7	9.9	7.8	18.8	22.7	22.6	22.8	24.6	27.1	38.7	40.9	32.3	0.0	1.9	10.2
NH Non-MSA	879	175,502,129	52.2	14,913	18.6	9.7	6.2	18.3	21.6	18.4	23.7	24.7	23.4	39.5	41.2	41.7	0.0	2.8	10.3
Total	1,685	339,439,891	100.0	28,334	19.1	9.8	7.0	18.5	22.1	20.4	23.3	24.6	25.2	39.1	41.1	37.2	0.0	2.4	10.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Manchester MSA	446	105,499,908	49.0	26,016	20.3	7.6	6.0	17.8	24.4	21.1	22.1	24.2	25.7	39.8	42.4	33.0	0.0	1.3	14.2
NH Non - MSA	465	113,329,997	51.0	24,561	19.3	4.9	4.4	17.7	16.3	16.6	22.0	28.2	23.2	41.0	44.7	43.1	0.0	5.8	12.8
Total	911	218,829,905	100.0	50,577	19.7	6.3	5.2	17.7	20.3	18.9	22.1	26.2	24.5	40.5	43.6	37.9	0.0	3.6	13.5

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Manchester MSA	1,175	32,609	50.7	10,151	8.4	5.5	6.5	16.8	15.0	15.0	40.5	46.1	40.2	33.9	32.9	37.1	0.4	0.4	1.2
NH Non-MSA	1,142	28,743	49.3	11,750	0.0	0.0	0.0	17.1	13.1	16.1	62.7	63.7	62.5	20.2	23.2	19.3	0.0	0.0	2.0
Total	2,317	61,352	100.0	21,901	3.9	2.8	3.0	17.0	14.1	15.6	52.4	54.8	52.3	26.6	28.1	27.4	0.2	0.2	1.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Manchester MSA	777	34,970	52.9	10,949	8.1	7.5	7.3	20.6	17.2	18.8	37.5	42.5	37.7	33.4	32.8	35.3	0.4	0.0	0.8
NH Non-MSA	693	29,447	47.1	11,993	0.0	0.0	0.0	15.6	15.6	14.7	60.1	61.2	60.3	24.2	23.2	23.6	0.0	0.0	1.5
Total	1,470	64,417	100.0	22,942	3.8	3.9	3.5	18.0	16.5	16.6	49.6	51.3	49.6	28.5	28.3	29.1	0.2	0.0	1.2

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Manchester MSA	1,175	32,609	50.7	10,151	89.9	82.6	47.6	3.4	15.3	6.7	2.0
NH Non-MSA	1,142	28,743	49.3	11,750	88.7	85.6	51.5	3.4	12.8	8.0	1.7
Total	2,317	61,352	100.0	21,901	89.3	84.1	49.7	3.4	14.1	7.4	1.9

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Manchester MSA	777	34,970	52.9	10,949	88.2	78.9	48.4	4.2	16.3	7.6	4.8
NH Non-MSA	693	29,447	47.1	11,993	86.5	81.7	47.7	4.2	13.1	9.3	5.2
Total	1,470	64,417	100.0	22,942	87.3	80.2	48.1	4.2	14.8	8.5	5.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Manchester MSA	7	236	50.0	47	3.3	0.0	2.1	10.8	0.0	10.6	47.3	85.7	42.6	38.6	14.3	42.6	0.1	0.0	2.1
NH Non-MSA	7	133	50.0	125	0.0	0.0	0.0	11.3	0.0	14.3	68.9	71.4	72.2	19.8	28.6	11.9	0.0	0.0	1.6
Total	14	369	100.0	172	1.2	0.0	0.6	11.1	0.0	13.3	61.1	78.6	64.2	26.6	21.4	20.2	0.0	0.0	1.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Manchester MSA	5	395	33.3	46	3.2	0.0	0.0	11.3	0.0	10.9	48.3	80.0	32.6	37.0	20.0	45.7	0.1	0.0	10.9
NH Non-MSA	10	253	66.7	112	0.0	0.0	0.0	11.2	20.0	12.4	67.0	60.0	68.6	21.8	20.0	16.2	0.0	0.0	2.9
Total	15	648	100.0	158	1.2	0.0	0.0	11.2	13.3	11.9	60.3	66.7	57.6	27.3	20.0	25.2	0.0	0.0	5.3

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Manchester MSA	7	236	50.0	47	97.9	100.0	44.7	1.1	0.0	1.0	0.0
NH Non-MSA	7	133	50.0	125	97.6	100.0	61.1	1.1	0.0	1.3	0.0
Total	14	369	100.0	172	97.7	100.0	56.6	1.1	0.0	1.2	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Manchester MSA	5	395	33.3	46	97.5	60.0	58.7	1.4	20.0	1.1	20.0
NH Non MSA	10	253	66.7	112	97.3	90.0	56.2	1.3	10.0	1.3	0.0
Total	15	648	100.0	158	97.4	80.0	57.0	1.4	13.3	1.2	6.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

New Jersey

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Atlantic City MSA	694	169,845,469	38.4	8,281	2.8	4.5	2.3	12.0	17.6	11.9	54.1	43.7	51.9	30.9	34.3	33.7	0.1	0.0	0.2
Ocean City MSA	429	205,337,312	23.7	6,030	2.2	3.5	5.1	5.6	4.4	4.0	52.5	34.7	45.8	39.7	57.3	45.1	0.0	0.0	0.0
Trenton MSA	559	181,379,031	30.9	8,631	6.4	5.5	5.9	21.7	33.8	22.7	32.4	24.2	34.0	39.5	36.5	37.4	0.0	0.0	0.0
Vineland MSA	125	15,181,571	6.9	3,352	3.9	4.8	4.2	10.9	12.8	10.6	42.7	39.2	43.4	42.5	43.2	41.7	0.0	0.0	0.0
Total	1,807	571,743,383	100.0	26,294	4.2	4.6	4.4	14.6	19.1	13.5	43.7	35.2	43.6	37.3	41.1	38.6	0.0	0.0	0.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Atlantic City MSA	282	86,060,168	31.7	14,528	3.4	3.5	2.5	16.3	21.6	12.9	39.3	37.2	38.0	40.1	36.5	45.2	1.0	1.1	1.5
Ocean City MSA	312	156,257,062	35.1	12,001	3.0	4.5	5.1	15.3	20.5	18.8	60.6	38.8	50.4	21.0	36.2	25.7	0.0	0.0	0.0
Trenton MSA	256	85,156,651	28.8	16,319	7.3	2.3	3.5	16.9	21.5	14.1	32.3	27.3	32.8	43.5	48.8	49.6	0.0	0.0	0.0
Vineland MSA	40	8,753,795	4.5	4,708	2.2	0.0	0.8	7.7	15.0	7.7	55.5	55.0	53.0	34.7	30.0	38.5	0.0	0.0	0.0
Total	890	336,227,675	100.0	47,556	4.7	3.4	3.3	15.1	20.9	14.3	42.1	35.7	40.9	37.9	39.7	41.1	0.3	0.3	0.5

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Atlantic City MSA	694	169,845,469	38.4	8,281	22.6	8.8	4.7	16.9	26.5	15.8	18.6	19.3	20.1	41.8	43.8	40.6	0.0	1.6	18.9
Ocean City MSA	429	205,337,312	23.7	6,030	19.7	4.9	4.1	18.1	17.2	10.5	21.7	9.6	13.8	40.5	65.5	58.9	0.0	2.8	12.7
Trenton MSA	559	181,379,031	30.9	8,631	23.6	14.3	10.8	16.2	29.7	20.3	19.8	14.3	19.7	40.5	40.6	32.4	0.0	1.1	16.8
Vineland MSA	125	15,181,571	6.9	3,352	24.7	11.2	3.9	16.2	21.6	18.3	18.4	27.2	26.4	40.7	39.2	29.7	0.0	0.8	21.6
Total	1,807	571,743,383	100.0	26,294	23.0	9.7	6.5	16.7	25.0	16.4	19.4	16.0	19.3	40.9	47.6	40.7	0.0	1.7	17.1

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Atlantic City MSA	282	86,060,168	31.7	14,528	22.8	5.0	4.3	17.0	22.0	15.8	18.5	18.4	19.5	41.7	52.5	40.5	0.0	2.1	19.9
Ocean City MSA	312	156,257,062	35.1	12,001	19.9	2.6	2.5	19.0	11.5	7.8	21.3	8.3	12.0	39.8	74.7	64.6	0.0	2.9	13.0
Trenton MSA	256	85,156,651	28.8	16,319	23.9	16.0	7.0	16.6	21.9	17.2	18.5	14.1	19.6	41.1	45.7	40.4	0.0	2.3	15.8
Vineland MSA	40	8,753,795	4.5	4,708	21.2	10.0	3.5	17.6	20.0	16.0	19.5	27.5	23.8	41.8	32.5	31.0	0.0	10.0	25.6
Total	890	336,227,675	100.0	47,556	22.6	7.5	4.7	17.2	18.2	14.3	19.0	14.0	18.1	41.2	57.4	45.6	0.0	2.8	17.3

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Atlantic City MSA	870	15,428	43.0	7,025	7.9	5.7	6.7	16.4	18.4	16.5	47.2	46.4	47.2	28.1	29.3	29.2	0.3	0.1	0.4
Ocean City MSA	323	7,206	16.0	3,494	5.8	9.0	6.0	2.9	1.2	3.1	45.4	32.8	48.0	45.9	57.0	42.3	0.0	0.0	0.6
Trenton MSA	591	12,839	29.2	10,476	12.0	10.8	7.3	20.8	26.6	20.1	25.9	27.9	26.5	41.3	34.7	45.9	0.0	0.0	0.3
Vineland MSA	241	3,360	11.9	2,742	15.3	16.6	19.7	12.6	19.9	9.2	38.2	33.2	40.0	33.9	30.3	30.2	0.1	0.0	0.9
Total	2,025	38,833	100.0	23,737	10.4	9.0	8.4	16.2	18.2	15.3	36.1	37.3	37.2	37.2	35.4	38.7	0.1	0.0	0.4

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Atlantic City MSA	580	21,874	40.0	7,814	9.7	8.6	9.0	18.8	17.1	18.1	33.3	32.6	32.6	37.3	41.4	38.8	0.9	0.3	1.4
Ocean City MSA	239	10,977	16.5	3,900	5.4	7.1	5.5	15.0	15.1	14.5	56.4	60.7	55.2	23.1	17.2	24.1	0.0	0.0	0.7
Trenton MSA	455	19,482	31.4	11,372	10.4	4.8	6.4	17.2	20.9	17.1	29.3	35.2	29.7	43.1	39.1	46.5	0.0	0.0	0.3
Vineland MSA	176	5,048	12.1	2,846	7.6	9.1	14.0	16.0	20.5	13.5	50.1	46.0	47.3	26.2	24.4	24.5	0.1	0.0	0.7
Total	1,450	57,381	100.0	25,932	9.2	7.2	7.9	17.2	18.3	16.6	36.6	39.7	36.3	36.7	34.6	38.5	0.3	0.1	0.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Atlantic City MSA	870	15,428	43.0	7,025	91.7	88.5	50.8	2.4	10.6	5.9	0.9
Ocean City MSA	323	7,206	16.0	3,494	91.8	86.7	47.9	2.4	11.8	5.8	1.5
Trenton MSA	591	12,839	29.2	10,476	90.4	91.5	50.6	3.3	6.8	6.3	1.7
Vineland MSA	241	3,360	11.9	2,742	89.7	87.1	53.4	3.5	10.8	6.8	2.1
Total	2,025	38,833	100.0	23,737	90.9	88.9	50.6	2.9	9.7	6.2	1.4

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Atlantic City MSA	580	21,874	40.0	7,814	89.0	79.8	39.4	3.4	14.7	7.6	5.5
Ocean City MSA	239	10,977	16.5	3,900	89.5	80.8	41.0	3.3	15.5	7.2	3.8
Trenton MSA	455	19,482	31.4	11,372	87.4	76.0	42.4	4.7	17.6	8.0	6.4
Vineland MSA	176	5,048	12.1	2,846	86.3	76.1	38.9	4.8	19.3	8.9	4.5
Total	1,450	57,381	100.0	25,932	88.0	78.3	40.9	4.1	16.3	7.9	5.4

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Atlantic City MSA	0	0	0.0	34	2.1	0.0	0.0	13.0	0.0	2.7	61.6	0.0	56.8	23.2	0.0	32.4	0.1	0.0	8.1
Ocean City MSA	1	33	50.0	23	1.8	0.0	0.0	4.4	0.0	0.0	53.6	100.0	52.2	40.2	0.0	47.8	0.0	0.0	0.0
Trenton MSA	0	0	0.0	32	9.4	0.0	27.3	26.4	0.0	6.1	26.4	0.0	9.1	37.8	0.0	54.5	0.0	0.0	3.0
Vineland MSA	1	130	50.0	29	6.7	0.0	0.0	9.0	0.0	0.0	33.8	0.0	32.1	50.5	100.0	67.9	0.0	0.0	0.0
Total	2	163	100.0	118	5.6	0.0	7.4	15.9	0.0	2.5	42.1	50.0	37.2	36.3	50.0	49.6	0.0	0.0	3.3

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Atlantic City MSA	5	378	55.6	54	1.9	0.0	0.0	12.5	0.0	6.1	41.3	40.0	34.7	43.2	60.0	57.1	1.1	0.0	2.0
Ocean City MSA	1	10	11.1	20	1.1	0.0	0.0	9.8	0.0	10.5	68.3	100.0	78.9	20.7	0.0	10.5	0.0	0.0	0.0
Trenton MSA	1	10	11.1	35	9.0	0.0	0.0	20.2	0.0	5.9	29.8	100.0	35.3	41.0	0.0	58.8	0.0	0.0	0.0
Vineland MSA	2	175	22.2	44	3.2	0.0	0.0	5.0	0.0	0.0	51.4	0.0	38.1	40.5	100.0	61.9	0.0	0.0	0.0
Total	9	573	100.0	153	4.7	0.0	0.0	13.6	0.0	4.9	42.8	44.4	41.7	38.6	55.6	52.8	0.3	0.0	0.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Atlantic City MSA	--	--	--	34	97.0	--	48.6	2.2	--	0.7	--
Ocean City MSA	1	33	50.0	23	98.5	100.0	65.2	0.7	0.0	0.9	0.0
Trenton MSA	--	--	--	32	97.7	--	57.6	0.9	--	1.4	--
Vineland-Bridgeton MSA	1	130	50.0	29	96.5	0.0	50.0	2.4	100.0	1.1	0.0
Total	2	163	100.0	118	97.4	50.0	54.5	1.6	50.0	1.1	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Atlantic City MSA	5	378	55.6	54	96.1	80.0	57.1	3.3	20.0	0.7	0.0
Ocean City MSA	1	10	11.1	20	98.9	100.0	73.7	0.6	0.0	0.6	0.0
Trenton MSA	1	10	11.1	35	97.4	100.0	67.6	1.3	0.0	1.3	0.0
Vineland MSA	2	175	22.2	44	95.7	50.0	64.3	3.2	50.0	1.1	0.0
Total	9	573	100.0	153	96.9	77.8	63.9	2.1	22.2	1.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

New York

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Glens Falls MSA	178	26,936,150	15.8	3,244	0.7	0.0	0.9	8.1	11.2	6.8	71.3	71.3	69.2	19.8	17.4	23.1	0.0	0.0	0.0
Poughkeepsie MSA	511	125,732,221	45.4	17,547	2.9	6.1	6.1	10.1	11.9	10.2	60.6	49.7	58.2	26.5	32.3	25.5	0.0	0.0	0.0
Albany MSA	163	36,619,854	14.5	21,528	3.4	3.1	4.3	9.9	15.3	11.4	50.1	53.4	48.3	36.4	28.2	35.5	0.2	0.0	0.4
Kingston MSA	39	12,524,537	3.5	2,213	0.0	0.0	0.0	16.8	20.5	19.5	64.2	71.8	67.2	14.2	2.6	9.6	4.7	5.1	3.7
NY non-MSA	234	42,742,947	20.8	5,087	0.0	0.0	0.0	6.9	7.7	9.2	62.5	70.1	53.9	29.9	20.5	35.8	0.7	1.7	1.0
Total	1,125	244,555,708	100.0	49,619	2.4	3.2	4.1	9.8	11.7	10.8	57.7	58.7	54.6	29.7	25.9	30.1	0.4	0.5	0.4

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Glens Falls MSA	71	11,220,226	11.8	4,684	0.0	0.0	0.0	4.1	2.8	6.2	83.8	74.6	79.7	12.2	22.5	14.1	0.0	0.0	0.0
Poughkeepsie MSA	271	76,420,241	45.2	26,948	2.6	4.4	5.7	10.9	13.3	9.3	53.3	49.1	50.6	33.2	33.2	34.4	0.0	0.0	0.0
Albany MSA	130	30,935,555	21.7	31,131	2.7	5.4	2.5	12.1	16.2	11.9	54.0	47.7	53.8	31.2	30.0	31.7	0.0	0.8	0.1
Kingston MSA	23	7,195,963	3.8	3,073	3.6	0.0	4.2	5.8	8.7	8.0	65.6	56.5	64.8	25.0	34.8	23.0	0.0	0.0	0.0
NY Non-MSA	105	18,810,729	17.5	6,899	0.3	1.0	0.3	6.7	9.5	8.3	60.0	60.0	55.0	33.0	29.5	36.4	0.0	0.0	0.0
Total	600	144,582,714	100.0	72,735	2.2	3.3	3.4	10.1	11.8	10.1	57.4	54.0	54.9	30.3	30.7	31.6	0.0	0.2	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Glens Falls MSA	178	26,936,150	15.8	3,244	19.2	16.3	8.1	19.1	25.8	20.8	20.8	20.2	24.0	40.8	34.8	35.2	0.0	2.8	11.8
Poughkeepsie MSA	511	125,732,221	45.4	17,547	21.4	8.8	7.4	17.4	20.9	22.3	21.5	26.0	27.6	39.7	42.9	33.1	0.0	1.4	9.5
Albany MSA	163	36,619,854	14.5	21,528	20.5	11.7	10.4	16.9	28.2	23.6	21.6	23.3	25.4	41.0	34.4	30.9	0.0	2.5	9.8
Kingston MSA	39	12,524,537	3.5	2,213	25.1	2.6	6.3	17.0	17.9	17.9	19.5	17.9	25.2	38.4	61.5	42.7	0.0	0.0	7.8
NY Non-MSA	234	42,742,947	20.8	5,087	18.3	6.4	4.4	15.1	15.4	13.7	20.5	22.2	21.9	46.1	55.1	49.8	0.0	0.9	10.3
Total	1,125	244,555,708	100.0	49,619	20.7	9.7	8.4	17.0	21.5	21.7	21.3	23.6	25.7	41.0	43.6	34.4	0.0	1.6	9.8

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Glens Falls MSA	71	11,220,226	11.8	4,684	20.2	9.9	6.5	17.1	26.8	19.9	23.8	22.5	23.4	38.9	36.6	37.9	0.0	4.2	12.3
Poughkeepsie MSA	271	76,420,241	45.2	26,948	20.3	7.0	4.7	15.7	19.6	18.8	20.4	26.9	28.0	43.6	44.3	38.2	0.0	2.2	10.3
Albany MSA	130	30,935,555	21.7	31,131	19.3	20.0	8.3	17.4	23.8	22.3	22.0	16.9	24.7	41.3	36.2	33.4	0.0	3.1	11.4
Kingston MSA	23	7,195,963	3.8	3,073	23.9	4.3	5.9	17.4	17.4	18.7	20.9	17.4	24.8	37.8	60.9	42.7	0.0	0.0	7.9
NY Non-MSA	105	18,810,729	17.5	6,899	19.2	5.7	2.7	15.5	17.1	11.4	20.2	21.0	20.6	45.2	55.2	54.0	0.0	1.0	11.4
Total	600	144,582,714	100.0	72,735	20.0	9.8	6.2	16.5	20.8	19.7	21.3	22.8	25.4	42.3	44.2	37.8	0.0	2.3	10.9

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Glens Falls MSA	198	5,208	13.3	2,687	3.3	0.5	2.7	9.6	11.1	8.8	70.3	63.6	69.4	16.9	24.7	17.9	0.0	0.0	1.1
Poughkeepsie MSA	702	27,086	47.2	22,232	11.5	16.0	15.4	12.7	9.8	11.4	53.5	46.9	50.2	22.2	27.4	22.2	0.0	0.0	0.8
Albany MSA	273	9,162	18.4	17,277	5.4	8.4	6.9	8.7	9.9	9.2	40.1	46.5	47.7	26.3	24.5	28.9	19.4	10.6	7.3
Kingston MSA	27	476	1.8	2,874	0.0	0.0	0.0	22.9	22.2	16.0	65.9	77.8	68.9	7.7	0.0	12.1	3.5	0.0	3.0
NY Non-MSA	287	6,607	19.3	5,508	0.0	0.0	0.0	16.7	11.8	13.3	51.2	71.8	56.1	31.3	16.4	28.4	0.8	0.0	2.2
Total	1,487	48,539	100.0	50,578	6.7	9.1	8.6	11.8	10.6	11.2	49.1	54.4	52.7	23.9	23.9	24.0	8.6	2.0	3.4

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2021

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Glens Falls MSA	126	5,352	13.1	2,941	0.0	0.0	0.0	8.4	7.1	7.6	81.9	84.9	81.4	9.6	7.9	10.2	0.0	0.0	0.8
Poughkeepsie MSA	447	20,643	46.4	21,764	10.8	12.3	15.0	13.6	13.9	11.8	47.2	46.1	43.6	28.5	27.7	28.9	0.0	0.0	0.7
Albany MSA	179	7,885	18.6	17,236	13.1	11.7	11.0	11.2	15.1	11.2	45.5	45.8	47.0	29.8	26.8	30.0	0.4	0.6	0.7
Kingston MSA	25	1,531	2.6	2,987	4.4	0.0	1.9	9.2	12.0	7.9	65.0	40.0	57.0	21.5	48.0	32.1	0.0	0.0	1.1
NY Non-MSA	186	5,399	19.3	5,368	2.0	3.8	1.3	16.4	12.9	14.9	52.0	62.9	51.3	29.3	20.4	31.4	0.2	0.0	1.1
Total	963	40,810	100.0	50,296	9.8	8.6	10.2	12.4	13.0	11.3	50.0	54.2	48.9	27.6	24.1	28.9	0.2	0.1	0.8

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Glens Falls MSA	198	5,208	13.3	2,687	87.3	87.4	49.7	3.2	11.6	9.5	1.0
Poughkeepsie MSA	702	27,086	47.2	22,232	91.7	82.6	48.7	2.3	15.2	6.0	2.1
Albany MSA	273	9,162	18.4	17,277	90.0	87.9	48.0	2.8	9.9	7.2	2.2
Kingston MSA	27	476	1.8	2,874	90.6	81.5	50.4	2.5	18.5	6.9	0.0
NY Non-MSA	287	6,607	19.3	5,508	89.0	84.3	49.2	2.9	13.2	8.1	2.4
Total	1,487	48,539	100.0	50,578	90.4	84.5	48.7	2.6	13.5	6.9	2.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Glens Falls MSA	126	5,352	13.1	2,941	84.7	84.9	36.0	4.0	12.7	11.4	2.4
Poughkeepsie MSA	447	20,643	46.4	21,764	89.3	73.8	40.8	3.1	20.4	7.6	5.8
Albany MSA	179	7,885	18.6	17,236	85.5	75.4	41.4	4.2	20.7	10.3	3.9
Kingston MSA	25	1,531	2.6	2,987	87.9	68.0	42.8	3.3	28.0	8.8	4.0
NY Non-MSA	186	5,399	19.3	5,368	85.5	83.3	39.4	4.0	11.3	10.5	5.4
Total	963	40,810	100.0	50,296	87.1	77.3	40.8	3.7	17.9	9.3	4.9

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Glens Falls MSA	4	233	36.4	44	0.8	0.0	0.0	7.1	0.0	4.7	83.3	100.0	90.7	8.7	0.0	4.7	0.0	0.0	0.0
Poughkeepsie MSA	2	10	18.2	163	2.4	0.0	0.6	10.2	0.0	5.4	60.5	50.0	56.0	26.9	50.0	36.1	0.0	0.0	1.8
Albany MSA	0	0	0.0	65	1.9	0.0	1.1	5.7	0.0	2.1	57.2	0.0	62.1	30.3	0.0	33.7	4.8	0.0	1.1
Kingston MSA	0	0	0.0	15	0.0	0.0	0.0	14.8	0.0	12.7	63.9	0.0	56.3	14.6	0.0	29.6	6.7	0.0	1.4
NY Non-MSA	5	106	45.5	121	0.0	0.0	0.0	6.4	0.0	2.2	57.6	100.0	67.4	35.5	0.0	27.5	0.5	0.0	2.9
Total	11	349	100.0	408	1.6	0.0	0.4	8.2	0.0	4.9	61.4	90.9	63.2	27.0	9.1	29.8	1.8	0.0	1.8

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Glens Falls MSA	8	232	53.3	58	0.0	0.0	0.0	1.6	0.0	0.0	77.5	75.0	78.0	20.9	25.0	22.0	0.0	0.0	0.0
Poughkeepsie MSA	1	37	6.7	161	1.6	0.0	1.8	8.9	0.0	1.8	52.1	100.0	44.8	37.4	0.0	48.5	0.0	0.0	3.0
Albany MSA	2	71	13.3	103	2.4	0.0	1.5	7.7	50.0	6.9	62.6	50.0	70.0	27.3	0.0	21.5	0.1	0.0	0.0
Kingston MSA	0	0	0.0	17	0.7	0.0	0.0	3.7	0.0	3.2	70.8	0.0	65.1	24.9	0.0	31.7	0.0	0.0	0.0
NY Non-MSA	4	90	26.7	114	0.3	0.0	0.0	5.7	0.0	5.4	60.1	50.0	46.8	34.0	50.0	46.8	0.0	0.0	0.9
Total	15	430	100.0	453	1.4	0.0	1.0	7.0	6.7	3.9	60.0	66.7	57.2	31.6	26.7	36.8	0.0	0.0	1.2

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Glens Falls MSA	4	233	36.4	44	96.9	25.0	32.6	2.2	50.0	0.9	25.0
Poughkeepsie MSA	2	10	18.2	163	97.8	100.0	57.2	1.3	0.0	0.8	0.0
Albany MSA	--	--	--	65	97.4	--	66.3	1.4	--	1.1	--
Kingston MSA	--	--	--	15	97.6	--	64.8	0.5	--	1.9	--
NY Non-MSA	5	106	45.5	121	97.9	80.0	50.7	1.8	20.0	0.3	0.0
Total	11	349	100.0	408	97.6	63.6	56.1	1.5	27.3	0.9	9.1

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Glens Falls MSA	8	232	53.3	58	96.5	87.5	48.0	2.4	12.5	1.1	0.0
Poughkeepsie MSA	1	37	6.7	161	97.6	0.0	57.6	1.7	0.0	0.7	100.0
Albany MSA	2	71	13.3	103	97.1	50.0	49.2	1.8	0.0	1.2	50.0
Kingston MSA	--	--	--	17	97.3	--	60.3	0.7	--	2.0	--
NY Non-MSA	4	90	26.7	114	97.7	75.0	51.4	2.1	25.0	0.2	0.0
Total	15	430	100.0	453	97.3	73.3	53.6	1.8	13.3	0.8	13.3

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

North Carolina

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Asheville MSA	311	128,806,946	49.2	13,210	0.9	1.6	1.4	14.9	19.0	14.5	56.9	50.2	57.1	27.2	29.3	26.9	0.0	0.0	0.0
Hickory MSA	40	12,389,382	6.3	2,442	0.0	0.0	0.0	11.7	17.5	12.5	80.7	52.5	79.4	7.7	30.0	8.1	0.0	0.0	0.0
Wilmington MSA	198	86,005,965	31.3	13,358	1.8	2.0	1.5	24.3	31.3	20.6	38.4	32.8	43.3	34.9	33.3	34.1	0.7	0.5	0.6
NC Non-MSA	83	30,156,196	13.1	4,955	0.0	0.0	0.0	10.8	15.7	12.1	79.9	67.5	76.7	9.2	16.9	11.2	0.0	0.0	0.0
Total	632	257,358,488	100.0	33,965	0.9	1.4	1.1	16.5	22.3	16.4	58.5	47.2	56.2	23.9	29.0	26.1	0.2	0.2	0.2

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Asheville MSA	170	59,772,551	52.3	26,802	1.4	2.9	1.4	10.9	15.9	10.6	64.1	52.9	62.5	23.6	28.2	25.4	0.0	0.0	0.0
Hickory MSA	18	7,256,894	5.5	3,537	0.0	0.0	0.0	11.1	11.1	10.8	72.1	50.0	71.7	16.8	38.9	17.5	0.0	0.0	0.0
Wilmington MSA	98	49,851,376	30.2	22,871	4.9	7.1	4.4	14.4	16.3	7.7	44.4	33.7	47.2	36.3	42.9	40.7	0.0	0.0	0.0
NC Non-MSA	39	13,324,035	12.0	7,004	0.0	0.0	0.0	7.7	10.3	7.4	86.9	76.9	81.7	5.4	12.8	10.8	0.0	0.0	0.0
Total	325	130,204,855	100.0	60,214	1.9	3.7	2.3	11.3	15.1	9.2	64.1	49.8	59.5	22.8	31.4	29.1	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Asheville MSA	311	128,806,946	49.2	13,210	19.2	6.4	6.0	18.0	18.0	16.0	21.8	15.8	21.4	41.0	58.2	47.1	0.0	1.6	9.4
Hickory MSA	40	12,389,382	6.3	2,442	22.0	7.5	8.3	20.7	17.5	20.2	21.5	15.0	25.4	35.8	57.5	37.0	0.0	2.5	9.1
Wilmington MSA	198	86,005,965	31.3	13,358	22.2	9.6	5.9	17.4	19.2	15.4	19.6	13.1	19.5	40.8	56.6	45.9	0.0	1.5	13.4
NC Non-MSA	83	30,156,196	13.1	4,955	18.6	12.0	5.6	21.0	22.9	16.6	22.1	12.0	22.7	38.3	51.8	44.5	0.0	1.2	10.7
Total	632	257,358,488	100.0	33,965	20.3	8.2	6.1	18.7	19.0	16.1	21.2	14.4	21.1	39.9	56.8	45.5	0.0	1.6	11.1

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Asheville MSA	170	59,772,551	52.3	26,802	20.1	14.7	5.9	18.3	18.8	16.8	20.5	15.3	21.9	41.1	48.8	42.0	0.0	2.4	13.4
Hickory MSA	18	7,256,894	5.5	3,537	23.0	0.0	5.6	16.4	27.8	19.0	21.9	16.7	22.3	38.6	55.6	39.6	0.0	0.0	13.5
Wilmington MSA	98	49,851,376	30.2	22,871	22.7	11.2	4.0	17.6	24.5	14.0	18.4	9.2	18.0	41.3	54.1	46.4	0.0	1.0	17.7
NC Non-MSA	39	13,324,035	12.0	7,004	20.8	2.6	3.5	19.7	15.4	13.1	22.1	10.3	19.9	37.3	69.2	50.9	0.0	2.6	12.7
Total	325	130,204,855	100.0	60,214	21.2	11.4	4.9	18.2	20.6	15.4	20.4	12.9	20.2	40.2	53.2	44.6	0.0	1.8	15.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Asheville MSA	315	9,108	63.3	11,919	0.9	0.6	1.0	19.2	20.3	20.1	54.8	57.1	54.8	25.2	21.9	23.5	0.0	0.0	0.6
Hickory MSA	25	875	5.0	1,409	0.0	0.0	0.0	23.7	24.0	23.3	70.0	68.0	67.6	6.4	8.0	8.7	0.0	0.0	0.4
Wilmington MSA	84	3,844	16.9	10,962	3.5	0.0	3.6	26.1	34.5	29.7	30.1	40.5	31.6	39.4	25.0	34.0	0.9	0.0	1.1
NC Non-MSA	74	2,305	14.9	3,126	0.0	0.0	0.0	16.2	13.5	13.9	73.2	78.4	75.0	10.6	8.1	10.0	0.0	0.0	1.1
Total	498	16,132	100.0	27,416	1.7	0.4	1.9	21.7	21.9	23.4	48.1	58.0	48.5	28.1	19.7	25.4	0.3	0.0	0.9

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Asheville MSA	211	13,484	59.9	13,494	3.0	3.3	3.0	14.7	20.4	15.6	53.5	50.2	52.9	28.8	26.1	27.7	0.0	0.0	0.8
Hickory MSA	17	859	4.8	1,412	0.0	0.0	0.0	10.5	0.0	9.0	74.7	82.4	73.7	14.8	17.6	15.6	0.0	0.0	1.8
Wilmington MSA	66	5,099	18.8	11,214	12.2	12.1	11.3	11.1	7.6	11.3	34.9	47.0	38.2	41.6	33.3	38.1	0.3	0.0	1.1
NC Non-MSA	58	3,623	16.5	2,898	0.0	0.0	0.0	11.1	8.6	9.5	79.7	77.6	81.1	9.2	13.8	7.4	0.0	0.0	2.0
Total	352	23,065	100.0	29,018	5.7	4.3	5.8	12.9	15.1	13.0	50.9	55.7	51.0	30.4	25.0	29.1	0.1	0.0	1.1

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2022-23

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Asheville MSA	315	9,108	63.3	11,919	91.9	81.9	53.5	2.2	16.5	5.9	1.6
Hickory MSA	25	875	5.0	1,409	88.1	92.0	57.7	3.2	8.0	8.7	0.0
Wilmington MSA	84	3,844	16.9	10,962	91.7	86.9	53.8	2.2	11.9	6.1	1.2
NC Non-MSA	74	2,305	14.9	3,126	89.5	85.1	61.6	2.6	13.5	7.9	1.4
Total	498	16,132	100.0	27,416	91.4	83.7	54.7	2.3	14.9	6.3	1.4

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2021

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Asheville MSA	211	13,484	59.9	13,494	89.7	70.1	49.2	3.1	23.2	7.2	6.6
Hickory MSA	17	859	4.8	1,412	84.4	82.4	49.3	4.7	11.8	10.9	5.9
Wilmington MSA	66	5,099	18.8	11,214	88.7	78.8	46.9	3.3	16.7	8.0	4.5
NC Non-MSA	58	3,623	16.5	2,898	86.6	75.9	55.6	3.7	15.5	9.7	8.6
Total	352	23,065	100.0	29,018	88.8	73.3	48.9	3.3	20.2	7.9	6.5

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Asheville MSA	1	5	100.0	96	0.9	0.0	0.0	17.8	0.0	15.6	58.9	100.0	64.6	22.4	0.0	19.8	0.0	0.0	0.0
Hickory MSA	0	0	0.0	27	0.0	0.0	0.0	15.3	0.0	3.6	76.4	0.0	82.1	8.4	0.0	10.7	0.0	0.0	3.6
Wilmington MSA	0	0	0.0	85	1.8	0.0	1.2	36.6	0.0	51.8	32.1	0.0	30.6	28.6	0.0	16.5	0.8	0.0	0.0
NC Non-MSA	0	0	0.0	53	0.0	0.0	0.0	9.9	0.0	5.7	77.5	0.0	81.1	12.6	0.0	13.2	0.0	0.0	0.0
Total	1	5	100.0	261	0.9	0.0	0.4	21.8	0.0	24.0	55.4	100.0	58.8	21.6	0.0	16.4	0.3	0.0	0.4

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Asheville MSA	1	40	50.0	105	1.3	0.0	1.0	14.0	0.0	19.0	63.5	100.0	63.8	21.2	0.0	15.2	0.0	0.0	1.0
Hickory MSA	1	11	50.0	36	0.0	0.0	0.0	12.4	0.0	14.3	70.6	100.0	68.6	17.0	0.0	17.1	0.0	0.0	0.0
Wilmington MSA	0	0	0.0	105	8.3	0.0	12.4	22.9	0.0	45.7	38.5	0.0	21.9	30.2	0.0	20.0	0.1	0.0	0.0
NC Non-MSA	0	0	0.0	63	0.0	0.0	0.0	3.8	0.0	4.8	90.8	0.0	93.7	5.5	0.0	1.6	0.0	0.0	0.0
Total	2	51	100.0	309	2.9	0.0	4.5	14.6	0.0	24.7	61.8	100.0	56.2	20.7	0.0	14.3	0.0	0.0	0.3

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Asheville MSA	1	5	100.0	96	98.2	100.0	64.6	0.8	0.0	1.0	0.0
Hickory MSA	--	--	--	27	98.2	--	71.4	0.7	--	1.1	--
Wilmington MSA	--	--	--	85	97.2	--	44.7	1.3	--	1.5	--
NC Non-MSA	--	--	--	53	99.1	--	73.6	0.4	--	0.5	--
Total	1	5	100.0	261	98.0	100.0	60.7	0.9	0.0	1.1	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Asheville MSA	1	40	50.0	105	97.7	0.0	54.3	1.3	0.0	1.1	100.0
Hickory MSA	1	11	50.0	36	97.9	0.0	54.3	0.5	0.0	1.5	100.0
Wilmington MSA	--	--	--	105	95.8	--	47.6	2.4	--	1.8	--
NC Non-MSA	--	--	--	63	98.6	--	44.4	0.5	--	0.9	--
Total	2	51	100.0	309	97.3	0.0	50.0	1.4	0.0	1.3	100.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

South Carolina

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Columbia MSA	578	136,914,561	13.4	27,648	1.7	1.6	1.0	19.9	30.5	15.2	41.5	26.8	41.6	36.2	40.8	41.4	0.7	0.3	0.8
Greenville MSA	692	159,302,278	16.0	31,810	2.9	3.6	2.7	20.0	24.7	17.6	43.1	37.0	41.1	33.7	33.8	37.6	0.4	0.9	0.9
Augusta MSA	169	42,439,100	3.9	5,954	2.0	0.6	1.2	21.5	21.3	14.7	52.5	48.5	55.0	23.6	29.0	28.6	0.4	0.6	0.6
Charleston MSA	1,105	553,828,185	25.6	37,138	4.6	3.7	2.6	22.8	30.3	17.1	33.6	19.3	35.7	38.4	45.4	43.9	0.6	1.3	0.7
Charlotte MSA 2022	64	12,767,408	1.5	12,404	0.5	3.1	0.6	12.5	25.0	13.1	50.4	25.0	44.1	36.6	46.9	42.3	0.0	0.0	0.0
Florence MSA	23	3,662,645	0.5	3,228	0.9	0.0	0.1	14.2	8.7	8.1	45.9	60.9	44.4	39.0	30.4	47.4	0.0	0.0	0.0
Hilton Head MSA	960	607,792,700	22.2	10,216	3.1	1.4	1.6	17.6	7.9	11.2	49.5	43.5	53.3	29.9	47.2	33.8	0.0	0.0	0.0
Myrtle Beach MSA	435	86,883,616	10.1	20,184	1.9	2.1	1.3	16.6	23.0	14.1	65.6	58.2	66.2	15.9	16.8	18.4	0.0	0.0	0.0
Spartanburg MSA	119	18,448,705	2.8	12,670	2.3	0.0	1.6	10.1	14.3	9.6	59.6	46.2	55.4	27.5	39.5	33.1	0.5	0.0	0.2
SC Non-MSA	176	59,579,232	4.1	6,081	0.0	0.0	0.0	13.2	8.0	6.1	48.9	29.5	44.6	37.9	62.5	49.3	0.0	0.0	0.0
Total	4,321	1,681,618,430	100.0	167,333	2.4	2.3	1.7	18.3	21.6	14.6	46.1	35.0	45.7	32.8	40.6	37.4	0.4	0.5	0.5

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Columbia MSA	312	80,152,517	11.4	44,045	2.3	2.9	1.4	21.9	18.3	12.8	35.9	18.9	31.9	39.9	59.9	53.8	0.0	0.0	0.0
Greenville MSA	418	117,991,940	15.3	50,724	3.1	3.8	2.7	20.9	24.9	13.8	43.6	36.1	41.7	32.4	35.2	41.8	0.0	0.0	0.0
Augusta MSA	146	42,267,541	5.3	8,825	0.0	0.0	0.0	29.3	25.3	19.6	43.9	48.6	47.8	26.7	26.0	32.6	0.0	0.0	0.0
Charleston MSA	634	403,370,429	23.2	64,006	3.3	3.8	2.3	19.1	14.2	11.1	42.4	26.3	45.2	34.9	55.5	41.1	0.3	0.2	0.4
Charlotte MSA	86	30,859,888	3.1	22,360	1.8	5.8	1.0	16.4	17.4	12.9	45.9	27.9	33.8	35.9	48.8	52.3	0.0	0.0	0.0
Florence MSA	6	1,151,338	0.2	4,779	2.0	0.0	0.4	14.2	0.0	8.3	49.9	83.3	42.3	33.9	16.7	48.9	0.0	0.0	0.0
Hilton Head MSA	711	454,780,685	26.0	17,890	0.0	0.0	0.0	27.1	16.0	18.5	45.1	35.4	53.0	27.8	48.5	28.5	0.0	0.0	0.0
Myrtle Beach MSA	266	63,111,407	9.7	30,691	0.6	0.8	0.6	14.8	17.3	10.5	70.4	69.2	70.5	14.0	12.4	18.3	0.3	0.4	0.1
Spartanburg MSA	44	8,187,111	1.6	18,268	2.3	11.4	1.1	15.6	18.2	9.3	47.1	34.1	42.7	35.1	36.4	46.9	0.0	0.0	0.0
SC Non-MSA	109	48,891,539	4.0	9,239	0.0	0.0	0.0	12.1	6.4	5.7	48.7	30.3	33.0	39.2	63.3	61.3	0.0	0.0	0.0
Total	2,732	1,250,764,394	100.0	270,827	2.1	2.2	1.5	19.5	17.5	12.4	45.2	35.2	44.3	33.1	45.0	41.7	0.1	0.1	0.1

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2022-23**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Columbia MSA	578	136,914,561	13.4	27,648	22.3	16.1	7.6	16.5	24.9	20.7	19.4	18.3	22.9	41.9	38.9	30.6	0.0	1.7	18.2
Greenville MSA	692	159,302,278	16.0	31,810	20.9	10.7	7.3	18.0	21.4	19.5	20.2	20.7	22.3	40.9	40.2	36.1	0.0	6.4	14.8
Augusta MSA	169	42,439,100	3.9	5,954	21.2	10.1	5.7	18.4	17.8	17.3	20.2	27.2	24.2	40.2	42.6	35.3	0.0	0.6	17.6
Charleston MSA	1,105	553,828,185	25.6	37,138	22.1	6.9	6.2	17.2	22.2	17.9	20.1	16.2	19.7	40.6	53.9	34.4	0.0	0.8	21.9
Charlotte MSA 2022	64	12,767,408	1.5	12,404	18.1	18.8	7.1	17.6	14.1	19.8	19.9	10.9	22.0	44.4	54.7	38.3	0.0	1.6	12.8
Florence MSA	23	3,662,645	0.5	3,228	20.7	13.0	5.3	16.5	30.4	16.6	19.3	30.4	22.0	43.4	26.1	35.8	0.0	0.0	20.4
Hilton Head MSA	960	607,792,700	22.2	10,216	21.0	2.5	5.5	17.6	12.9	16.4	20.8	10.6	20.1	40.6	73.4	45.1	0.0	0.5	13.0
Myrtle Beach MSA	435	86,883,616	10.1	20,184	21.2	10.6	6.0	19.2	19.3	16.4	21.8	22.3	20.8	37.8	46.0	41.3	0.0	1.8	15.6
Spartanburg MSA	119	18,448,705	2.8	12,670	20.1	10.1	6.4	18.2	20.2	21.0	20.8	24.4	25.1	40.9	41.2	32.0	0.0	4.2	15.5
SC Non-MSA	176	59,579,232	4.1	6,081	19.0	5.7	2.7	15.3	19.3	11.0	18.6	10.2	16.6	47.1	63.1	55.9	0.0	1.7	13.7
Total	4,321	1,681,618,430	100.0	167,333	21.0	8.6	6.5	17.5	19.9	18.5	20.1	17.0	21.5	41.4	52.6	36.5	0.0	2.0	17.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Columbia MSA	312	80,152,517	11.4	44,045	22.2	8.7	5.3	16.4	20.2	17.1	19.5	19.2	19.7	41.8	47.4	34.0	0.0	4.5	23.9
Greenville MSA	418	117,991,940	15.3	50,724	22.9	14.8	6.4	17.1	19.6	18.2	18.8	12.9	20.8	41.2	45.9	36.5	0.0	6.7	18.1
Augusta MSA	146	42,267,541	5.3	8,825	23.3	4.8	5.9	17.9	25.3	16.0	18.0	14.4	22.3	40.8	55.5	33.9	0.0	0.0	21.9
Charleston MSA	634	403,370,429	23.2	64,006	22.6	6.3	5.2	16.7	20.2	16.5	19.9	10.9	19.7	40.8	60.1	37.4	0.0	2.5	21.3
Charlotte MSA	86	30,859,888	3.1	22,360	21.0	8.1	4.9	17.5	30.2	14.6	19.4	9.3	20.2	42.1	51.2	43.4	0.0	1.2	17.0
Florence MSA	6	1,151,338	0.2	4,779	22.4	16.7	4.7	15.4	50.0	15.6	19.6	0.0	19.3	42.6	33.3	38.0	0.0	0.0	22.4
Hilton Head MSA	711	454,780,685	26.0	17,890	20.1	1.5	2.8	19.5	6.3	11.1	20.0	9.3	18.0	40.4	81.9	50.9	0.0	1.0	17.3
Myrtle Beach MSA	266	63,111,407	9.7	30,691	20.8	9.4	5.0	18.9	28.2	15.4	21.7	16.9	19.8	38.7	43.6	43.0	0.0	1.9	16.8
Spartanburg MSA	44	8,187,111	1.6	18,268	21.0	15.9	6.4	17.4	25.0	21.5	18.9	18.2	22.1	42.7	31.8	30.3	0.0	9.1	19.7
SC Non-MSA	109	48,891,539	4.0	9,239	18.7	1.8	2.1	16.6	13.8	8.0	17.2	12.8	14.1	47.5	70.6	60.1	0.0	0.9	15.8
Total	2,732	1,250,764,394	100.0	270,827	21.9	6.9	5.2	17.2	17.8	16.3	19.4	12.6	19.9	41.6	59.9	38.9	0.0	2.8	19.7

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Columbia MSA	306	11,035	15.1	18,558	2.9	2.9	2.2	23.3	24.2	20.5	37.0	34.3	39.8	35.3	38.2	35.8	1.5	0.3	1.7
Greenville MSA	700	33,384	34.5	22,169	3.8	2.7	3.4	18.6	19.9	17.7	36.1	38.6	38.3	40.4	38.3	38.8	1.1	0.6	1.8
Augusta MSA	18	1,490	0.9	2,874	2.8	0.0	1.8	16.5	27.8	16.8	56.9	66.7	58.2	22.6	5.6	21.4	1.2	0.0	1.8
Charleston MSA	230	13,245	11.3	24,675	6.7	7.0	5.3	22.7	15.7	19.3	28.1	20.0	30.1	41.4	56.1	43.0	1.2	1.3	2.2
Charlotte MSA 2022	20	817	1.0	7,383	2.8	5.0	1.6	19.2	10.0	15.8	40.1	30.0	41.7	37.8	55.0	40.5	0.1	0.0	0.4
Florence MSA	35	483	1.7	2,409	2.0	2.9	1.1	11.6	2.9	10.2	46.3	74.3	47.5	40.0	20.0	40.4	0.1	0.0	0.9
Hilton Head MSA	253	8,163	12.5	6,621	4.1	7.1	5.5	14.4	7.1	14.0	48.1	48.2	48.7	33.3	37.5	31.0	0.1	0.0	0.8
Myrtle Beach MSA	239	3,874	11.8	11,996	6.8	5.4	6.1	19.5	22.6	18.0	54.3	50.2	58.6	19.4	21.8	16.7	0.0	0.0	0.5
Spartanburg MSA	112	4,309	5.5	7,306	2.8	1.8	3.1	14.1	7.1	11.8	50.4	47.3	52.8	31.7	41.1	31.0	0.9	2.7	1.3
SC Non-MSA	117	4,502	5.8	4,323	0.0	0.0	0.0	11.6	13.7	10.2	44.2	42.7	43.5	44.2	43.6	45.2	0.0	0.0	1.0
Total	2,030	81,302	100.0	108,314	4.2	3.9	3.7	19.5	17.3	17.4	38.9	39.7	41.7	36.4	38.6	35.7	0.9	0.5	1.5

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Columbia MSA	261	13,085	19.7	18,247	8.4	9.6	5.9	22.1	19.5	19.3	32.3	29.1	32.8	36.6	41.8	41.1	0.7	0.0	0.9
Greenville MSA	387	26,804	29.1	22,224	6.0	7.0	5.3	18.4	19.6	15.6	39.2	38.8	38.5	36.3	34.6	39.8	0.0	0.0	0.9
Augusta MSA	13	675	1.0	2,602	0.0	0.0	0.0	27.7	38.5	24.0	45.3	38.5	47.8	26.8	23.1	27.5	0.2	0.0	0.8
Charleston MSA	152	13,068	11.4	25,339	7.6	12.5	6.9	18.6	11.8	15.9	34.6	27.0	33.8	37.6	46.7	41.0	1.5	2.0	2.3
Charlotte MSA	59	2,648	4.4	7,216	3.1	13.6	2.7	20.3	27.1	17.6	36.3	30.5	33.5	40.2	28.8	45.5	0.1	0.0	0.7
Florence MSA	24	1,214	1.8	2,539	4.9	0.0	3.2	19.1	8.3	15.8	40.6	70.8	42.8	35.3	20.8	36.6	0.1	0.0	1.6
Hilton Head MSA	137	6,414	10.3	7,138	0.0	0.0	0.0	25.6	23.4	25.9	48.2	46.0	45.7	26.2	30.7	27.3	0.0	0.0	1.1
Myrtle Beach MSA	144	5,664	10.8	11,485	5.4	11.8	5.4	14.3	9.0	13.0	62.6	65.3	64.1	17.1	11.8	16.2	0.7	2.1	1.3
Spartanburg MSA	63	3,578	4.7	7,527	2.4	3.2	1.7	20.8	17.5	17.0	40.2	41.3	42.0	36.7	38.1	38.4	0.0	0.0	0.8
SC Non-MSA	88	4,596	6.6	4,144	0.0	0.0	0.0	10.1	5.7	7.8	44.1	45.5	40.9	45.8	48.9	49.9	0.0	0.0	1.4
Total	1,328	77,746	100.0	108,461	5.4	7.4	4.6	19.5	17.2	16.8	39.9	39.9	40.0	34.7	35.0	37.3	0.5	0.5	1.3

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbia MSA	306	11,035	15.1	18,558	92.4	85.3	52.5	1.8	12.4	5.9	2.3
Greenville MSA	700	33,384	34.5	22,169	91.5	84.1	51.9	2.2	14.0	6.3	1.9
Augusta MSA	18	1,490	0.9	2,874	91.6	94.4	54.5	1.7	5.6	6.7	0.0
Charleston MSA	230	13,245	11.3	24,675	93.2	83.5	49.6	1.6	13.9	5.2	2.6
Charlotte (2022)	20	817	1.0	7,383	92.2	75.0	57.4	2.1	5.0	5.7	20.0
Florence MSA	35	483	1.7	2,409	89.7	94.3	52.5	2.4	5.7	7.8	0.0
Hilton Head MSA	253	8,163	12.5	6,621	93.3	86.2	49.0	1.8	12.3	4.9	1.6
Myrtle Beach MSA	239	3,874	11.8	11,996	92.7	89.5	47.6	1.7	8.4	5.7	2.1
Spartanburg MSA	112	4,309	5.5	7,306	90.7	81.3	51.7	2.6	15.2	6.8	3.6
SC Non-MSA	117	4,502	5.8	4,323	90.8	81.2	55.4	2.1	18.8	7.2	0.0
Total	2,030	81,302	100.0	108,314	92.2	84.9	51.4	1.9	13.0	5.9	2.1

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Columbia MSA	261	13,085	19.7	18,247	83.8	71.6	47.8	4.4	18.4	11.8	10.0
Greenville MSA	387	26,804	29.1	22,224	83.7	74.7	47.6	4.9	18.9	11.4	6.5
Augusta MSA	13	675	1.0	2,602	84.4	92.3	50.1	3.6	7.7	12.0	0.0
Charleston MSA	152	13,068	11.4	25,339	85.5	75.0	45.1	4.2	19.1	10.4	5.9
Charlotte MSA	59	2,648	4.4	7,216	86.4	83.1	49.1	3.8	15.3	9.8	1.7
Florence MSA	24	1,214	1.8	2,539	81.4	54.2	44.1	5.1	12.5	13.6	33.3
Hilton Head MSA	137	6,414	10.3	7,138	87.0	75.9	44.2	4.1	16.1	8.9	8.0
Myrtle Beach MSA	144	5,664	10.8	11,485	85.7	77.8	45.3	3.9	17.4	10.4	4.9
Spartanburg MSA	63	3,578	4.7	7,527	82.4	55.6	46.0	5.4	36.5	12.2	7.9
SC Non-MSA	88	4,596	6.6	4,144	83.4	64.8	46.5	4.3	27.3	12.3	8.0
Total	1,328	77,746	100.0	108,461	84.5	73.2	46.5	4.4	19.4	11.1	7.5

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Columbia MSA	0	0	0.0	131	1.8	0.0	0.0	22.2	0.0	29.0	42.6	0.0	48.1	32.9	0.0	22.1	0.6	0.0	0.8
Greenville MSA	3	42	33.3	129	2.9	0.0	0.0	22.0	0.0	27.3	44.5	0.0	40.9	30.0	100.0	29.5	0.7	0.0	2.3
Augusta MSA	0	0	0.0	65	0.8	0.0	1.5	29.3	0.0	54.5	50.4	0.0	30.3	19.1	0.0	12.1	0.5	0.0	1.5
Charleston MSA	0	0	0.0	88	6.1	0.0	8.0	27.2	0.0	33.0	33.2	0.0	30.7	32.9	0.0	28.4	0.6	0.0	0.0
Charlotte MSA 2022	0	0	0.0	41	0.8	0.0	0.0	12.6	0.0	2.4	59.1	0.0	75.6	27.5	0.0	22.0	0.0	0.0	0.0
Florence MSA	0	0	0.0	56	0.4	0.0	0.0	16.8	0.0	19.6	48.8	0.0	66.1	34.0	0.0	14.3	0.0	0.0	0.0
Hilton Head MSA	0	0	0.0	33	6.2	0.0	8.8	21.4	0.0	44.1	52.2	0.0	29.4	20.2	0.0	14.7	0.0	0.0	2.9
Myrtle Beach MSA	3	255	33.3	95	3.4	0.0	1.1	19.2	0.0	25.3	65.6	100.0	71.6	11.8	0.0	2.1	0.0	0.0	0.0
Spartanburg MSA	0	0	0.0	43	2.4	0.0	0.0	9.4	0.0	6.7	60.0	0.0	60.0	27.9	0.0	26.7	0.3	0.0	6.7
SC Non-MSA	3	210	33.3	125	0.0	0.0	0.0	10.6	0.0	26.8	52.8	0.0	47.2	36.6	100.0	26.0	0.0	0.0	0.0
Total	9	507	100.0	806	3.1	0.0	1.5	20.9	0.0	27.9	47.1	33.3	48.7	28.6	66.7	20.8	0.4	0.0	1.1

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Columbia MSA	4	105	50.0	145	2.5	0.0	0.7	22.3	25.0	33.8	37.4	50.0	43.4	37.7	25.0	22.1	0.1	0.0	0.0
Greenville MSA	3	46	37.5	151	2.7	0.0	1.3	19.7	0.0	23.2	49.1	100.0	48.3	28.4	0.0	27.2	0.0	0.0	0.0
Augusta MSA	1	7	12.5	68	0.0	0.0	0.0	32.3	100.0	35.3	48.2	0.0	55.9	19.4	0.0	8.8	0.0	0.0	0.0
Charleston MSA	0	0	0.0	90	3.4	0.0	1.1	18.8	0.0	15.6	44.9	0.0	46.7	32.4	0.0	36.7	0.5	0.0	0.0
Charlotte MSA	0	0	0.0	37	1.2	0.0	0.0	16.8	0.0	5.4	51.5	0.0	75.7	30.6	0.0	18.9	0.0	0.0	0.0
Florence MSA	0	0	0.0	61	0.4	0.0	3.3	15.5	0.0	9.8	55.2	0.0	63.9	28.9	0.0	23.0	0.0	0.0	0.0
Hilton Head MSA	0	0	0.0	31	0.0	0.0	0.0	36.4	0.0	41.9	46.6	0.0	45.2	17.0	0.0	12.9	0.0	0.0	0.0
Myrtle Beach MSA	0	0	0.0	100	1.4	0.0	2.0	20.8	0.0	28.0	66.5	0.0	63.0	10.5	0.0	4.0	0.8	0.0	3.0
Spartanburg MSA	0	0	0.0	45	1.1	0.0	0.0	16.1	0.0	24.4	45.8	0.0	53.3	37.1	0.0	22.2	0.0	0.0	0.0
SC Non-MSA	0	0	0.0	139	0.0	0.0	0.0	12.4	0.0	15.1	54.2	0.0	66.9	33.4	0.0	18.0	0.0	0.0	0.0
Total	8	158	100.0	867	1.9	0.0	0.9	20.8	25.0	23.4	48.2	62.5	55.0	28.9	12.5	20.3	0.2	0.0	0.3

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Columbia MSA	--	--	--	131	97.9	--	56.5	0.8	--	1.3	--
Greenville MSA	3	42	33.3	129	97.9	66.7	59.1	0.6	33.3	1.5	0.0
Augusta MSA	--	--	--	65	98.6	--	65.2	0.3	--	1.0	--
Charleston MSA	--	--	--	88	96.7	--	63.6	1.4	--	1.8	--
Charlotte MSA 2022	--	--	--	41	98.2	--	58.5	1.0	--	0.8	--
Florence MSA	--	--	--	56	98.3	--	33.9	0.4	--	1.3	--
Hilton Head MSA	--	--	--	33	96.8	--	67.6	1.8	--	1.5	--
Myrtle Beach MSA	3	255	33.3	95	98.4	33.3	69.5	0.7	66.7	1.0	0.0
Spartanburg MSA	--	--	--	43	97.6	--	55.6	0.6	--	1.8	--
SC Non-MSA	3	210	33.3	125	98.3	0.0	44.7	0.8	66.7	0.9	33.3
Total	9	507	100.0	806	97.7	33.3	57.1	0.9	55.6	1.4	11.1

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Columbia MSA	4	105	50.0	145	96.6	100.0	45.5	2.0	0.0	1.3	0.0
Greenville MSA	3	46	37.5	151	97.1	100.0	52.3	1.3	0.0	1.6	0.0
Augusta MSA	1	7	12.5	68	98.8	100.0	36.8	0.2	0.0	0.9	0.0
Charleston MSA	--	--	--	90	94.0	--	56.7	3.2	--	2.8	--
Charlotte MSA	--	--	--	37	97.1	--	56.8	1.8	--	1.2	--
Florence MSA	--	--	--	61	98.3	--	34.4	0.8	--	0.8	--
Hilton Head MSA	--	--	--	31	93.8	--	80.6	3.9	--	2.2	--
Myrtle Beach MSA	--	--	--	100	98.1	--	62.0	1.0	--	0.9	--
Spartanburg MSA	--	--	--	45	96.5	--	35.6	1.6	--	1.9	--
SC Non-MSA	--	--	--	139	97.2	--	42.4	1.5	--	1.3	--
Total	8	158	100.0	867	96.4	100.0	49.0	1.9	0.0	1.7	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Vermont

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
VT Non-MSA	338	101,369,306	60.5	8,736	0.0	0.0	0.0	12.3	16.0	12.6	68.8	55.9	66.6	18.6	25.4	19.2	0.3	2.7	1.6
Burlington MSA	221	76,065,277	39.5	6,670	1.1	0.0	1.4	14.8	18.6	16.4	67.1	53.4	64.7	16.8	28.1	17.2	0.2	0.0	0.3
Total	559	177,434,583	100.0	15,406	0.4	0.0	0.6	13.2	17.0	14.3	68.2	54.9	65.7	18.0	26.5	18.3	0.3	1.6	1.1

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
VT Non MSA	207	54,424,609	67.0	12,865	0.0	0.0	0.0	8.0	4.8	6.0	78.7	73.4	74.8	13.4	21.7	19.2	0.0	0.0	0.0
Burlington MSA	102	40,056,444	33.0	11,404	1.0	1.0	1.3	13.2	15.7	13.8	65.6	49.0	64.3	20.2	34.3	20.6	0.0	0.0	0.0
Total	309	94,481,053	100.0	24,269	0.4	0.3	0.6	9.8	8.4	9.7	74.0	65.4	69.8	15.8	25.9	19.9	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
VT Non-MSA	338	101,369,306	60.5	8,736	20.3	7.7	7.1	18.4	14.2	17.9	22.2	17.5	20.7	39.1	59.8	44.6	0.0	0.9	9.7	
Burlington MSA	221	76,065,277	39.5	6,670	19.8	8.6	9.5	17.7	23.5	22.6	23.5	16.7	25.4	39.0	44.8	34.3	0.0	6.3	8.4	
Total	559	177,434,583	100.0	15,406	20.1	8.1	8.1	18.2	17.9	19.9	22.7	17.2	22.7	39.1	53.8	40.1	0.0	3.0	9.1	
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				
TD BANK N.A. (9DFUS0SEEKG), TD BANK N.A. (10000024096), TD Bank (90000497404) excluded from Aggregate																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
VT Non-MSA	207	54,424,609	67.0	12,865	20.1	3.9	5.1	18.0	12.6	16.4	22.4	17.4	19.5	39.5	63.8	47.2	0.0	2.4	11.9
Burlington MSA	102	40,056,444	33.0	11,404	20.5	4.9	7.3	17.9	21.6	20.8	23.1	15.7	24.2	38.5	53.9	37.2	0.0	3.9	10.5
Total	309	94,481,053	100.0	24,269	20.2	4.2	6.1	18.0	15.5	18.5	22.7	16.8	21.7	39.1	60.5	42.5	0.0	2.9	11.2
Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			
TD BANK N.A. (10000024096), TD Bank (90000497404), TD BANK N.A. (9DFUS0SEEKG) excluded from Aggregate																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
VT Non-MSA	386	8,754	49.3	7,806	0.0	0.0	0.0	14.7	13.0	13.1	60.4	59.8	59.5	24.1	26.9	23.9	0.8	0.3	3.4
Burlington MSA	397	10,993	50.7	5,438	1.7	2.3	1.4	17.1	17.1	18.6	50.2	51.6	52.8	29.8	28.0	25.2	1.2	1.0	2.0
Total	783	19,747	100.0	13,244	0.7	1.1	0.6	15.7	15.1	15.3	56.1	55.7	56.8	26.5	27.5	24.5	1.0	0.6	2.8

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
VT Non MSA	303	17,330	49.1	8,237	0.0	0.0	0.0	10.8	7.3	8.5	72.9	62.4	70.4	16.3	30.4	19.5	0.0	0.0	0.0
Burlington MSA	314	14,397	50.9	5,696	0.9	2.9	1.0	23.5	25.8	22.0	53.9	47.1	52.9	21.6	24.2	23.2	0.2	0.0	1.0
Total	617	31,727	100.0	13,933	0.4	1.5	0.4	16.1	16.7	13.9	65.0	54.6	63.4	18.5	27.2	21.0	0.1	0.0	0.1

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
VT Non-MSA	386	8,754	49.3	7,806	89.4	83.9	46.6	3.1	13.2	7.5	2.9
Burlington MSA	397	10,993	50.7	5,438	91.0	82.9	47.0	2.9	15.6	6.1	1.5
Total	783	19,747	100.0	13,244	90.1	83.4	46.8	3.0	14.4	6.9	2.2

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
VT Non MSA	303	17,330	49.1	8,237	86.6	76.9	39.7	4.2	19.8	9.2	3.3
Burlington MSA	314	14,397	50.9	5,696	88.6	78.0	41.1	4.0	17.5	7.4	4.5
Total	617	31,727	100.0	13,933	87.4	77.5	40.3	4.1	18.6	8.5	3.9

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
VT Non-MSA	3	90	50.0	185	0.0	0.0	0.0	9.5	0.0	4.8	69.9	100.0	76.6	20.3	0.0	17.0	0.3	0.0	1.6
Burlington MSA	3	22	50.0	82	1.2	0.0	0.0	12.3	0.0	26.2	65.3	66.7	65.5	20.9	33.3	6.0	0.2	0.0	2.4
Total	6	112	100.0	267	0.4	0.0	0.0	10.5	0.0	11.4	68.3	83.3	73.2	20.5	16.7	13.6	0.3	0.0	1.8

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
VT Non-MSA	3	67	50.0	181	0.0	0.0	0.0	4.2	0.0	2.8	83.7	100.0	87.6	12.1	0.0	9.6	0.0	0.0	0.0
Burlington MSA	3	67	50.0	94	0.5	0.0	1.1	13.5	0.0	22.0	66.9	100.0	64.8	19.1	0.0	12.1	0.0	0.0	0.0
Total	6	134	100.0	275	0.2	0.0	0.4	7.3	0.0	9.3	78.1	100.0	79.9	14.4	0.0	10.4	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

TD BANK N.A. (10000024096) excluded from Aggregate

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-23**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
VT Non-MSA	3	90	50.0	185	98.5	100.0	51.6	1.0	0.0	0.5	0.0
Burlington MSA	3	22	50.0	82	98.4	100.0	39.3	0.7	0.0	0.9	0.0
Total	6	112	100.0	267	98.5	100.0	47.8	0.9	0.0	0.6	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											
TD BANK N.A. (10000024096) excluded from Aggregate											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
VT Non-MSA	3	67	50.0	181	98.3	66.7	53.4	1.1	0.0	0.6	33.3
Burlington MSA	3	67	50.0	94	98.4	66.7	39.6	0.8	33.3	0.8	0.0
Total	6	134	100.0	275	98.3	66.7	48.7	1.0	16.7	0.6	16.7
Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											
TD BANK N.A. (10000024096) excluded from Aggregate											