



PUBLIC DISCLOSURE

January 11, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

KeyBank, N.A.
Charter Number: 14761

127 Public Square
Cleveland, Ohio 44114

Office of the Comptroller of the Currency

Large Bank Supervision
400 7th Street SW
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.

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GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of **KeyBank, N.A.** issued by the Office of the Comptroller of the Currency, the institution's supervisory agency, for the evaluation period from **January 1, 2012, to December 31, 2015**. The agency rates the CRA performance of a national bank or a federal savings association consistent with the provisions set forth in appendix A to 12 CFR 25, or 12 CFR 195 respectively.

Institution’s CRA Rating

Institution’s CRA Rating: This institution is rated **Outstanding**.

The following table indicates the performance level of **KeyBank, N.A.** with respect to the lending, investment, and service tests:

Performance Levels	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:

- A good level of lending activity.
- The origination or purchase of the substantial majority of loans inside the bank’s assessments areas (AAs).
- An exceptionally strong level of community development lending that is responsive to identified needs and that had a positive impact on the bank’s overall lending test rating. CD lending had a significantly positive impact on lending performance in nine of the 14 rating areas and a positive impact on the remaining five.
- The excellent level and responsiveness of qualified investment activity.
- The excellent level of retail banking services that are accessible to geographies and individuals of different income levels including branch office hours that do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies. Branch office hours are consistent across all offices and any differences were reasonably explained.
- The excellent level of community development services.

Description of Institution

KeyBank, National Association (Key) is an interstate bank headquartered in Cleveland, Ohio. Key is a wholly owned subsidiary of KeyCorp, a \$95.1 billion one-bank holding company also headquartered in Cleveland, Ohio. Key offers a broad spectrum of financial products and services to consumers, small business, and commercial clients through its two major business segments: Key Community Bank and Key Corporate Bank. In addition to traditional loan and deposit products, Key also provides personal and corporate trust services, personal financial services, access to mutual funds, international banking services, and investment management services.

Historically, Key's strategic focus has been on corporate banking with a secondary focus on community, or retail banking, and its related products. Key's primary strategy for new business development is based on a relationship banking model in which the bank cross sells products and services to deepen its relationship with its customers. Key generally places low emphasis on pricing as the basis for competition for new business.

Beginning in 2012, Key experienced a downward trend in the volume of newly booked mortgage loans. The lower booking rate reflects both strategic business decisions, as well as a slowdown in refinance volume. A portion of the downward trend in volume was related to the bank's difficulty in maintaining a high quality of mortgage loan servicing and servicing related operations as it relied on third-party vendors to perform those functions. Since outsourcing its mortgage lending operations (originations, closing, processing, and servicing) to mortgage servicing vendors in 2010, Key experienced a number of difficulties related to the quality of loan servicing provided by the vendors. In 2014, management changed its strategic direction and began an initiative to increase staffing levels supporting the generation of new mortgage business, enhancing its call strategies, and developing an alternative business strategy to the model currently in place at that time. Management also committed to the creation of an internal mortgage servicing operation and a move away from outsourcing.

For CRA evaluation purposes, Key has 14 rating areas that include 78 assessment areas in 13 states and one multistate area comprised of Portland, Oregon and Vancouver, Washington. Key operates 990 retail banking branches and 1,254 automated teller machines (ATMs). Key's retail footprint includes branches in Alaska, Colorado, Idaho, Indiana, Maine, Michigan, New York, Ohio, Oregon, Utah, Vermont, and Washington. Key operates three offices exclusively for its private banking clients in Florida, and Key operates no ATMs in this market. Key's three largest markets are in Cleveland, Ohio; Albany, New York; and Seattle, Washington. During the evaluation period, the bank exited both the Connecticut and Kentucky markets.

As of December 31, 2015, Key reported total assets of \$93 billion, deposits of \$73.7 billion, and Tier One Capital of \$9.2 billion. Included in the deposits are approximately \$1 million held in foreign offices.

As of December 31, 2015, Key's net loans (net of leases) totaled \$58.3 billion and represented 62.7 percent of total assets. The loan portfolio consisted of approximately \$22.1 billion (37.9 percent) real estate-related, \$24.5 billion (42.9 percent) commercial, \$4.9 billion (8.3 percent) consumer, and the remaining \$6.9 billion (11.8 percent) in other loans such as loans to non-

depository institutions, states and U.S. political subdivisions and similar type entities. Farm and agricultural loans comprised a very small percentage of the commercial loan portfolio.

Key's investment strategy has been to focus most of its investments toward affordable housing, primarily using low-income housing tax credits (LIHTCs). LIHTCs deliver a substantial impact to LMI individuals and communities in the form of affordable housing.

The state of Ohio is a significant market for Key. Ohio is the source of \$20.8 billion of the bank's deposits and it is the location of the bank's headquarters. While the nation continued to recover from the sub-prime mortgage loan crisis of 2007 during the evaluation period, Ohio lagged the nation in economic recovery. The weak economy in Ohio was marked by population loss, slow job growth, and wage stagnation.

Additionally, the majority of Ohio's largest Metropolitan Statistical Area (MSA) had more housing units than households to occupy them. The state, especially within its largest urban areas, experienced a soft housing market, low level of home mortgage applications compared to pre-crisis levels, high levels of vacant and blighted properties, and high levels of foreclosure. In June 2015, Ohio ranked seventh highest in the nation with one in every 763 housing units in foreclosure. We considered the impact of these economic factors on the bank's mortgage-related lending performance in the state of Ohio.

Since the previous CRA evaluation, Key completed the following acquisition-related transactions. On July 13, 2012, Key acquired 37 retail banking branches of HSBC in western New York for approximately \$2 billion. On September 14, 2012, Key acquired credit card assets from HSBC of approximately \$68 million. On August 1, 2012, Key acquired \$718 million in credit card assets from Elan Financial Services.

After its acquisition of the HSBC retail banking branches, Key began a detailed investment, profitability, and utilization analysis of its branch system. In early 2013, the bank began to consolidate branches primarily to increase operating efficiencies by reducing occupancy costs. Each branch (or branches) considered for closure or consolidation was reviewed by the Community Bank line of business, which conducts profitability assessments and makes the business decision to close, consolidate, or retain. The proposed closure or consolidation was reviewed by the bank's Community Investment Committee, which provides CRA considerations and has the last voice of approval or refusal before action is taken. The bank had 1,083 branches as of October 31, 2011. Once the consolidation effort was finished in late 2015, the bank had 990 branches, for a reduction (net of branch openings) of 93 branches. The net reduction includes five branches closed when the bank exited the Connecticut (one branch) and Kentucky (four branches) markets. The consolidations were paced to maintain a general ratio throughout the branch network of two non-LMI branch closures or consolidations for every one LMI branch closure or consolidation. While the ratio of consolidations and closures in low- and moderate-income areas compared to middle- and upper-income areas may vary, in total, the bank maintained an overall ratio of closing or consolidating two non-LMI branches for every one LMI branch closure or consolidation.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs.

The last CRA Performance Evaluation performed for KeyBank is dated October 1, 2011. The bank received an Outstanding rating at that examination.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test is January 1, 2012, through December 31, 2015. Conclusions regarding the bank's lending performance are based on home purchase, home improvement, and home refinance mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses and farms the bank reported under the Community Reinvestment Act (CRA). Retail services were evaluated from January 1, 2012, through December 31, 2015. The evaluation period for Community Development (CD) loans, investments, and services is October 1, 2011, through December 31, 2015. Please refer to appendix A for information on the subsidiaries, affiliates, and products reviewed during this evaluation.

The evaluation period includes demographic data from the 2010 Census. The 2010 Census resulted in changes in demographic data as well as new census tract (CT) income designations mandated by the Office of Management and Budget (OMB). Tables 1 through 12 in appendix D reflect the bank's lending volume from January 1, 2014, through December 31, 2015. We determined this to be the period of greatest significance to evaluation conclusions as it reflected the bank's current business model and strategy, current lending practices, and represented the substantial majority of lending activity over the evaluation period. The OMB changes to the MSAs in which Key operates had minor impacts to the composition of Key's assessment areas. The primary changes were the addition of three new limited-scope MSAs (two in Oregon and one in New York) and the removal of one MSA (Sandusky, Ohio), which was rolled into the Cleveland-Elyria MSA (Cleveland MSA). In our analysis, we considered the bank's lending volume for both 2012 through 2013, and 2014 through 2015, but generally gave the 2014 through 2015 period more weight for the reasons provided above.

Table 14 in appendix D reflects investments from October 1, 2011, through December 31, 2015. Table 15 in appendix D reflects retail branches as of December 31, 2015, and the branch openings and closings that occurred from January 1, 2012, through December 31, 2015. Branch openings and closings are reflected on table 15, according to the census data that was in effect as of the date of the change.

Refer to the lending test section under each State or Multistate Area Rating for details regarding how loan products are weighted in arriving at an overall lending test rating.

Data Integrity

Prior to the start of this evaluation, the OCC tested the accuracy of the bank's small business and small farm lending data, community development loans, qualified investments, and community development services. We determined that the data were accurate as reported and that community development loans, qualified investments, and community development services considered during this evaluation met the definition of community development.

Additionally, we performed data integrity on 2015 HMDA data and concluded that the HMDA loan data were accurate and could be relied on for this evaluation. For 2012 through 2014, we relied on the Consumer Financial Protection Bureau (CFPB) and Key's internal audit

evaluation of the data collection systems and internal controls for ensuring the accuracy of the data.

Selection of Areas for Full-Scope Review

At least one AA within each state where the bank has a deposit-taking branch was selected for a full-scope review. Refer to the Scope section under each State Rating for details regarding how the areas were selected. Every multistate metropolitan area (MMA) in which the bank has branches in more than one state received a full-scope review. Key has defined 78 AAs within 13 states and one MMA. We completed a full-scope review of one AA in each state and within the MMA in which Key has an office. For the state of Ohio, however, we conducted a full-scope review for two AAs. Refer to the “Description of Institution’s Operations and Scope of Evaluation” section under each state and MMA rating section for details regarding how the areas were selected.

Ratings

The bank’s overall rating is a blend of the MMA rating and state ratings. The ratings for the states of New York, Ohio, and Washington carried the greatest weights in our overall conclusions. These states represent 71.40 percent of Key’s deposits, with 21.69, 36.30, and 13.41 percent, respectively.

In this evaluation, we place more emphasis on the bank’s performance in 2014/2015 than its performance in 2012/2013 to reach our conclusions, as this was determined to be the period of greatest significance to evaluation conclusions.

The MMA rating and state ratings are based primarily on those areas that received full-scope reviews. Refer to the “Scope” section under each State and Multistate Metropolitan Area Rating section for details regarding how AAs were weighted in arriving at the overall state and multistate area ratings.

Inside/Outside Ratio

We performed an analysis of the volume of loans generated inside the combined AAs to the volume generated outside the combined AAs. Key originated or purchased the substantial majority (92.1 percent) of its loans within the combined AAs during the evaluation period. Key originated or purchased 91.2 percent of its small business and 78.8 percent of its small farm loans within the bank’s AAs. The bank originated or purchased 93.4 percent of its home mortgage loans within the AAs, including 90.6 percent of home purchase, 92.5 percent of home improvement, and 94.8 percent of home refinance loans. We considered the volume of loans made inside Key’s AAs as a positive factor in our evaluation of lending performance.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed Key’s mortgage, small business, and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous gaps in any AA.

Community Contacts

Refer to the market profiles in appendix C for community contact information as well as detailed demographics and other performance context information for AAs that received full-scope reviews.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, 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, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices.

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

Multistate Metropolitan Area Rating

Portland-Vancouver-Hillsboro, OR-WA MMA

CRA rating¹:	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:

- Key's distribution of loans among geographies is excellent. Performance for home mortgage loans is good and for small loans to businesses is excellent.
- Key's excellent level of community development lending had a positive impact on the bank's overall lending test rating.
- Key's performance in qualified community development investments is excellent.
- Key provides excellent retail banking services readily accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Portland-Vancouver-Hillsboro, OR-WA MMA

Key has delineated one AA within the multistate area of Portland-Vancouver-Hillsboro, OR/WA MMA (Portland OR/WA Multistate).

Based on June 30, 2015, FDIC summary of deposit information, Key had \$2.68 billion in deposits in the MMA, which represented 3.87 percent of the bank's total deposits. The bank made 6.08 percent of its evaluation period lending in this MMA.

Key has 53 office locations and 27 deposit-taking ATMs within the MMA. The bank ranks fifth in deposit market share with 6.28 percent. Primary competitors include U.S. Bank N.A. with 22.88 percent, Bank of America N.A. with 20.18 percent, Wells Fargo Bank N.A. with 18.60 percent, and JPMorgan Chase Bank, N.A. with 9.78 percent. There are 36 FDIC-insured depository institutions within the bank's AA.

Refer to the market profiles for the Portland OR/WA Multistate in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

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

Scope of Evaluation in Portland OR/WA Multistate

The Portland OR/WA Multistate has 100 percent of the deposits within this rated area, which is the AA we selected for analysis using full-scope procedures. This was consistent for both the 2012 through 2013 analysis and the 2014 through 2015 analysis. As a result, we based our ratings solely on this AA. We also gave greater consideration to the bank's performance in the 2014 through 2015 portion of the evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Portland OR/WA Multistate is outstanding. Based on the full-scope review, the bank's performance in the Portland OR/WA Multistate is excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs in the Portland OR/WA Multistate. Key's deposit market share for the Portland OR/WA Multistate is 6.28 percent and the bank is ranked fifth out of 36 deposit-taking entities. The top four entities capture over 71 percent of the deposits in the MMA. For home purchase loans, the bank is ranked 48th out of 433 lenders (top 11 percent) with a 0.44 percent market share. The top five home purchase lenders have 27.6 percent of the market. For home improvement loans, the bank is ranked sixth out of 145 lenders (top four percent) with a 4.32 percent market share. The top five lenders have 40.5 percent of the market. For home refinance loans, the bank is ranked 21st out of 402 lenders (top six percent) with a 1.14 percent market share. The top home refinance lender has just over 11 percent of the market and the top five have 31.7 percent of the market. Key's market share for small loans to businesses is 1.83 percent and ranked tenth out of 104 lenders (top ten percent). The top five small business lenders in the AA have over 69 percent of the market and are nationwide lenders that have significant small business credit card portfolios.

Refer to table 1, Lending Volume, in the Portland OR/WA Multistate section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Key's overall geographic distribution of loans by income level of geography is excellent in the Portland OR/WA Multistate. Key had good geographic distribution of home mortgage loans and excellent distribution of small loans to businesses.

Home Mortgage Loans

Geographic distribution of home purchase loans in the Portland OR/WA Multistate is excellent. Geographic distribution of home improvement and home refinance loans in the Portland OR/WA Multistate is adequate. We placed more weight on distribution in moderate-income geographies as those geographies make up a larger percentage of the bank's AA. Refer to tables 2, 3, 4, and 5 in the Portland OR/WA Multistate 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.

Home Purchase

The bank's geographic distribution of home purchase loans is excellent. The percentages of home purchase loans originated or purchased in low- and moderate-income geographies exceed the percentages of owner-occupied housing units located in those geographies. The bank's market shares for home purchase loans in low- and moderate-income geographies exceeds the bank's overall home purchase loan market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Home Improvement

The bank's geographic distribution of home improvement loans is adequate. The percentage of home improvement loans originated or purchased in low-income geographies is well below the percentage of owner-occupied housing units located in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home improvement loans in low-income geographies is significantly below and in moderate-income geographies is below the bank's overall home improvement loan market share. Performance for 2012 through 2013 was stronger than the distribution for 2014 through 2015 due to better low-income distribution and positively impacted our conclusion.

Home Refinance

The bank's geographic distribution of home refinance loans is adequate. The percentage of home refinance loans originated or purchased in low-income geographies is significantly below the percentage of owner-occupied housing units located in low-income geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies is near to the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home refinance loans in low-income geographies is significantly below and in moderate-income geographies near to the bank's overall home refinance loan market share. Performance for 2012 through 2013 was weaker than the distribution for 2014 through 2015 due to poorer moderate-income distribution and had a neutral impact on the conclusion.

Small Loans to Businesses

Geographic distribution of small loans to businesses in the Portland OR/WA Multistate is excellent. Refer to table 6 in the Portland OR/WA Multistate section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses is excellent. The percentages of small loans to businesses originated or purchased in low- and moderate-income geographies exceed the percentages of small businesses located in those geographies. The bank's market shares for small loans to businesses in low- and moderate-income geographies exceed the bank's overall small loans to businesses market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Lending Gap Analysis

We analyzed Key's geographic lending patterns throughout the AA and we found no unexplained lending gaps.

Distribution of Loans by Income Level of the Borrower

Key's overall distribution of loans to borrowers of different income levels is good in the Portland OR/WA Multistate. Key's borrower distribution of home mortgage loans is good and small loans to businesses is adequate.

Home Mortgage Loans

Key's distribution of home purchase loans among individuals of different income levels in the Portland OR/WA Multistate is adequate. The borrower distribution of home improvement and home refinance loans is good. Refer to tables 8, 9 and 10 in the Portland OR/WA Multistate 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.

Home Purchase

The bank's borrower distribution of home purchase loans is adequate. The percentage of home purchase loans originated or purchased to low-income borrowers is well below and for moderate-income borrowers exceeds the percentage of families defined as such in the AA. The bank's market share for home purchase loans to low-income borrowers is substantially below and for moderate-income borrowers exceeds the bank's overall home purchase loan market share. Performance for 2012 through 2013 was stronger than the distribution for 2014 through 2015 due to a higher percentage of market share and had a positive impact on the conclusion.

Home Improvement

The bank's borrower distribution of home improvement loans is good. The percentage of home improvement loans originated or purchased to low-income borrowers is well below and

for moderate-income borrowers is below the percentage of families defined as such located in the AA. The bank's market share for home improvement loans to low-income borrowers is below and moderate-income borrowers approximates the bank's overall home improvement loan market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Home Refinance

The bank's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is well below the percentage of low-income families located in the AA. The percentage of home refinance loans originated or purchased to moderate-income borrowers exceeds the percentage of moderate-income families located in the AA. The bank's market share for home refinance loans to low-income borrowers is below and for moderate-income borrowers exceeds the bank's overall home refinance loan market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Small Loans to Businesses

Borrower distribution of small loans to businesses in the Portland OR/WA Multistate is adequate. Refer to table 11 in the Portland OR/WA Multistate 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.

Key's borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses originated or purchased is below the percentage of small businesses located in the AA. The bank's market share for small loans to businesses exceeds the bank's overall small business loan market share. Performance for 2012 through 2013 was weaker than the distribution for 2014 through 2015 and did not have an impact on the overall conclusion.

Community Development Lending

Key is a leader in making community development loans, all of which were responsive to community development needs. The level of community development lending in the Portland OR/WA Multistate is excellent and had a positive impact on the lending test rating. Key originated ten affordable housing community development loans totaling over \$42.5 million. Key originated 12 loans totaling over \$19.3 million to facilitate qualified community development services. In addition, Key originated five economic development loans totaling \$8.1 million.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Portland OR/WA Multistate equaled 20.4 percent of allocated Tier One Capital as of December 31, 2015.

Refer to table 1, Lending Volume, in the Portland OR/WA Multistate section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. table 5 does not separately list community development loans.

Product Innovation and Flexibility

Key makes little use of innovative and flexible lending practices in order to serve assessment area credit needs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the Portland OR/WA Multistate is rated outstanding. Based on a full-scope review, performance in the Portland OR/WA Multistate is excellent. Refer to table 14 in the Portland OR/WA Multistate section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Key has an excellent level of qualified investments in the Portland OR/WA Multistate. Key made five current-period qualified investments totaling \$19.9 million in the AA. They have 21 prior-period investments totaling \$8.8 million that continue to benefit the AA. In addition, they made 36 grants totaling \$499 thousand to a variety of organizations that support community services targeted to low- and moderate-income individuals and revitalization and stabilization of low- and moderate-income geographies. The combined current and prior period investment dollar volume represents 8.38 percent of the Tier One Capital allocated to the AA.

The bank exhibits excellent responsiveness to credit and community economic development needs in the Portland OR/WA Multistate. Four of the five current-period qualified investments and all of the prior-period investments are LIHTCs that support over 1,850 units of affordable housing. One unique LIHTC example is for a project that will provide permanent, stable housing for 30 chronically homeless individuals considered high users of resources to address substance abuse, mental health, domestic abuse and other issues, while also providing the supportive services necessary to ensure an individual's maximum opportunity for overcoming homelessness. The remaining current-period investment is a New Markets Tax Credit that helps to support small business development.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Key's performance under the service test in the Portland OR/WA Multistate is rated outstanding. Based on a full-scope review, performance in the Portland OR/WA Multistate is excellent.

Retail Banking Services

Refer to table 15 in the state of Portland OR/WA Multistate section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's delivery systems are readily accessible to all geographies and individuals of different income levels in the Portland OR/WA Multistate. Key's distribution of banking offices in the low- and moderate-income geographies exceeds the percentages of the population that resides there.

To the extent changes have been made, Key's record of opening and closing branches has generally not adversely affected the accessibility of delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Key opened three branches, none of which were located in a low- or moderate-income geography. Key closed three branches, including one located in a moderate-income geography.

Services including, where appropriate, business hours, do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income geographies, and/or individuals. Banking hours in the MMA reflect comparable banking hours for all branches without regard to the income levels represented by the branches' geographic locations. Key offers traditional banking services at all branches.

Three branches, none of which are located in low- or moderate-income geographies, offer the KeyBank Plus service, which primarily targets the needs of low- and moderate-income customers and the unbanked. This service allows customers and non-customers to cash their approved payroll, tax refund, or government checks for a low fee and every fifth check cashed is free. Participants are also eligible to receive five fee-free money orders when they cash their check.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Key provides an excellent level of CD services to the AA, which were responsive to local community development needs. Bank employees devoted 2,341 hours in financial expertise, including financial and management advice and board activities to 20 organizations with CD purposes for affordable housing, community services, economic development, revitalization, and stabilization.

Two examples include: Key employees dedicated approximately 484 hours in board activities to an organization that promotes affordable housing and has developed a wide range of programs to assist families and individuals out of poverty and homelessness. Key employees also dedicated approximately 141 hours in board activities to a statewide non-profit corporation that provides financing to non-profits for affordable housing, including long-term permanent financing and preservation loans that include minimum affordability for low- and moderate-income individuals.

State Rating

State of Alaska

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

The major factors that support this rating include:

- Key's distribution of loans among geographies is adequate. Distribution for home mortgage loans is adequate and small loans to businesses is poor.
- Key's excellent level of community development lending had a significantly positive impact on the bank's overall lending test rating.
- Key's performance in qualified community development investments is good.
- Key provides adequate retail banking services reasonably accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Alaska

Key has delineated three AAs within the state of Alaska. They include the Anchorage and Fairbanks MSAs, as well as the following five non-MSA counties: Aleutians West, Juneau, Kenai, Ketchikan, and Kodiak Island.

Based on June 30, 2015, FDIC summary of deposit information, Key had \$924.3 million in deposits in the state, which represented 1.33 percent of the bank's total deposits. The bank made one percent of its evaluation period lending in this state.

Key has 15 office locations and two deposit-taking ATMs within the state. The bank ranks fourth in deposit market share with approximately 8.08 percent. Primary competitors include Wells Fargo Bank, N.A. with 53.03 percent, First National Bank Alaska with 19.53 percent, and Northrim Bank with 10.90 percent. There are seven FDIC-insured depository institutions within the bank's AAs.

Scope of Evaluation in Alaska

The Anchorage, AK MSA (Anchorage MSA) has 70.49 percent of the deposits within the rated area, which is the AA we selected for analysis using full-scope procedures and weighted most heavily in our overall conclusions. All other AAs were analyzed using limited-scope procedures. This was consistent for both the 2012 through 2013 analysis and the 2014 through 2015 analysis. We based our ratings primarily on the results of the area that received a full-scope review. We also gave greater consideration to the bank's performance in the

2014-2015 evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in state of Alaska is low satisfactory. Based on the full-scope review, the bank's performance in the Anchorage MSA is adequate.

Lending Activity

Lending levels reflect poor responsiveness to assessment area credit needs in the Anchorage MSA. Key's deposit market share for Anchorage MSA is 9.91 percent and the bank is ranked fourth out of four deposit-taking entities. For home purchase loans, the bank is ranked 33rd out of 103 lenders (top 32 percent) with a 0.14 percent market share. The top three home purchase lenders have almost 70 percent of the market. For home improvement loans, the bank is ranked fifth out of 37 lenders (top 13 percent) with a 4.17 percent market share. The top four home improvement lenders have 78 percent of the market. For home refinance loans, the bank is ranked 18th out of 119 lenders (top 15 percent) with a 0.81 percent market share. The top three home refinance lenders have almost 55 percent of the market. Key's market share for small loans to businesses is 1.19 percent and ranked 13th out of 41 lenders (top 31 percent). The top five small business lenders in the AA have almost 75 percent of the market and are nationwide lenders that have significant small business credit card portfolios.

Refer to table 1, Lending Volume, in the state of Alaska section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Key's overall distribution of loans by income level of geography is adequate in the Anchorage MSA. Key has adequate geographic distribution of home mortgage loans and good distribution of small loans to businesses.

Home Mortgage Loans

Geographic distribution of home improvement and home refinance loans in the Anchorage MSA is adequate. Key did not make enough home purchase loans in the Anchorage MSA to allow for a meaningful analysis. We placed more weight on distribution in moderate-income geographies as those geographies make up a larger percentage of the bank's AA. Only 0.48 percent of owner-occupied housing units are located in low-income geographies. Refer to tables 2, 3, 4, and 5 in the state of Alaska 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.

Home Improvement

The bank's geographic distribution of home improvement loans is adequate. Key did not originate or purchase any home improvement loans in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies is near to the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home improvement loans in moderate-income geographies is significantly below the bank's overall home improvement loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 due to poorer moderate-income distribution. The weaker performance had a neutral impact on the conclusion.

Home Refinance

The bank's geographic distribution of home refinance loans is adequate. Key did not originate or purchase any home refinance loans in low-income geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home refinance loans in moderate-income geographies is below the bank's overall home refinance loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 due to poorer moderate-income distribution. The weaker performance had a neutral impact on the conclusion.

Small Loans to Businesses

Geographic distribution of small loans to businesses in the Anchorage MSA is good. We placed more weight on distribution in moderate-income geographies as those geographies make up a larger percentage of the bank's AA. Refer to table 6 in the state of Alaska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased in low-income geographies exceeds the percentage of small businesses located in low-income geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies is below the percentage of small businesses located in moderate-income geographies. The bank's market share for small loans to businesses in low-income geographies exceeds and moderate-income geographies is below the bank's overall small loans to businesses market share. Performance for 2012 through 2013 is stronger than the distribution for 2014 through 2015. The stronger performance had a positive impact on the conclusion.

Lending Gap Analysis

We analyzed Key's geographic lending patterns throughout the AA and we found no unexplained lending gaps.

Distribution of Loans by Income Level of the Borrower

Key's overall distribution of loans to borrowers of different income levels is adequate in the Anchorage MSA. Key's borrower distribution of home mortgage loans is good and small loans to businesses is poor.

Home Mortgage Loans

Key's distribution of home improvement loans among individuals of different income levels in the Anchorage MSA is adequate. The borrower distribution of home refinance loans is good. Key did not make enough home purchase loans in the Anchorage MSA to allow for a meaningful analysis. Refer to tables 8, 9 and 10 in the state of Alaska 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.

Home Improvement

The bank's borrower distribution of home improvement loans is adequate. The percentage of home improvement loans originated or purchased to low-income borrowers is well below and for moderate-income borrowers is near to the percentage of families defined as such located in the AA. The bank's market share for home improvement loans to low-income borrowers approximates and moderate-income borrowers is well below the bank's overall home improvement loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Refinance

The bank's borrower distribution of home refinance loans is good. The bank did not make any loans to low-income borrowers. The percentage of home refinance loans originated or purchased to moderate-income borrowers exceeds the percentage of moderate-income families located in the AA. The bank's market share for home refinance loans to moderate-income borrowers is near to the bank's overall home refinance loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Small Loans to Businesses

Borrower distribution of small loans to businesses in the Anchorage MSA is poor. Refer to table 11 in the state of Alaska 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.

Key's borrower distribution of small loans to businesses is poor. The percentage of small loans to businesses originated or purchased is well below the percentage of small businesses located in the AA. The bank's market share for small loans to businesses is near to the bank's overall small business loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Community Development Lending

Key is a leader in making community development loans. The level of community development lending in the Anchorage MSA is excellent and had a positive impact on the lending test rating. The loans were all responsive to identified community development needs. Key originated one affordable housing community development loan totaling over \$1.5 million. This loan facilitated the creation or redevelopment of 55 affordable housing units. Key originated 18 loans totaling over \$244 million to facilitate qualified community development services. In addition, Key originated five economic development loans totaling almost \$94 million.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Anchorage MSA equaled 376.46 percent of allocated Tier One Capital as of December 31, 2015.

Refer to table 1, Lending Volume, in the state of Alaska section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Product Innovation and Flexibility

Key makes little use of innovative and flexible lending practices in order to serve assessment area credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Fairbanks, AK MSA and AK non-MSA is consistent with the bank's low satisfactory performance under the lending test in the state of Alaska. Refer to tables 1 through 12 in the state of Alaska section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Alaska is rated high satisfactory. Based on a full-scope review, the bank's performance in the Anchorage MSA is excellent. Performance in the limited-scope AAs had a negative impact on the overall state rating. Refer to table 14 in the state of Alaska section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Key has an excellent level of qualified investments in the Anchorage MSA. The bank made two qualified investments totaling almost \$10 million in LIHTC projects. They also made \$40 thousand in grants to several community development organizations. There were no prior-period qualified investments attributed to the AA. The dollar amount of the investments represents 11.13 percent of Tier One Capital allocated to the Anchorage MSA.

Key exhibits excellent responsiveness to community needs through investing in affordable housing-related projects. One of the LIHTC investments supported 88 low-income housing units for some of the AA's most vulnerable citizens and is highly responsive to one of the main community development needs in the AA. A unique factor to this development was the combination of senior and family units at one of the sites. This allowed multigenerational families to live in close proximity to each other, a factor of particular importance to the growing refugee population in Anchorage.

The bank had two prior-period qualified investments for \$55 thousand that benefitted the statewide area including the bank's AA; however, they had a neutral impact on the overall state rating.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the investment test in the Fairbanks, AK MSA is consistent with the bank's performance in the full-scope AA. Key's performance in the Alaska non-MSA AA is weaker than the bank's performance in the full-scope area. There was no investment activity in the AA during the evaluation period and there were no prior-period investments still outstanding. The Alaska non-MSA AA represents approximately 18 percent of the bank's operations in the state, therefore, the very poor level and responsiveness of investment performance in the Alaska non-MSA AA had a negative impact on the overall investment test rating for Alaska. Refer to table 14 in the state of Alaska section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Key's performance under the service test in Alaska is rated low satisfactory. Based on a full-scope review, the bank's performance in the Anchorage MSA is adequate. Performance in the limited-scope AAs had a neutral impact on the service test rating in Alaska.

Retail Banking Services

Refer to table 15 in the state of Alaska section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's delivery systems are reasonably accessible to geographies and individuals of different income levels in the Anchorage AA. Key has no branches in low-income geographies. Branch

distribution in moderate-income geographies is below the percentage of population that resides there. Branch distribution is enhanced by one bank branch located in a middle-income geography that is within one-half mile of an adjacent moderate-income geography. Our evaluation of the proximity of these branches included consideration of the absence of physical barriers, such as water or highways, which might obstruct convenient access to the branch. We placed more emphasis on the performance in the moderate-income geographies because only 2.03 percent of the AA population lives in low-income geographies.

To the extent changes have been made, 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 did not open or close any branches during the evaluation period.

Services including, where appropriate, business hours, do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income geographies, and/or individuals. Banking hours in the AA reflect comparable banking hours for all branches without regard to the income levels represented by the branches' geographic locations.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Key bank provides an adequate level of CD services. The CD services were responsive to local community development needs. Bank employees devoted 176 hours in financial expertise, including board activities, financial education, and financial management to four CD organizations that support community services and economic development.

An example includes Key employees dedicating approximately 60 hours to an organization that encourages growth and diversity in the Anchorage economy by providing technical and financial support to very small and start-up enterprises.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Key's performance under the service test in the Fairbanks AA is consistent with the overall low satisfactory performance noted in the Anchorage AA. Performance in the Alaska non-MSA AA is stronger due to excellent branch distribution in moderate-income geographies. Performance in the limited-scope areas had a neutral impact on the overall service test rating.

State Rating

State of Colorado

CRA rating:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Key had a good level of lending activity.
- Key's distribution of loans among geographies is good. Performance for home mortgage loans is good and small loans to businesses is excellent.
- Key's excellent level of community development lending had a positive impact on the bank's overall lending test rating.
- Key's performance in qualified community development investments is excellent.
- Key's branch distribution and level of community development services are good when taking into account the adjacent serving branches.

Description of Institution's Operations in Colorado

Key has delineated five AAs within the state of Colorado. They include the Denver-Aurora-Lakewood, Boulder, Colorado Springs, and Fort Collins as well as one non-MSA county, which is Logan.

Based on June 30, 2015, FDIC summary of deposit information, Key has \$3.4 billion in deposits in the state, which represents 4.93 percent of the bank's total deposits. The bank made 4.81 percent of its evaluation period lending in this state.

Key has 65 office locations and 69 deposit-taking ATMs within the state. The bank ranks sixth in deposit market share with approximately 2.93 percent. Primary competitors include Wells Fargo Bank, N.A. with 24.83 percent, FirstBank with 11.13 percent, U.S. Bank, N.A. with 9.96 percent, JP Morgan Chase, N.A. with 8.89 percent, and Bank of the West with 3.35 percent. There are 145 FDIC-insured depository institutions within the state.

Scope of Evaluation in Colorado

The Denver-Aurora-Lakewood, CO MSA (Denver MSA) has 90.65 percent of the deposits within the rated area, which is the AA we selected for analysis using full-scope procedures and weighted most heavily in our overall conclusions. All other AAs were analyzed using limited-

scope procedures. This was consistent for both the 2012 through 2013 analysis and the 2014 through 2015 analysis. We based our ratings primarily on the results of the area that received a full-scope review. We also gave greater consideration to the bank's performance in the 2014-2015 evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Colorado is high satisfactory. Based on the full-scope review, the bank's performance in the Denver MSA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs in the Denver MSA. Key's deposit market share for Denver MSA is 4.44 percent and the bank is ranked fifth out of 71 deposit-taking entities. The top four depository institutions have almost 64 percent of the deposit market share. For home purchase loans, the bank is ranked 93rd out of 626 lenders (top 14 percent) with a 0.21 percent market share. For home improvement loans, the bank is ranked eighth out of 206 lenders (top 4 percent) with a 3.40 percent market share. The top seven home improvement lenders have 44 percent of the market. For home refinance loans, the bank is ranked 49th out of 523 lenders (top nine percent) with a 0.42 percent market share. The top three home refinance lenders have over 21 percent of the market. Key's market share for small loans to businesses is 0.87 percent and ranked 14th out of 145 lenders (top 10 percent). The top five small business lenders in the AA have over 70 percent of the market and are nationwide lenders that have significant small business credit card portfolios.

Refer to table 1, Lending Volume, in the state of Colorado section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Key's overall geographic distribution of loans by income level of geography is good in the Denver MSA. Key has good geographic distribution of home mortgage loans and excellent distribution of small loans to businesses.

Home Mortgage Loans

Geographic distribution of home purchase loans in the Denver MSA is good. Geographic distribution of home improvement and home refinance loans in the Denver MSA is adequate. We placed more weight on distribution in moderate-income geographies as those geographies make up a larger percentage of the bank's AA. Refer to tables 2, 3, 4, and 5 in the state of Colorado 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.

Home Purchase

The bank's geographic distribution of home purchase loans is good. The percentage of home purchase loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units located in low-income geographies. The percentage of home purchase loans originated or purchased in moderate-income geographies is near to the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home purchase loans in low-income geographies is well below and in moderate-income geographies near to the bank's overall home purchase loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Improvement

The bank's geographic distribution of home improvement loans is good. The percentages of home improvement loans originated or purchased in low- and moderate-income geographies are near to the percentages of owner-occupied housing units located in those geographies. The bank's market share for home improvement loans in low-income geographies is below and in moderate-income geographies exceeds the bank's overall home improvement loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Refinance

The bank's geographic distribution of home refinance loans is adequate overall. The percentage of home refinance loans originated or purchased in low-income geographies approximates the percentage of owner-occupied housing units located in low-income geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies is near to the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home refinance loans in low-income geographies exceeds and in moderate-income geographies is near to the bank's overall home refinance loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 due to poorer distributions in low- and moderate-income geographies. The weaker performance had a negative impact on the conclusion.

Small Loans to Businesses

Geographic distribution of small loans to businesses in the Denver MSA is excellent. Refer to table 6 in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses is excellent. The percentages of small loans to businesses originated or purchased in low- and moderate-income geographies exceed the percentages of small businesses located in those geographies. The bank's market share for small loans to businesses in low- and moderate-income geographies exceeds the bank's overall small loans to businesses market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Lending Gap Analysis

We analyzed Key's geographic lending patterns throughout the AA and we found no unexplained lending gaps.

Distribution of Loans by Income Level of the Borrower

Key's overall distribution of loans to borrowers of different income levels is adequate in the Denver MSA. Key's borrower distribution of home mortgage loans and small loans to businesses is adequate.

Home Mortgage Loans

Key's distribution of home purchase loans among individuals of different income levels in the Denver MSA is good. The borrower distribution of home improvement and home refinance loans is adequate. Refer to tables 8, 9 and 10 in the state of Colorado 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.

Home Purchase

The bank's borrower distribution of home purchase loans is good. The percentage of home purchase loans originated or purchased to low-income borrowers is below and for moderate-income borrowers exceeds the percentage of families defined as such in the AA. The bank's market shares for home purchase loans to low- and moderate-income borrowers exceed the bank's overall home purchase loan market shares. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 due to poorer distribution to low-income borrowers and had a neutral impact on the conclusion.

Home Improvement

The bank's borrower distribution of home improvement loans is adequate. The percentage of home improvement loans originated or purchased to low-income borrowers is well below and for moderate-income borrowers near to the percentage of families defined as such located in the AA. The bank's market shares for home improvement loans to low- and moderate-income borrowers are well below the bank's overall home improvement loan market shares. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Refinance

The bank's borrower distribution of home refinance loans is adequate. The percentage of home refinance loans originated or purchased to low-income borrowers is below the percentage of low-income families located in the AA. The percentage of home refinance loans originated or purchased to moderate-income borrowers exceeds the percentage of moderate-income families located in the AA. The bank's market share for home refinance loans to low-income borrowers is well below and for moderate-income borrowers equals the bank's overall home refinance loan market share. Performance for 2012 through 2013 is weaker than the

distribution for 2014 through 2015 due to poorer distribution to both low- and moderate-income borrowers. The weaker performance had a negative impact on the conclusion.

Small Loans to Businesses

Borrower distribution of small loans to businesses in the Denver MSA is adequate. Refer to table 11 in the state of Colorado 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.

Key's borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses originated or purchased is below the percentage of small businesses located in the AA. The bank's market share for small loans to businesses is near to the bank's overall small business loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015. The weaker performance had a negative impact on the conclusion.

Community Development Lending

Key is a leader in making community development loans. The level of community development lending in the Denver MSA is excellent and had a positive impact on the lending test rating. The loans were all responsive to identified community development needs. Key originated 15 affordable housing community development loans totaling over \$186.6 million. These loans facilitated the creation or redevelopment of over 1,086 affordable housing units. In addition, Key originated ten economic development loans totaling over \$19.3 million.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Denver MSA equaled 51.73 percent of allocated Tier One Capital as of December 31, 2015.

Refer to table 1, Lending Volume, in the state of Colorado section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Product Innovation and Flexibility

Key makes little use of innovative and flexible lending practices in order to serve assessment area credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Colorado Springs, CO MSA is consistent with the bank's overall high satisfactory performance under the lending test in the state of Colorado. In the Boulder, CO; Ft. Collins, CO MSAs; and

the CO non-MSA areas, the bank's performance is weaker than the bank's overall performance in the state due to low levels of community development lending in these AAs. Refer to tables 1 through 12 in the state of Colorado section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Colorado is rated outstanding. Based on a full-scope review, performance in the Denver MSA is excellent. Performance in the limited-scope AAs did not impact the overall investment test rating for Colorado. Refer to table 14 in the state of Colorado section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Key has an excellent level of qualified investments in the Denver MSA. Key made six current-period investments totaling over \$46 million and 14 prior-period investments totaling over \$4 million in the full-scope AA. In addition, Key made over \$500 thousand in grants to a variety of organizations that support community services targeted to low- and moderate-income individuals, revitalization and stabilization of low- and moderate-income geographies, and development of small businesses. The combined current- and prior-period investment dollar volume represents 12.93 percent of the Tier One Capital allocated to the AA.

Key exhibits excellent responsiveness to community economic development needs in the AA. Affordable housing and small business funding and are both identified CD needs within the AA. A substantial majority of the dollar volume of both the current- and prior-period investment transactions in the AA is LIHTCs, which supported over 1,700 units of affordable housing, a primary CD need in the AA. Examples include \$8 million to sustain a 200-unit apartment complex and \$23 million to support a 217-unit apartment complex. Another investment of \$11.1 million in new market tax credits supports small businesses in communities that are underserved by traditional sources of risk capital.

In addition, Key has one current- and 27 prior-period qualified investments totaling \$9 million in statewide or regional funds whose service area includes the bank's AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Boulder and Colorado Springs, CO AAs is consistent with the bank's overall outstanding performance under the investment test in the Denver MSA. Performance in the Fort Collins, CO AA and the CO non-MSA AA was weaker than the bank's performance in the full-scope AA. The weaker performance is due to the bank making no current-period investment in these AAs. The performance in limited-scope areas did not have an impact on the overall investment test rating for Colorado. Refer to table 14 in the state of Colorado section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Key's performance under the service test in Colorado is rated high satisfactory. Based on a full-scope review, the bank's performance in the Denver AA is good. Performance in the limited-scope AAs had a neutral impact on the service test rating in Colorado.

Retail Banking Services

Refer to table 15 in the state of Colorado section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's delivery systems are accessible to geographies and individuals of different income levels in the Denver MSA. Key's distribution of banking offices in low-income geographies is significantly less than, and in moderate-income geographies exceeds the percentage of population living there. However, three bank branches located in middle- or upper-income geographies are within one-half mile of at least three low-income geographies. Our evaluation of the proximity of these branches included consideration of the absence of physical barriers, such as water or highways, which might obstruct convenient access to the branch.

To the extent changes have been made, 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. Key opened three branches, one of which was in a moderate-income geography. Key closed eight branches, two of which were in low-income geographies and two moderate-income geographies.

Services including, where appropriate, business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and/or individuals. The bank offers extended hours, Saturday hours, and drive-up services at all of the branches located in low-income geographies. For branches in moderate-income geographies, the bank offers extended hours at 100 percent, Saturday hours at 68 percent, and drive-up services at 56 percent of the branches.

Twenty-two branches, including 13 located in low- and moderate-income geographies, offer the KeyBank Plus Check Cashing service, which primarily targets the needs of low- and moderate-income customers and the unbanked. This service allows customers to cash their approved payroll, tax refund, or government checks for a low fee and every fifth check cashed is free. Participants are also eligible to receive five fee-free money orders when they cash their check.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed

on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Key provides an excellent level of CD services to the AA, which were responsive to local community needs. Key Bank employees devoted 2,504 hours in financial expertise to 25 organizations that support affordable housing, community services, and economic development.

Two examples of CD services include: Key employees dedicated approximately 902 hours in board activities to a non-profit organization whose purpose is to positively impact Colorado's minority communities by empowering minority businesses and providing educational opportunities and training through scholarships. Although the scholarships are based on academics, the majority of the recipients were primarily low- and moderate-income students. Key employees also dedicated approximately 100 hours in financial and management advice to an organization that provides employability, education, and life skills services to primarily low- and moderate-income individuals, as well as free workshops for small business owners.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Key's performance under the service test for the Colorado non-MSA AA is stronger than the overall high satisfactory performance noted in the Denver MSA, as the only branch is located in a moderate-income geography. Performance in the Boulder, Colorado Springs, and Ft. Collins AAs is weaker due to the bank having no branches in low-income geographies in these AAs. Performance in the limited-scope AAs had a neutral impact on the service test rating in Colorado.

State Rating

State of Florida

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

The major factors that support this rating include:

- Key's performance related to the distribution of loans among geographies was not rated due to the limited volume of activity, which did not allow for meaningful analysis for the periods reviewed.
- Key's performance related to distribution of home mortgage loans by income level of borrower and small loans to businesses of different sizes was not rated due to the limited volume of activity, which did not allow for meaningful analysis for the periods reviewed.
- Key has a good level of community development loans.
- Key's performance in qualified community development investments is good.

Description of Institution's Operations in Florida

Key has delineated three AAs within the state of Florida. They include the Naples-Immokalee-Marco Island, Cape Coral-Fort Myers, and West Palm Beach-Boca Raton-Delray Beach MSAs. There are no non-MSA AAs delineated in the state of Florida.

Based on June 30, 2015, FDIC summary of deposit information, Key has \$2.4 billion in deposits in the state, which represents 3.42 percent of the bank's total deposits. The bank made 0.19 percent of its evaluation period lending in this state.

Key has three office locations and no ATMs within the state. Key's market strategy in these three locations is to serve Key Private Bank (KPB) customers exclusively. As a result, Key's strategic focus in its three AAs is on Wealth Advisory and Investment Product sales growth, not on retail deposits, retail credit products, or retail services.

The bank ranks 28th in deposit market share with approximately 0.47 percent. Primary competitors include Bank of America, N.A. with 19.48 percent, Wells Fargo Bank, N.A. with 14.93 percent, and SunTrust Bank with 9.21 percent. There are 254 FDIC-insured depository institutions within the state.

Scope of Evaluation in Florida

The Naples-Immokalee-Marco Island, FL MSA (Naples – Marco Island MSA) has 67.05 percent of the deposits within the rated area, which is the AA we selected for analysis using full-scope procedures and weighted most heavily in our overall conclusions. All other AAs were analyzed using limited-scope procedures. This was consistent for both the 2012 through 2013 analysis and the 2014 through 2015 analysis. We based our ratings primarily on the results of the area that received a full-scope review. We also gave greater consideration to the bank's performance in the 2014-2015 evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Florida is low satisfactory. Based on the full-scope review, the bank's performance in the Naples – Marco Island MSA is poor. However, the bank's strategic focus of providing loan products and services exclusively to its Private Banking clientele mitigates the low volume of lending in this AA. The low volume of small business, home purchase, home equity, and home refinance lending is due to the fact that the bank serves the credit needs of its target market of approximately 700 KPB clients within its three Florida AAs.

Lending Activity

Lending levels reflect poor responsiveness to assessment area credit needs in the Naples – Marco Island MSA. Home purchase, home improvement, home refinance, and small loans to businesses each had less than 50 loans to analyze. For 2014 through 2015, Key originated or purchased 25 home mortgage loans and five small loans to businesses. For 2012 through 2013, Key originated or purchased 28 home mortgage loans and 28 small loans to businesses. Key originated six community development loans for \$52 million.

Key's deposit market share for the Naples – Marco Island MSA is 11.29 percent, and the bank is ranked third out of 38 deposit-taking entities. For home purchase loans, the bank is ranked 99th out of 468 lenders (top 21 percent) with a 0.10 percent market share. For home refinance loans, the bank is ranked 66th out of 304 lenders (top 22 percent) with a 0.19 percent market share. No home improvement loans were originated or purchased for 2014 through 2015. The level of small loans to businesses for 2014 through 2015 was not sufficient to provide a meaningful analysis.

Refer to table 1, Lending Volume, in the state of Florida section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

The bank's performance related to both home mortgage loans and small loans to businesses was not analyzed or discussed because the limited volume of activity did not allow for a meaningful analysis for 2014 through 2015 or for 2012 through 2013.

Distribution of Loans by Income Level of the Borrower

The bank's performance related to both home mortgage loans and small loans to businesses was not analyzed or discussed because the limited volume of activity did not allow for a meaningful analysis for 2014 through 2015 or for 2012 through 2013.

Community Development Lending

Key has made a relatively high level of community development lending in the Naples – Marco Island MSA, and the level of community development lending had a positive impact on the lending test rating. There are community development lending opportunities available in the Naples – Marco Island MSA, but Key is in competition with other financial institutions operating in the Naples – Marco Island MSA for these opportunities. Key originated six affordable housing community development loans totaling over \$52 million. The loans are responsive to the affordable housing needs of the MSA. None of the community development loans are considered complex or innovative.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Naples – Marco Island MSA equaled 26.07 percent of allocated Tier One Capital as of December 31, 2015.

Refer to table 1, Lending Volume, in the state of Florida section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Product Innovation and Flexibility

No innovative or complex products were identified in this MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the lending test in the West Palm Beach – Boca Raton – Delray Beach, FL MSA is consistent with the bank's overall low satisfactory performance under the lending test in the Naples – Marco Island MSA. This market also exists to serve the bank's Private Banking clientele exclusively. The bank's performance related to both home mortgage loans and small loans to businesses was not

analyzed because the limited volume of activity did not allow for a meaningful analysis for 2014 through 2015 or for 2012 through 2013.

Key originated two community development loans for \$13 million in the West Palm Beach – Boca Raton – Delray Beach, FL MSA. In the Cape Coral – Fort Myers MSA, the bank's performance was weaker than the bank's overall low satisfactory performance under the lending test in the Naples – Marco Island MSA. This market also exists to serve the bank's Private Banking clientele exclusively. The bank's performance related to both home mortgage loans and small loans to businesses was not analyzed because the limited volume of activity did not allow for a meaningful analysis for 2014 through 2015 or for 2012 through 2013, and no community development loans were originated or purchased. Key's performance in the limited-scope areas did not impact the overall lending test rating for the state of Florida.

Refer to tables 1 through 12 in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Florida is rated high satisfactory. Based on the full-scope review, the bank's performance in the Naples – Marco Island MSA is adequate. Statewide and regional investments had a positive impact on the state rating. Performance in the limited-scope AAs had a neutral impact on the overall state rating. Refer to table 14 in the state of Florida section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Key has an adequate level of qualified community development investments in the Naples – Marco Island MSA. Key made one current-period qualified investment in the AA totaling \$5.6 million that provides affordable housing. The bank also made a \$5 thousand grant to a non-profit provider of health services to low-and moderate-income individuals. In addition, the bank has \$1.09 million in unfunded commitments for qualified investments. The amount of investments, not including unfunded commitments, represents 2.76 percent of Tier One Capital allocated to the Naples – Marco Island MSA.

The bank exhibits adequate responsiveness to credit and community economic development needs in the in the Naples – Marco Island MSA. While the bank made only one investment in the AA, it was a complex investment that involved a multi-investor platform utilizing investor capital as well as conventional debt to acquire an affordable housing property that was outside of its tax-credit-compliance period and within its extended-use period. This investment preserved 176 units of affordable housing.

The bank has over \$15 million in two current-period qualified investments and 30 prior-period qualified investments of \$661 thousand that benefitted a broader statewide or regional area that includes the bank's AAs and had a positive impact on the overall state rating.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the West Palm Beach-Boca Raton-Delray Beach MD AA is consistent with the bank's performance in the full-scope AA. Performance in the Cape Coral-Fort Myers, FL MSA is stronger than the bank's performance in the full-scope AA. The volume of qualified investments as a percent of the allocated Tier One Capital exceeds the volume of investments made in the full-scope AA. The performance in the limited-scope AAs had a neutral impact on the overall investment test rating for Florida.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Key's performance under the service test in the state of Florida is rated low satisfactory. Based on a full-scope review, performance in the Naples – Marco Island MSA is poor; however, the bank's strategic focus of serving Private Banking clients mitigates the poor level of service. Performance in the limited-scope AAs had a neutral impact the service test rating in the state of Florida.

Retail Banking Services

Refer to table 15 in the state of Florida section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key has a total of three Private Banking and Investing offices in the state of Florida located in the Naples – Marco Island MSA, the Cape Coral -- Fort Myers MSA, and the West Palm Beach MSA. These facilities exist primarily to service Key's existing Private Banking and Wealth Management clients. As a result, Key does not solicit deposits from, or sell loan products to, the general public in Florida.

Because the bank does not offer retail services to the general public, Key's distribution of banking offices is inaccessible to portions of the Naples – Marco Island MSA, particularly to low- or moderate-income geographies or to low- or moderate-income individuals. The bank did not open or close any branches during the review periods.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Key provides an adequate level of CD services to the AA considering its limited branch presence. CD services were responsive to local community development needs. Key employees devoted 92 hours in financial expertise, including board activities and financial education to an organization that provides community services to low- and moderate-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Key's performance under the service test in the Cape Coral-Fort Meyers and West Palm Beach AAs is consistent with the overall low satisfactory performance noted in the Naples – Marco Island MSA.

State Rating

State of Idaho

CRA rating:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Key had an adequate level of lending activity.
- Key's distribution of loans among geographies is good. Performance for home mortgage loans is adequate and small loans to businesses is excellent.
- Key's distribution of home mortgage loans by income level of borrower and small loans to businesses of different sizes is adequate.
- Key's good level of community development lending had a positive impact on the bank's overall lending test rating.
- Key's performance in qualified community development investments is excellent.
- Key's branch distribution and level of community development services are good when taking into account the adjacent serving branches.

Description of Institution's Operations in Idaho

Key has delineated four AAs within the state of Idaho. They include the Boise City, Idaho Falls, and Pocatello MSA as well as the following eight non-MSA counties: Bingham, Cassia, Fremont, Madison, Payette, Power, Teton, and Twin Falls.

Based on June 30, 2015, FDIC summary of deposit information, Key had \$1.41 billion in deposits in the state, which represented 2.04 percent of the bank's total deposits. The bank made 2.04 percent of its evaluation period lending in this state.

Key has 28 office locations and no deposit-taking ATMs within the state. The bank ranks third in deposit market share with approximately 6.53 percent. Primary competitors include Wells Fargo Bank, N.A. with 23.82 percent, and U.S. Bank, N.A. with 18.14 percent. There are 33 FDIC-insured depository institutions within the state.

Scope of Evaluation in Idaho

The Boise City, ID MSA (Boise MSA) has 74.43 percent of the deposits within the rated area, which is the AA we selected for analysis using full-scope procedures and weighted most

heavily in our overall conclusions. All other AAs were analyzed using limited-scope procedures. This was consistent for both the 2012 through 2013 analysis and the 2014 through 2015 analysis. We based our ratings primarily on the results of the area that received a full-scope review. We also gave greater consideration to the bank's performance in the 2014-2015 evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Idaho is high satisfactory. Based on the full-scope review, the bank's performance in the Boise MSA is good.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs in the Boise MSA. Key's deposit market share for the Boise MSA is 11.48 percent and the bank is ranked third out of 20 deposit-taking entities. The top two entities have almost 50 percent of the deposits. For home purchase loans, the bank is ranked 39th out of 240 lenders (top 16 percent) with a 0.57 percent market share. The top two home purchase lenders have over 20 percent of the market. For home improvement loans, the bank is ranked third out of 71 lenders (top four percent) with a 9.27 percent market share. The top two home improvement lenders have over 32 percent of the market share. For home refinance loans, the bank is ranked 11th out of 198 lenders (top six percent) with a 2.13 percent market share. The top three home refinance lenders have almost 27 percent of the market. Key's market share for small loans to business is 1.72 percent and ranked 13th out of 54 lenders (top 24 percent). The top five small business lenders in the AA have over 69 percent of the market and are nationwide lenders that have significant small business credit card portfolios.

Refer to table 1, Lending Volume, in the state of Idaho section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Key's overall geographic distribution of loans by income level of geography is good in the Boise MSA. Key has adequate geographic distribution of home mortgage loans and excellent distribution of small loans to businesses.

Home Mortgage Loans

Geographic distribution of home purchase and home refinance loans in the Boise MSA is adequate. Geographic distribution of home improvement loans in the Boise MSA is good. We placed more weight on distribution in moderate-income geographies as those geographies make up a larger percentage of the bank's AA. Only 0.59 percent of owner-occupied housing units are located in low-income geographies. Refer to tables 2, 3, 4, and 5 in the state of

Idaho 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.

Home Purchase

The bank's geographic distribution of home purchase loans is adequate. Key did not originate or purchase any loans in low-income geographies. The percentage of home purchase loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home purchase loans in moderate-income geographies is below the bank's overall home purchase loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 due to poorer distribution in moderate-income geographies and had a neutral impact on the conclusion.

Home Improvement

The bank's geographic distribution of home improvement loans is good. The percentage of home improvement loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units located in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home improvement loans in low-income geographies is significantly below and in moderate-income geographies exceeds the bank's overall home improvement loan market share. Performance for 2012 through 2013 is stronger than the distribution for 2014 through 2015 due to better distribution in moderate-income geographies and had a positive impact on the conclusion.

Home Refinance

The bank's geographic distribution of home refinance loans is adequate. Key did not originate or purchase any loans in low-income geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home refinance loans in moderate-income geographies is near to the bank's overall home refinance loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 due to poorer distribution in moderate-income geographies and had a neutral impact on the conclusion.

Small Loans to Businesses

Geographic distribution of small loans to businesses in the Boise MSA is excellent. We placed more weight on distribution in moderate-income geographies as those geographies make up a larger percentage of the bank's AA. The percentage of businesses in low-income geographies is only 0.98 percent. Refer to table 6 in the state of Idaho section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses originated or purchased in low-income geographies is below the percentage of small businesses located in low-income geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeds the percentage of small businesses located in moderate-income geographies. The bank's market share for small loans to businesses in low-income geographies is well below and moderate-income geographies exceeds the bank's overall small loans to businesses market share. Performance for 2012 through 2013 is stronger than the distribution for 2014 through 2015.

Lending Gap Analysis

We analyzed Key's geographic lending patterns throughout the AA and we found no unexplained lending gaps.

Distribution of Loans by Income Level of the Borrower

Key's overall distribution of loans to borrowers of different income levels is adequate in the Boise MSA. Key's borrower distribution of home mortgage loans and small loans to businesses is adequate.

Home Mortgage Loans

Key's distribution of home purchase and home improvement loans among individuals of different income levels in the Boise MSA is adequate. The borrower distribution of home refinance loans is good. Refer to tables 8, 9 and 10 in the state of Idaho 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.

Home Purchase

The bank's borrower distribution of home purchase loans is adequate. The percentage of home purchase loans originated or purchased to low-income borrowers is well below and for moderate-income borrowers below the percentage of families defined as such in the AA. The bank's market share for home purchase loans to low-income borrowers is below and moderate-income borrowers well below the bank's overall home purchase loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Improvement

The bank's borrower distribution of home improvement loans is adequate. The percentage of home improvement loans originated or purchased to low-income borrowers is below and for moderate-income borrowers near to the percentage of families defined as such located in the AA. The bank's market share for home improvement loans to low-income borrowers exceeds and moderate-income borrowers is near to the bank's overall home improvement loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Refinance

The bank's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is well below the percentage of low-income families located in the AA. The percentage of home refinance loans originated or purchased to moderate-income borrowers is near to the percentage of moderate-income families located in the AA. The bank's market share for home refinance loans to low-income borrowers is near to and moderate-income borrowers below the bank's overall home refinance loan market share. Performance for 2012 through 2013 is stronger than the distribution for 2014 through 2015 due to better distribution to moderate-income borrowers and positively impacted our conclusion.

Small Loans to Businesses

Borrower distribution of small loans to businesses in the Boise MSA is adequate. Refer to table 11 in the state of Idaho 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.

Key's borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses originated or purchased is below the percentage of small businesses located in the AA. The bank's market share for small loans to businesses exceeds the bank's overall small business loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Community Development Lending

Key has made a relatively high level of community development loans, all of which were responsive to identified community development needs. The level of community development lending in the Boise MSA is good and had a positive impact on the lending test rating. Key originated five affordable housing community development loans totaling over \$11 million. These loans facilitated the creation or redevelopment of over 102 affordable housing units.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Boise MSA equaled 7.48 percent of allocated Tier One Capital as of December 31, 2015.

Refer to table 1, Lending Volume, in the state of Idaho section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Product Innovation and Flexibility

Key makes little use of innovative and flexible lending practices in order to serve assessment area credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the ID non-MSA area is consistent with the bank's overall high satisfactory performance under the lending test in the state of Idaho. In the Idaho Falls, ID MSA, the bank's performance is stronger than the bank's overall performance in the state of Idaho due to stronger geographic performance. For the Pocatello, ID MSA, the bank's performance is weaker due to weaker community development lending activities. The bank's performance in limited-scope areas did not have an impact on the overall state rating. Refer to tables 1 through 12 in the state of Idaho section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Idaho is rated outstanding. Based on a full-scope review, performance in the Boise MSA AA is good. Performance in limited-scope AAs as well as the impact of statewide and regional investments had a positive impact on the overall investment test rating for the state of Idaho. Refer to table 14 in the state of Idaho section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Key has a significant level of qualified community development investments in the Boise MSA AA. Key made three current-period qualified investments totaling over \$7.5 million in the AA. They have two prior-period investments totaling \$1.4 million that continue to benefit the AA. In addition, they made 25 grants totaling \$160 thousand to a variety of organizations that support community services targeted to low- and moderate-income individuals and revitalization and stabilization of low- and moderate-income geographies. The combined current- and prior-period investment dollar volume represents 6.16 percent of the Tier One Capital allocated to the AA.

The bank exhibits good responsiveness to credit and community economic development needs in the Boise MSA AA. Two of the current-period qualified investments and all of the prior-period investments are LIHTCs that support over 156 units of affordable housing, including senior housing, housing geared toward families with very low-incomes, and housing for people with disabilities. Grants were made to a variety of organizations that support community services and job training targeted to low- and moderate-income individuals in the AA.

The bank has over \$9.3 million in four current-period qualified investments and one prior-period qualified investment of \$13 thousand that benefitted a broader statewide or regional area that includes the bank's AAs and had a positive impact on the overall state rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Pocatello ID MSA AA is consistent with the full-scope AA. Key's performance in the Idaho Falls, ID MSA AA and the ID non-MSA AA is stronger than the bank's performance under the investment test in the full-scope AA. The volume of qualified investments as a percent of the allocated Tier One Capital exceeds the volume of investments made in the full-scope AA and had a positive impact on the overall investment test rating for the state of Idaho.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Key's performance under the service test performance in the state of Idaho is rated high satisfactory. Based on a full-scope review, performance in the Boise MSA AA is good. Performance in the limited-scope AAs had a neutral impact on the service test rating in the state of Idaho.

Retail Banking Services

Refer to table 15 in the state of Idaho section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's delivery systems are accessible to geographies and individuals of different income levels in the Boise MSA AA. Key's distribution of banking offices is poor in low-income geographies and excellent in moderate-income geographies. Key has no branches in low-income geographies. The bank's branch distribution in moderate-income geographies exceeds the percentage of the population that resides within those geographies. We placed more emphasis on the performance in the moderate-income geographies because only 1.22 percent of the AA population lives in low-income geographies.

To the extent changes have been made, Key's record of opening and closing branches has generally not adversely affected the accessibility of the bank's delivery systems particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Key did not open any branches and closed two branches, including one in a moderate-income geography.

Services including, where appropriate, business hours, do not vary in a way that inconveniences portions of the AA, particularly low- and moderate-income geographies and /or individuals. Banking hours in the AA reflect comparable banking hours for all branches without regard to the income levels represented by the branches' geographic locations. Key's offers traditional banking services at all branches.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Key provides a good level of CD services to the AA that were responsive to local community development needs. Key employees devoted 528 hours in financial expertise, including Board and committee member activities, to six organizations that supported affordable housing and community services.

Examples include: Key employees dedicated approximately 117 hours in committee member activities to an organization that develops affordable housing for low- and moderate-income persons and educates and assists first time homebuyers. The organization also assists with home rehabilitation loans and homebuyer foreclosure education. Key employees also dedicated 20 hours in board activities to an organization that provides educational services, including new, high quality books, to low-income families and children coming from poverty situations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Key's performance under the service test in the Idaho Falls and Pocatello AAs is consistent with the overall high satisfactory performance noted in the Boise AA. Performance in the Non-MSA AAs is stronger due to better branch distribution in low-income geographies and had a positive impact on the overall service test rating.

State Rating

State of Indiana

CRA rating:	Outstanding
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Outstanding

The major factors that support this rating include:

- Key's excellent level of community development lending had a significantly positive impact on the bank's overall lending test rating.
- Key's performance in qualified community development investments is excellent.
- Key provides excellent retail banking services readily accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Indiana

Key has delineated five AAs within the state of Indiana. They include the Indianapolis-Carmel-Anderson, Elkhart-Goshen, Kokomo, and South Bend-Mishawaka, IN MSAs as well as the following five non-MSA counties: Kosciusko, Marshall, Pulaski, Starke, and Steuben.

Based on June 30, 2015, FDIC summary of deposit information, Key has \$3.47 billion in deposits in the state, which represents 5.01 percent of the bank's total deposits. The bank made 4.41 percent of its evaluation period lending in this state

Key has 59 office locations and no deposit-taking ATMs within the state. The bank ranks seventh in deposit market share with 3.07 percent. Primary competitors include JPMorgan Chase Bank, N.A. with 14.97 percent, PNC Bank, N.A. with 9.77 percent, Fifth Third Bank with 7.34 percent, and Old National Bank with 5.42 percent. There are 161 FDIC-insured depository institutions within the bank's AAs.

Refer to the market profiles for the state of Indiana in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Indiana

The Indianapolis-Carmel-Anderson, IN MSA (Indianapolis MSA) has 66.82 percent of the deposits within this rated area, which is the AA we selected for analysis using full-scope procedures and weighted most heavily in our overall conclusions. All other AAs were analyzed using limited-scope procedures. This was consistent for both the 2014 through 2015 analysis and the 2012 through 2013 analysis. We based our ratings primarily on the results of the area that received a full-scope review. We also gave greater consideration to the bank's

performance in the 2014 through 2015 portion of the evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Indiana is high satisfactory. Based on the full-scope review, the bank's performance in the Indianapolis MSA is good.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs in the Indianapolis MSA. Key's deposit market share for the Indianapolis is 5.42 percent and the bank is ranked sixth out of 50 deposit-taking entities. For home purchase loans, the bank is ranked 70th out of 421 lenders (top 17 percent) with a 0.28 percent market share. For home improvement loans, the bank is ranked third out of 141 lenders (top two percent) with an 8.50 percent market share. For home refinance loans, the bank is ranked 25th out of 362 lenders (top seven percent) with a 1.03 percent market share. Although the bank's market share in home purchase and home refinance loans is below the bank's deposit market share, Key's performance is adequate when considering the number of lenders and depository institutions and competition. There are 513 home mortgage lenders, many without a depository presence. In contrast, there are 50 depository institutions in the MSA. Key's market share for small loans to business is 1.08 percent and the bank ranked 21st out of 103 lenders (top 20 percent). The top three small business lenders in the MSA have 41.95 percent of the market.

Refer to table 1, Lending Volume, in the state of Indiana section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Key's overall geographic distribution of loans by income level of geography is adequate in the Indianapolis MSA. Key has poor geographic distribution of home mortgage loans and adequate distribution of small loans to businesses.

Home Mortgage Loans

Geographic distribution of home purchase loans in the Indianapolis MSA is adequate. Geographic distribution of home improvement and home refinance loans in the Indianapolis MSA is poor. We placed more weight on the distribution in moderate-income geographies, as those geographies make up a larger percentage of the bank's AA. Refer to tables 2, 3, and 4 in the state of Indiana 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.

Home Purchase

The bank's geographic distribution of home purchase loans is adequate. The bank's geographic distribution of home purchase loans for 2014 through 2015 is adequate. The percentage of home purchase loans originated or purchased in low-income geographies is significantly below the percentage of owner-occupied housing units located in low-income geographies. The percentage of home purchase loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market shares for home purchase loans in low- and moderate-income geographies exceed the bank's overall home purchase loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Improvement

The bank's geographic distribution of home improvement loans is poor. The bank's geographic distribution of home improvement loans for 2014 through 2015 is poor. The percentage of home improvement loans originated or purchased in low-income geographies is significantly below the percentage of owner-occupied housing units located in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies is well below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home improvement loans in low-income geographies is well below and in moderate-income geographies is near to the bank's overall home improvement loan market share. Performance for 2012 through 2013 is stronger than the distribution for 2014 through 2015 and considered adequate. The percentage of home improvement loans originated or purchased in low-income geographies is near to the percentage of owner-occupied housing units located in low-income geographies. The bank's market shares for home improvement loans in low- and moderate-income geographies exceed the bank's overall home improvement market share and had a positive impact on the conclusion.

Home Refinance

The bank's geographic distribution of home refinance loans is poor. The bank's geographic distribution of home refinance loans for 2014 through 2015 is poor. The percentage of home refinance loans originated or purchased in low-income geographies is significantly below the percentage of owner-occupied housing units located in low-income geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home refinance loans in low-income geographies is well below and in moderate-income geographies is near to the bank's overall home refinance loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Small Loans to Businesses

Geographic distribution of small loans to businesses in the Indianapolis MSA is adequate.

Refer to table 6 in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses is adequate. The bank's geographic distribution of small loans to businesses for 2014 through 2015 is adequate. The percentage of small loans to businesses originated or purchased in low-income geographies is below the percentage of small businesses located in low-income geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies is below the percentage of small businesses located in moderate-income geographies. The bank's market share for small loans to businesses in low-income geographies is near to and in moderate-income geographies is well below the bank's overall small loans to businesses market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Lending Gap Analysis

We analyzed Key's geographic lending patterns throughout the Indianapolis MSA and we found no unexplained lending gaps.

Distribution of Loans by Income Level of the Borrower

Key's overall distribution of loans to borrowers of different income levels is adequate in the Indianapolis MSA. Key's borrower distribution of home mortgage loans is good and small loans to businesses is adequate.

Home Mortgage Loans

Key's distribution of home purchase loans among individuals of different income levels in the Indianapolis MSA is excellent. The distribution of home improvement loans in the Indianapolis MSA is adequate. Key's distribution of home refinance loans among individuals of different income levels in the Indianapolis MSA is good. Refer to tables 8, 9 and 10 in the state of Indiana 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.

Home Purchase

The bank's borrower distribution of home purchase loans is excellent. The bank's borrower distribution of home purchase loans for 2014 through 2015 is excellent. The percentage of home purchase loans originated or purchased to low-income borrowers is near to and for moderate-income borrowers exceeds the percentage of families defined as such in the AA. The bank's market shares for home purchase loans to both low- and moderate-income borrowers exceed the bank's overall home purchase loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Improvement

The bank's borrower distribution of home improvement loans is adequate. The bank's borrower distribution of home improvement loans for 2014 through 2015 is adequate. The percentage of home improvement loans originated or purchased to low-income borrowers is well below and for moderate-income borrowers is below the percentage of families defined as such located in the AA. The bank's market share for home improvement loans to low-income borrowers is below and to moderate-income borrowers is well below the bank's overall home improvement loan market share. Performance for 2012 through 2013 is stronger than the distribution for 2014 through 2015 and considered good. The percentage of home improvement loans originated or purchased to low-income borrowers is below and to moderate-income borrowers is near to the percentage of families defined as such located in the AA. The bank's market share for home improvement loans to low-income borrowers exceeds the bank's overall market share and had a positive impact on the conclusion.

Home Refinance

The bank's borrower distribution of home refinance loans is good. The bank's borrower distribution of home refinance loans for 2014 through 2015 is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below the percentage of low-income families located in the AA. The percentage of home refinance loans originated or purchased to moderate-income borrowers exceeds the percentage of moderate-income families located in the AA. The bank's market share for home refinance loans to low-income borrowers is below and to moderate-income borrowers is near to the bank's overall home refinance loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Small Loans to Businesses

Borrower distribution of small loans to businesses in the Indianapolis MSA is adequate. Refer to table 11 in the state of Indiana 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.

Key's borrower distribution of small loans to businesses is adequate. The borrower distribution of small loans to businesses for 2014 through 2015 is adequate. The percentage of small loans to businesses originated or purchased is below the percentage of small businesses located in the AA. The bank's market share for small loans to businesses exceeds the bank's overall small business loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Community Development Lending

Key is a leader in making community development loans. The level of community development lending in the Indianapolis MSA is excellent and had a significantly positive

impact on the lending test rating. Community development lending opportunities in the Indianapolis MSA are ample. Key originated 12 affordable housing community development loans totaling \$83 million, five loans totaling \$11 million for revitalization and stabilization and one loan for \$7 million to facilitate qualified community development services. All of the loans are responsive to the needs of the AA, and six of these loans, totaling \$38 million, are considered flexible and/or innovative.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Indianapolis MSA equaled 30.92 percent of allocated Tier One Capital as of December 31, 2015.

Refer to table 1, Lending Volume, in the state of Indiana section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Product Innovation and Flexibility

No innovative or complex products were identified in this MSA, other than noted above.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Elkhart – Goshen, IN MSA, Kokomo, IN MSA, South Bend – Mishawaka, IN MSA, and the Non-MSA, IN AAs is consistent with the bank's overall high satisfactory performance under the lending test in the Indianapolis MSA. Key's performance in the limited-scope areas did not impact the overall lending test rating for the state of Indiana. Refer to tables 1 through 12 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Indiana is rated outstanding. Based on a full-scope review, performance in the Indianapolis MSA AA is excellent. Performance in the limited-scope AAs did not impact the overall conclusion. Refer to table 14 in the state of Indiana section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Key has an excellent level of qualified investments in the Indianapolis MSA AA. The bank made two current-period investments totaling almost \$11.3 million and 23 prior-period investments totaling over \$21.1 million in the AA. In addition, the bank made 32 grants totaling \$306 million to a variety of organizations that support community services targeted to low- and

moderate-income individuals, revitalization and stabilization of low- and moderate-income geographies, and small business development. The combined current-and prior-period investment dollar volume represents nearly 10 percent of the Tier One Capital allocated to the AA.

Key exhibits excellent responsiveness to community needs through investing in affordable housing-related projects. All of the current- and prior-period investments are in LIHTCs or other housing related funds. These investments supported over 1,500 units of affordable housing, a primary CD need in the AA.

The bank had 69 prior-period qualified investments for \$3.8 million that benefitted the statewide area including the bank's AA; however, they had a neutral impact on the overall state rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Elkhart-Goshen, IN MSA, Kokomo, IN MSA, and South Bend-Mishawaka, IN MSA AAs is consistent with the bank's overall outstanding performance under the investment test in the Indianapolis MSA AA. Performance in the Indiana Non-MSA AA was weaker as the bank did not make any current-period investments in the AA. Performance in the limited-scope AAs had a neutral impact on the overall conclusion in the state of Indiana.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Key's performance under the service test in the state of Indiana is rated outstanding. Based on a full-scope review, performance in the Indianapolis MSA AA is good. Performance in limited-scope AAs had a positive impact on the service test rating in the state of Indiana.

Retail Banking Services

Refer to table 15 in the state of Indiana section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's delivery systems are accessible to essentially all portions of the Indianapolis AA. Key's distribution of banking offices in low-income geographies is below, and in moderate-income geographies approximates, the percentage of AA population that resides in those geographies. Branch distribution is enhanced by one bank branch in a middle-income geography that is within one-half a mile of a low-income geography. Our evaluation of the proximity of this branch included consideration of the absence of physical barriers, such as water or highways, which might obstruct convenient access to the branch.

To the extent changes have been made, Key's record of opening and closing branches has generally not adversely affected the accessibility of the bank's delivery systems particularly in

low- and moderate-income geographies and/or to low- and moderate-income individuals. Key did not open any branches. Key closed six branches, including one in a moderate-income geography.

Services including, where appropriate, business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies, and/or individuals. Banking hours in the AA reflect comparable banking hours for all branches without regard to the income levels represented by the branches' geographic locations. Key offers traditional banking services at all branches.

Fourteen branches, including six located in low- and moderate-income geographies, offer the KeyBank Plus service, which primarily targets the needs of low- and moderate-income customers and the unbanked. This service allows customers to cash their approved payroll, tax refund, or government checks for a low fee and every fifth check cashed is free. Participants are also eligible to receive five fee-free money orders when they cash their check.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Key provides an excellent level of CD services to the AA that were responsive to local community development needs. Key employees devoted 1,187 hours in financial expertise, including board activities, financial and management advice, and financial education to 15 community development organizations.

Two examples include: Key employees dedicated approximately 120 hours in board activities to an organization that provides professional attire and a network of support and career development tools to disadvantaged women in poverty. Key employees also dedicated approximately 100 hours in financial and management advice to an organization that purchases homes to rehabilitate and sell at below market prices to low-income persons and families. This organization also provides education, counseling, and mentoring on the home-buying process to low- and moderate-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Key's performance under the service test performance in the Elkhart, Kokomo, South Bend, and non-MSA AAs is stronger than the overall high satisfactory performance in the Indianapolis MSA AA. All limited-scope areas had better branch distribution in moderate-income geographies. In addition, the South Bend AA had excellent branch distribution in low-income geographies and had a positive impact on the overall rating.

State Rating

State of Maine

CRA rating:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Key's distribution of loans among geographies is good. Performance for home mortgage loans is good and small loans to businesses is excellent.
- Key's distribution of home mortgage loans by income level of borrower and small loans to businesses of different sizes is adequate.
- Key's excellent level of community development lending had a significantly positive impact on the bank's overall lending test rating.
- Key's performance in qualified community development investments is excellent.
- Retail banking services reasonably accessible to geographies and individuals of different income levels is adequate.

Description of Institution's Operations in Maine

Key has delineated four AAs within the state of Maine. They include the Bangor, Portland-South Portland, Lewiston-Auburn, ME MSAs as well as the following ten non-MSA counties: Aroostook, Franklin, Hancock, Kennebec, Knox, Lincoln, Oxford, Piscataquis, Somerset, and Waldo.

Based on June 30, 2015, FDIC summary of deposit information, Key has \$2.89 billion in deposits in the state, which represents 4.17 percent of the bank's total deposits. The bank made 4.95 percent of its evaluation period lending in this state.

Key has 52 office locations and three deposit-taking ATMs within the state. The bank ranks second in deposit market share with approximately 11.62 percent. Key's primary competitor is TD Bank N.A. with 13.30 percent. There are 32 FDIC-insured depository institutions within the state.

Scope of Evaluation in Maine

The Portland-South Portland, ME MSA (Portland ME MSA) has 72.7 percent of the deposits within the rated area, which is the AA we selected for analysis using full-scope procedures and weighted most heavily in our overall conclusions. All other AAs were analyzed using limited-

scope procedures. This was consistent for both the 2012 through 2013 analysis and the 2014 through 2015 analysis. We based our ratings primarily on the results of the area that received a full-scope review. We also gave greater consideration to the bank's performance in the 2014-2015 evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Maine is high satisfactory. Based on the full-scope review, the bank's performance in the Portland, ME MSA is good.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs in the Portland, ME MSA, considering the bank's highly competitive market. Key's deposit market share for the Portland, ME MSA is 18.04 percent and the bank is ranked first out of 22 deposit-taking entities. For home purchase loans, the bank is ranked 42nd out of 269 lenders (16 percent) with a 0.48 percent market share. For home improvement loans, the bank is ranked sixth out of 107 lenders (top six percent) with a 4.55 percent market share. For home refinance loans, the bank is ranked tenth out of 258 lenders (top four percent) with a 2.37 percent market share. Although the bank's market share for all home mortgage loan products is below the bank's deposit market share, Key's performance is adequate when considering the number of lenders and depository institutions and competition. There are 344 home mortgage lenders. In contrast, there are only 22 depository institutions. Key's market share for small loans to business is 2.73 percent and ranked 15th out of 64 lenders (top 23 percent). The top two small business lenders in the AA have 24.28 percent of the market and are nationwide lenders that have significant small business credit card portfolios.

Refer to table 1, Lending Volume, in the state of Maine section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Key's overall geographic distribution of loans by income level of geography is good in the Portland ME MSA. Key had good geographic distribution of home mortgage loans and excellent distribution of small loans to businesses.

Home Mortgage Loans

Geographic distribution of home purchase, home improvement, and home refinance loans in the Portland, ME MSA is good. We placed more weight on distribution in moderate-income geographies, as those geographies make up a larger percentage of the bank's AA. Refer to tables 2, 3, and 4 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.

Home Purchase

The bank's geographic distribution of home purchase loans is good. The bank's geographic distribution of home purchase loans for 2014 through 2015 is good. The percentage of home purchase loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units located in low-income geographies. The percentage of home purchase loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home purchase loans in low-income geographies exceeds and in moderate-income geographies is well below the bank's overall home purchase loan market share. Performance for 2012 through 2013 is stronger than the distribution for 2014 through 2015 and considered excellent. The percentage of home purchase loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units located in both low-income geographies and had a positive impact on the conclusion.

Home Improvement

The bank's geographic distribution of home improvement loans is good. The bank's geographic distribution of home improvement loans for 2014 through 2015 is good. The percentage of home improvement loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units located in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home improvement loans in low-income geographies exceeds and in moderate-income geographies is significantly below the bank's overall home improvement loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 and considered adequate. The percentage of home improvement loans originated or purchased in moderate-income geographies is well below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home improvement loans in both low- and moderate-income geographies is significantly below the bank's overall home improvement loan market share and had a negative impact on the conclusion.

Home Refinance

The bank's geographic distribution of home refinance loans is good. The bank's geographic distribution of home refinance loans for 2014 through 2015 is good. The percentage of home refinance loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units located in low-income geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home refinance loans in low-income geographies exceeds and in moderate-income geographies is near to the bank's overall home refinance loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Small Loans to Businesses

Geographic distribution of small loans to businesses in the Portland ME MSA is excellent. Refer to table 6 in the state of Maine section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses is excellent. The bank's geographic distribution of small loans to businesses for 2014 through 2015 is excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeds the percentage of small businesses located in low-income geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeds the percentage of small businesses located in moderate-income geographies. The bank's market share for small loans to businesses in low-income geographies exceeds and in moderate-income geographies is below the bank's overall small loans to business market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 and considered good. The percentage of small loans to businesses originated or purchased in moderate-income geographies is below the percentage of small businesses located in moderate-income geographies and had no impact on the conclusion.

Lending Gap Analysis

We analyzed Key's geographic lending patterns throughout the AA and we found no unexplained lending gaps.

Distribution of Loans by Income Level of the Borrower

Key's overall distribution of loans to borrowers of different income levels is adequate in the Portland ME MSA. Key's borrower distribution of home mortgage loans is adequate and small loans to businesses is adequate.

Home Mortgage Loans

Key's distribution of home purchase and home refinance loans among individuals of different income levels in the Portland ME MSA is adequate. The borrower distribution of home improvement loans is good. Refer to tables 8, 9 and 10 in the state of Maine 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.

Home Purchase

The bank's borrower distribution of home purchase loans is adequate. The bank's borrower distribution of home purchase loans for 2014 through 2015 is adequate. The percentage of home purchase loans originated or purchased to low-income borrowers is near to and for moderate-income borrowers is well below the percentage of families defined as such in the AA. The bank's market shares for home purchase loans to low- and moderate-income

borrowers are well below the bank's overall home purchase loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Improvement

The bank's borrower distribution of home improvement loans is good. The bank's borrower distribution of home improvement loans for 2014 through 2015 is good. The percentage of home improvement loans originated or purchased to low-income borrowers is below and for moderate-income borrowers exceeds the percentage of families defined as such located in the AA. The bank's market share for home improvement loans to low-income borrowers is well below and to moderate-income borrowers is below the bank's overall home improvement loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Refinance

The bank's borrower distribution of home refinance loans is adequate. The bank's borrower distribution of home refinance loans for 2014 through 2015 is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below the percentage of low-income families located in the AA. The percentage of home refinance loans originated or purchased to moderate-income borrowers approximates the percentage of moderate-income families located in the AA. The bank's market share for home refinance loans to low-income borrowers exceeds and to moderate-income borrowers is near to the bank's overall home refinance loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 and considered adequate. The percentage of home refinance loans originated or purchased to low-income borrowers is below the percentage of low-income families located in the AA. The percentage of home refinance loans originated or purchased to moderate-income borrowers is below the percentage of moderate-income families located in the AA. The bank's market shares for home refinance loans to low- and moderate-income borrowers are below the bank's overall home refinance loan market share and had a negative impact on the conclusion.

Small Loans to Businesses

Borrower distribution of small loans to businesses in the Portland, ME MSA is adequate. Refer to table 11 in the state of Maine 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.

Key's borrower distribution of small loans to businesses is adequate. The bank's borrower distribution of small loans to businesses for 2014 through 2015 is adequate. The percentage of small loans to businesses originated or purchased is below the percentage of small businesses located in the AA. The bank's market share for small loans to businesses exceeds the bank's overall small business loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Community Development Lending

Key has made an excellent level of community development lending in the Portland ME MSA and community development lending had a significantly positive impact on the lending test rating. There are community development lending opportunities in the Portland ME MSA. Key originated 20 loans totaling over \$56 million to facilitate qualified community development services. The loans are responsive to the needs of the AA. None of the community development loans are considered flexible or innovative.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Portland ME MSA equaled 20.79 percent of allocated Tier One Capital as of December 31, 2015.

Refer to table 1, Lending Volume, in the state of Maine section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Product Innovation and Flexibility

No innovative or complex products were identified in this MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Bangor, ME MSA and the ME Non-MSA is consistent with the bank's overall high satisfactory performance under the lending test in the Portland, ME MSA. For the Lewiston – Auburn, ME MSA, the bank's performance under the lending test is weaker than the bank's overall high satisfactory performance under the lending test in the Portland, ME MSA and considered adequate. The weaker performance is due to a weaker geographic distribution and no community development loans were originated or purchased in this AA. Key's performance in the limited-scope areas did not impact the overall Lending Test rating for the state of Maine. Refer to tables 1 through 12 in the state of Maine section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Maine is rated outstanding. Based on a full-scope review, performance in the Portland, ME AA is excellent. Performance in the limited-scope AAs did not impact the overall conclusion. Refer to table 14 in the State of

Maine section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Key has an excellent level of qualified investments in the Portland, ME MSA AA. The bank made six current-period investments totaling over \$15.6 million and 28 prior-period investments totaling over \$5.7 million in the AA. In addition, the bank made 18 grants totaling \$188 thousand to a variety of organizations that support community services targeted to low- and moderate-income individuals, revitalization and stabilization of low- and moderate-income geographies, and small business development. In addition, the bank has \$1.9 million in unfunded commitments for qualified investments. The amount of combined current- and prior-period investment dollar volume, not including unfunded commitments, represents 7.92 percent of the Tier One Capital allocated to the AA.

Key exhibits excellent responsiveness to community needs through investing in affordable housing-related projects. All of the current- and prior-period investments are in LIHTCs or other housing related funds. These investments supported over 936 units of affordable housing, a primary CD need in the AA.

The bank has 19 prior-period qualified investments totaling almost \$3.2 million that benefitted a broader statewide or regional area that includes the bank's AAs and supports the overall state rating. All but one of these qualified investments support affordable housing and provided 701 units. The final qualified investment supported small business development.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Bangor and Maine Non-MSA AAs is consistent with the outstanding performance under the Investment Test for the full-scope AA. Performance in the Lewiston-Auburn AA is weaker than performance in the full-scope area due to the bank not making any current period investments in the AA. The Bank's performance in limited-scope AAs had a neutral impact on the state rating.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Key's performance under the service test in the state of Maine is low satisfactory. Based on a full-scope review, performance in the Portland, ME MSA AA is adequate. Performance in the limited-scope AAs had a neutral impact on the service test rating in the state of Maine.

Retail Banking Services

Refer to table 15 in the state of Maine section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's delivery systems are reasonably accessible to geographies and individuals of different income levels in the Portland, ME MSA AA. Key's distribution of banking offices is excellent in

low-income geographies and adequate in moderate-income geographies. Branch distribution in low-income geographies exceeds the percentage of AA population that resides there. Key's branch distribution in moderate-income geographies is well below the percentage of AA population that resides there. Branch distribution is enhanced by two bank branches located in middle- and upper-income geographies that is within one-half mile of at least two moderate-income geographies. Our evaluation of the proximity of these branches included consideration of the absence of physical barriers, such as water or highways, which might obstruct convenient access to the branch. We placed more emphasis on the performance in the moderate-income geographies because only 1.64 percent of the AA population lives in low-income geographies.

To the extent changes have been made, Key's record of opening and closing branches has generally not adversely affected the accessibility of the bank's delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Key did not open any branches and closed four branches, none of which were located in low- or moderate-income geographies.

Services including, where appropriate, business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies, and/or individuals. Banking hours in the AA reflect comparable banking hours for all branches without regard to the income levels represented by the branches' geographic locations. Key offers traditional banking services at all branches.

Twelve branches, including three located in low- or moderate-income geographies, offer the KeyBank Plus service, which primarily targets the needs of low- and moderate-income customers and the unbanked. This service allows customers to cash their approved payroll, tax refund, or government checks for a low fee and every fifth check cashed is free. Participants are also eligible to receive five fee-free money orders when they cash their check.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Key provides a good level of CD services to the AA, which were responsive to local community development needs. Key employees devoted 836 hours in financial expertise, including financial education, financial advice, and board activities to 14 CD organizations.

One example includes Key employees devoting approximately 379 hours in financial and management advice to an organization that helps empower individuals and families to achieve long-term financial stability. The main assistance provided to low-and moderate-income persons is free tax preparation.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Key's performance under the service test performance in the Lewiston AA is consistent with the overall low satisfactory performance noted in the Portland, ME MSA AA. Performance in the Bangor and non-MSA AAs is stronger due to better branch distribution in moderate-income geographies and had a positive impact on the conclusion.

State Rating

State of Michigan

CRA rating:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Key had an adequate level of lending activity.
- Key's distribution of loans among geographies is adequate. Performance for home mortgage loans is very poor and small loans to businesses is good.
- Key's distribution of home mortgage loans by income level of borrower is adequate and small loans to businesses of different sizes is adequate.
- Key's excellent level of community development lending had a positive impact on the bank's overall lending test rating.
- Key's performance in qualified community development investments is excellent.
- Key provides adequate retail banking services reasonably accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Michigan

Key has delineated five AAs within the state of Michigan. They include the Ann Arbor, Detroit-Dearborn-Livonia, Monroe, Warren-Troy-Farmington Hills, MI MSAs as well as the following two non-MSA counties: Lenawee and St. Joseph.

Based on June 30, 2015, FDIC summary of deposit information, Key has \$1.15 billion in deposits in the state, which represents 1.66 percent of the bank's total deposits. The bank made 1.95 percent of its evaluation period lending in this state.

Key has 23 office locations and no deposit-taking ATMs within the state. The bank ranks 18th in deposit market share with approximately 0.60 percent. Primary competitors include JP Morgan Chase Bank N.A. with 20.53 percent, Comerica Bank with 14.43 percent, and PNC Bank N.A. with 8.58 percent. There are 142 FDIC-insured depository institutions within the state.

Scope of Evaluation in Michigan

The Ann Arbor, MI MSA (Ann Arbor MSA) has 67.62 percent of the deposits within the rated

area, which is the AA we selected for analysis using full-scope procedures and weighted most heavily in our overall conclusions. All other AAs were analyzed using limited-scope procedures. This was consistent for both the 2012 through 2013 analysis and the 2014 through 2015 analysis. We based our ratings primarily on the results of the area that received a full-scope review. We also gave greater consideration to the bank's performance in the 2014-2015 evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Michigan is low satisfactory. Based on the full-scope review, the bank's performance in the Ann Arbor MSA is adequate.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs in the Ann Arbor MSA. Key's deposit market share for the Ann Arbor MSA is 10.38 percent and the bank is ranked fourth out of 21 deposit-taking entities. For home purchase loans, the bank is ranked 49th out of 247 lenders (top 20 percent) with a 0.32 percent market share. For home improvement loans, the bank is ranked third out of 73 lenders (top four percent) with a 7.83 percent market share. For home refinance loans, the bank is ranked 33rd out of 222 lenders (top 15 percent) with a 0.65 percent market share. Although the bank's market share for all home mortgage loan products is below the bank's deposit market share, Key's performance is adequate when considering the number of lenders and depository institutions and competition. There are 319 home mortgage lenders. In contrast, there are only 21 depository institutions. Key's market share for small loans to business is 1.01 percent, and Key ranked 14th out of 55 lenders (top 25 percent). The top three small business lenders in the AA have over 53 percent of the market and are nationwide lenders that have significant small business credit card portfolios.

Refer to table 1, Lending Volume, in the state of Michigan section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Key's overall geographic distribution of loans by income level of geography is adequate in the Ann Arbor MSA. Key had a very poor geographic distribution of home mortgage loans and good distribution of small loans to businesses.

Home Mortgage Loans

Geographic distribution of home improvement and home refinance loans in the Ann Arbor MSA is very poor. The bank's performance related to home purchase loans is not discussed because the limited volume of activity did not allow for a meaningful analysis. We placed more weight on the distribution in moderate-income geographies, as those geographies make up a

larger percentage of the bank's AA. Refer to tables 2, 3, and 4 in the state of Michigan 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.

Home Improvement

The bank's geographic distribution of home improvement loans is very poor. For 2014 through 2015, the bank originated or purchased less than 50 home improvement loans. The bank's performance related to home improvement loans for 2014 through 2015 is not discussed because the limited volume of activity did not allow for a meaningful analysis. For 2012 through 2013, the percentage of home improvement loans originated or purchased in low-income geographies is well below the percentage of owner-occupied housing units located in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies is significantly below the percentage of owner-occupied housing units located in moderate-income geographies. Key did not have a market share ranking for home improvement loans in low- or moderate-income geographies.

Home Refinance

The bank's geographic distribution of home refinance loans is very poor. For 2014 through 2015, the bank originated or purchased less than 50 home refinance loans. The bank's performance related to home refinance loans for 2014 through 2015 is not discussed because the limited volume of activity did not allow for a meaningful analysis. For 2012 through 2013, the percentage of home refinance loans originated or purchased in low-income geographies is significantly below the percentage of owner-occupied housing units located in low-income geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies is significantly below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home refinance loans in moderate-income geographies is significantly below the bank's overall home refinance loan market share. Key did not have a market share ranking for home refinance loans in low-income geographies.

Small Loans to Businesses

Geographic distribution of small loans to businesses in the Ann Arbor MSA is good. Refer to table 6 in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses is good. The bank's geographic distribution of small loans to businesses for 2014 through 2015 is good. The percentage of small loans to businesses originated or purchased in low-income geographies is below the percentage of small businesses located in low-income geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies is near to the percentage of small businesses located in moderate-income geographies. The bank's market shares for small loans to businesses in low- and moderate-income geographies exceed the bank's overall small loans to businesses market share. Performance for 2012 through 2013 is stronger than the distribution for 2014 through 2015 and considered excellent. The percentage of small loans to businesses originated or purchase in

low-income geographies is near to and in moderate-income geographies exceeds the percentage of small businesses located in low- and moderate-income geographies and had a positive impact on the conclusion.

Lending Gap Analysis

We analyzed Key's geographic lending patterns throughout the AA and we found no unexplained lending gaps.

Distribution of Loans by Income Level of the Borrower

Key's overall distribution of loans to borrowers of different income levels is poor in the Ann Arbor MSA. Key's borrower distribution of home mortgage loans is adequate and small loans to businesses is adequate.

Home Mortgage Loans

Key's distribution of home improvement and home refinance loans in the Ann Arbor MSA is adequate. The bank's performance related to home purchase loans is not discussed because the limited volume of activity did not allow for a meaningful analysis. Refer to tables 8, 9 and 10 in the state of Michigan 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.

Home Improvement

The bank's borrower distribution of home improvement loans is adequate. For 2014 through 2015, the bank originated or purchased less than 50 home improvement loans. The bank's performance related to home improvement loans for 2014 through 2015 is not discussed because the limited volume of activity did not allow for a meaningful analysis. For 2012 through 2013, the percentages of home improvement loans originated or purchased to both low- and moderate-income borrowers are below the percentages of families defined as such located in the AA. The bank's market share for home improvement loans to low-income borrowers exceeds the bank's overall home improvement market share. The bank's market share for home improvement loans to moderate-income borrowers is well below the bank's overall home improvement loan market share.

Home Refinance

The bank's borrower distribution of home refinance loans is adequate. For 2014 through 2015, the bank originated or purchased less than 50 home refinance loans. The bank's performance related to home refinance loans for 2014 through 2015 is not discussed because the limited volume of activity did not allow for a meaningful analysis. For 2012 through 2013, the percentage of home refinance loans originated or purchased to low-income borrowers is below the percentage of low-income families located in the AA. The percentage of home refinance loans originated or purchased to moderate-income borrowers is well below the percentage of moderate-income families located in the AA. The bank's market share for home refinance loans to low-income borrowers is below and to moderate-income borrowers is well below the bank's overall home refinance loan market share.

Small Loans to Businesses

Borrower distribution of small loans to businesses in the Ann Arbor MSA is adequate. Refer to table 11 in the state of Michigan 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.

Key's borrower distribution of small loans to businesses is adequate. The borrower distribution of small loans to businesses for 2014 through 2015 is adequate. The percentage of small loans to businesses originated or purchased is below the percentage of small businesses located in the AA. The bank's market share for small loans to businesses exceeds the bank's overall small business loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Community Development Lending

Key originated or purchased a relatively high level of community development lending in the Ann Arbor MSA. Community development lending had a positive impact on lending performance in the AA. Community development lending opportunities in the Ann Arbor MSA are available, but Key is in competition for these opportunities. Key originated one affordable housing community development loan totaling \$13 million. The loan is responsive to the affordable housing needs of the AA, but it is not considered innovative or complex.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Ann Arbor MSA equaled 12.91 percent of allocated Tier One Capital as of December 31, 2015.

Refer to table 1, Lending Volume, in the state of Michigan section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Product Innovation and Flexibility

No innovative or complex products were identified in this MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Detroit – Dearborn – Livonia, MI MSA, Monroe, MI MSA, Warren – Troy- Farmington Hills, MI MSA and MI Non-MSA is consistent with the bank's overall low satisfactory performance under the lending test in the Ann Arbor MSA. Key's performance in the limited-scope areas did not impact the overall lending test rating for the state of Michigan. Refer to tables 1 through 12 in

the state of Michigan section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Michigan is rated outstanding. Based on a full-scope review, performance in the Ann Arbor MSA AA is excellent. Performance in the limited-scope AAs and the broader statewide or regional area further support our conclusion. Refer to table 14 in the State of Michigan section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Key has an excellent level of qualified investments in the Ann Arbor MSA AA. The bank made one current-period qualified investments for almost \$16.2 million. They have four prior-period qualified investments totaling \$162 thousand. In addition, they made nine grants totaling \$74 thousand to a variety of organizations that support community services targeted to low- and moderate-income individuals. The combined current- and prior-period investment dollar volume represents more than 16 percent of the Tier One Capital allocated to the AA.

Key exhibits excellent responsiveness to community economic development needs in the AA. All current- and prior-period investments are in LIHTCs that supported 227 units of affordable housing.

The bank has two current-period qualified investments totaling \$5.5 million and 203 prior-period qualified investments totaling \$9.4 million that benefitted a broader statewide or regional area that includes the bank's AAs and supports the overall state rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Detroit-Dearborn-Livonia, MI MD; Monroe, MI MSA; Warren-Troy-Farmington Hills, MI MD, and Michigan non-MSA AAs is consistent with the bank's overall outstanding performance under the investment test in the Ann Arbor MSA AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Key's performance under the service test performance in the state of Michigan is low satisfactory. Based on a full-scope review, performance in the Ann Arbor MSA AA is adequate. Performance in the limited-scope AAs had a neutral impact on the service test rating in the state of Michigan.

Retail Banking Services

Refer to table 15 in the state of Michigan section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's delivery systems are reasonably accessible to geographies and individuals of different income levels in the Ann Arbor MSA AA. Key's distribution of banking offices is poor in low-income geographies and excellent in moderate-income geographies. Key has no branches in low-income geographies. The bank's branch distribution in moderate-income geographies exceeds the percentage of the population that resides there. Branch distribution is enhanced by three bank branches located in middle-income geographies and one branch located in an upper-income geography that is within one-half mile of four low-income geographies. Our evaluation of the proximity of these branches included consideration of the absence of physical barriers, such as water or highways, which might obstruct convenient access to the branch.

To the extent changes have been made, Key's record of opening and closing branches has not adversely affected the accessibility of the bank's delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Key did not open any branches and closed one branch, which was not located in a low- or moderate-income geography.

Services including, where appropriate, business hours do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income geographies, and/or individuals. Banking hours in the AA reflect comparable banking hours for all branches without regard to the income levels represented by the branches' geographic locations. Key offers traditional banking services at all branches.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Key provides an adequate level of CD services to the AA, which were responsive to local community development needs. Key employees devoted 126 hours in financial expertise, including board activities, financial education, and fundraising to three CD organizations.

Two examples include: Key employees dedicated approximately 40 hours in fundraising to an organization that provides affordable housing to low income families. Key employees also dedicated approximately 72 hours in board activities to a community based not-for-profit hospice whose mission is to provide comfort, assurance and care to families and patients who have life-limiting illnesses. Services are provided to all families, including low- and moderate-income families, regardless of an individual's ability to pay.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, service test performance in the Monroe, Warren-Farmington, and non-MSA AAs is consistent with the low satisfactory performance noted in the Ann Arbor MSA AA. Performance in the Detroit AA is weaker due to Key not having any branches in low- and moderate-income geographies and had no impact on the conclusion.

State Rating

State of New York

CRA rating:	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:

- Key's distribution of home mortgage loans by income level of borrower is excellent and small loans to businesses of different sizes is good.
- Key's excellent level of community development lending had a significantly positive impact on the bank's overall lending test rating.
- Key's performance in qualified community development investments is excellent.
- Key's branch distribution and level of community development services are excellent when taking into account the adjacent serving branches.

Description of Institution's Operations in New York

Key has delineated 12 AAs within the state of New York. They include the Albany, Buffalo, Dutchess-Putnam, Glens Falls, Kingston, New York, Poughkeepsie-Newburgh, Rochester, Syracuse, Utica-Rome, Watertown-Fort Drum, NY MSAs, as well as the following 15 non-MSA counties: Cattaraugus, Cayuga, Chautaugua, Clinton, Columbia, Cortland, Franklin, Fulton, Genesee, Greene, Lewis, Montgomery, Otsego, St Lawrence, and Sullivan.

Based on June 30, 2015, FDIC summary of deposit information, Key has \$15.03 billion in deposits in the state, which represents 21.69 percent of the bank's total deposits. The bank made 31.04 percent of its evaluation period lending in this state.

Key has 232 office locations and 170 deposit-taking ATMs within the state. The bank ranks 15th in deposit market share with approximately 1.09 percent. Key's primary competitors are JP Morgan Chase Bank with 34.76 percent, The Bank of New York Mellon with 9.54 percent, and HSBC Bank USA NA with 6.23 percent. There are 217 FDIC-insured depository institutions within the state.

Scope of Evaluation in New York

The Albany, NY MSA (Albany MSA) has 35.26 percent of the deposits within the rated area, which is the AA we selected for analysis using full-scope procedures and weighted most heavily in our overall conclusions. All other AAs were analyzed using limited-scope procedures. This was consistent for both the 2012 through 2013 analysis and the 2014

through 2015 analysis. We based our ratings primarily on the results of the area that received a full-scope review. We also gave greater consideration to the bank's performance in the 2014-2015 evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of New York is outstanding. Based on the full-scope review, the bank's performance in the Albany MSA is excellent.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs in the Albany MSA. Key's deposit market share for the Albany MSA is 25.32 percent, and the bank is ranked first out of 25 deposit-taking entities. For home purchase loans, the bank is ranked 36th out of 193 lenders (top 19 percent) with a 0.50 percent market share. The top three home purchase lenders have approximately 40 percent of the market share. For home improvement loans, the bank is ranked third out of 76 lenders (top four percent) with a 6.12 percent market share. The top lender is SEFCU and has a 23.45 percent market share. For home refinance loans, the bank is ranked ninth out of 168 (top five percent) with a 2.53 percent market share. Although the bank's market share in home purchase, home improvement, and home refinance loans is below the bank's deposit market share, Key's performance is adequate when considering the number of lenders and depository institutions and competition. There are 251 home mortgage lenders, many without a depository presence. In contrast, there are 25 depository institutions in the AA. Key's market share for small loans to business is 3.88 percent and ranked tenth out of 75 lenders (top 13 percent). The top two small business lenders in the AA have 30 percent of the market and are nationwide lenders that have significant small business credit card portfolios.

Refer to table 1, Lending Volume, in the state of New York section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Key's overall geographic distribution of loans by income level of geography is good in the Albany MSA. Key has a good geographic distribution of home mortgage loans and excellent distribution of small loans to businesses.

Home Mortgage Loans

Geographic distribution for home purchase and home improvement loans in the Albany MSA is good. Geographic distribution of home refinance loans in the Albany MSA is adequate. We placed more weight on the distribution in moderate-income geographies, as those geographies make up a larger percentage of the bank's AA. Refer to tables 2, 3, and 4 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.

Home Purchase

The bank's geographic distribution of home purchase loans is good. The bank's geographic distribution of home purchase loans for 2014 through 2015 is good. The percentage of home purchase loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units located in low-income geographies. The percentage of home purchase loans originated or purchased in moderate-income geographies is near to the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home purchase loans in low-income geographies exceeds and in moderate-income geographies is significantly below the bank's overall home purchase loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Improvement

The bank's geographic distribution of home improvement loans is good. The bank's geographic distribution of home improvement loans for 2014 through 2015 is good. The percentage of home improvement loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units located in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies is well below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home improvement loans in low-income geographies exceeds and in moderate-income geographies is well below the bank's overall home improvement loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Refinance

The bank's geographic distribution of home refinance loans is adequate. The bank's geographic distribution of home refinance loans for 2014 through 2015 is good. The percentage of home refinance loans originated or purchased in low-income geographies is below the percentage of owner-occupied housing units located in low-income geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies is near to the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home refinance loans in low- and moderate-income geographies exceeds the bank's overall home refinance loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 and considered poor. The percentage of home refinance loans originated or purchased in low-income geographies is significantly below the percentage of owner-occupied housing units located in low-income geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies is well below the percentage of owner-occupied housing units located in moderate-income geographies and had a neutral impact on the conclusion.

Small Loans to Businesses

Geographic distribution of small loans to businesses in the Albany MSA is excellent.

Refer to table 6 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 origination and purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses is excellent. The bank's geographic distribution of small loans to businesses for 2014 through 2015 is excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeds the percentage of small businesses located in low-income geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies is near to the percentage of small businesses located in moderate-income geographies. The bank's market shares for small loans to businesses in low- and moderate-income geographies exceed the bank's overall small loans to businesses market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Lending Gap Analysis

We analyzed Key's geographic lending patterns throughout the AA and we found no unexplained lending gaps.

Distribution of Loans by Income Level of the Borrower

Key's overall distribution of loans to borrowers of different income levels is good in the Albany MSA. Key's borrower distribution of home mortgage loans is excellent and small loans to businesses is good.

Home Mortgage Loans

Key's distribution of home mortgage loans among individuals of different income levels in the Albany MSA is excellent.

Refer to tables 8, 9 and 10 in the state of New York 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.

Home Purchase

The bank's borrower distribution of home purchase loans is excellent. The bank's borrower distribution of home purchase loans for 2014 through 2015 is excellent. The percentage of home purchase loans originated or purchased to low-income borrowers is near to and for moderate-income borrowers exceeds the percentage of families defined as such in the AA. The bank's market share for home purchase loans to low-income borrowers exceeds and to moderate-income borrowers is near to the bank's overall home purchase loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Improvement

The bank's borrower distribution of home improvement loans is excellent. The bank's borrower distribution of home improvement loans for 2014 through 2015 is good. The percentage of home improvement loans originated or purchased to low-income borrowers is near to and for moderate-income borrowers exceeds the percentage of families defined as such located in the AA. The bank's market share for home improvement loans to low-income borrowers is below and to moderate-income borrowers exceeds the bank's overall home improvement loan market share. Performance for 2012 through 2013 is stronger than the distribution for 2014 through 2015 and considered excellent. The bank's market share performance for 2012 through 2013 is stronger than for 2014 through 2015 and had a positive impact on the conclusion.

Home Refinance

The bank's borrower distribution of home refinance loans is excellent. The bank's borrower distribution of home refinance loans for 2014 through 2015 is excellent. The percentage of home refinance loans originated or purchased to low-income borrowers is near to the percentage of low-income families located in the AA. The percentage of home refinance loans originated or purchased to moderate-income borrowers exceeds the percentage of moderate-income families located in the AA. The bank's market shares for home refinance loans to low- and moderate-income borrowers exceed the bank's overall home refinance loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 and considered good. The percentage of home refinance loans originated or purchased to low-income borrowers is well below the percentage of low-income families located in the AA for 2012 through 2013. The weaker performance had no impact on the conclusion.

Small Loans to Businesses

Borrower distribution of small loans to businesses in the Albany MSA is good. Refer to table 11 in the state of New York 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.

Key's borrower distribution of small loans to businesses is good. The bank's borrower distribution of small loans to businesses for 2014 through 2015 is good. The percentage of small loans to businesses originated or purchased is near to the percentage of small businesses located in the AA. The bank's market share for small loans to businesses exceeds the bank's overall small business loan market share. Performance for 2012 through 2013 is weaker than 2014 through 2015 and considered adequate and had no impact on the conclusion. The percentage of small loans to businesses is below the percentage of small businesses located in the AA. The bank's market share for small loans to businesses is significantly below the bank's overall small business loan market share. However, no revenue information was available for 69.03 percent of the small loans to businesses in 2012 through 2013.

Community Development Lending

Key is a leader in making community development loans. The level of community development lending in the Albany MSA is excellent and had a significantly positive impact on

the lending test rating. There are ample community development lending opportunities in the Albany MSA. Key originated six affordable housing community development loans totaling \$70.9 million. Key originated 19 loans totaling \$47.5 million to facilitate qualified community development services. In addition, Key originated three revitalization/stabilization loans totaling \$3.7 million. All of the community development loans were responsive to the needs of the AA. Four loans, totaling \$58 million, are considered complex and/or innovative.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Albany MSA equaled 52.01 percent of allocated Tier One Capital as of December 31, 2015.

Refer to table 1, Lending Volume, in the state of New York section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Product Innovation and Flexibility

Key makes use of innovative and flexible lending practices in order to serve assessment area credit needs. See the Community Development Lending section for more detail about innovative and flexible community development loans in the Albany MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Buffalo – Cheektowaga – Niagara Falls, NY MSA, Dutchess County – Putnam County, NY MSA, Rochester, NY MSA, and Syracuse, NY MSA AAs is consistent with the bank's overall outstanding performance under the lending test in the Albany MSA. In the Kingston, NY MSA, New York – Jersey City- White Plains, NY MSA, Utica – Rome, NY MSA, Watertown – Fort Drum, NY MSA, and NY Non-MSA AAs, the bank's performance is weaker than the bank's overall outstanding performance under the lending test in the Albany MSA and considered good. For the Kingston, NY MSA, no community development loans were originated or purchased in this AA. For the New York – Jersey City – White Plains, NY MSA, the borrower distribution is weaker. For the Utica – Rome, NY MSA, the geographic and borrower distributions are weaker. For the Watertown – Fort Drum, NY MSA, the geographic distribution is weaker and no community development loans were originated or purchased in this AA. For the NY Non-MSA AA, the weaker performance is due to a lower level of community development lending in this AA. In the Glens Falls, NY MSA, the bank's performance is weaker than the bank's overall outstanding performance under the lending test in the Albany MSA and considered adequate. For the Glens Falls, NY MSA, the geographic and borrower distributions are weaker and no community development loans were originated or purchased in this AA. Key's performance in the limited-scope areas did not impact the overall lending test rating for the state of New York. Refer to tables 1 through 12 in the state of New York section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in New York is rated outstanding. Based on a full-scope review, performance in Albany MSA AA is excellent. Performance in the limited-scope AAs did not impact the investment test rating in New York. Refer to table 14 in the state of New York section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Key has an excellent level of qualified investments in the Albany MSA AA. The bank made nine current-period qualified investments totaling \$99 million. The bank also had two qualified investments from the prior-period totaling \$4 million. In addition, Key made 87 grants to a variety of organizations totaling in excess of \$700 thousand. The combined current- and prior-period investment dollar volume represents 9.47 percent of the Tier One Capital allocated to the AA.

The bank exhibits excellent responsiveness to credit and community economic development needs in the Albany MSA AA. Eight of nine of the current- and all of the prior period investment transactions in the AA are in LIHTC investments. Key's investments support over 800 units of affordable housing, a primary CD need in the AA. An example of investment in the full-scope AA include a \$12 million LIHTC for a low-income housing project that will serve homeless individuals and families and include a certain number of units set aside for domestic violence victims. The project will help revitalize the area by turning an old abandoned warehouse into 67 units of affordable housing. Another LIHTC investment of nearly \$15 million will create 155 units of housing for very low-income individuals, many of whom are homeless, developmentally disabled, or mentally ill.

A majority of the grants support community services targeted to low- and moderate-income individuals; grants additionally supported revitalization and stabilization of low- and moderate-income geographies, affordable housing and other CD needs. The bank has three current-period qualified investments totaling \$12.1 million and 46 prior-period qualified investments totaling \$16.31 million that benefitted a broader statewide or regional area that includes the bank's AAs and supports the overall state rating. All of these qualified investments support affordable housing and provided over 3,400 units.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Buffalo-Cheektowaga-Niagara Falls, NY MSA AA, New York-Jersey City-White Plains, MD AA, Rochester, NY MSA AA, Syracuse, NY MSA AA, Utica-Rome, NY MSA AA, Watertown-Fort Drum, NY MSA AA, and the NY non-MSA AA is consistent with the bank's overall outstanding performance in the full-scope Albany MSA AA. Performance in the Dutchess County-Putnam County, Glens Falls, NY MSA AA, and the Kingston, NY MSA AA is weaker than the full-scope AA. Weaker performance is due to a lower level of investments relative to the bank's

operations in the AA. The performance in the limited-scope areas did not impact the overall investment test rating for New York.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Key's performance under the service test in the state of New York is outstanding. Based on a full-scope review, performance in the Albany MSA AA is excellent. Performance in the limited-scope AAs had a neutral impact the service test rating in the state of New York.

Retail Banking Services

Refer to table 15 in the state of New York section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's delivery systems are readily accessible to geographies and individuals of different income levels in the Albany MSA AA. Key's distribution of branch offices in low-income and moderate-income geographies exceeds the percentage of population that resides there.

To the extent changes have been made, Key's record of opening and closing branches has generally not adversely affected the accessibility of the bank's delivery systems in the AA. Key opened one branch; however, it was not in a low- or moderate-income geography. Key closed five branches, including one branch each in a low- and moderate- income geography.

The bank's hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies, and/or individuals. Banking hours in the AA reflect comparable banking hours for all branches without regard to the income levels represented by the branches' geographic locations. Key offers traditional banking services at all branches.

Twenty-seven branches, including eight located in low- and moderate-income geographies, offer the KeyBank Plus service, which primarily targets the needs of low- and moderate-income customers and the unbanked. This service allows customers to cash their approved payroll, tax refund, or government checks for a low fee and every fifth check cashed is free. Participants are also eligible to receive five fee-free money orders when they cash their check.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Key provides a good level of CD services to the AA, which were responsive to local community development needs. Bank employees devoted 486 hours in financial expertise, including board activities, financial and management advice to eight organizations with CD purposes for affordable housing and community services.

Two examples include: Key employees dedicated approximately 75 hours in financial and management advice to a Community Development Financial Institution that promotes affordable housing and services for small/micro business startups and for not-for-profit agencies. Key employees also dedicated approximately 80 hours in financial and management advice to an organization that provides affordable housing and help to low- and moderate-income families and individuals to overcome the obstacles to homeownership.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Key's performance under the service test in the Buffalo, Kingston, Syracuse, Watertown Ft Drum, and non-MSA AAs is consistent with the overall outstanding performance noted in the Albany MSA AA. Performance in the Dutchess-Putnam, Glen Falls, New York-White Plains, Rochester, and Utica-Rome AAs is weaker due to poorer branch distribution in low- or moderate-income geographies.

State Rating

State of Ohio

CRA rating:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Key had an adequate level of lending activity, adequate geographic distribution of loans by income level of geography, and adequate distribution of loans to borrowers of different income levels. The bank's good level of community development lending had a positive impact on the bank's overall lending test rating.
- Key's performance in qualified community development investments is excellent and reflects responsiveness to the identified needs within the assessment area, and an excellent volume of current and prior-period qualified investments.
- Key's delivery system is accessible in both low- and moderate-income geographies. CD services performance is excellent.

Description of Institution's Operations in Ohio

Key has delineated 12 AAs within the state of Ohio. They include the Akron, Canton-Massillon, Cincinnati, Cleveland-Elyria, Columbus, Dayton, Mansfield, Sandusky, Springfield, Toledo, and Youngstown-Warren-Boardman, OH MSAs as well as the following eight non-MSA counties: Ashtabula, Columbiana, Defiance, Erie, Hancock, Huron, Ottawa, and Sandusky.

Based on June 30, 2015, FDIC summary of deposit information, Key has \$25.16 billion in deposits in the state, which represents 36.30 percent of the bank's total deposits. The bank made 21.80 percent of its evaluation period lending in this state.

Key has 232 office locations and 222 deposit-taking ATMs within the state. The bank ranks sixth in deposit market share with approximately 8.41 percent. Primary competitors include U.S. Bank N.A. with 14.90 percent, Fifth Third Bank with 14.45 percent, The Huntington National Bank N.A. with 11.89 percent, PNC Bank N.A. with 9.32 percent, and JP Morgan Chase Bank, N.A. with 8.59 percent. There are 235 FDIC-insured depository institutions within the state.

Competition for home mortgage-related loans is very intense in the Cleveland MSA. Within the Cleveland MSA, Key faces competition from 13 mortgage companies, 10 banks, and 3 savings and loans, most of which compete on the basis of pricing, a contrast to Key's relationship

banking approach to servicing its customers. Additionally, many competitors for loans products do not have branches located in the area.

During the evaluation period, Ohio continued to experience the impact of foreclosures and declining property values that linger from the sub-prime mortgage lending crisis that began in late 2007. Many of Ohio's largest MSAs experienced housing market weakness resulting from an oversupply of housing units, low property values, high foreclosure rates, and abandoned or blighted properties. In 2015, Cuyahoga County, whose seat is Cleveland, had the highest number of foreclosure filings in the state of Ohio. Lucas County, whose seat is Toledo, ranked seventh in the number of foreclosures in the state.

We took these facts related to market competition and housing market conditions into consideration in assessing the bank's lending activity and overall lending performance.

In the past, Key has reported deposits of its Public Finance customers as part of the total deposits attributed to the Cleveland MSA; however, the bank's Public Finance customers reside across the bank's national footprint. During our evaluation, we asked the bank to provide adjusted deposit totals for each state and full-scope MSA that reflect the true location of the Public Finance customers and the location of origins of their respective deposits. As of June 30, 2015, these deposits totaled approximately \$4.3 billion. We used the adjusted deposit totals for each state and full-scope MSA because they provide a more accurate indication of the deposits in each geography.

Scope of Evaluation in Ohio

The Cleveland MSA has 71.16 percent of the deposits within the rated area, which is the AA we selected for analysis using full-scope procedures and weighted most heavily in our overall conclusions. Additionally, we included a full-scope analysis of the Toledo MSA (Toledo MSA) in our scope. The Toledo MSA has 4.84 percent of the deposits within the rated area. We included the Toledo MSA as a result of increased interest in Key's activities generated by community groups in the Toledo area related to Key's acquisition of First Niagara Bank in March 2016.

All other AAs were analyzed using limited-scope procedures. This was consistent for both the 2012 through 2013 analysis and the 2014 through 2015 analysis. We based our ratings primarily on the results of the area that received a full-scope review. We also gave greater consideration to the bank's performance in the 2014-2015 evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Ohio is high satisfactory. Based on the full-scope review, the bank's performance in the Cleveland MSA and Toledo MSA is

good. Performance in the limited-scope areas was considered and, overall, was consistent with the high satisfactory performance in the state.

Lending Activity

Overall, Key's lending activity in the state of Ohio is adequate. Lending levels reflect adequate responsiveness to assessment area credit needs in the Cleveland MSA and Toledo MSA. CD lending is responsive, complex, innovative, and had a positive impact that elevates lending test performance. We also considered performance context issues related to mortgage foreclosures and declining home values in the Cleveland and Toledo MSAs.

Cleveland MSA - Key's deposit market share for the Cleveland MSA is 28.10 percent and the bank is ranked first out of 37 deposit-taking entities. For home purchase loans, the bank is ranked 27th out of 326 lenders (top 8 percent) with a 0.95 percent market share. The top two home purchase lenders have over 19 percent of the market. For home improvement loans, the bank is ranked first out of 93 lenders (top one percent) with a 21.93 percent market share. For home refinance loans, the bank is ranked 15th out of 302 lenders (top 5 percent) with a 2.07 percent market share. The top three home refinance lenders have over 28 percent of the market. Key's market share for small loans to business is 3.84 percent and ranked ninth out of 95 lenders (top 9 percent). The top five small business lenders in the AA have over 61 percent of the market, several of which are nationwide lenders that have significant small business credit card portfolios.

Toledo MSA - Key's deposit market share for the Toledo MSA is 12.27 percent and the bank is ranked third out of 19 deposit-taking entities. For home purchase loans, the bank is ranked 13th out of 203 lenders (top six percent) with a 2.18 percent market share. The top two home purchase lenders have over 17 percent of the market. For home improvement loans, the bank is ranked first out of 67 lenders with a 10.05 percent market share. For home refinance loans, the bank is ranked sixth out of 180 lenders (top 3 percent) with a 3.35 percent market share. The top two home refinance lenders have 20 percent of the market. Key's market share for small loans to business is 4.41 percent and ranked 8th out of 67 lenders (top 11 percent). The top two small business lenders in the AA have over 29 percent of the market and are nationwide lenders that have significant small business credit card portfolios.

Refer to table 1, Lending Volume, in the state of Ohio section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Key's overall geographic distribution of loans by income level of geography in the state of Ohio is adequate. In the Cleveland MSA and Toledo MSA, Key has poor geographic distribution of home mortgage loans and good distribution of small loans to businesses.

Home Mortgage Loans

Refer to tables 2, 3, and 4 in the state of Ohio 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. We placed more weight on distribution in moderate-income geographies as those geographies make up a larger percentage of the bank's AA.

Cleveland MSA

Geographic distribution of home purchase and home refinance loans in the Cleveland MSA is poor. Geographic distribution of home improvement loans in the Cleveland MSA is excellent.

Home Purchase

The bank's geographic distribution of home purchase loans is poor. For 2014 through 2015, the percentage of home purchase loans originated or purchased in low-income geographies is well below the percentage of owner-occupied housing units located in low-income geographies. The percentage of home purchase loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market shares for home purchase loans in low- and moderate-income geographies exceed the bank's overall home purchase loan market share. Performance for 2012 through 2013 was weaker than the distribution for 2014 through 2015. The percentages of home purchase loans originated or purchased in both low- and moderate-income geographies were significantly below the percentage of owner-occupied housing units and had a negative impact on the conclusion.

Home Improvement

The bank's geographic distribution of home improvement loans is excellent. The percentage of home improvement loans originated or purchased in low-income geographies approximates the percentage of owner-occupied housing units located in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies is near to the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home improvement loans in low-income geographies exceeds and in moderate-income geographies is near to the bank's overall home improvement loan market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Home Refinance

The bank's geographic distribution of home refinance loans is poor. The percentage of home refinance loans originated or purchased in low-income geographies is significantly below the percentage of owner-occupied housing units located in low-income geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies is well below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market shares for home refinance loans in low- and moderate-income geographies are below the bank's overall home refinance loan market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Toledo MSA

Geographic distribution of home purchase loans in the Toledo MSA is poor, for home improvement loans is adequate, and for home refinance loans is very poor.

Home Purchase

The bank's geographic distribution of home purchase loans is poor. Key did not originate or purchase any home purchase loans in low-income geographies. The percentage of home purchase loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home purchase loans in moderate-income geographies exceeds the bank's overall home purchase loan market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Home Improvement

The bank's geographic distribution of home improvement loans is adequate. The percentages of home improvement loans originated or purchased in low- and moderate-income geographies are below the percentages of owner-occupied housing units located in these geographies. The bank's market share for home improvement loans in low-income geographies is significantly below and in moderate-income geographies well below the bank's overall home improvement loan market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Home Refinance

The bank's geographic distribution of home refinance loans is very poor. The percentages of home refinance loans originated or purchased in low- and moderate-income geographies are significantly below the percentages of owner-occupied housing units located in these geographies. The bank's market share for home refinance loans in low-income geographies is significantly below and in moderate-income geographies well below the bank's overall home refinance loan market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Small Loans to Businesses

Geographic distribution of small loans to businesses in the Cleveland MSA and in the Toledo MSA is good.

Refer to table 6 in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses. We placed more weight on distribution in moderate-income geographies as those geographies make up a larger percentage of the bank's AA.

Cleveland MSA

The bank's geographic distribution of small loans to businesses is good. The percentages of small loans to businesses originated or purchased in low- and moderate-income geographies

are near to the percentages of small businesses located in low- and moderate-income geographies, respectively. The bank's market share for small loans to businesses in low-income geographies exceeds and for moderate-income geographies is near to the bank's overall small loans to businesses market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Toledo MSA

The bank's geographic distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased in low-income geographies is well below the percentage of small businesses located in low-income geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies approximates the percentage of small businesses located in moderate-income geographies. The bank's market share for small loans to businesses in low-income geographies is below and moderate-income geographies exceeds the bank's overall small loans to businesses market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Lending Gap Analysis

We analyzed Key's geographic lending patterns throughout the AAs and we found no unexplained lending gaps.

Distribution of Loans by Income Level of the Borrower

Key's overall distribution of loans to borrowers of different income levels is adequate in the state of Ohio. In the Cleveland MSA, Key's borrower distribution of home mortgage loans and small loans to businesses is adequate. In the Toledo MSA, Key has good borrower distribution of home mortgage loans and adequate distribution of small loans to businesses.

Home Mortgage Loans

Refer to tables 8, 9 and 10 in the state of Ohio 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. We placed more weight on distribution to low-income borrowers as they make up a larger percentage of the demographic.

Cleveland MSA

Key's distribution of home purchase loans among individuals of different income levels in the Cleveland MSA is good. The borrower distribution of home improvement and home refinance loans is adequate.

Home Purchase

The bank's borrower distribution of home purchase loans is good. The percentage of home purchase loans originated or purchased to low-income borrowers is below and for moderate-income borrowers exceeds the percentage of families defined as such in the AA. The bank's market share for home purchase loans to low-income borrowers exceeds and moderate-

income borrowers is near to the bank's overall home purchase loan market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Home Improvement

The bank's borrower distribution of home improvement loans is adequate. The percentage of home improvement loans originated or purchased to low-income borrowers is well below and for moderate-income borrowers near to the percentage of families defined as such located in the AA. The bank's market share for home improvement loans to low-income borrowers is well below and for moderate-income borrowers below the bank's overall home improvement loan market share. The performance for 2012 through 2013 was stronger than the distribution for 2014 through 2015 due to better moderate-income distribution and had a positive impact on the conclusion.

Home Refinance

The bank's borrower distribution of home refinance loans is adequate. The percentage of home refinance loans originated or purchased to low-income borrowers is well below the percentage of low-income families located in the AA. The percentage of home refinance loans originated or purchased to moderate-income borrowers is below the percentage of moderate-income families located in the AA. The bank's market share for home refinance loans to low-income borrowers exceeds and moderate-income borrowers is below the bank's overall home refinance loan market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Toledo, OH, MSA

Key's distribution of home purchase loans among individuals of different income levels in the Toledo, OH MSA is excellent. The borrower distribution of home improvement and home refinance loans is good.

Home Purchase

The bank's borrower distribution of home purchase loans is excellent. The percentage of home purchase loans originated or purchased to low-income borrowers is near to and for moderate-income borrowers exceeds the percentage of families defined as such in the AA. The bank's market share for home purchase loans to low- and moderate-income borrowers exceeds the bank's overall home purchase loan market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Home Improvement

The bank's borrower distribution of home improvement loans is good. The percentage of home improvement loans originated or purchased to low-income borrowers is below and for moderate-income borrowers exceeds the percentage of families defined as such located in the AA. The bank's market shares for home improvement loans to low- and moderate-income borrowers are below the bank's overall home improvement loan market share. Performance for 2012 through 2013 was weaker than the distribution for 2014 through 2015 due to poorer

moderate-income distribution. The weaker performance had a slightly negative impact on the conclusion.

Home Refinance

The bank's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below the percentage of low-income families located in the AA. The percentage of home refinance loans originated or purchased to moderate-income borrowers exceeds the percentage of moderate-income families located in the AA. The bank's market share for home refinance loans to low-income borrowers exceeds and moderate-income borrowers is below the bank's overall home refinance loan market share. Performance for 2012 through 2013 was weaker than the distribution for 2014 through 2015 due to poorer moderate-income distribution. The weaker performance had a slightly negative impact on the conclusion.

Small Loans to Businesses

Borrower distribution of small loans to businesses in the Cleveland MSA and Toledo MSA is adequate.

Refer to table 11 in the state of Ohio 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.

Cleveland MSA

Key's borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses originated or purchased is below the percentage of small businesses located in the AA. The bank's market share for small loans to businesses exceeds the bank's overall small business loan market share. Performance for 2012 through 2013 was weaker than the distribution for 2014 through 2015 and had a negative impact on the conclusion.

Toledo MSA

Key's borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses originated or purchased is near to the percentage of small businesses located in the AA. The bank's market share for small loans to businesses exceeds the bank's overall small business loan market share. Performance for 2012 through 2013 was weaker than the distribution for 2014 through 2015. The weaker performance has a negative impact on the conclusion.

Community Development Lending

Refer to table 1, Lending Volume, in the state of Ohio section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multifamily

loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Cleveland MSA

Key has made a relatively high level of community development loans, all of which were responsive to community development needs. The level of community development lending in the Cleveland MSA is good and had a positive impact on the lending test rating. While community development lending opportunities in the Cleveland MSA are numerous, there is significant competition for community development loans among financial institutions in the AA. Key originated 16 affordable housing community development loans totaling over \$99 million. Eight of these loans, totaling over \$57.2 million, were considered innovative or flexible. These loans facilitated the creation or redevelopment of over 1,069 affordable housing units. Key originated 11 loans totaling \$16.5 million to facilitate qualified community development services. In addition, Key originated 16 economic development loans totaling over \$48.1 million. Six of these, totaling \$20.6 million, were considered innovative or flexible.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Cleveland MSA equaled 9.51 percent of allocated Tier One Capital as of December 31, 2015.

Toledo MSA

Key has made a relatively high level of community development loans in the Toledo MSA given the competition for community development loans among the number of large financial institutions in the AA. They were all responsive to identified community development needs. The level of community development lending in the Toledo MSA is good and had a positive impact on the lending test rating. Key originated two affordable housing community development loans totaling \$21.6 million. These loans facilitated the creation or redevelopment of 544 affordable housing units. In addition, Key originated one economic development loan totaling \$1.1 million.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Toledo MSA equaled 14.7 percent of allocated Tier One Capital as of December 31, 2015.

Product Innovation and Flexibility

Key makes use of innovative and flexible lending practices in order to serve assessment area credit needs. See the Community Development Lending section for more detail about innovative and flexible community development loans in the Cleveland MSA. No innovative or flexible community development loans were originated in Toledo during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Akron, OH; Cincinnati, OH; Columbus, OH; Mansfield, OH MSAs; and OH non-MSA areas is consistent with the bank's overall high satisfactory performance under the lending test in the state of Ohio. In the Dayton, OH MSA, the bank's performance is stronger than the bank's overall performance in the state of Ohio because the geographic distribution of home mortgage and small loans to businesses was stronger. For the Canton-Massillon, OH; Springfield, OH; and Youngstown-Warren-Boardman, OH MSAs, the bank's performance is weaker than the bank's overall performance in the state of Ohio due to low levels of community development lending. The weaker performance had no impact on the conclusion. Refer to tables 1 through 12 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Ohio is rated outstanding. Based on full-scope reviews, performance in the Cleveland MSA AA and Toledo MSA AA is excellent. The rating is further supported by performance in the limited-scope AAs and other statewide and regional investment activity. Refer to table 14 in the state of Ohio section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Cleveland MSA

Key has made an excellent level of qualified investments in the Cleveland MSA AA. The bank made 31 current-period investments totaling almost \$144 million. The bank also made 62 qualified investments totaling \$39.5 million from the prior period. In addition, Key made 81 charitable contributions totaling almost \$3.4 million to 35 different organizations.

The bank exhibits excellent responsiveness to credit and community economic development needs in the Cleveland MSA AA. The substantial majority of both the current- and prior-period investment transactions in the AA are in LIHTCs or other housing related investments. These investments supported over 2,045 units of affordable housing, a primary CD need in the AA. The remaining investments were in NMTCs and SBICs that support small business development. The combined current- and prior-period investment dollar volume represents 10.85 percent of the Tier One Capital allocated to the AA.

Toledo MSA

Key has made an excellent level of qualified investments in the Toledo MSA AA. The bank made six current-period investments totaling over \$5.6 million. The bank also had 30 qualified investments totaling \$13.1 million from the prior period. In addition, Key made 14 charitable contributions totaling \$248 thousand to eight different organizations. The combined current- and prior period investment dollar volume represents 12.28 percent of the Tier One Capital allocated to the AA.

The bank exhibits excellent responsiveness to credit and community economic development needs in the Toledo MSA AA. All of the current- and prior-period investment transactions in the AA are in LIHTCs or other housing-related investments. These investments supported over 2,150 units of affordable housing, a primary CD need in the AA.

The bank has two current-period qualified investments totaling almost \$4.8 million and 104 prior-period qualified investments totaling almost \$14.9 million that benefitted a broader statewide or regional area that includes the bank's AAs and supports the overall state rating. All of these qualified investments support affordable housing and provided over 5,220 units.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Akron, OH MSA; Canton, OH MSA Cincinnati, OH MSA; Columbus, OH MSA; Dayton, OH MSA; Mansfield, OH MSA; Springfield, OH, MSA; Youngstown, OH MSA; and Ohio non-MSA AAs is consistent with the bank's overall outstanding performance under the investment test in the Cleveland MSA and Toledo MSA AAs. Refer to table 14 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Key's performance under the service test in the state of Ohio is rated high satisfactory. Based on full-scope reviews, performance in the Cleveland AA is excellent, and in the Toledo AA is adequate. Performance in the limited-scope AAs had a neutral impact on the service test rating in the state of Ohio.

Retail Banking Services

Refer to table 15 in the state of Ohio section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Cleveland MSA

Key's delivery systems are readily accessible to geographies and individuals of different income levels in the Cleveland MSA AA. Key's distributions of banking offices in both low- and moderate-income geographies are near to the percentages of the populations that reside there. However, three branches located middle-income geographies are within one-half mile of three low-income geographies. In addition, six branches located in middle-income geographies and three branches located in upper-income geographies are within one-half mile of nine moderate-income geographies. Our evaluation of the proximity of these branches included consideration of the absence of physical barriers, such as water or highways, which might obstruct convenient access to the branch. Taking into account the adjacent serving branches, access to banking services in low- and moderate-income geographies is considered excellent.

To the extent changes have been made, Key's record of opening and closing branches has generally not adversely affected the accessibility of the bank's delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Key opened eight branches, including one located in a low-income geography and one located in a moderate-income geography. Key closed eight branches, including two located in low-income geographies.

Services, including business hours, do not vary in a way that inconveniences any portions of the assessment area, particularly low- and moderate-income geographies, and/or individuals. Banking hours in the AA reflect comparable banking hours for all branches without regard to the income levels represented by the branches' geographic locations. Key offers traditional banking services at all branches.

Twenty-nine branches, including 15 located in low- and moderate-income geographies, offer the KeyBank Plus Check Cashing service, which primarily targets the needs of low- and moderate-income customers and the unbanked. This service allows customers and non-customers to cash their approved payroll, tax refund, or government checks for a low fee and every fifth check cashed is free. Participants are also eligible to receive five fee-free money orders when they cash their check.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Toledo MSA

Key's delivery systems are reasonably accessible to geographies and individuals of different income levels in the Toledo MSA AA. Key has no branches in low-income geographies. Key's branch distribution in moderate-income geographies exceeds the percentage of population that resides there. Branch distribution is enhanced by one bank branch located in middle-income geography that is within one-half mile of a low-income geography. Our evaluation of the proximity of this branch included consideration of the absence of physical barriers, such as water or highways, which might obstruct convenient access to the branch.

Key's record of opening and closing branches has adversely affected the accessibility of the bank's delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Key opened one branch in a moderate-income geography and closed seven branches, including two in low- income and three in moderate-income geographies.

Services, including business hours, do not vary in a way that inconveniences any portions of the assessment area, particularly low- and moderate-income geographies, and/or individuals. Banking hours in the AA reflect comparable banking hours for all branches without regard to

the income levels represented by the branches' geographic locations. Key offers traditional banking services at all branches.

Eighteen branches, including six located in moderate-income geographies, offer the KeyBank Plus service, which primarily targets the needs of low- and moderate-income customers and the unbanked. This service allows customers and non-customers to cash their approved payroll, tax refund, or government checks for a low fee and every fifth check cashed is free. Participants are also eligible to receive five fee-free money orders when they cash their check.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Cleveland MSA

Key provides an excellent level of CD services in the Cleveland MSA that were responsive to local community development needs. Key employees devoted 4,179 hours in financial expertise, including board activities, financial and management advice, credit counseling, financial education, training, tax preparation and fundraising to 113 organizations with CD purposes for affordable housing, revitalization and stabilization, community services, financial oversight, and economic development.

Two examples include: Key employees dedicated approximately 61 hours in financial and management advice to a homeless shelter that supports the development, management, operations, and services of permanent supportive housing. Permanent supportive housing combines quality affordable housing with an array of accessible mental health, recovery, employment and other support services. Key employees also dedicated approximately 64 hours to an organization that provides free-of-charge tax preparation for low- and moderate-income families.

Toledo MSA

Key provides a good level of CD services in the Toledo MSA that were responsive to local community development needs. Key employees devoted 533 hours in financial expertise, including board activities and financial and management advice to 11 organizations with a CD purpose of affordable housing and community services.

Two examples include: Key employees dedicated approximately 50 hours in board activities to an organization that provides primary oral health services for underserved low- and moderate-income children and adults. Key employees also dedicated approximately 12 hours in board activities to a nonprofit agency that feeds hungry children from low- and moderate-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, service test performance in the Akron, Columbus, Dayton, and non-MSA AAs is consistent with the overall high satisfactory performance noted in the full-scope AAs. Performance in the Mansfield AA is stronger due to better branch distribution in moderate-income geographies. Performance in the Canton, Cincinnati, Springfield, and Youngstown AAs is weaker due to poorer branch distribution in low- and/or moderate-income geographies. The bank's performance in the limited scope AAs had no impact on the overall conclusion for the state of Ohio. Refer to table 15 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

State Rating

State of Oregon

CRA rating²:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	Low Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Key had an adequate level of lending activity.
- Key's distribution of loans among geographies is good. Performance for home mortgage loans is adequate and small loans to businesses is good.
- Key's distribution of home mortgage loans by income level of borrower is adequate and small loans to businesses of different sizes is adequate.
- Key's good level of community development lending had a positive impact on the bank's overall lending test rating.
- Key's performance in qualified community development investments is adequate.
- Key provides a good level of retail banking services that are reasonably accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Oregon

Key has delineated seven AAs within the state of Oregon. They include the Albany, Corvallis, Eugene, Grants Pass, Medford, Salem, OR MSAs, as well as one non-MSA county, which is Flood River. This does not include the counties in the Portland Multistate.

Based on June 30, 2015, FDIC summary of deposit information, Key has \$946.7 million in deposits in the state, which represents 1.37 percent of the bank's total deposits. The bank made 2.95 percent of its evaluation period lending in this state.

Key has 27 office locations and 15 deposit-taking ATMs within the state. The bank ranks tenth in deposit market share with 3.35 percent. Primary competitors include Umpqua Bank with 17.76 percent, U.S. Bank N.A. with 16.85 percent, Wells Fargo Bank, N.A. with 14.05 percent

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

and JPMorgan Chase Bank, N.A. with 7.35 percent. There are 32 FDIC-insured depository institutions within the state.

Refer to the market profiles for the state of Oregon in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Oregon

The Salem, OR MSA (Salem MSA) has 28.34 percent of the deposits within this rated area, which is the AA we selected for analysis using full-scope procedures and weighted most heavily in our overall conclusions. All other AAs were analyzed using limited-scope procedures. This was consistent for both the 2012 through 2013 analysis and the 2014 through 2015 analysis. We based our ratings primarily on the results of the area that received a full-scope review. We also gave greater consideration to the bank's performance in the 2014 through 2015 portion of the evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Oregon is low satisfactory. Based on the full-scope review, the bank's performance in the Salem MSA is good. Lack of lending activity and weaker performance in the limited-scope areas had a negative impact on the state rating.

Lending Activity

Lending volume is adequate in the Salem MSA. Key's deposit market share for Salem MSA is 5.57 percent and the bank is ranked seventh out of 14 deposit-taking entities. For home purchase loans, the bank is ranked 46th out of 217 lenders with a 0.46 percent market share. For home improvement loans, the bank is ranked fourth out of 54 lenders with an 8.28 percent market share. For home refinance loans, the bank is ranked tenth out of 205 lenders with a 2.41 percent market share. Key's market share for small loans to business is 1.61 percent and ranked 12th out of 54 lenders. The top two small business lenders in the AA have over 40 percent of the market and are nationwide lenders that have significant small business credit card portfolios.

Refer to table 1, Lending Volume, in the state of Oregon section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Key's overall geographic distribution of loans by income level of geography is good in the Salem MSA. Key had adequate geographic distribution of home mortgage loans and good distribution of small loans to businesses.

Home Mortgage Loans

Geographic distribution of home purchase loans in the Salem MSA is adequate. Geographic distribution of home improvement loans is poor. Geographic distribution of home refinance loans is good. Since there are no low-income geographies in the Salem MSA, our conclusions were based on the distribution of loans in moderate-income geographies. Refer to tables 2, 3, 4, and 5 in the state of Oregon 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.

Home Purchase

The bank's geographic distribution of home purchase loans is adequate. The percentage of home purchase loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home purchase loans in moderate-income geographies is below the bank's overall home purchase loan market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Home Improvement

The bank's geographic distribution of home improvement loans is poor. The percentage of home improvement loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home improvement loans in moderate-income geographies is well below the bank's overall home improvement loan market share. Performance for 2012 through 2013 was weaker than the distribution for 2014 through 2015 and had a negative impact on the conclusion.

Home Refinance

The bank's geographic distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased in moderate-income geographies exceeds the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home refinance loans in moderate-income geographies exceeds the bank's overall home refinance loan market share. Performance for 2012 through 2013 was weaker than the distribution for 2014 through 2015 and had a negative impact on the conclusion.

Small Loans to Businesses

Geographic distribution of small loans to businesses in the Salem MSA is good. Our conclusions are based on the distribution in moderate-income geographies, as there are no

low-income geographies in the AA. Refer to table 6 in the state of Oregon section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses is good. The percentage of small loans to businesses originated or purchased in moderate-income geographies is near to the percentage of small businesses located in moderate-income geographies. The bank's market share for small loans to businesses in low- and moderate-income geographies exceeds the bank's overall small loans to businesses market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Lending Gap Analysis

We analyzed Key's geographic lending patterns throughout the AA and we found no unexplained lending gaps.

Distribution of Loans by Income Level of the Borrower

Key's overall distribution of loans to borrowers of different income levels is adequate in the Salem MSA. Key's borrower distribution of home mortgage loans and small loans to businesses is adequate.

Home Mortgage Loans

Key's distribution of home purchase and home improvement loans among individuals of different income levels in the Salem MSA is adequate. The borrower distribution of home refinance loans is poor. Refer to tables 8, 9 and 10 in the state of Oregon 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.

Home Purchase

The bank's borrower distribution of home purchase loans is adequate. The percentages of home purchase loans originated or purchased to low- and moderate-income borrowers are well below the percentages of families defined as such in the AA. The bank's market share for home purchase loans to low-income borrowers exceeds and for moderate-income borrowers is near to the bank's overall home purchase loan market share. Performance for 2012 through 2013 was stronger than the distribution for 2014 through 2015 due to better distribution to both low- and moderate-income borrowers and had a positive impact on the conclusion.

Home Improvement

The bank's borrower distribution of home improvement loans is adequate. The percentage of home improvement loans originated or purchased to low-income borrowers is well below and for moderate-income borrowers below the percentage of families defined as such located in the AA. The bank's market shares for home improvement loans to low- and moderate-income borrowers exceed the bank's overall home improvement loan market share. Performance for 2012 through 2013 was consistent with the distribution for 2014 through 2015.

Home Refinance

The bank's borrower distribution of home refinance loans is poor. The percentage of home refinance loans originated or purchased to low-income borrowers is significantly below the percentage of low-income families located in the AA. The percentage of home refinance loans originated or purchased to moderate-income borrowers is below the percentage of moderate-income families located in the AA. The bank's market share for home refinance loans to both low-income borrowers is well below and moderate-income borrowers below the bank's overall home refinance loan market share. Performance for 2012 through 2013 was stronger than the distribution for 2014 through 2015 due to better distribution to both low- and moderate-income borrowers and had a positive impact on the conclusion.

Small Loans to Businesses

Borrower distribution of small loans to businesses in the Salem MSA is adequate. Refer to table 11 in the state of Oregon 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.

Key's borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses originated or purchased below the percentage of small businesses located in the AA. The bank's market share for small loans to businesses exceeds the bank's overall small business loan market share. Performance for 2012 through 2013 was weaker than the distribution for 2014 through 2015 and had no impact on the conclusion.

Community Development Lending

Key has made a relatively high level of community development loans that were responsive to identified community development needs. The level of community development lending in the Salem MSA is good and had a positive impact on the lending test rating. Key originated one affordable housing community development loan totaling \$4.2 million. This loan facilitated the creation of 122 affordable housing units. In addition, Key originated one economic development loan totaling \$1.6 million.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Salem MSA equaled 17.1 percent of allocated Tier One Capital as of December 31, 2015.

Refer to table 1, Lending Volume, in the state of Oregon section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Product Innovation and Flexibility

Key makes little use of innovative and flexible lending practices in order to serve assessment area credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Corvallis, OR MSA is consistent with the bank's overall low satisfactory performance in the state of Oregon. In the Eugene, OR and Medford, OR MSAs, performance is stronger than with the bank's overall low satisfactory performance due to stronger lending performance. In the Grants Pass, OR, and the Non-MSA AA, the bank's performance is weaker than the bank's overall performance due to the lack of overall lending activity. For the Albany, OR MSAs, the bank's performance of home mortgage and small loans to businesses was weaker due to lower economic development lending activity. The performance of the limited scope areas had no impact on the overall conclusion for the state of Oregon. Refer to tables 1 through 12 in the state of Oregon section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Oregon is rated low satisfactory. Based on a full-scope review, performance in the Salem MSA AA is poor. Performance in the limited-scope AAs and the broader statewide or regional area had a positive impact on the overall investment test rating. Refer to table 14 in the state of Oregon section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

While Key has few, if any, qualified community development investments or grants in the Salem MSA AA, the AA has very strong competition for the few LIHTC investment opportunities available. The bank made two grants totaling \$15 thousand during the current period and there were no prior-period qualified investments. The combined current- and prior-period investment dollar volume represents 0.04 percent of the Tier One Capital allocated to the AA. The bank exhibits poor responsiveness to credit and community economic development needs in the Salem MSA AA.

The bank has 34 prior-period qualified investments totaling almost \$3.71 million that benefitted a broader statewide or regional area that includes the bank's AAs and had a positive impact on the overall investment test rating in the state of Oregon.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Corvallis, OR AA is consistent with the bank's poor performance under the investment test in the full-scope AA. The bank's performance under the investment test in the Albany, OR MSA, Eugene, OR MSA, Grants Pass, OR MSA, Medford, OR MSA, and the Oregon non-MSA AAs is stronger than that of the full-scope AA. The stronger performance is due to higher levels of current- and prior-period qualified investments in these AA and had a positive impact on the investment test rating.

SERVICE TEST

Key's performance under the service test in Oregon is rated high satisfactory. Based on a full-scope review, performance in the Salem MSA AA is good. Performance in the limited-scope AAs had a neutral impact on the service test rating in the state of Oregon.

Retail Banking Services

Refer to table 15 in the state of Oregon section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's delivery systems are accessible to geographies and individuals of different income levels in the Salem MSA AA. Key's distribution of branch offices is adequate in moderate-income geographies. There are no low-income geographies in the Salem MSA AA. Key's distribution in moderate-income geographies is below the percentage of population that resides there. Branch distribution is enhanced by two bank branches in middle-income geographies that are within one-half mile of at least two moderate-income geographies. Our evaluation of the proximity of this branch included consideration of the absence of physical barriers, such as water or highways, which might obstruct convenient access to the branch.

To the extent changes have been made, Key's record of opening and closing branches has not adversely affected the accessibility of the bank's delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Key did not open any branches and closed one branch that was not in a low- or moderate-income area.

Services including, where appropriate, business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies, and/or individuals. Banking hours in the AA reflect comparable banking hours for all branches without regard to the income levels represented by the branches' geographic locations. Key offers traditional banking services at all branches.

Two branches, including one in a moderate-income geography, offer the KeyBank Plus service, which primarily targets the needs of low- and moderate-income customers and the unbanked. This service allows customers to cash their approved payroll, tax refund, or government checks for a low fee and every fifth check cashed is free. Participants are also eligible to receive five fee-free money orders when they cash their check.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Key provides an adequate level of CD services to the AA that were responsive to local community development needs. Bank employees devoted 62 hours in financial expertise, including board activities, to two organizations with CD purposes for affordable housing.

Examples include: Key employees dedicated approximately 26 hours in board activities to an organization that promotes affordable housing, economic development, and other CRA related issues. The organization also has a small business resource center that provides educational resources and advice on financing needs to start-up businesses or established businesses seeking capital for expansions. Key employees also dedicated approximately 36 hours in board activities to an organization that provides leadership and policy guidance for the development and financing of affordable housing throughout the state of Oregon.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Key's performance under the service test in the Albany AA is stronger than overall high satisfactory performance noted in the Salem MSA AA. Performance is stronger due to better branch performance in moderate-income geographies. Performance in the Corvallis, Eugene-Springfield, Grants Pass, and Medford AAs is weaker due to poorer branch distribution in low- or moderate-income geographies. The non-MSA AA has no low- or moderate-income geographies.

State Rating

State of Utah

CRA rating:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	Outstanding

The major factors that support this rating include:

- Key had an adequate level of lending activity.
- Key's distribution of loans among geographies is good. Performance for home mortgage loans is adequate and small loans to businesses is excellent.
- Key's distribution of home mortgage loans by income level of borrower is good and small loans to businesses of different sizes is adequate.
- Key's excellent level of community development lending had a significantly positive impact on the bank's overall lending test rating.
- Key's performance in qualified community development investments is good.
- Key provides excellent banking services that are readily accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Utah

Key has delineated five AAs within the state of Utah. They include the Logan UT-ID, Ogden-Clearfield, Provo-Orem, and Salt Lake City, UT MSAs, as well as the following two non-MSA counties: Carbon and Summit.

Based on June 30, 2015, FDIC summary of deposit information, Key has \$3.10 billion in deposits in the state, which represents 4.47 percent of the bank's total deposits. The bank made 3.63 percent of its evaluation period lending in this state

Key has 34 office locations and no deposit taking ATMs within the state. The bank ranks 16th in deposit market share with .06 percent. Primary competitors include Morgan Stanley Bank N.A. with 21.46 percent, Goldman Sachs Bank USA with 15.10 percent, Ally Bank with 12.00 percent, and UBS Bank USA with 8.31 percent. There are 63 FDIC-insured depository institutions within the state.

Refer to the market profiles for the state of Utah in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Utah

The Salt Lake, UT MSA (Salt Lake MSA) has 88.30 percent of the deposits within this rated area, which is the AA we selected for analysis using full-scope procedures and weighted most heavily in our overall conclusions. All other AAs were analyzed using limited-scope procedures. This was consistent for both the 2012 through 2013 analysis and the 2014 through 2015 analysis. We based our ratings primarily on the results of the area that received a full-scope review. We also gave greater consideration to the bank's performance in the 2014 through 2015 portion of the evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Utah is low satisfactory. Based on the full-scope review, the bank's performance in the Salt Lake MSA is adequate.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs in the Salt Lake MSA. Key's deposit market share for the Salt Lake MSA is 0.56 percent and the bank is ranked 16th out of 44 deposit-taking entities. However, 12 of the top 15 deposit-taking institutions are non-traditional retail institutions that take nationwide deposits with only one office in the MSA. These 12 entities account for over 81 percent of the deposit market share for this MSA. For home purchase loans, the bank is ranked 80th out of 263 lenders (top 30 percent) with a 0.12 percent market share. The top two home purchase lenders have over 21 percent of the market. For home improvement loans, the bank is ranked ninth out of 89 lenders (top 10 percent) with a 3.77 percent market share. For home refinance loans, the bank is ranked 31st out of 257 lenders (top 12 percent) with a 0.87 percent market share. The top home refinance lender has just over nine percent of the market. Key's market share for small loans to business is 1.51 percent and ranked ninth out of 73 lenders (top 12 percent). The top five small business lenders in the AA have over 77 percent of the market and several are nationwide lenders that have significant small business credit card portfolios.

Refer to table 1, Lending Volume, in the state of Utah section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Key's overall geographic distribution of loans by income level of geography is good in the Salt Lake MSA. Key has adequate geographic distribution of home mortgage loans and excellent distribution of small loans to businesses.

Home Mortgage Loans

Geographic distribution of home purchase and home refinance loans in the Salt Lake MSA is adequate. Geographic distribution of home improvement loans in the Salt Lake MSA is poor. We placed more weight on distribution in moderate-income geographies as those geographies make up a larger percentage of the bank's AA. Refer to tables 2, 3, 4, and 5 in the state of Utah 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.

Home Purchase

The bank's geographic distribution of home purchase loans is adequate. Key bank did not originate or purchase any loans in low-income geographies in 2014 or 2015; however, only 1.96 percent of owner-occupied housing units are in these geographies. The percentage of home purchase loans originated or purchased in moderate-income geographies exceeds the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home purchase loans in moderate-income geographies approximates the bank's overall home purchase loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 due to poorer distribution in moderate-income geographies and had a negative impact on the conclusion.

Home Improvement

The bank's geographic distribution of home improvement loans is poor. The percentage of home improvement loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units located in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies is significantly below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home improvement loans in low-income geographies is near to and in moderate-income geographies significantly below the bank's overall home improvement loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Refinance

The bank's geographic distribution of home refinance loans is adequate. The percentage of home refinance loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units located in low-income geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home refinance loans in low-income geographies exceeds and in moderate-income geographies is below the bank's overall home refinance loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 due to poorer distribution in both low and moderate-income geographies and had no impact on the conclusion.

Small Loans to Businesses

Geographic distribution of small loans to businesses in the Salt Lake MSA is excellent. We placed more weight on distribution in moderate-income geographies as those geographies make up a larger percentage of the bank's AA. Refer to table 6 in the state of Utah section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses is excellent. The percentages of small loans to businesses originated or purchased in low- and moderate-income geographies exceed the percentages of small businesses located in those geographies. The bank's market shares for small loans to businesses in low- and moderate-income geographies exceed the bank's overall small loans to businesses market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Lending Gap Analysis

We analyzed Key's geographic lending patterns throughout the AA and we found no unexplained lending gaps.

Distribution of Loans by Income Level of the Borrower

Key's overall distribution of loans to borrowers of different income levels is adequate in the Salt Lake MSA. Key's borrower distribution of home mortgage loans is good and small loans to businesses is adequate.

Home Mortgage Loans

Key's distribution of home purchase and home refinance loans among individuals of different income levels in the Salt Lake MSA is good. The borrower distribution of home improvement loans is adequate. Refer to tables 8, 9 and 10 in the state of Utah 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.

Home Purchase

The bank's borrower distribution of home purchase loans is good. The percentage of home purchase loans originated or purchased to low-income borrowers is below and for moderate-income borrowers exceeds the percentage of families defined as such in the AA. The bank's market shares for home purchase loans to low- and moderate-income borrowers are below the bank's overall home purchase loan market share. Performance for 2012 through 2013 is stronger than the distribution for 2014 through 2015 due to better distribution to low-income borrowers and had a positive impact on the conclusion.

Home Improvement

The bank's borrower distribution of home improvement loans is adequate. The percentage of home improvement loans originated or purchased to low-income borrowers is well below and for moderate-income borrowers near to the percentage of families defined as such located in the AA. The bank's market share for home improvement loans to low-income borrowers is below and moderate-income borrowers well below the bank's overall home improvement loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Refinance

The bank's borrower distribution of home refinance loans is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below the percentage of low-income families located in the AA. The percentage of home refinance loans originated or purchased to moderate-income borrowers exceeds the percentage of moderate-income families located in the AA. The bank's market share for home refinance loans to low-income borrowers is near to and moderate-income borrowers exceeds the bank's overall home refinance loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Small Loans to Businesses

Borrower distribution of small loans to businesses in the Salt Lake MSA is adequate. Refer to table 11 in the state of Utah 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.

Key's borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses originated or purchased is below the percentage of small businesses located in the AA. The bank's market share for small loans to businesses exceeds the bank's overall small business loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 and had a negative impact on the conclusion.

Community Development Lending

Key is a leader in making community development loans. The level of community development lending in the Salt Lake MSA is excellent and had a positive impact on the lending test rating. They were all responsive to identified community development needs. Competition for community development lending opportunities in the Salt Lake MSA is strong given the number of non-traditional financial institutions subject to CRA that are chartered in the MSA. Key originated five affordable housing community development loans totaling over \$22 million. These loans facilitated the creation or redevelopment of 182 affordable housing units. In addition, Key originated seven economic development loans totaling over \$11.4 million.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development

lending in the Salt Lake MSA equaled 9.65 percent of allocated Tier One Capital as of December 31, 2015.

Refer to table 1, Lending Volume, in the state of Utah section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Product Innovation and Flexibility

Key makes little use of innovative and flexible lending practices in order to serve assessment area credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Ogden-Clearfield, UT, Provo-Orem, UT MSAs, and the UT non-MSA areas is consistent with the bank's overall low satisfactory performance under the lending test in the state of Utah. In the Logan, UT MSA, is weaker than the bank's overall performance in the state due to a very poor level of activity as to not allow a meaningful analysis and did not impact the conclusion. Refer to tables 1 through 12 in the state of Utah section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Utah is rated high satisfactory. Based on a full-scope review, performance in the Salt Lake MSA AA is good. Refer to table 14 in the state of Utah section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Key has a good level of qualified investments in the Salt Lake MSA AA. Key made one current-period qualified investments totaling almost \$11.6 million in the AA. They have eight prior-period investments totaling almost \$8 million that continue to benefit the AA. In addition, they made 43 grants totaling \$408 thousand to a variety of organizations that support community services targeted to low- and moderate-income individuals and revitalization and stabilization of low- and moderate-income geographies. The combined current and prior period investment dollar volume represents 5.77 percent of the Tier One Capital allocated to the AA.

The bank exhibits excellent responsiveness to credit and community economic development needs in the Salt Lake MSA AA. The current-period qualified investment and all but one of the prior-period investments are LIHTCs that support over 681 units of affordable housing. The

remaining prior-period investment is in microenterprise loan fund that helps to support small business development.

The bank has almost \$2.3 million in three current-period qualified investments and 14 prior-period qualified investments of \$288 thousand that benefitted a broader statewide or regional area that includes the bank's AAs which helps to support the overall high satisfactory rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Ogden, UT MSA and Utah non-MSA AAs is stronger than the bank's performance in the Salt Lake MSA full-scope area. The stronger performance is represented by investment levels that are relatively higher based on the bank's operations in the respective AAs. Performance in the Logan, UT AA, and Provo-Orem AA are weaker than the bank's performance in the full-scope area due to minimal investments made in those AAs. The bank's performance in the limited-scope AAs had a neutral impact on the overall investment test rating for the state of Utah.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Key's performance under the service test performance in the state of Utah is rated outstanding. Based on a full-scope review, performance in the Salt Lake MSA AA is excellent. Performance in the limited-scope AAs had a neutral impact on the service test rating in the state of Utah.

Retail Banking Services

Refer to table 15 in the state of Utah section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's delivery systems are readily accessible to geographies and individuals of different income levels in the Salt Lake MSA. Key's distribution of banking offices in both low-and moderate-income geographies exceeds the percentage of the population that resides there.

To the extent changes have been made, Key's record of opening and closing branches has not adversely affected the accessibility of delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Key did not open any branches and closed two branches, neither of which were located in a low- or moderate-income geography.

Services including, where appropriate, business hours do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income geographies, and/or individuals. Banking hours in the AA reflect comparable banking hours for all branches without regard to the income levels represented by the branches' geographic locations. Key offers traditional banking services at all branches.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Key provides an adequate level of CD services to the AA that were responsive to local community development needs. Bank employees devoted 252 hours in financial expertise, including Board Activities and financial and management advice to five organizations with CD purposes for affordable housing, community services and revitalization and stabilization.

Two examples include: Key employees dedicated approximately 126 hours in financial and management advice that provides free basic income tax return preparation to low- and moderate-income individuals regardless of age. Key employees also dedicated approximately 30 hours in board activities to an organization that provides HUD-approved education and counselling, loan products, and foreclosure prevention services to low- and moderate-income homebuyers.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Key's performance under the service test in the non-MSA AAs is consistent with the overall outstanding performance noted in the Salt Lake MSA. Performance in the Logan, Ogden, and Provo AAs is weaker due to poorer branch distribution in low-income geographies and did not have an impact on the overall conclusion for the service test rating in the state of Utah.

State Rating

State of Vermont

CRA rating:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Key's distribution of loans among geographies is adequate. Performance for home mortgage loans and small loans to businesses is adequate.
- Key's distribution of home mortgage loans by income level of borrower and small loans to businesses of different sizes is adequate.
- Key's excellent level of community development lending had a significantly positive impact on the bank's overall lending test rating.
- Key's performance in qualified community development investments is excellent.
- Key provides adequate retail banking services are reasonably accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Vermont

Key has delineated two AAs within the state of Vermont. They include the Burlington-South Burlington, VT MSA as well as the following four non-MSA counties: Addison, Rutland, Washington, and Windham.

Based on June 30, 2015, FDIC summary of deposit information, Key has \$719.57 million in deposits in the state, which represents 1.04 percent of the bank's total deposits. The bank made 0.96 percent of its evaluation period lending in this state

Key has 12 office locations and no deposit-taking ATMs within the state. The bank ranks fifth in deposit market share with 5.95 percent. Primary competitors include People's United Bank N.A. with 22.81 percent, TD Bank N.A. with 20.57 percent and Merchants Bank with 11.14 percent. There are 23 FDIC-insured depository institutions within the bank's AAs.

Refer to the market profiles for the state of Vermont in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Vermont

The Burlington-South Burlington, VT MSA (Burlington MSA) has 85.23 percent of the deposits within this rated area, which is the AA we selected for analysis using full-scope procedures and weighted most heavily in our overall conclusions. All other AAs were analyzed using limited-scope procedures. This was consistent for both the 2012 through 2013 analysis and the 2014 through 2015 analysis. We based our ratings primarily on the results of the area that received a full-scope review. We also gave greater consideration to the bank's performance in the 2014 through 2015 portion of the evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Vermont is low satisfactory. Based on the full-scope review, the bank's performance in the Burlington MSA is adequate. We placed more weight on small loans to businesses than home mortgage loans since the bank made a significantly higher number of small loans to businesses. Within home mortgage loans, our conclusions are based on home refinance loans as the bank did not originate enough home purchase or home improvement loans to conduct meaningful analyses on these products. Poor responsiveness in lending activity was offset by excellent responsiveness in community development lending.

Lending Activity

Lending levels reflects poor responsiveness to assessment area credit needs in the Burlington MSA. Key's deposit market share for Burlington MSA is 13.22 percent and the bank is ranked fourth out of 12 deposit-taking entities. The top three depository institutions have almost 70 percent of the deposit market. For home purchase loans, the bank is ranked 77th out of 158 lenders with a 0.08 percent market share. For home improvement loans, the bank is ranked 12th out of 49 lenders with a 1.95 percent market share. For home refinance loans, the bank is ranked 23rd out of 139 lenders with a 1.19 percent market share. Key's market share for small loans to business is 1.45 percent and ranked 15 out of 53 lenders.

Refer to table 1, Lending Volume, in the state of Vermont section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Key's overall geographic distribution of loans by income level of geography is adequate in the Burlington MSA. Key had adequate geographic distribution of both home mortgage loans and small loans to businesses.

Home Mortgage Loans

Geographic distribution of home refinance loans in the Burlington MSA is adequate. We placed more weight on distribution in moderate-income geographies as those geographies make up a larger percentage of the bank's AA. Refer to tables 2, 3, 4, and 5 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.

Home Refinance

The bank's geographic distribution of home refinance loans is adequate. Key did not originate or purchase any home refinance loans in low-income geographies, however only 0.40 percent of owner-occupied units are in those geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies is near to the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home refinance loans in moderate-income geographies is below the bank's overall home refinance loan market share. Performance for 2012 through 2013 was weaker than the distribution for 2014 through 2015 and had no impact on the conclusion.

Small Loans to Businesses

Geographic distribution of small loans to businesses in the Burlington MSA is adequate. We placed more weight on distribution in moderate-income geographies as those geographies make up a larger percentage of the bank's AA. Refer to table 6 in the state of Vermont section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses is adequate. Key did not originate or purchase any small loans to businesses in low-income geographies, however only 1.10 percent of businesses are located in those geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies was below the percentage of small businesses located in moderate-income geographies. The bank's market share for small loans to businesses in moderate-income geographies exceeds the bank's overall small loans to businesses market share. Performance for 2012 through 2013 was stronger than the distribution for 2014 through 2015 and had a positive impact on the conclusion.

Lending Gap Analysis

We analyzed Key's geographic lending patterns throughout the AA and we found no unexplained lending gaps.

Distribution of Loans by Income Level of the Borrower

Key's overall distribution of loans to borrowers of different income levels is adequate in the Burlington MSA. Key's borrower distribution of home mortgage loans and small loans to businesses is adequate.

Home Mortgage Loans

Key's borrower distribution of home refinance loans is adequate. Refer to tables 8, 9 and 10 in the state of Vermont 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.

Home Refinance

The bank's borrower distribution of home refinance loans is adequate. The percentage of home refinance loans originated or purchased to low- and moderate-income borrowers is well below the percentage of low- or moderate-income families located in the AA. The bank's market shares for home refinance loans to low- and moderate-income borrowers are well below the bank's overall home refinance loan market share. Performance for 2012 through 2013 was stronger than the distribution for 2014 through 2015 and had a positive impact on the conclusion.

Small Loans to Businesses

Borrower distribution of small loans to businesses in the Burlington MSA is adequate. Refer to table 11 in the state of Vermont 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.

Key's borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses originated or purchased is below the percentage of small businesses located in the AA. The bank's market share for small loans to businesses exceeds the bank's overall small business loan market share. Performance for 2012 through 2013 was stronger than the distribution for 2014 through 2015 and had a positive impact on the conclusion.

Community Development Lending

Key is a leader in making community development loans, all of which were responsive to community development needs. The level of community development lending in the Burlington MSA is excellent and had a positive impact on the lending test rating. Key originated 15 affordable housing community development loans totaling over \$125 million. Key originated two loans totaling \$2 million to facilitate qualified community development services. In addition, Key originated three economic development loans totaling over \$7.8 million.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Burlington MSA equaled 173.3 percent of allocated Tier One Capital as of December 31, 2015.

Refer to table 1, Lending Volume, in the state of Vermont section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all

multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Product Innovation and Flexibility

Key makes little use of innovative and flexible lending practices in order to serve assessment area credit needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Vermont non-MSA AA is weaker than the bank's overall low satisfactory performance under the lending test in the Burlington MSA due to a lack of community development lending. The weaker performance no impact on the conclusion. Refer to tables 1 through 12 in the state of Vermont section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Vermont is rated outstanding. Based on a full-scope review, performance in the Burlington MSA is excellent. Refer to table 14 in the state of Vermont section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Key has an excellent level of qualified investments in the Burlington MSA. Key made four current-period qualified investments totaling almost \$13.5 million in the AA. They have nine prior-period investments totaling almost \$4.6 million that continue to benefit the AA. In addition, they made 30 grants totaling \$215 thousand to a variety of organizations that support community services targeted to low- and moderate-income individuals and revitalization and stabilization of low- and moderate-income geographies. The combined current and prior period investment dollar volume represents 23.42 percent of the Tier One Capital allocated to the AA.

The bank exhibits excellent responsiveness to credit and community economic development needs in the Burlington MSA. All of the current-period qualified investments and eight of the prior-period investments are LIHTCs that support over 285 units of affordable housing. The remaining current-period investment is real estate investment fund that specializes in economic development.

The bank has almost \$1.6 million in 16 prior-period qualified investments that benefitted a broader statewide or regional area that includes the bank's AAs and helps to support the overall outstanding rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Vermont non-MSA AA is consistent with the bank's overall outstanding performance under the investment test in the Burlington MSA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Key's performance under the service test in the state of Vermont is rated low satisfactory. Based on a full-scope review, performance in the Burlington MSA is adequate. Performance in the limited-scope AAs had a neutral impact the service test rating in Vermont.

Retail Banking Services

Refer to table 15 in the state of Vermont section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's delivery systems are reasonably accessible to geographies and individuals of different income levels in the Burlington MSA. Key's distribution of banking offices is poor in low-income geographies and good in moderate-income geographies.

Key has no branches in low-income geographies. Key's branch distribution in moderate-income geographies is below the percentage of the population that resides there. Branch distribution is enhanced by one bank branch located in a middle-income geography that is within one-half mile of a moderate-income geography. Our evaluation of the proximity of this branch included consideration of the absence of physical barriers, such as water or highways, which might obstruct convenient access to the branch. We placed more emphasis on the performance in the moderate-income geographies because only 1.54 percent of the AA population lives in low-income geographies.

To the extent changes have been made, Key's record of opening and closing branches has generally not adversely affected the accessibility of delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. Key did not open any branches and closed one branch, which was located in a moderate-income geography.

Services including, where appropriate, business hours do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income geographies, and/or individuals. Banking hours in the AA reflect comparable banking hours for all branches without regard to the income levels represented by the branches geographic locations. Key offers traditional banking services at all branches.

Two branches, neither of which are located in low- and moderate-income geographies, offer the KeyBank Plus service, which primarily targets the needs of low- and moderate-income

customers and the unbanked. This service allows customers to cash their approved payroll, tax refund, or government checks for a low fee and every fifth check cashed is free. Participants are also eligible to receive five fee-free money orders when they cash their check.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Key provides an adequate level of CD services to the AA that were responsive to local community development needs. Bank employees devoted 511 hours in financial expertise, including board activities to three organizations with CD purposes for affordable housing and community services.

Two examples include: Key employees dedicated approximately 235 hours in board activities to a nonprofit organization that provides free rehabilitation and critical repairs to homes of low-income persons. Key employees also dedicated approximately 38 hours in board activities to an organization that provides emergency shelter, services and housing for homeless or marginally housed persons.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Key's performance under the service test in the non-MSA AA is stronger than the overall low satisfactory performance noted in the Burlington MSA due to better branch distribution in moderate-income geographies. The non-MSA AA does not contain low-income geographies. The stronger performance in the limited-scope AA positively impact the service test rating.

State Rating

State of Washington

CRA rating³:	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:

- Key's distribution of loans among geographies is excellent. Performance for home purchase loans is excellent and small loans to businesses is excellent.
- Key's excellent level of community development lending had a significantly positive impact on the bank's overall lending test rating.
- Key's performance in qualified community development investments is excellent.
- Key provides excellent retail banking services readily accessible to geographies and individuals of different income levels.

Description of Institution's Operations in Washington

Key has delineated 12 AAs within the state of Washington. They include the Bellingham, Bremerton-Silverdale, Kennewick-Richland, Longview, Mount Vernon-Anacortes, Olympia-Tumwater, Seattle-Bellevue-Everett, Spokane-Spokane Valley, Tacoma-Lakewood, Wenatchee, and Yakima, WA MSAs, as well as the following nine non-MSA counties: Clallam, Grant, Grays Harbor, Island, Lewis, Lincoln, Mason, Pacific, and San Juan.

Based on June 30, 2015, FDIC summary of deposit information, Key has \$9.30 billion in deposits in the state, which represents 13.41 percent of the bank's total deposits. The bank made 13.21 percent of its evaluation period lending in this state.

Key has 154 office locations and 126 deposit-taking ATMs within the state. The bank ranks fifth in deposit market share with 7.15 percent. Primary competitors include Bank of America N.A. with 22.19 percent, Wells Fargo Bank, N.A. with 12.32 percent, US Bank N.A. with 10.34 percent, and JPMorgan Chase Bank, N.A. with 9.78 percent. There are 88 FDIC-insured depository institutions within the bank's AAs.

³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the market profiles for the state of Washington in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Washington

The Seattle-Bellevue-Everett, WA MSA (Seattle MSA) has 68.75 percent of the deposits within this rated area, which is the AA we selected for analysis using full-scope procedures and weighted most heavily in our overall conclusions. All other AAs were analyzed using limited-scope procedures. This was consistent for both the 2012 through 2013 analysis and the 2014 through 2015 analysis. We based our ratings primarily on the results of the area that received a full-scope review. We also gave greater consideration to the bank's performance in the 2014 through 2015 portion of the evaluation period because it was more reflective of the bank's current business environment and capacity. Please see the table in appendix A for more information.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the state of Washington is outstanding. Based on the full-scope review, the bank's performance in the Seattle MSA is excellent.

Lending Activity

Lending levels reflect adequate responsiveness to assessment area credit needs in the Seattle MSA. Key's deposit market share for the Seattle MSA is 8.55 percent, and the bank is ranked fifth out of 57 deposit-taking entities. For home purchase loans, the bank is ranked 49th out of 438 lenders (top 11 percent) with a 0.38 percent market share. For home improvement loans, the bank is ranked seventh out of 157 lenders (top four percent) with a 3.33 percent market share. The top lender is Boeing Employees Credit Union, with a 30.66 percent market share. For home refinance loans, the bank is ranked 18th out of 443 (top four percent) with a 1.01 percent market share. Although the bank's market share in home purchase, home improvement, and home refinance loans is below the bank's deposit market share, Key's performance is adequate when considering the number of lenders and depository institutions and competition. Key's market share for small loans to business is 1.76 percent and the bank is ranked tenth out of 108 lenders (top nine percent). The top four small business lenders in the AA have 58.83 percent of the market and are nationwide lenders that have significant small business credit card portfolios.

Refer to table 1, Lending Volume, in the state of Washington section of appendix D for the facts and data used to evaluate the bank's lending activity.

Distribution of Loans by Income Level of the Geography

Key's overall geographic distribution of loans by income level of geography is excellent in the Seattle MSA. Key has good geographic distribution of home mortgage loans and excellent distribution of small loans to businesses.

Home Mortgage Loans

Geographic distribution for home purchase loans in the Seattle MSA is excellent. Geographic distribution for home improvement and home refinance loans in the Seattle MSA is good. We placed more weight on the distribution in moderate-income geographies, as those geographies make up a larger percentage of the bank's AA. Refer to tables 2, 3, and 4 in the state of Washington 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.

Home Purchase

The bank's geographic distribution of home purchase loans is excellent. The bank's geographic distribution of home purchase loans for 2014 through 2015 is excellent. The percentage of home purchase loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units located in low-income geographies. The percentage of home purchase loans originated or purchased in moderate-income geographies exceeds the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market shares for home purchase loans in low- and moderate-income geographies exceed the bank's overall home purchase loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 and considered good. The percentage of home purchase loans originated or purchased in low-income geographies is below the percentage of owner-occupied housing units located in low-income geographies. The weaker performance did not have a material impact on the overall conclusion.

Home Improvement

The bank's geographic distribution of home improvement loans is good. The bank's geographic distribution of home improvement loans for 2014 through 2015 is excellent. The percentage of home improvement loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units located in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies exceeds the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market share for home improvement loans in low-income geographies is below the bank's overall home improvement loan market share. The bank's market share for home improvement loans in moderate-income geographies exceeds the bank's overall home improvement loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 and considered adequate. The percentage of home improvement loans originated or purchased in low-income geographies is near to the percentage of owner-occupied housing units located in low-income geographies. The percentage of home improvement loans originated or purchased in moderate-income geographies is well below the percentage of owner-occupied housing units located in

moderate-income geographies. The bank's market share for home improvement loans in moderate-income geographies is well below the bank's overall home improvement loan market share. The weaker performance did not have a material impact on the overall conclusion.

Home Refinance

The bank's geographic distribution of home refinance loans is good. The bank's geographic distribution of home refinance loans for 2014 through 2015 is excellent. The percentage of home refinance loans originated or purchased in low-income geographies exceeds the percentage of owner-occupied housing units located in low-income geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies exceeds the percentage of owner-occupied housing units located in moderate-income geographies. The bank's market shares for home refinance loans in low- and moderate-income geographies exceed the bank's overall home refinance loan market share. Performance for 2012 through 2013 is weaker than the distribution for 2014 through 2015 and considered adequate. The percentage of home refinance loans originated or purchased in low-income geographies is well below the percentage of owner-occupied housing units located in low-income geographies. The percentage of home refinance loans originated or purchased in moderate-income geographies is below the percentage of owner-occupied housing units located in moderate-income geographies. The weaker performance did not have a material impact on the overall conclusion.

Small Loans to Businesses

Geographic distribution of small loans to businesses in the Seattle MSA is excellent.

Refer to table 6 in the state of Washington section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The bank's geographic distribution of small loans to businesses is excellent. The bank's geographic distribution of small loans to businesses for 2014 through 2015 is excellent. The percentage of small loans to businesses originated or purchased in low-income geographies exceeds the percentage of small businesses located in low-income geographies. The percentage of small loans to businesses originated or purchased in moderate-income geographies exceeds the percentage of small businesses located in moderate-income geographies. The bank's market share for small loans to businesses in low- and moderate-income geographies exceeds the bank's overall small loans to businesses market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Lending Gap Analysis

We analyzed Key's geographic lending patterns throughout the AA and we found no unexplained lending gaps.

Distribution of Loans by Income Level of the Borrower

Key's overall distribution of loans to borrowers of different income levels is adequate in the Seattle MSA. Key's borrower distribution of home mortgage loans is good and small loans to businesses is adequate.

Home Mortgage Loans

Key's distribution of home mortgage loans among individuals of different income levels in the Seattle MSA is good.

Refer to tables 8, 9 and 10 in the state of Washington 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.

Home Purchase

The bank's borrower distribution of home purchase loans is excellent. The bank's borrower distribution of home purchase loans for 2014 through 2015 is excellent. The percentage of home purchase loans originated or purchased to low-income borrowers is near to and for moderate-income borrowers exceeds the percentage of families defined as such in the AA. The bank's market shares for home purchase loans to low- and moderate-income borrowers exceed the bank's overall home purchase loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Improvement

The bank's borrower distribution of home improvement loans is good. The bank's borrower distribution of home improvement loans for 2014 through 2015 is good. The percentage of home improvement loans originated or purchased to low-income borrowers is below and for moderate-income borrowers exceeds the percentage of families defined as such located in the AA. The bank's market shares for home improvement loans to low- and moderate-income borrowers exceed the bank's overall home improvement loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Home Refinance

The bank's borrower distribution of home refinance loans is good. The bank's borrower distribution of home refinance loans for 2014 through 2015 is good. The percentage of home refinance loans originated or purchased to low-income borrowers is below the percentage of low-income families located in the AA. The percentage of home refinance loans originated or purchased to moderate-income borrowers exceeds the percentage of moderate-income families located in the AA. The bank's market share for home refinance loans to low- and moderate-income borrowers exceeds the bank's overall home refinance loan market share. Performance for 2012 through 2013 is consistent with the distribution for 2014 through 2015.

Small Loans to Businesses

Borrower distribution of small loans to businesses in the Seattle MSA is adequate. Refer to table 11 in the state of Washington 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.

Key's borrower distribution of small loans to businesses is adequate. The bank's borrower distribution of small loans to businesses for 2014 through 2015 is adequate. The percentage of small loans to businesses originated or purchased is below the percentage of small businesses located in the AA. The bank's market share for small loans to businesses exceeds the bank's overall small business loan market share. Performance for 2012 through 2013 is consistent with 2014 through 2015.

Community Development Lending

Key is a leader in making community development loans. The level of community development lending in the Seattle MSA is excellent and had a significantly positive impact on the lending test rating. There are ample community development lending opportunities in the Seattle MSA. Key originated 43 affordable housing community development loans totaling \$357 million. Key originated 14 loans totaling \$28 million to facilitate qualified community development services. In addition, Key originated six revitalization/stabilization loans totaling \$15 million. All of the community development loans were responsive to the needs of the AA. Seven loans, totaling \$45 million, are considered complex and/or innovative.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. The bank's level of community development lending in the Seattle MSA equaled 44.88 percent of allocated Tier One Capital as of December 31, 2015.

Refer to table 1, Lending Volume, in the state of Washington section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans.

Product Innovation and Flexibility

Key makes use of innovative and flexible lending practices in order to serve assessment area credit needs. See the community Development Lending section for more detail about innovative and flexible community development loans in the Seattle MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Bellingham, WA MSA and the Mount Vernon – Anacortes, WA MSA AAs is consistent with the

bank's overall outstanding performance under the lending test in the Seattle MSA. In the Bremerton – Silverdale, WA MSA, Kennewick – Richland, WA MSA, Olympia – Tumwater, WA MSA, Tacoma – Lakewood, WA MSA, Yakima, WA MSA, and WA Non-MSA, WA AAs, the bank's performance is weaker than the bank's overall outstanding performance under the lending test in the Seattle MSA and considered good. For the Bremerton – Silverdale, WA MSA, Olympia – Tumwater, WA MSA, and Yakima, WA MSA AAs, the geographic distribution is weaker. For the Kennewick – Richland, WA MSA and WA Non-MSA AAs, no community development loans were originated or purchased in these AAs. For the Tacoma – Lakewood, WA MSA, AAs, the geographic distribution is weaker and there was a lower level of community development loans originated or purchased in this AA. For the Longview, WA MSA, Spokane – Spokane Valley, WA MSA, and Wenatchee, WA MSA AAs, the volume of home mortgage and small loans to businesses was insufficient to result in a meaningful analysis or conclusions and no community development loans were originated or purchased. Key's performance in the limited-scope areas did not impact the overall lending test rating for the state of Washington. Refer to tables 1 through 12 in the state of Washington section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in the state of Washington is rated outstanding. Based on a full-scope review, performance in the Seattle MSA AA is excellent. Refer to table 14 in the state of Washington section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Key has an excellent level of qualified investments in the Seattle MSA AA. Key made 15 current-period qualified investments totaling almost \$74.3 million in the AA. They have 29 prior-period investments totaling \$22.7 million that continue to benefit the AA. In addition, they made 79 grants totaling \$853 thousand to a variety of organizations that support community services targeted to low- and moderate-income individuals and revitalization and stabilization of low- and moderate-income geographies. The combined current and prior period investment dollar volume represents 10.98 percent of the Tier One Capital allocated to the AA.

The bank exhibits excellent responsiveness to credit and community economic development needs in the Burlington MSA. Thirteen of the current-period qualified investments and all of the prior-period investments are in LIHTCs or other housing related investments that support over 3,079 units of affordable housing. The remaining current-period investments are New Market Tax Credits that supports small business development.

The bank has almost \$2.6 million in four current-period qualified investments and six prior-period qualified investments of \$2.2 million that benefitted a broader statewide or regional area that includes the bank's AAs and helps to support the overall outstanding rating.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Bellingham, Bremerton-Silverdale, Kennewick-Richland, Olympia, Yakima, and Washington non-MSA AAs is consistent with the bank's overall outstanding performance under the investment test in the Seattle, WA MSA AA. Performance in the Longview, Mount Vernon-Anacortes, Spokane-Spokane Valley, Tacoma-Lakewood, and Wenatchee AAs is weaker than the bank's performance in the Seattle, WA MSA AA. The weaker performance is due to lower levels of current- and prior-period investments in those AAs. The performance in the limited-scope areas had a neutral impact on the overall investment test rating for the state of Washington.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Key's performance under the service test in the state of Washington is rated outstanding. Based on a full-scope review, performance in the Seattle AA is excellent. Performance in the limited-scope AAs had a neutral impact the service test rating in Washington.

Retail Banking Services

Refer to table 15 in the state of Washington section of appendix D for facts and data used to evaluate the distribution of branch delivery systems and branch openings and closings.

Key's delivery systems are readily accessible to geographies and individuals of different income levels in the Seattle AA. Key's distribution of branch offices in both low- and in moderate-income geographies exceeds the percentage of population that resides there.

To the extent that changes have been made, Key's record of opening and closing branches has generally not adversely affected the accessibility of delivery systems. Key opened six branches, none of which were located in a low- or moderate-income geography. Key closed nine branches, including two in low-income and two in moderate-income geographies.

Services including, where appropriate, business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies, and /or individuals. Banking hours in the AA reflect comparable banking hours for all branches without regard to the income levels represented by the branches' geographic locations. Key offers traditional banking services at all branches.

One branch, which is located in a moderate-income geography, offers the KeyBank Plus service, which primarily targets the needs of low- and moderate-income customers and the unbanked. This service allows customers to cash their approved payroll, tax refund, or government checks for a low fee and every fifth check cashed is free. Participants are also eligible to receive five fee-free money orders when they cash their check.

Key offers an array of alternative delivery systems for its products and services to help reach its customers. These include ATMs, online banking, and telephone banking. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of Key's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding the bank's performance under the service test.

Community Development Services

Key provides an excellent level of CD services to the AA that were responsive to local community development needs. Key employees devoted 2,365 hours in financial expertise, including board activities, fundraising, committee membership, financial and management advice to 31 organizations with CD purposes for affordable housing, community services, and economic development.

Two examples include: Key employees dedicated approximately 216 hours in board activities to an organization that connects local organizations and community leaders with resources to revitalize neighborhoods. The organization works with a vast network of community-based partner organizations to make investments in housing, jobs, education, safety, and health for low-income persons and connects low-income people with the services they need to achieve their financial goals. The organization provides free or low-cost one-on-one support to low-income individuals who want to understand more about their money, make good financial decisions, and have choices for savings and loans.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Key's performance under the service test in the Bremerton, Mt. Vernon, Olympia, Spokane, Yakima, and Non-MSA AAs is consistent with the overall outstanding performance noted in the Seattle AA. Performance in the Kennewick AA is weaker due to poorer branch distribution in low-income geographies. Performance in the Bellingham and Tacoma AAs is weaker due to poorer branch distribution in moderate-income geographies. Performance in the Longview is weaker due to no branches in low- or moderate-income geographies. The Wenatchee AA has no low- or moderate-income geographies. The weaker performance in the limited-scope areas did not have a material impact on the overall conclusions for the service test rating.

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 metropolitan and nonmetropolitan areas 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”).

Note: For a list of the counties within each state’s non-MSA AAs, please refer to the “Description of Institution’s Operations” contained within the narrative for each state.

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/2012 to 12/31/2015) Investment and Service Tests and CD Loans: (10/01/2011 to 12/31/2015)	
Financial Institution	Products Reviewed	
KeyBank, N.A.	HMDA reported loans, CRA loans, community development loans, qualified investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Key Community Development Corporation	Subsidiary of KeyBank, National Association	Community Development Loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information - Counties
Portland OR-WA Multistate MMA	Full scope	Clackamas, Clark, Multnomah, Washington, Yamhill
State of Alaska Anchorage, AK MSA	Full scope	Anchorage, Matanuska-Susitna
Fairbanks, AK MSA AK Non-MSA	Limited scope Limited scope	Fairbanks North Star
State of Colorado Denver-Aurora-Lakewood, CO MSA	Full scope	Adams, Arapahoe, Broomfield, Denver, Douglas, Jefferson Boulder
Boulder, CO MSA Colorado Springs, CO MSA Fort Collins, CO MSA CO Non-MSA	Limited scope Limited scope Limited scope Limited scope	El Paso Larimer
State of Florida Naples-Immokalee-Marco Island, FL MSA	Full scope	Collier
Cape Coral-Fort Myers, FL MSA	Limited scope	Lee

West Palm Beach-Boca Raton-Delray Beach, FL MD FL Non-MSA	Limited scope	Palm Beach
State of Idaho Boise City, ID MSA Idaho Falls, ID MSA Pocatello, ID MSA ID Non-MSA	Full scope Limited scope Limited scope Limited scope	Ada, Canyon, Gem Bonneville Bannock
State of Indiana Indianapolis-Carmel-Anderson, IN MSA	Full scope	Boone, Hamilton, Hendricks, Johnson, Madison, Marion, Morgan, Shelby
Elkhart-Goshen, IN MSA Kokomo, IN MSA South Bend-Mishawaka, IN-MI MSA IN Non-MSA	Limited scope Limited scope Limited scope Limited scope	Elkhart Howard St. Joseph
State of Maine Portland-South Portland, ME MSA	Full scope	Cumberland, Sagadahoc, York
Bangor, ME MSA Lewiston-Auburn, ME MSA ME Non-MSA	Limited scope Limited scope Limited scope	Penobscot Androscoggin
State of Michigan Ann Arbor, MI MSA Detroit-Dearborn-Livonia, MI MD Monroe, MI MSA Warren-Troy-Farmington, MI MD MI Non-MSA	Full scope Limited scope Limited scope Limited scope Limited scope	Washtenaw Wayne Monroe Livingston and Oakland
State of New York Albany-Schenectady-Troy, NY MSA	Full scope	Albany, Rensselaer, Saratoga, Schenectady, Schoharie
Buffalo-Cheektowaga-Niagara Falls, NY MSA	Limited scope	Erie, Niagara
Dutchess County-Putnam County, NY MD	Limited scope	Dutchess and Putnam
Glens Falls, NY MSA	Limited scope	Warren
Kingston, NY MSA	Limited scope	Ulster
New York-Jersey City-White Plains, NY-NJ MD	Limited scope	New York, Orange, Rockland, Westchester
Rochester, NY MSA	Limited scope	Livingston, Monroe, Ontario, Orleans, and Wayne
Syracuse, NY MSA	Limited scope	Madison, Onondaga, Oswego
Utica-Rome, NY MSA	Limited scope	Oneida
Watertown-Fort Drum, NY MSA	Limited scope	Jefferson
NY Non-MSA	Limited scope	
State of Ohio Cleveland-Elyria, OH MSA	Full scope	Cuyahoga, Geauga, Lake, Lorain, Medina
Toledo, OH MSA	Full scope	Fulton, Lucas, Wood
Akron, OH MSA	Limited scope	Portage and Summit
	Limited scope	

<p>Canton-Massillon, OH MSA Cincinnati, OH-KY MSA</p> <p>Columbus, OH MSA</p> <p>Dayton, OH MSA Mansfield, OH MSA Springfield, OH MSA Youngstown-Warren-Boardman, OH MSA OH Non-MSA</p>	<p>Limited scope Limited scope</p> <p>Limited scope</p> <p>Limited scope Limited scope Limited scope</p> <p>Limited scope Limited scope</p>	<p>Carroll and Stark Butler, Clermont, Hamilton, and Warren Delaware, Fairfield, Franklin</p> <p>Greene, Montgomery Richland Clark</p> <p>Mahoning, Trumbull</p>
<p>State of Oregon</p> <p>Salem, OR MSA Albany, OR MSA Corvallis, OR MSA Eugene, OR MSA Grants Pass, OR MSA Medford, OR MSA OR Non-MSA</p>	<p>Full scope Limited scope Limited scope Limited scope Limited scope Limited scope Limited scope</p>	<p>Marion, Polk Linn Benton Lane Josephine Jackson</p>
<p>State of Utah</p> <p>Salt Lake City, UT MSA Logan, UT MSA Ogden-Clearfield, UT MSA Provo-Orem, UT MSA UT Non-MSA</p>	<p>Full scope Limited scope Limited scope Limited scope Limited scope</p>	<p>Salt Lake, Tooele Cache Davis, Box Elder, and Weber Utah</p>
<p>State of Vermont</p> <p>Burlington-South Burlington, VT MSA VT Non-MSA</p>	<p>Full scope Limited scope</p>	<p>Chittenden, Franklin</p>
<p>State of Washington</p> <p>Seattle-Bellevue-Everett, WA MD Bellingham, WA MSA Bremerton-Silverdale, WA MSA Kennewick-Richland, WA MSA Longview, WA MSA Mount Vernon-Anacortes, WA MSA Olympia-Tumwater, WA MSA Spokane-Spokane Valley, WA MSA Tacoma-Lakewood, WA MD Wenatchee, WA MSA Yakima, WA MSA WA Non-MSA</p>	<p>Full scope Limited scope Limited scope Limited scope Limited scope Limited scope Limited scope Limited scope Limited scope Limited scope Limited scope Limited scope</p>	<p>King, Snohomish Whatcom Kitsap Benton Cowlitz Skagit Thurston Stevens Pierce Chelan Yakima</p>

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS KeyBank, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
KeyBank, N.A.	High Satisfactory	Outstanding	Outstanding	Outstanding
Multistate Metropolitan Area or State:				
Portland OR/WA Multistate MMA	Outstanding	Outstanding	Outstanding	Outstanding
Alaska	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Colorado	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Florida	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Idaho	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Indiana	High Satisfactory	Outstanding	Outstanding	Outstanding
Maine	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Michigan	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
New York	Outstanding	Outstanding	Outstanding	Outstanding
Ohio	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Oregon	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Utah	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
Vermont	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Washington	Outstanding	Outstanding	Outstanding	Outstanding

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

Appendix C: Market Profiles for Full-Scope Areas

Portland-Vancouver-Hillsboro, OR-WA MMA (Portland OR/WA MultiState)

Demographic Information for Full-Scope Area: Portland OR/WA MultiState						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	476	2.94	24.16	46.22	26.26	0.42
Population by Geography	2,165,592	2.76	24.05	47.09	26.08	0.01
Owner-Occupied Housing by Geography	521,285	1.29	18.68	49.07	30.96	0.00
Business by Geography	206,310	4.37	22.87	43.05	29.57	0.13
Farms by Geography	6,105	1.80	15.00	52.96	30.19	0.05
Family Distribution by Income Level	524,297	20.45	17.71	21.29	40.54	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	200,083	4.52	33.93	45.90	15.65	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		68,924 73,900 11%	Median Housing Value Unemployment Rate (2010 US Census)		305,178 4.45%	

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

Source: 2010 US Census and 2015 FFIEC updated MFI

The Portland OR/WA Multistate MMA consists of the six counties in Oregon and one county in Washington. According to the FDIC’s 2015 summary of deposit information, Key’s deposits in the AA comprised 3.87 percent of the bank’s total deposits, making this MMA the bank’s sixth largest market in terms of deposits held by Key.

Competition is significant with approximately 35 direct competitors operating 504 offices in the AA. Key operates 53 branches in the AA and has a 6.38 percent deposit market share which ranks fifth among all institutions. Major competitors include US Bank N.A. with 22.85 percent, Bank of America N.A. with 20.15 percent, Wells Fargo Bank, N.A. with 18.58 percent, and JP Morgan Chase Bank N.A. with 9.77 percent.

The Portland OR/WA Multistate has a moderately diversified economy. Key sectors of the economy include professional and business services, education and healthcare services, government, manufacturing, and retail trade. Major employers in the AA include Intel Corporation, Providence Health Systems, Oregon Health & Science University, and Kaiser Permanente. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Portland OR/WA Multistate was 5.3 percent in 2015, compared to 6.1 percent in 2014 and 7.0 percent in 2013.

Data from Moody’s Analytics indicates the median price of a home at December 31, 2015, was \$305,178 for the Portland OR/WA Multistate. This is a 46.40 percent increase from the median home price of \$208,452 at December 31, 2011.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing for low-to-moderate income individuals
- Gap financing for community development projects
- Small-dollar loans to businesses
- Loan programs that help individuals repair their credit

Significant opportunities for participation by financial institutions include the following:

- Originating loans between \$250,000 and \$500,000
- Lending on affordable housing projects

State of Alaska

Anchorage, AK MSA

Demographic Information for Full Scope Area: Anchorage MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	79	1.27	29.11	51.90	17.72	0.00
Population by Geography	380,821	2.03	24.82	53.76	19.39	0.00
Owner-Occupied Housing by Geography	87,632	0.48	16.01	58.29	25.23	0.00
Business by Geography	33,804	1.31	27.32	52.13	19.24	0.00
Farms by Geography	606	0.99	20.46	59.57	18.98	0.00
Family Distribution by Income Level	91,429	19.60	18.01	23.62	38.77	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	34,392	3.25	34.31	53.79	8.64	0.00
Median Family Income		82,861	Median Housing Value	242,183		
FFIEC Adjusted Median Family Income for 2015		89,600	Unemployment Rate (2010 US Census)	4.04%		
Households Below Poverty Level		7%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 US Census and 2015 FFIEC updated MFI

The Anchorage MSA AA consists of one municipality and one borough in the MSA: Anchorage Municipality, and Matanuska-Susitna Borough. According to the FDIC’s 2015 summary of deposit information, Key deposits in the AA comprised 0.94 percent of the bank’s total deposits, making this AA Key’s 23th largest market in terms of deposits held.

Competition is significant with approximately three competitors operating 38 offices in the AA. Key operates 16 branches in the AA and has a 10.51 percent deposit market share which ranks fourth among all institutions. Major competitors include Wells Fargo Bank NA with 53.66 percent, First National Bank Alaska with 20.84 percent and Northrim Bank with 14.98 percent.

The Anchorage MSA AA has a diversified economy. Key sectors of the economy include government, education and healthcare services, retail trade, professional and business services, and leisure and hospitality services. Major employers in the AA include Fort Richardson, Elmendorf Airforce Base, Providence Health & Services, Walmart/Sam’s Club, Carrs/Safeway, Inc., and Fred Meyer. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Anchorage, AK MSA AA was 5.6 percent in 2015, compared to 5.8 percent in 2014 and 5.8 percent in 2013.

Data from Moody’s Analytics indicates the median price of a home at December 31, 2015, was \$242,183 for the Anchorage MSA. This is a 12.03 percent increase from the median home price of \$ 216,179 at December 31, 2011.

A review of community contacts indicated that the following are identified needs within the community:

- Significant shortage of housing of both affordable rental units and single-family, owner-occupied units
- More housing construction
- Loan products consist with Muslim/Islamic religious requirements
- More bank locations in rural areas
- Banking for small business market

Significant opportunities for participation by financial institutions include the following:

- Financing of housing construction
- Serving credit and banking needs of rural communities
- Offering banking products and services to startup and small businesses

State of Colorado

Denver-Aurora-Lakewood, CO MSA

Demographic Information for Full Scope Area: Denver MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	605	11.40	22.64	32.56	32.23	1.16
Population by Geography	2,489,661	11.39	23.34	32.64	32.59	0.05
Owner-Occupied Housing by Geography	631,576	6.50	19.37	35.18	38.95	0.00
Business by Geography	281,937	8.44	20.23	30.31	40.70	0.32
Farms by Geography	5,155	7.24	18.39	32.78	41.51	0.08
Family Distribution by Income Level	605,228	22.09	17.11	20.18	40.62	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	237,240	19.73	34.43	29.58	16.25	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		75,101 79,900 11%	Median Housing Value Unemployment Rate (2010 US Census)	265,725 3.73%		

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

Source: 2010 US Census and 2015 FFIEC updated MFI

The Denver MSA consists of the ten Colorado counties in the MSA: Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, and Park. According to the FDIC’s 2015 summary of deposit information, Key deposits in the AA comprised 4.47 percent of the bank’s total deposits, making this AA Key’s fifth largest market in terms of deposits held.

Competition is significant with approximately 70 competitors operating 620 offices in the AA. Key operates 50 branches in the AA and has a 4.49 percent deposit market share which ranks fifth among all institutions. Major competitors include Wells Fargo Bank, N.A. with 27.37 percent, First Bank with 13.48 percent, US Bank N.A. with 12.61 percent and JP Morgan Chase Bank N.A. with 10.04 percent.

The Denver MSA has a highly diversified economy. Key sectors of the economy include government, professional and business services, education and healthcare services, and retail trade. Major employers in the AA include HealthONE, CenturyLink, Exempla Healthcare, University Colorado Hospital, and Children’s Hospital. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Denver MSA was 3.73 percent in 2015, compared to 4.7 percent in 2014 and 6.4 percent in 2013.

Data from Moody’s Analytics indicates the median price of a home at December 31, 2015, was \$265,725 for the Denver MSA. This is a 52.48 percent increase from the median home price of \$174,269 at December 31, 2011.

A review of community contacts indicated that the following are identified needs within the community:

- More grocery stores within the city for city dweller access on public transportation lines
- Steady demand for micro loans to businesses
- High demand for housing and good-paying jobs
- High demand for education, job training, and mentor programs

Significant opportunities for participation by financial institutions include the following:

- Credit needs of small business with less emphasis on collateral
- Construction loans for new homes
- Lending to small businesses and commercial borrowers

State of Florida

Naples-Immokalee-Marco Island, FL MSA

Demographic Information for Full Scope Area: Naples - Marco Island MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	73	8.22	20.55	38.36	32.88	0.00
Population by Geography	321,520	9.05	20.27	43.40	27.27	0.00
Owner-Occupied Housing by Geography	91,397	2.40	16.42	46.03	35.15	0.00
Business by Geography	47,668	2.68	13.33	42.64	41.35	0.00
Farms by Geography	1,284	6.46	18.77	49.22	25.55	0.00
Family Distribution by Income Level	81,135	21.14	18.31	19.04	41.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	32,010	10.31	27.24	44.01	18.44	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		68,556 66,500 9%	Median Housing Value Unemployment Rate (2010 US Census)	427,396 3.36%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2015 FFIEC updated MFI

The Naples - Marco Island MSA consists of the only county in the MSA: Collier. According to the FDIC’s 2015 summary of deposit information, Key deposits in the AA comprised 2.29 percent of the bank’s total deposits, making this AA Key’s eleventh largest market in terms of deposits held.

Competition is significant with approximately 37 direct competitors operating 157 offices in the AA. Key operates one office in the AA and has an 11.29 percent deposit market share which ranks third among all institutions. Major competitors include Fifth Third Bank, N.A. with 17.07 percent, Wells Fargo Bank N.A. with 12.05 percent, and Bank of America, N.A. with 10.79 percent.

The Naples - Marco Island MSA has a moderately diversified economy. Key sectors of the economy include leisure and hospitality services, retail trade, education and healthcare services, and professional and business services. Major employers in the AA include Naples Community Hospital, Wal-Mart Stores, Inc., Allen Systems Group, Gargiulo Incorporated, and Marriott International Incorporated. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Naples - Marco Island MSA was 5.1 percent in 2015, compared to 5.8 percent in 2014 and 6.9 percent in 2013.

Data from Moody’s Analytics indicates the median price of a home at December 31, 2015, was \$427,396 for Naples - Marco Island MSA. This is a 52.88 percent increase from the median home price high of \$279,555 at December 31, 2011.

A review of community contacts indicated that the following are identified needs within the community:

- High level of dilapidated mobile home rentals resulting in insufficient supply of low-to-moderate income housing
- Insufficient supply to meet demand for affordable senior housing options
- Diversification of industries and employers
- Residential mortgages for inland residences, not beachfront properties
- Affordable housing
- Owner-occupied properties versus rental properties
- Financial literacy, computer literacy, and English language education
- Child care services.

Significant opportunities for participation by financial institutions include the following:

- Financing of affordable housing construction and affordable housing rehabilitation
- Serving the banking needs of the un- and under-banked population
- Offering affordable mortgage products for owner purchases versus investor purchases
- Financial literacy initiatives especially pertaining to loan products available for community development purposes.

State of Idaho

Boise City, ID MSA

Demographic Information for Full Scope Area: Boise MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	91	2.20	30.77	41.76	25.27	0.00
Population by Geography	598,007	1.22	27.12	43.62	28.04	0.00
Owner-Occupied Housing by Geography	150,843	0.59	23.31	45.03	31.07	0.00
Business by Geography	42,346	0.98	30.26	38.61	30.15	0.00
Farms by Geography	1,988	0.75	21.58	54.07	23.59	0.00
Family Distribution by Income Level	148,591	19.16	18.28	22.49	40.07	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	55,624	2.38	40.03	41.78	15.82	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		59,649 61,300 11%	Median Housing Value Unemployment Rate (2010 US Census)		201,123 3.73%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2015 FFIEC updated MFI

The Boise MSA consists of five Idaho counties in the MSA: Ada, Boise, Canyon, Gem, and Owyhee. According to the FDIC’s 2015 summary of deposit information, Key deposits in the AA comprised 1.52 percent of the bank’s total deposits, making this AA Key’s eighteenth largest market in terms of deposits held.

Competition is significant with approximately 19 direct competitors operating 166 offices in the AA. Key operates 14 branches in the AA and has a 12.64 percent deposit market share which ranks third among all institutions. Major competitors include Wells Fargo Bank N.A. with 25.89 percent, US Bank, N.A. with 22.49 percent, and Bank of the Cascades with 6.05 percent.

The Boise MSA has a moderately diversified economy. Key sectors of the economy include education and healthcare services, government, manufacturing, professional and business services, and retail trade. Major employers in the AA include St. Luke’s Health System, Micron Technology, Inc., St. Alphonsus Regional Medical Center, J R Simplot Company, and Hewlett-Packard Company. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Boise MSA was 4.0 percent in 2015, compared to 4.7 percent in 2014 and 5.9 percent in 2013.

Data from Moody’s Analytics indicates the median price of a home at December 31, 2015, was \$201,123 for the Boise MSA. This is a 59.73 percent increase from the median home price of \$125,911 on January 1, 2012.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing benefitting low-to-moderate-income families
- Financial literacy
- Capital for community development financial institutions to make loans
- High demand for residential mortgages
- Individual Development Account awareness and funding
- More community development financial institutions

Significant opportunities for participation by financial institutions include the following:

- Affordable housing financing of both rental and owner-occupied units
- Financing and investment in low-income housing tax credits and new market tax credits
- Investments into Individual Development Accounts
- EQ2 Investments into micro lenders and community development financial institutions

State of Indiana

Indianapolis-Carmel-Anderson, IN MSA

Demographic Information for Full Scope Area: Indianapolis MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	376	13.56	27.93	35.37	22.87	0.27
Population by Geography	1,764,670	8.50	24.07	36.06	31.18	0.19
Owner-Occupied Housing by Geography	454,486	5.38	19.14	39.58	35.90	0.00
Business by Geography	120,133	5.55	19.70	38.54	36.17	0.03
Farms by Geography	4,205	2.31	9.75	56.91	31.01	0.02
Family Distribution by Income Level	440,116	21.33	17.28	20.54	40.85	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	169,907	15.81	34.65	34.02	15.52	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		64,663 68,900 12%	Median Housing Value Unemployment Rate (2010 US Census)	145,017 4.15%		

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

Source: 2010 US Census and 2015 FFIEC updated MFI

The Indianapolis MSA consists of the eleven Indiana counties in the MSA: Boone, Brown, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Putnam, and Shelby. According to the FDIC’s 2015 summary of deposit information, Key deposits in the AA comprised 3.57 percent of the bank’s total deposits, making this AA Key’s eighth largest market in terms of deposits held.

Competition is significant with approximately 49 competitors operating 539 offices in the AA. Key operates 36 branches in the AA and has a 6.06 percent deposit market share which ranks fifth among all institutions. Major competitors include JP Morgan Chase Bank N.A. with 24.03 percent, PNC Bank N.A. with 18.70 percent, Fifth Third Bank N.A. with 9.12 percent, Huntington National Bank, N.A. with 7.11 percent.

The Indianapolis MSA has a highly diversified economy. Key sectors of the economy include professional and business services, retail trade, leisure and hospitality services, and manufacturing. Major employers in the AA include Saint Vincent Hospitals and Health Services, Indiana University Health, Eli Lilly and Company, Community Health Network, Wal-Mart Stores, Incorporated, and Indiana University-Purdue University Indianapolis. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Indianapolis MSA was 4.5 percent in 2015, compared to 5.6 percent in 2014 and 7.2 percent in 2013.

Data from Moody's Analytics indicates the median price of a home at December 31, 2015, was \$145,017 for the Indianapolis MSA. This is a 16.93 percent increase from the median home price of \$124,024 at December 31, 2011.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing in poorer neighborhoods outside of downtown Indianapolis
- Workforce housing
- Single-family and multifamily housing
- Personal finance education

Significant opportunities for participation by financial institutions include the following:

- Affordable mortgage products
- Lines of credit to developers
- Construction financing
- Loans for land development
- Participation in larger community development projects

State of Maine

Portland-South Portland, ME MSA

Demographic Information for Full Scope Area: Portland ME MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	115	2.61	15.65	60.00	20.87	0.87
Population by Geography	514,098	1.64	12.85	61.95	23.56	0.00
Owner-Occupied Housing by Geography	151,579	0.34	10.36	63.15	26.15	0.00
Business by Geography	36,775	7.85	10.46	57.08	24.61	0.00
Farms by Geography	1,202	2.66	7.74	64.23	25.37	0.00
Family Distribution by Income Level	135,937	18.96	18.25	23.60	39.19	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	50,583	1.81	18.57	63.89	15.72	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		67,971 73,200 10%	Median Housing Value Unemployment Rate (2010 US Census)	254,924 3.11%		

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

Source: 2010 US Census and 2015 FFIEC updated MFI

The Portland ME MSA consists of three Maine counties in the MSA: Cumberland, Sagadahoc, and York. According to the FDIC’s 2015 summary of deposit information, Key deposits in the AA comprised 3.03 percent of the bank’s total deposits, making this AA Key’s ninth largest market in terms of deposits held.

Competition is significant with approximately 21 competitors operating 173 offices in the AA. Key operates 22 branches in the AA and has an 18.33 percent deposit market share which ranks first among all institutions. Major competitors include TD Bank N.A. with 16.52 percent, Bank of America N.A. with 14.12 percent, and Kennebunk Savings Bank with 6.75 percent.

The Portland MSA has a relatively undiversified economy. Key sectors of the economy include education and healthcare services, government, professional and business services, and retail trade. Major employers in the AA include Maine Medical Center, Bath Iron Works, LL Bean, Incorporated, and Unum Provident. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Portland ME MSA was 3.6 percent in 2015, compared to 4.7 percent in 2014 and 5.6 percent in 2013.

Data from Moody’s Analytics indicates the median price of a home at December 31, 2015, was \$254,924 for the Portland ME MSA. This is an 8.90 percent increase from the median home price of \$234,100 at December 31, 2011.

A review of community contacts indicated that the following are identified needs within the community:

- High demand for loans to start-up businesses
- Heavy demand for affordable rental units and Section 8 housing
- Steady demand for micro loans to businesses
- Heavy demand for financial self-sufficiency program to support recent immigrants
- Heavy demand for technical support for business owners and entrepreneurs

Significant opportunities for participation by financial institutions include the following:

- Financing of affordable housing construction
- Financing for start-up businesses
- Offering affordable mortgage and consumer loan products
- Providing basic financial literacy education to area schools and adults

State of Michigan

Ann Arbor, MI MSA

Demographic Information for Full Scope Area: Ann Arbor MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	100	11.00	18.00	44.00	23.00	4.00
Population by Geography	344,791	8.05	17.84	46.48	24.26	3.37
Owner-Occupied Housing by Geography	84,487	3.99	14.89	51.87	29.26	0.00
Business by Geography	23,282	4.81	12.50	49.75	31.46	1.47
Farms by Geography	884	1.24	5.43	69.34	23.98	0.00
Family Distribution by Income Level	79,138	21.69	16.89	21.43	39.99	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	30,535	13.87	28.34	44.07	13.71	0.01
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		82,184 84,300 13%	Median Housing Value Unemployment Rate (2010 US Census)	226,375 4.24%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2015 FFIEC updated MFI

The Ann Arbor MSA consists of the only county in the MSA: Washtenaw. According to the FDIC’s 2015 summary of deposit information, Key deposits in the AA comprised 1.12 percent of the bank’s total deposits, making this AA Key’s twenty-first largest market in terms of deposits held.

Competition is significant with approximately 20 competitors operating 87 offices in the AA. Key operates nine branches in the AA and has a 10.71 percent deposit market share which ranks fourth among all institutions. Major competitors include JP Morgan Chase Bank N.A. with 15.83 percent, TCF National Bank with 12.34 percent, and Bank of Ann Arbor with 11.31 percent.

The Ann Arbor MSA has an undiversified economy. Key sectors of the economy include government, professional and business services, education and healthcare services, and retail trade. Major employers in the AA include University of Michigan Medical Center, University of Michigan, Trinity Health Corporation, and General Motors Milford Proving Grounds. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Ann Arbor MSA was 3.5 percent in 2015, compared to 4.5 percent in 2014 and 5.3 percent in 2013.

Data from Moody’s Analytics indicates the median price of a home at December 31, 2015, was \$226,375 for the Ann Arbor MSA. This is a 30.11 percent increase from the median home price high of \$173,989 at December 31, 2011.

A review of community contacts indicated that the following are identified needs within the community:

- Attracting new employers into the MSA
- Loans for start-up and micro businesses
- Private employers willing to offer internships
- Technical job skills for area residents to match employers' demands for these job skills
- Safe and stable rental housing
- Steady demand for micro loans to businesses
- Community distrust of banks resulting in many within the community who are unbanked/have no relationship or accounts with banks

Significant opportunities for participation by financial institutions include the following:

- Financing for small business
- Subordinate lending for special community projects
- Investment in incentive pools
- Provide employment and/or internships
- Construction and permanent financing for transitional housing
- Mainstreaming community population into the banking system

State of New York

Albany-Schenectady-Troy, NY MSA

Demographic Information for Full Scope Area: Albany MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	218	11.01	16.51	50.00	21.56	0.92
Population by Geography	870,716	9.63	14.16	50.96	24.89	0.37
Owner-Occupied Housing by Geography	229,151	4.37	11.32	56.55	27.76	0.00
Business by Geography	53,656	7.37	15.16	50.70	26.73	0.03
Farms by Geography	1,670	1.68	9.94	65.87	22.51	0.00
Family Distribution by Income Level	213,800	20.53	18.05	21.80	39.62	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	82,480	15.02	20.96	49.39	14.64	0.00
Median Family Income		74,739	Median Housing Value		186,839	
FFIEC Adjusted Median Family Income for 2015		82,700	Unemployment Rate (2010 US Census)		3.26%	
Households Below Poverty Level		10%				

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

Source: 2010 US Census and 2015 FFIEC updated MFI

The Albany MSA consists of the five New York counties in the MSA: Albany, Rensselaer, Saratoga, Schenectady, and Schoharie. According to the FDIC’s 2015 summary of deposit information, Key deposits in the AA comprised 7.65 percent of the bank’s total deposits, making this AA Key’s third largest market in terms of deposits held.

Competition is significant with approximately 24 competitors operating 269 offices in the AA. Key operates 39 branches in the AA and has a 34.18 percent deposit market share which ranks first among all institutions. Major competitors include Citizens Bank, N.A. with 11.20 percent, TrustCo Bank with 10.82 percent, and First Niagara Bank, N.A. with 9.21 percent.

The Albany MSA has a moderately diversified economy. Key sectors of the economy include education and healthcare services, government, manufacturing, professional and business services, and retail trade. Major employers in the AA include St. Peter’s Health Partners, General Electric Energy, Albany Medical Center, Golub Corporation, and Bechtel Marine Propulsion Corporation. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Albany MSA was 4.5 percent in 2015, compared to 5.0 percent in 2014 and 6.1 percent in 2013.

Data from Moody’s Analytics indicates the median price of a home at December 31, 2015, was \$186,839 for the Albany MSA. This is a 4.60 percent increase from the median home price of \$178,614 at December 31, 2011.

A review of community contacts indicated that the following are identified needs within the community:

- High demand for residential mortgages
- Steady demand for micro loans to businesses
- High demand for housing and good-paying jobs
- High demand for education, job training, and mentor programs

Significant opportunities for participation by financial institutions include the following:

- Financing of affordable housing construction, affordable housing rehabilitation, and housing services
- Serving credit needs of rural communities
- Offering affordable mortgage products
- Offering affordable small business loans
- Providing more philanthropic support for housing related programs
- Providing more affordable and conveniently located banking products and services

State of Ohio

Cleveland-Elyria, OH MSA

Demographic Information for Full Scope Area: Cleveland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	636	16.35	21.23	36.16	25.47	0.79
Population by Geography	2,077,240	10.38	17.42	38.71	33.49	0.01
Owner-Occupied Housing by Geography	575,920	5.68	13.81	41.98	38.53	0.01
Business by Geography	138,941	7.53	13.00	38.46	40.64	0.37
Farms by Geography	3,699	2.54	7.81	44.44	45.17	0.03
Family Distribution by Income Level	535,574	21.71	17.29	20.69	40.30	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	208,889	19.45	25.53	37.15	17.86	0.01
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		62,627 66,100 13%	Median Housing Value Unemployment Rate (2010 US Census)	151,321 4.82%		

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

Source: 2010 US Census and 2015 FFIEC updated MFI

The Cleveland MSA consists of the five Ohio counties in the MSA: Cuyahoga, Geauga, Lake, Lorain, and Medina. According to the FDIC's 2015 summary of deposit information, Key deposits in the AA comprised 25.83 percent of the bank's total deposits, making this AA Key's largest market (number 1) in terms of deposits held.

Competition is significant with approximately 36 competitors operating almost 615 offices in the AA. Key operates 76 branches in the AA and has a 23.54 percent deposit market share which ranks first among all institutions. Major competitors include PNC Bank N.A. with 12.92 percent, Citizens Bank N.A. with 9.51 percent, Third Federal Saving and Loan Association of Cleveland with 9.3 percent, and Huntington National Bank N.A. with 8.07 percent.

The Cleveland MSA has a moderately diversified economy. Key sectors of the economy include education and healthcare services, professional and business services, government and manufacturing. Major employers in the AA include Cleveland Clinic, University Hospitals, Progressive Corporation, Giant Eagle, Inc., and General Motors Corporation. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Cleveland MSA was 4.8 percent in 2015, compared to 6.0 percent in 2014 and 6.8 percent in 2013.

Data from Moody's Analytics indicates the median price of a home at December 31, 2015, was \$151,321 for the Cleveland MSA. This is a 4.60 percent increase from the median home price high of 144,660 at December 31, 2011.

A review of community contacts indicated that the following are identified needs within the community:

- Incentives to encourage home purchases in the city of Cleveland
- Home repair funding
- Acquisition and rehabilitation financing products
- Small dollar consumer loans under \$3,000 to break the payday lending cycle
- Loan products directed at women and minority-owned businesses

Significant opportunities for participation by financial institutions include the following:

- Long-term financing of city-owned commercial properties to facilitate restructuring of debt
- Bank branches in low-to-moderate communities including branches located in grocery stores, community centers, etc.
- Affordable housing purchase and rehabilitation loans under \$20,000
- Construction financing
- Owner-occupied mortgage loans and home equity loans
- Small business loans
- Second chance retail checking accounts

Toledo, OH MSA

Demographic Information for Full Scope Area: Toledo MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	164	16.46	18.29	42.68	21.95	0.61
Population by Geography	610,001	9.43	16.63	45.30	27.78	0.85
Owner-Occupied Housing by Geography	163,295	5.77	12.85	48.96	32.41	0.00
Business by Geography	35,056	6.44	13.84	44.91	34.54	0.27
Farms by Geography	1,498	1.54	4.87	63.02	30.57	0.00
Family Distribution by Income Level	153,896	21.88	16.99	20.48	40.65	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	59,819	18.16	23.12	44.13	14.57	0.02
Median Family Income		58,200	Median Housing Value		127,571	
FFIEC Adjusted Median Family Income for 2015		61,700	Unemployment Rate (2010 US Census)		5.98%	
Households Below Poverty Level		16%				

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

Source: 2010 US Census and 2015 FFIEC updated MFI

The Toledo MSA consists of the three Ohio counties in the MSA: Fulton, Lucas, and Wood County. According to the FDIC’s 2015 summary of deposit information, Key deposits in the AA comprised 1.76 percent of the bank’s total deposits; making this AA Key’s fifteenth largest in terms of deposits held.

Competition is significant with approximately 18 direct competitors operating almost 151 offices in the AA. Key operates 22 branches in the AA and has a 12.27 percent deposit market share which ranks third among all institutions. Major competitors include Huntington National Bank N.A. with 23.73 percent, Fifth Third Bank with 22.64 percent, and PNC Bank N.A. with 9.01 percent.

The Toledo MSA has a moderately diversified economy. Key sectors of the economy include education and healthcare services, government, manufacturing, retail trade, and professional and business services. Major employers in the AA include ProMedica Health Systems, The University of Toledo, Mercy Health Partners, and Bowling Green State University. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Toledo, OH MSA AA was 5.0 percent in 2015, compared to 6.0 percent in 2014 and 8.1 percent in 2013.

Data from Moody's Analytics indicates the median price of a home at December 31, 2015, was \$127,571 for the Toledo MSA. This is a 5.55 percent increase from the median home price high of \$120,901 on January 1, 2012.

A review of community contacts indicated that the following are identified needs within the community:

- Stronger marketing of banking products and services to underserved communities and borrowers
- Affordable housing benefitting low-to-moderate-income families
- Financial literacy

Significant opportunities for participation by financial institutions include the following:

- Stronger marketing of bank products and services to underserved communities and individuals

State of Oregon

Salem, OR MSA

Demographic Information for Full Scope Area: Salem MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	70	0.00	20.00	58.57	21.43	0.00
Population by Geography	390,738	0.00	21.03	56.99	21.98	0.00
Owner-Occupied Housing by Geography	89,039	0.00	11.87	60.16	27.96	0.00
Business by Geography	28,001	0.00	21.00	56.72	22.28	0.00
Farms by Geography	1,920	0.00	8.07	71.77	20.16	0.00
Family Distribution by Income Level	96,240	19.90	18.83	21.12	40.15	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	37,271	0.00	29.21	54.75	16.04	0.00
Median Family Income		56,016	Median Housing Value	213,365		
FFIEC Adjusted Median Family Income for 2015		57,200	Unemployment Rate (2010 US Census)	4.59%		
Households Below Poverty Level		14%				

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

Source: 2010 US Census and 2015 FFIEC updated MFI

The Salem MSA AA consists of the two Oregon counties in the MSA: Marion and Polk. According to the FDIC’s 2015 summary of deposit information, Key deposits in the AA comprised 0.39 percent of the bank’s total deposits, making this AA Key’s 33rd largest market in terms of deposits held.

Competition is significant with approximately 13 direct competitors operating 85 offices in the AA. Key operates eight branches in the AA and has a 5.57 percent deposit market share which ranks seventh among all institutions. Major competitors include Wells Fargo Bank N.A. with 18.73 percent, US Bank N.A. with 18.49 percent, Columbia State Bank with 14.44 percent, and JP Morgan Chase Bank with 10.66 percent.

The Salem MSA AA has a moderately diversified economy. Key sectors of the economy include government, education and healthcare services, retail trade, leisure and hospitality services, and professional and business services. Major employers in the AA include Salem Hospital, SuperMedia LLC, Association of Salem Keizer Education Support, and Fred Meyer Stores. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Salem MSA AA was 4.5 percent in 2015, compared to 5.0 percent in 2014 and 6.1 percent in 2013.

Data from Moody’s Analytics indicates the median price of a home at December 31, 2015, was \$213,365 for the Salem MSA. This is a 25.21 percent increase from the median home price of \$177,569 on January 1, 2012.

A review of community contacts indicated that the following are identified needs within the community:

- Financial education for low-to-moderate-income individuals
- Affordable housing both rentals and owner occupied

Significant opportunities for participation by financial institutions include the following:

- Lending to small business with loans from \$2,000 to \$100,000
- Funding Community Development Financial Institutions
- Funding technical assistance for small businesses
- Lending to affordable housing developers and nonprofits for multifamily and single-family units

State of Utah

Salt Lake City, UT MSA

Demographic Information for Full Scope Area: Salt Lake MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	223	4.93	18.83	47.53	27.35	1.35
Population by Geography	1,087,873	3.90	17.59	51.26	26.89	0.35
Owner-Occupied Housing by Geography	243,024	1.96	13.10	53.77	31.17	0.00
Business by Geography	91,731	4.60	18.56	44.36	31.97	0.51
Farms by Geography	1,562	3.20	15.43	47.06	34.19	0.13
Family Distribution by Income Level	250,518	18.10	18.80	23.10	40.01	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	92,421	7.08	27.33	50.67	14.92	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		67,016 72,500 10%	Median Housing Value Unemployment Rate (2010 US Census)	249,143 3.07%		

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

Source: 2010 US Census and 2015 FFIEC updated MFI

The Salt Lake MSA AA consists of the two Utah counties in the MSA: Salt Lake and Tooele. According to the FDIC's 2015 summary of deposit information, Key deposits in the AA comprised 3.95 percent of the bank's total deposits, making this AA Key's seventh largest market in terms of deposits held.

Competition is significant with approximately 43 competitors operating 219 offices in the AA. Key operates 21 branches in the AA and has a 0.56 percent deposit market share which ranks 16th among all institutions. Major competitors include Morgan Stanley Bank, N.A. with 22.61 percent, Goldman Sachs Bank USA with 15.91 percent, Ally Bank with 12.64 percent, UBS Bank USA with 8.75 percent, and Synchrony Bank with 8.15 percent.

The Salt Lake MSA AA has a moderately diversified economy. Key sectors of the economy include professional and business services, education and healthcare services, government, manufacturing, and retail trade. Major employers in the AA include Intermountain Health Care Incorporated, University of Utah, World Financial Capital Bank, and Smith's Food and Drug. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Salt Lake MSA AA was 3.3 percent in 2015, compared to 3.7 percent in 2014 and 4.3 percent in 2013.

Data from Moody's Analytics indicates the median price of a home at December 31, 2015, was \$249,143 for the Salt Lake MSA. This is a 37.81 percent increase from the median home price of \$180,783 on January 1, 2012.

A review of community contacts indicated that the following are identified needs within the community:

- Small business credit
- Affordable housing for low and moderate income individuals and families
- Affordable housing project loans

Significant opportunities for participation by financial institutions include the following:

- Funding grants to provide capital for loan programs
- Offering low-cost lines of credit in support of loan programs
- Financing for start-up businesses

State of Vermont

Burlington-South Burlington, VT MSA

Demographic Information for Full Scope Area: Burlington MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	112	0.89	14.29	63.39	20.54	0.89
Population by Geography	406,801	0.77	15.38	62.84	21.00	0.00
Owner-Occupied Housing by Geography	114,984	0.19	11.50	64.99	23.29	0.03
Business by Geography	36,832	0.54	16.16	59.63	23.59	0.08
Farms by Geography	1,971	0.25	11.42	63.57	24.76	0.00
Family Distribution by Income Level	103,176	17.77	18.59	22.99	40.65	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	37,516	0.87	21.96	62.38	14.69	0.10
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		63,689 69,093 11%	Median Housing Value Unemployment Rate (2010 US Census)	224,848 3.30%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2015 FFIEC updated MFI

The Burlington MSA consists of three Vermont counties in the MSA: Chittenden, Franklin, and Grand Isle. According to the FDIC’s 2015 summary of deposit information, Key deposits in the AA comprised 0.88 percent of the bank’s total deposits, making this AA Key’s 25th largest market in terms of deposits held.

Competition is significant with approximately 11 competitors operating 64 offices in the AA. Key operates eight branches in the AA and has a 13.25 percent deposit market share which ranks fourth among all institutions. Major competitors include People’s United Bank N.A. with 28.42 percent, TD Bank N.A. with 25.74 percent, Merchants Bank, N.A. with 15.08 percent, and Citizens Bank, N.A. with 6.40 percent.

The Burlington MSA has an undiversified economy. Key sectors of the economy include education and healthcare services, government, professional and business services, and retail trade. Major employers in the AA include The University of Vermont Medical Center, University of Vermont, Globalfoundries, Keurig Green Mountain, Incorporated, and Shaw’s Supermarkets Incorporated. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Burlington MSA was 3.0 percent in 2015, compared to 3.2 percent in 2014 and 3.5 percent in 2013.

Data from Moody’s Analytics indicates the median price of a home at December 31, 2015, was \$224,848 for the Burlington MSA. This is a 6.08 percent increase from the median home price of \$211,962 at December 31, 2011.

A review of community contacts indicated that the following are identified needs within the community:

- Critical housing shortage
- Inability of the area to attract employees
- Inability of businesses to expand due to lack of talent
- Transportation investment
- Rental units
- Assistance for first-time home buyers
- Affordable housing for low-to-moderate income individuals and families

Significant opportunities for participation by financial institutions include the following:

- Affordable housing preservation financing
- Expansion of municipal resources to support low-to-moderate income housing
- Affordable mortgage products

State of Washington

Seattle-Bellevue-Everett, WA MSA

Demographic Information for Full Scope Area: Seattle MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	549	4.55	20.58	45.72	28.42	0.73
Population by Geography	2,644,584	4.50	20.34	47.23	27.72	0.22
Owner-Occupied Housing by Geography	648,302	1.84	15.62	49.34	33.20	0.00
Business by Geography	243,178	4.69	17.27	44.19	33.72	0.13
Farms by Geography	4,950	2.24	14.97	51.70	31.07	0.02
Family Distribution by Income Level	636,092	20.39	17.77	22.17	39.67	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	242,717	6.51	30.20	47.44	15.84	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2015 Households Below Poverty Level		83,852 89,600 9%	Median Housing Value Unemployment Rate (2010 US Census)		405,176 3.54%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2015 FFIEC updated MFI

The Seattle MSA consists of the two Washington counties in the MSA: King and Snohomish. According to the FDIC 2015 summary of deposit information, Key deposits in the AA comprised 9.22 percent of the bank’s total deposits, making this AA the bank’s second largest market in terms of deposits held.

Competition is significant with approximately 48 direct competitors operating 644 offices in the AA. Key operates 82 branches in the AA and has 8.66 percent deposit market share which ranks fifth among all institutions. Major competitors include Bank of America, N.A. with 28.12%, Wells Fargo Bank, N.A. with 14.26 percent, JP Morgan Chase Bank with 11.52, and US Bank, N.A. with 10.98 percent.

The Seattle MSA has a moderately diversified economy. Key sectors of the economy include professional and business services, education and healthcare services, government, manufacturing, and retail trade. Major employers in the AA include Boeing Corporation, Microsoft Corporation, University of Washington, Amazon, Providence Health & Services, Wal-Mart Stores, Incorporated, and Fred Meyer Stores. Based on data from the Bureau of Labor Statistics, the unemployment rate in the Seattle MSA was 4.5 percent in 2015, a decline compared to 4.9 percent in 2014 and 5.2 percent in 2013.

Data from Moody’s Analytics indicates the median price of a home at December 31, 2015, was \$405,176 for the Seattle MSA. This is a 51.70 percent increase from the median home price high of \$267,089 at December 31, 2011.

A review of community contacts indicated that the following are identified needs within the community:

- Renovations and improvements of older homes and housing
- Renovations and improvements of public facilities such as schools, libraries, and other public facilities
- Affordable housing for working families, the disabled, and seniors
- Shelters and temporary housing for homeless individuals and families

Significant opportunities for participation by financial institutions include the following:

- Home improvements and/or home equity loans and lines of credit for home improvements
- Support for the creation of affordable housing for low- and moderate-income families
- Partnership with, and support of, non-profit organizations and community groups who work with the homeless.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 as originations; (2) Market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the assessment area; (3) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core tables 2 through 7 and part of table 13; and (4) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core tables 8 through 12 and part of table 13. 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 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Questions & Answers Regarding Community Reinvestment (See Interagency Qs & As) __.12 (h) - 6 and - 7 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- t4. Geographic Distribution of Home Mortgage Refinance Loans** - See table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank

in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms** - 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. The table also presents market share information based on the most recent aggregate market data available. Because 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 8. Borrower Distribution of Home Purchase Loans** - 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 assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the

table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table 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 households within each geography. For borrower distribution, the table 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 of households by income level in each assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each assessment area. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding, tracked, and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Qs & As __.12 (h) - 6 and - 7 for guidance on when a bank may receive positive CRA consideration for such investments.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each assessment area. The table also presents data on branch openings and closings in each assessment area.

Table 1. Lending Volume

LENDING VOLUME													Geography: PORTLAND OR/WA MULTISTATE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***								
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)									
Full Review:																				
Portland OR/WA Multistate	100.00	1,318	346,162	1,721	157,670	29	4,800	28	70,976	3,096	579,608	100.00								

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: PORTLAND OR/WA MULTISTATE								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland OR/WA Multistate	379	100.00	1.29	3.43	18.68	21.90	49.07	41.42	30.96	33.25	0.44	0.60	0.61	0.38	0.43

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: PORTLAND OR/WA MULTISTATE								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland OR/WA Multistate	287	100.00	1.29	0.70	18.68	12.20	49.07	48.43	30.96	38.68	4.37	0.00	3.30	4.09	5.84

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of owner-occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: PORTLAND OR/WA MULTISTATE						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland OR/WA Multistate	648	100.00	1.29	0.46	18.68	16.67	49.07	46.60	30.96	36.27	1.14	0.30	1.08	1.12	1.24

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: PORTLAND OR/WA MULTISTATE								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland OR/WA Multistate	4	100.00	6.36	0.00	31.11	25.00	42.94	75.00	19.59	0.00	0.52	0.00	0.67	0.63	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: PORTLAND OR/WA MULTISTATE								valuation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		E Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland OR/WA Multistate	1,716	100.00	4.37	6.06	22.87	24.07	43.05	42.54	29.57	27.33	1.83	2.86	1.93	1.85	1.72

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: PORTLAND OR/WA MULTISTATE						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland OR/WA Multistate	29	100.00	1.80	0.00	15.00	3.45	52.96	51.72	30.19	44.83	2.91	0.00	1.89	2.59	4.22

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: PORTLAND OR/WA MULTISTATE						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland OR/WA Multistate	379	100.00	20.45	3.77	17.71	23.45	21.29	19.95	40.54	52.83	0.51	0.21	0.66	0.36	0.57

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.1% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: PORTLAND OR/WA MULTISTATE								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland OR/WA Multistate	287	100.00	20.45	5.02	17.71	16.85	21.29	22.94	40.54	55.20	4.44	3.16	4.55	3.25	5.24

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.8% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: PORTLAND OR/WA MULTISTATE						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland OR/WA Multistate	648	100.00	20.45	4.82	17.71	19.61	21.29	22.51	40.54	53.05	1.29	0.86	1.40	1.08	1.42

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 4.0% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: PORTLAND OR/WA MULTISTATE			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Portland OR/WA Multistate	1,721	100.00	80.21	57.87	86.23	3.60	10.17	1.83	2.31

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 12.14% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: PORTLAND OR/WA MULTISTATE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Portland OR/WA Multistate	29	100.00	95.33	41.38	48.28	20.69	31.03	2.91	2.88

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 13.79% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: PORTLAND OR/WA MULTISTATE				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Portland OR/WA Multistate	21	8,790	5	19,867	26	28,657	100.00	13	10,288

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS		Geography: PORTLAND OR/WA MULTISTATE						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015									
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Portland OR/WA Multistate	100.00	53	100.00	7.55	32.08	32.08	28.30	0	2	0	- 1	0	- 1	2.76	24.05	47.09	26.08

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF ALASKA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Anchorage MSA	59.93	135	21,777	161	22,689	0	0	24	339,538	320	384,004	72.29
Limited Review:												
Fairbanks MSA	9.55	10	1,056	36	6,426	1	1	4	2,000	51	9,483	9.69
AK Non-MSA	30.52	82	21,183	77	5,767	1	25	3	4,911	163	31,886	18.01
Broader Statewide or Regional Area	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1	1,900	1	1,900	N/A

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF ALASKA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Anchorage MSA	20	68.97	0.48	0.00	16.01	10.00	58.29	70.00	25.23	20.00	0.14	0.00	0.15	0.15	0.09
Limited Review:															
Fairbanks MSA	1	3.45	2.36	0.00	7.72	0.00	59.95	100.00	29.97	0.00	0.00	0.00	0.00	0.00	0.00
AK Non-MSA	8	27.59	0.00	0.00	0.78	0.00	74.15	37.50	25.07	62.50	0.06	0.00	0.00	0.00	0.22

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One-to-Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF ALASKA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Anchorage MSA	58	61.05	0.48	0.00	16.01	15.52	58.29	62.07	25.23	22.41	4.19	0.00	0.92	4.82	5.43
Limited Review:															
Fairbanks MSA	7	7.37	2.36	0.00	7.72	14.29	59.95	0.00	29.97	85.71	1.68	0.00	7.69	0.00	4.17
AK Non-MSA	30	31.58	0.00	0.00	0.78	3.33	74.15	60.00	25.07	36.67	5.56	0.00	0.00	4.11	10.20

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One-to-Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF ALASKA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Anchorage MSA	57	55.88	0.48	0.00	16.01	10.53	58.29	70.18	25.23	19.30	0.82	0.00	0.55	1.06	0.45
Limited Review:															
Fairbanks MSA	2	1.96	2.36	0.00	7.72	0.00	59.95	100.00	29.97	0.00	0.00	0.00	0.00	0.00	0.00
AK Non-MSA	43	42.16	0.00	0.00	0.78	0.00	74.15	55.81	25.07	44.19	2.07	0.00	0.00	1.82	2.79

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF ALASKA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Anchorage MSA	0	0.00	3.45	0.00	44.50	0.00	44.86	0.00	7.19	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Fairbanks MSA	0	0.00	13.71	0.00	44.54	0.00	33.57	0.00	8.19	0.00	0.00	0.00	0.00	0.00	0.00
AK Non-MSA	1	100.00	0.00	0.00	4.60	0.00	63.21	100.00	32.19	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF ALASKA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Anchorage MSA	161	58.76	1.31	5.59	27.32	21.12	52.13	60.87	19.24	12.42	1.16	8.65	0.95	1.22	0.96
Limited Review:															
Fairbanks MSA	36	13.14	3.82	2.78	35.22	36.11	40.45	44.44	20.51	16.67	1.09	2.78	1.07	1.26	0.83
AK Non-MSA	77	28.10	0.00	0.00	2.07	1.30	70.56	71.43	27.37	27.27	1.35	0.00	0.00	1.62	0.85

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF ALASKA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Anchorage MSA	0	0.00	0.99	0.00	20.46	0.00	59.57	0.00	18.98	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Fairbanks MSA	1	50.00	0.68	0.00	18.37	0.00	53.74	100.00	27.21	0.00	7.14	0.00	0.00	9.09	0.00
AK Non-MSA	1	50.00	0.00	0.00	2.48	0.00	75.23	0.00	22.29	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF ALASKA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015									
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:																	
Anchorage MSA	20	68.97	19.60	16.67	18.01	16.67	23.62	22.22	38.77	44.44	0.13	0.53	0.12	0.08	0.13		
Limited Review:																	
Fairbanks MSA	1	3.45	20.02	0.00	18.09	0.00	24.27	0.00	37.62	100.00	0.00	0.00	0.00	0.00	0.00		
AK Non-MSA	8	27.59	17.31	0.00	16.06	12.50	20.74	12.50	45.88	75.00	0.07	0.00	0.00	0.00	0.14		

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 6.9% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF ALASKA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Anchorage MSA	58	61.05	19.60	5.45	18.01	16.36	23.62	29.09	38.77	49.09	4.25	4.23	2.73	4.88	4.53
Limited Review:															
Fairbanks MSA	7	7.37	20.02	14.29	18.09	28.57	24.27	14.29	37.62	42.86	1.70	0.00	0.00	0.00	3.03
AK Non-MSA	30	31.58	17.31	10.00	16.06	16.67	20.74	16.67	45.88	56.67	5.73	10.53	0.00	2.04	9.30

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.2% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: STATE OF ALASKA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Anchorage MSA	57	55.88	19.60	0.00	18.01	20.00	23.62	25.45	38.77	54.55	1.08	0.00	1.01	1.07	1.27
Limited Review:															
Fairbanks MSA	2	1.96	20.02	0.00	18.09	50.00	24.27	0.00	37.62	50.00	0.00	0.00	0.00	0.00	0.00
AK Non-MSA	43	42.16	17.31	2.38	16.06	9.52	20.74	28.57	45.88	59.52	2.42	2.38	0.91	1.74	3.27

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF ALASKA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Anchorage MSA	161	58.76	78.54	50.31	73.29	8.70	18.01	1.16	1.09
Limited Review:									
Fairbanks MSA	36	13.14	77.20	50.00	75.00	2.78	22.22	1.09	1.14
AK Non-MSA	77	28.10	75.09	57.14	88.31	6.49	5.19	1.35	1.18

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 11.31% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF ALASKA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Anchorage MSA	0	0.00	94.88	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Fairbanks MSA	1	50.00	98.64	100.00	100.00	0.00	0.00	7.14	8.33
AK Non-MSA	1	50.00	90.71	100.00	100.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF ALASKA				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Anchorage MSA	0	0	7	10,036	7	10,036	72.70	0	0
Limited Review:									
Fairbanks MSA	1	3,713	0	0	1	3,713	26.90	0	0
AK Non-MSA	0	0	0	0	0	0	0.00	0	0
Broader Statewide or Regional Area	2	55	0	0	2	55	0.40	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: STATE OF ALASKA				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
Full Review:																								
Anchorage MSA	72.29	6	40.00	0.00	16.67	66.67	16.67	0	0	0	0	0	0	2.03	24.82	53.76	19.39							
Limited Review:																								
Fairbanks MSA	9.69	2	13.33	0.00	100.00	0.00	0.00	0	2	0	- 1	- 1	0	3.50	19.17	52.24	25.08							
AK Non-MSA	18.01	7	46.67	0.00	14.29	57.14	28.57	0	0	0	0	0	0	0.00	2.28	70.88	26.83							

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF COLORADO						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Denver MSA	80.81	983	404,030	1,038	106,008	0	0	25	206,050	2,046	716,088	90.78
Limited Review:												
Boulder MSA	5.65	65	13,850	78	4,948	0	0	0	0	143	18,798	2.53
Colorado Springs MSA	7.35	50	36,997	128	14,744	0	0	8	14,824	186	66,565	2.15
Ft Collins MSA	5.65	80	12,872	63	6,913	0	0	0	0	143	19,785	3.98
CO Non-MSA	0.55	12	1,097	2	42	0	0	0	0	14	1,139	0.57
Broader Statewide or Regional Area	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7	24,023	7	24,023	N/A

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF COLORADO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver MSA	254	80.63	6.50	7.09	19.37	17.72	35.18	25.98	38.95	49.21	0.21	0.14	0.20	0.17	0.26
Limited Review:															
Boulder MSA	17	5.40	2.83	5.88	14.95	11.76	45.76	35.29	36.45	47.06	0.16	0.49	0.00	0.08	0.31
Colorado Springs MSA	15	4.76	2.51	0.00	21.90	13.33	42.99	33.33	32.59	53.33	0.06	0.00	0.08	0.04	0.09
Ft Collins MSA	23	7.30	1.01	0.00	18.16	34.78	50.04	34.78	30.79	30.43	0.21	0.00	0.38	0.16	0.22
CO Non-MSA	6	1.90	0.00	0.00	10.58	50.00	89.42	50.00	0.00	0.00	1.27	0.00	4.88	0.73	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One-to-Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF COLORADO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver MSA	287	84.16	6.50	5.92	19.37	16.72	35.18	26.13	38.95	51.22	3.43	3.96	2.57	2.24	4.81
Limited Review:															
Boulder MSA	19	5.57	2.83	5.26	14.95	5.26	45.76	47.37	36.45	42.11	2.70	0.00	1.96	3.27	2.38
Colorado Springs MSA	13	3.81	2.51	0.00	21.90	7.69	42.99	38.46	32.59	53.85	0.38	0.00	0.49	0.21	0.59
Ft Collins MSA	21	6.16	1.01	4.76	18.16	19.05	50.04	47.62	30.79	28.57	1.65	0.00	4.65	1.75	0.00
CO Non-MSA	4	0.29	0.00	0.00	10.58	100.00	89.42	0.00	0.00	0.00	5.88	0.00	50.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF COLORADO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver MSA	432	82.60	6.50	6.25	19.37	17.59	35.18	31.94	38.95	44.21	0.42	0.47	0.34	0.34	0.52
Limited Review:															
Boulder MSA	29	5.54	2.83	0.00	14.95	17.24	45.76	37.93	36.45	44.83	0.35	0.00	0.44	0.24	0.50
Colorado Springs MSA	21	4.02	2.51	4.76	21.90	23.81	42.99	28.57	32.59	42.86	0.15	0.00	0.23	0.05	0.27
Ft Collins MSA	36	6.88	1.01	0.00	18.16	22.22	50.04	55.56	30.79	22.22	0.33	0.00	0.25	0.43	0.21
CO Non-MSA	5	0.96	0.00	0.00	10.58	20.00	89.42	80.00	0.00	0.00	0.74	0.00	0.00	0.86	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One-to-Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF COLORADO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver MSA	10	90.91	20.66	30.00	32.10	50.00	32.63	10.00	14.61	10.00	0.48	0.00	1.59	0.00	0.00
Limited Review:															
Boulder MSA	0	0.00	8.66	0.00	30.19	0.00	46.97	0.00	14.18	0.00	0.00	0.00	0.00	0.00	0.00
Colorado Springs MSA	1	9.09	11.63	0.00	42.01	0.00	35.38	100.00	10.99	0.00	0.00	0.00	0.00	0.00	0.00
Ft Collins MSA	0	0.00	8.14	0.00	34.63	0.00	44.95	0.00	12.28	0.00	0.00	0.00	0.00	0.00	0.00
CO Non-MSA	0	0.00	0.00	0.00	32.10	0.00	67.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF COLORADO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver MSA	1,036	79.27	8.44	11.49	20.23	27.90	30.31	24.52	40.70	36.10	0.85	1.02	1.13	0.73	0.76
Limited Review:															
Boulder MSA	78	5.97	3.80	3.85	22.21	21.79	42.36	39.74	31.63	34.62	0.40	0.60	0.40	0.39	0.42
Colorado Springs MSA	128	9.79	6.73	4.69	23.71	32.81	35.08	32.81	34.36	29.69	0.56	0.36	0.84	0.56	0.42
Ft Collins MSA	63	4.82	0.97	1.59	20.68	25.40	49.43	52.38	28.91	20.63	0.42	0.89	0.73	0.37	0.29
CO Non-MSA	2	0.15	0.00	0.00	26.89	0.00	73.11	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF COLORADO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver MSA	0	0.00	7.24	0.00	18.39	0.00	32.78	0.00	41.51	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Boulder MSA	0	0.00	3.73	0.00	16.19	0.00	47.92	0.00	32.16	0.00	0.00	0.00	0.00	0.00	0.00
Colorado Springs MSA	0	0.00	3.82	0.00	25.97	0.00	41.63	0.00	28.57	0.00	0.00	0.00	0.00	0.00	0.00
Ft Collins MSA	0	0.00	1.01	0.00	16.87	0.00	48.21	0.00	33.75	0.00	0.00	0.00	0.00	0.00	0.00
CO Non-MSA	0	0.00	0.00	0.00	3.57	0.00	96.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF COLORADO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver MSA	254	80.63	22.09	8.30	17.11	22.13	20.18	13.83	40.62	55.73	0.25	0.28	0.26	0.13	0.32
Limited Review:															
Boulder MSA	17	5.40	22.09	0.00	16.59	11.76	20.06	11.76	41.26	76.47	0.18	0.00	0.10	0.08	0.31
Colorado Springs MSA	15	4.76	20.07	0.00	18.25	40.00	21.61	6.67	40.08	53.33	0.08	0.00	0.09	0.03	0.12
Ft Collins MSA	23	7.30	20.17	4.35	17.62	34.78	22.26	17.39	39.94	43.48	0.25	0.25	0.37	0.10	0.28
CO Non-MSA	6	1.90	24.32	33.33	20.96	50.00	18.71	0.00	36.01	16.67	1.72	4.76	2.82	0.00	1.18

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.3% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF COLORADO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver MSA	287	84.16	22.09	5.02	17.11	15.05	20.18	20.07	40.62	59.86	3.58	2.05	1.86	2.43	5.30
Limited Review:															
Boulder MSA	19	5.57	22.09	0.00	16.59	10.53	20.06	21.05	41.26	68.42	3.11	0.00	0.00	4.35	4.76
Colorado Springs MSA	13	3.81	20.07	0.00	18.25	23.08	21.61	7.69	40.08	69.23	0.40	0.00	0.61	0.00	0.64
Ft Collins MSA	21	6.16	20.17	4.76	17.62	28.57	22.26	23.81	39.94	42.86	1.74	0.00	3.37	1.69	1.36
CO Non-MSA	1	0.29	24.32	0.00	20.96	100.00	18.71	0.00	36.01	0.00	7.14	0.00	25.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.3% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF COLORADO						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver MSA	432	82.60	22.09	9.11	17.11	19.18	20.18	17.03	40.62	54.68	0.50	0.27	0.50	0.33	0.64
Limited Review:															
Boulder MSA	29	5.54	22.09	8.33	16.59	16.67	20.06	12.50	41.26	62.50	0.30	0.00	0.00	0.20	0.59
Colorado Springs MSA	21	4.02	20.07	9.52	18.25	23.81	21.61	19.05	40.08	47.62	0.24	0.38	0.36	0.07	0.27
Ft Collins MSA	36	6.88	20.17	11.11	17.62	30.56	22.26	27.78	39.94	30.56	0.39	0.33	0.39	0.53	0.30
CO Non-MSA	5	0.96	24.32	0.00	20.96	40.00	18.71	40.00	36.01	20.00	1.08	0.00	5.56	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.8% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF COLORADO			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Denver MSA	1,038	79.30	80.67	58.00	82.56	5.20	12.24	0.85	1.07
Limited Review:									
Boulder MSA	78	5.96	81.48	61.54	89.74	1.28	8.97	0.40	0.50
Colorado Springs MSA	128	9.78	82.21	59.38	82.81	4.69	12.50	0.56	0.69
Ft Collins MSA	63	4.81	82.84	68.25	79.37	6.35	14.29	0.42	0.59
CO Non-MSA	2	0.15	77.69	100.00	100.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 15.20% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: STATE OF COLORADO			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Denver MSA	0	0.00	95.42	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Boulder MSA	0	0.00	96.38	0.00	0.00	0.00	0.00	0.00	0.00
Colorado Springs MSA	0	0.00	96.94	0.00	0.00	0.00	0.00	0.00	0.00
Ft Collins MSA	0	0.00	97.28	0.00	0.00	0.00	0.00	0.00	0.00
CO Non-MSA	0	0.00	98.38	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF COLORADO				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Denver MSA	14	4,676	81	46,813	95	51,489	76.21	1	402
Limited Review:									
Boulder MSA	1	3,065	6	82	7	3,147	4.66	0	0
Colorado Springs MSA	1	5	1	3,100	2	3,105	4.59	1	655
Ft Collins MSA	1	400	0	0	1	400	0.59	0	0
CO Non-MSA	0	0	0	0	0	0	0.00	0	0
Broader Statewide or Regional Area	27	8,908	1	515	28	9,423	13.95	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		Geography: STATE OF COLORADO				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population											
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography											
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp								
Full Review:																									
Denver MSA	90.78	51	78.46	3.92	31.37	27.45	37.25	0	4	- 2	- 1	0	- 1	11.39	23.34	32.64	32.59								
Limited Review:																									
Boulder MSA	2.53	4	6.15	0.00	25.00	50.00	25.00	0	0	0	0	0	0	6.89	18.39	45.80	28.91								
Colorado Springs MSA	2.15	4	6.15	0.00	50.00	25.00	25.00	0	0	0	0	0	0	4.44	26.96	40.33	27.54								
Ft Collins MSA	3.98	5	7.69	0.00	40.00	40.00	20.00	0	0	0	0	0	0	2.64	22.37	48.27	26.69								
CO Non-MSA	0.57	1	1.54	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	13.70	86.30	0.00								

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF FLORIDA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Naples - Marco Island MSA	39.13	25	60,509	5	955	0	0	6	52,482	36	113,946	67.05
Limited Review:												
Cape Coral-Fort Myers MSA	41.30	32	12,260	6	963	0	0	0	0	38	13,223	13.98
West Palm Beach MSA	19.57	9	11,421	6	2,236	1	462	2	12,696	18	26,815	18.96
Broader Statewide or Regional Area	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2	26,940	2	26,940	N/A

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF FLORIDA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Naples - Marco Island MSA	12	27.27	2.40	0.00	16.42	16.67	46.03	41.67	35.15	41.67	0.08	0.00	0.08	0.05	0.11
Limited Review:															
Cape Coral-Fort Myers MSA	26	59.09	1.32	0.00	14.17	3.85	55.62	26.92	28.89	69.23	0.12	0.00	0.06	0.06	0.25
West Palm Beach MSA	6	13.64	2.96	0.00	22.08	0.00	36.12	50.00	38.83	50.00	0.00	0.00	0.00	0.00	0.01

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One-to-Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF FLORIDA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Naples - Marco Island MSA	0	0.00	2.40	0.00	16.42	0.00	46.03	0.00	35.15	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Cape Coral-Fort Myers MSA	1	100.00	1.32	0.00	14.17	0.00	55.62	100.00	28.89	0.00	0.00	0.00	0.00	0.00	0.00
West Palm Beach MSA	0	0.00	2.96	0.00	22.08	0.00	36.12	0.00	38.83	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One-to-Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF FLORIDA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Naples - Marco Island MSA	8	53.33	2.40	0.00	16.42	0.00	46.03	37.50	35.15	62.50	0.12	0.00	0.00	0.00	0.32
Limited Review:															
Cape Coral-Fort Myers MSA	5	33.33	1.32	0.00	14.17	0.00	55.62	40.00	28.89	60.00	0.04	0.00	0.00	0.04	0.06
West Palm Beach MSA	2	13.33	2.96	0.00	22.08	50.00	36.12	50.00	38.83	0.00	0.01	0.00	0.09	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF FLORIDA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Naples - Marco Island MSA	5	83.33	3.02	20.00	13.85	20.00	39.45	60.00	43.68	0.00	22.22	33.33	25.00	33.33	0.00
Limited Review:															
Cape Coral-Fort Myers MSA	0	0.00	7.80	0.00	15.02	0.00	39.74	0.00	37.44	0.00	0.00	0.00	0.00	0.00	0.00
West Palm Beach MSA	1	16.67	6.39	0.00	31.55	100.00	33.58	0.00	28.47	0.00	1.23	0.00	2.94	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF FLORIDA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015								
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Naples - Marco Island MSA	5	29.41	2.68	0.00	13.33	20.00	42.64	60.00	41.35	20.00	0.01	0.00	0.00	0.02	0.00
Limited Review:															
Cape Coral-Fort Myers MSA	6	35.29	3.44	0.00	14.77	0.00	51.80	66.67	29.86	33.33	0.02	0.00	0.00	0.01	0.04
West Palm Beach MSA	6	35.29	3.57	0.00	18.88	16.67	31.75	0.00	45.56	83.33	0.01	0.00	0.01	0.00	0.01

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF FLORIDA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Naples - Marco Island MSA	0	0.00	6.46	0.00	18.77	0.00	49.22	0.00	25.55	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Cape Coral-Fort Myers MSA	0	0.00	1.36	0.00	17.75	0.00	56.10	0.00	24.71	0.00	0.00	0.00	0.00	0.00	0.00
West Palm Beach MSA	1	100.00	4.15	0.00	21.50	0.00	30.05	0.00	44.23	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF FLORIDA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Naples - Marco Island MSA	12	27.27	21.14	0.00	18.31	0.00	19.04	0.00	41.50	100.00	0.09	0.00	0.00	0.00	0.13
Limited Review:															
Cape Coral-Fort Myers MSA	26	59.09	18.96	0.00	18.96	3.85	21.42	3.85	40.66	92.31	0.14	0.00	0.00	0.00	0.25
West Palm Beach MSA	6	13.64	21.50	0.00	17.84	0.00	18.93	0.00	41.73	100.00	0.01	0.00	0.00	0.00	0.01

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF FLORIDA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Naples - Marco Island MSA	0	0.00	21.14	0.00	18.31	0.00	19.04	0.00	41.50	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Cape Coral-Fort Myers MSA	1	100.00	18.96	0.00	18.96	0.00	21.42	0.00	40.66	100.00	0.00	0.00	0.00	0.00	0.00
West Palm Beach MSA	0	0.00	21.50	0.00	17.84	0.00	18.93	0.00	41.73	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF FLORIDA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Naples - Marco Island MSA	8	53.33	21.14	0.00	18.31	0.00	19.04	0.00	41.50	100.00	0.13	0.00	0.00	0.00	0.20
Limited Review:															
Cape Coral-Fort Myers MSA	5	33.33	18.96	0.00	18.96	0.00	21.42	20.00	40.66	80.00	0.05	0.00	0.00	0.11	0.05
West Palm Beach MSA	2	13.33	21.50	0.00	17.84	50.00	18.93	50.00	41.73	0.00	0.01	0.00	0.10	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF FLORIDA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Naples - Marco Island MSA	5	29.41	81.51	60.00	80.00	0.00	20.00	0.01	0.02
Limited Review:									
Cape Coral-Fort Myers MSA	6	35.29	82.35	33.33	50.00	33.33	16.67	0.02	0.01
West Palm Beach MSA	6	35.29	82.65	33.33	0.00	50.00	50.00	0.01	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 29.41% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
				geography: STATE OF FLORIDA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015		
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Naples - Marco Island MSA	0	0.00	94.39	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Cape Coral-Fort Myers MSA	0	0.00	96.87	0.00	0.00	0.00	0.00	0.00	0.00
West Palm Beach MSA	1	100.00	96.14	100.00	0.00	0.00	100.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		geography: STATE OF FLORIDA				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Naples - Marco Island MSA	0	0	2	5,560	2	5,560	15.26	1	1,093
Limited Review:									
Cape Coral-Fort Myers MSA	1	6,415	1	6,232	2	12,647	34.72	0	0
West Palm Beach MSA	0	0	1	2,294	1	2,294	6.30	0	0
Broader Statewide or Regional Area	30	661	2	15,169	37	15,923	43.72	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF FLORIDA																	
Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Naples - Marco Island MSA	67.05	1	33.33	0.00	0.00	0.00	100.00	0	0	0	0	0	0	9.05	20.27	43.40	27.27
Limited Review:																	
Cape Coral-Fort Myers MSA	13.98	1	33.33	0.00	0.00	100.00	0.00	0	0	0	0	0	0	3.49	19.26	52.98	24.27
West Palm Beach MSA	18.96	1	33.33	0.00	0.00	100.00	0.00	0	0	0	0	0	0	4.88	26.01	33.30	35.59

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF IDAHO						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Boise MSA	58.03	571	96,834	394	39,954	16	1,600	5	11,085	986	149,473	76.39
Limited Review:												
Idaho Falls MSA	10.24	89	11,680	83	12,093	1	100	1	4,968	174	28,841	6.66
Pocatello MSA	5.06	48	4,918	34	4,453	4	494	0	0	86	9,865	4.59
ID Non-MSA	26.66	215	26,746	170	11,261	66	11,689	2	6,082	453	55,778	12.36
Broader Statewide or Regional Area	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3	8,242	3	8,242	N/A

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF IDAHO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Boise MSA	140	66.35	0.59	0.00	23.31	17.14	45.03	34.29	31.07	48.57	0.57	0.00	0.48	0.47	0.74	
Limited Review:																
Idaho Falls MSA	28	13.27	0.00	0.00	17.46	25.00	52.50	21.43	30.04	53.57	0.40	0.00	0.34	0.19	0.74	
Pocatello MSA	7	3.32	0.97	0.00	14.64	14.29	56.00	42.86	28.40	42.86	0.36	0.00	0.66	0.39	0.24	
ID Non-MSA	36	17.06	0.89	2.78	8.15	8.33	83.51	86.11	7.46	2.78	0.43	0.00	0.33	0.49	0.00	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF IDAHO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Boise MSA	142	67.30	0.59	0.70	23.31	16.90	45.03	44.37	31.07	38.03	9.27	0.00	10.49	8.61	9.45
Limited Review:															
Idaho Falls MSA	15	7.11	0.00	0.00	17.46	6.67	52.50	40.00	30.04	53.33	6.72	0.00	6.25	2.94	12.00
Pocatello MSA	17	8.06	0.97	0.00	14.64	17.65	56.00	52.94	28.40	29.41	9.09	0.00	20.00	3.45	14.29
ID Non-MSA	37	17.54	0.89	0.00	8.15	2.70	83.51	89.19	7.46	8.11	7.79	0.00	20.00	7.58	8.33

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF IDAHO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Boise MSA	288	57.60	0.59	0.00	23.31	17.01	45.03	44.44	31.07	38.54	2.13	0.00	2.10	2.22	2.05
Limited Review:															
Idaho Falls MSA	46	9.20	0.00	0.00	17.46	21.74	52.50	50.00	30.04	28.26	2.78	0.00	3.23	2.86	2.40
Pocatello MSA	24	4.80	0.97	0.00	14.64	8.33	56.00	58.33	28.40	33.33	1.75	0.00	1.06	1.84	2.07
ID Non-MSA	142	28.40	0.89	0.70	8.15	2.11	83.51	87.32	7.46	9.86	3.56	0.00	0.94	3.64	5.65

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF IDAHO					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Boise MSA	1	100.00	1.57	0.00	45.96	0.00	34.52	100.00	17.96	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Idaho Falls MSA	0	0.00	0.00	0.00	63.53	0.00	21.32	0.00	15.16	0.00	0.00	0.00	0.00	0.00	0.00	
Pocatello MSA	0	0.00	17.98	0.00	24.02	0.00	47.63	0.00	10.37	0.00	0.00	0.00	0.00	0.00	0.00	
ID Non-MSA	0	0.00	15.30	0.00	35.03	0.00	45.49	0.00	4.18	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF IDAHO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Boise MSA	394	57.86	0.98	0.76	30.26	32.23	38.61	33.50	30.15	33.50	1.64	0.83	2.06	1.42	1.68
Limited Review:															
Idaho Falls MSA	83	12.19	0.00	0.00	27.64	33.73	38.09	25.30	34.27	40.96	2.10	0.00	3.44	0.89	2.61
Pocatello MSA	34	4.99	7.15	11.76	23.15	2.94	45.85	67.65	23.85	17.65	1.35	2.97	0.39	1.94	0.81
ID Non-MSA	170	24.96	2.96	2.35	10.90	6.47	77.89	82.94	8.25	8.24	2.03	1.53	1.53	2.29	1.20

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF IDAHO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Boise MSA	16	18.39	0.75	0.00	21.58	12.50	54.07	62.50	23.59	25.00	2.49	0.00	1.20	2.71	3.70
Limited Review:															
Idaho Falls MSA	1	1.15	0.00	0.00	11.50	100.00	48.66	0.00	39.84	0.00	0.00	0.00	0.00	0.00	0.00
Pocatello MSA	4	4.60	0.98	0.00	7.80	0.00	61.46	0.00	29.76	100.00	12.90	0.00	0.00	0.00	40.00
ID Non-MSA	66	75.86	0.42	0.00	2.99	6.06	89.98	83.33	6.61	10.61	5.71	0.00	20.00	5.33	5.56

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF IDAHO					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015									
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Boise MSA	140	66.35	19.16	3.62	18.28	13.77	22.49	17.39	40.07	65.22	0.66	0.54	0.34	0.43	0.93	
Limited Review:																
Idaho Falls MSA	28	13.27	17.92	7.14	19.13	25.00	22.11	14.29	40.84	53.57	0.47	0.00	0.45	0.23	0.83	
Pocatello MSA	7	3.32	20.47	14.29	17.37	42.86	22.73	14.29	39.43	28.57	0.46	0.99	1.04	0.00	0.23	
ID Non-MSA	36	17.06	19.85	8.33	18.28	22.22	23.13	5.56	38.75	63.89	0.53	0.63	0.32	0.00	1.00	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF IDAHO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loan****	Overall	Low	Mod	Mid	Upp
Full Review:															
Boise MSA	142	67.30	19.16	8.09	18.28	16.91	22.49	23.53	40.07	51.47	9.94	15.56	8.66	10.06	9.63
Limited Review:															
Idaho Falls MSA	15	7.11	17.92	13.33	19.13	13.33	22.11	26.67	40.84	46.67	6.87	12.50	5.00	6.06	7.14
Pocatello MSA	17	8.06	20.47	6.25	17.37	25.00	22.73	31.25	39.43	37.50	9.43	0.00	16.67	12.50	7.41
ID Non-MSA	37	17.54	19.85	5.56	18.28	30.56	23.13	13.89	38.75	50.00	8.22	0.00	8.00	11.43	7.41

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.8% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF IDAHO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Boise MSA	288	57.60	19.16	5.86	18.28	17.22	22.49	26.01	40.07	50.92	2.50	2.46	1.91	2.89	2.52
Limited Review:															
Idaho Falls MSA	46	9.20	17.92	6.82	19.13	25.00	22.11	36.36	40.84	31.82	3.41	2.99	1.40	7.06	2.55
Pocatello MSA	24	4.80	20.47	4.35	17.37	34.78	22.73	8.70	39.43	52.17	2.26	1.82	3.33	1.39	2.35
ID Non-MSA	142	28.40	19.85	5.19	18.28	17.04	23.13	25.93	38.75	51.85	4.30	3.70	4.24	4.14	4.49

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 5.0% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF IDAHO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less	
Full Review:										
Boise MSA	394	57.86	79.24	55.84	80.96	6.35	12.69	1.64	1.92	
Limited Review:										
Idaho Falls MSA	83	12.19	76.59	49.40	74.70	8.43	16.87	2.10	2.36	
Pocatello MSA	34	4.99	75.31	58.82	76.47	11.76	11.76	1.35	1.73	
ID Non-MSA	170	24.96	78.14	58.82	85.29	7.06	7.65	2.03	2.46	

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 14.68% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: STATE OF IDAHO					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Boise MSA	16	18.39	95.57	87.50	50.00	50.00	0.00	2.49	4.33
Limited Review:									
Idaho Falls MSA	1	1.15	94.65	0.00	100.00	0.00	0.00	0.00	0.00
Pocatello MSA	4	4.60	98.05	75.00	75.00	25.00	0.00	12.90	13.04
ID Non-MSA	66	75.86	94.65	62.12	51.52	16.67	31.82	5.71	5.21

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 3.45% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF IDAHO				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Boise MSA	2	1,413	28	7,715	30	9,128	30.05	0	0
Limited Review:									
Idaho Falls MSA	1	1,281	2	5,628	3	6,909	22.75	0	0
Pocatello MSA	1	500	7	36	8	536	1.76	0	0
ID Non-MSA	1	20	2	4,393	3	4,413	14.53	0	0
Broader Statewide or Regional Area	1	13	4	9,373	5	9,386	30.91	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: STATE OF IDAHO				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
Full Review:																								
Boise MSA	76.39	14	50.00	0.00	50.00	21.43	28.57	0	2	0	- 1	- 1	0	1.22	27.12	43.62	28.04							
Limited Review:																								
Idaho Falls MSA	6.66	3	10.71	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.00	22.15	51.82	26.04							
Pocatello MSA	4.59	3	10.71	0.00	33.33	66.67	0.00	0	0	0	0	0	0	3.52	15.76	55.42	25.30							
ID Non-MSA	12.36	8	28.57	12.50	12.50	75.00	0.00	0	1	0	- 1	0	0	3.78	12.16	77.40	6.65							

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF INDIANA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Indianapolis MSA	68.57	1,010	148,742	523	44,544	7	1,348	18	101,569	1,558	296,203	69.25
Limited Review:												
Elkhart MSA	9.38	135	12,088	76	8,927	1	30	1	1,180	213	22,225	7.35
Kokomo MSA	4.62	79	10,247	26	318	0	0	0	0	105	10,565	4.27
South Bend MSA	8.41	120	10,654	70	10,682	1	200	0	0	191	21,536	13.67
IN Non-MSA	9.02	159	28,786	46	2,630	0	0	0	0	205	31,416	5.47
Broader Statewide or Regional Area	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4	29,323	4	29,323	N/A

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF INDIANA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	210	59.83	5.38	1.90	19.14	14.29	39.58	42.38	35.90	41.43	0.28	0.35	0.33	0.28	0.26
Limited Review:															
Elkhart MSA	39	11.11	0.00	0.00	13.11	7.69	55.62	64.10	31.27	28.21	0.70	0.00	0.72	0.94	0.31
Kokomo MSA	22	6.27	0.00	0.00	25.42	13.64	36.06	40.91	38.52	45.45	1.69	0.00	1.65	1.64	1.75
South Bend MSA	42	11.97	2.22	0.00	21.95	30.95	37.41	19.05	38.43	50.00	0.59	0.00	1.06	0.24	0.70
IN Non-MSA	38	10.83	0.00	0.00	3.51	2.63	78.09	78.95	18.40	18.42	0.76	0.00	0.85	0.82	0.52

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF INDIANA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	373	71.46	5.38	1.34	19.14	12.33	39.58	37.27	35.90	49.06	8.54	4.62	7.72	8.70	8.93
Limited Review:															
Elkhart MSA	36	6.90	0.00	0.00	13.11	5.56	55.62	72.22	31.27	22.22	8.28	0.00	4.35	13.29	3.23
Kokomo MSA	19	3.64	0.00	0.00	25.42	36.84	36.06	15.79	38.52	47.37	7.14	0.00	16.67	2.86	8.11
South Bend MSA	37	7.09	2.22	0.00	21.95	21.62	37.41	40.54	38.43	37.84	5.49	0.00	5.19	7.89	3.80
IN Non-MSA	57	10.92	0.00	0.00	3.51	5.26	78.09	80.70	18.40	14.04	6.80	0.00	8.33	7.69	1.89

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: STATE OF INDIANA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015								
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total **	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Indianapolis MSA	423	67.68	5.38	1.42	19.14	12.53	39.58	41.13	35.90	44.92	1.04	0.68	1.00	1.06	1.04	
Limited Review:																
Elkhart MSA	60	9.60	0.00	0.00	13.11	10.00	55.62	48.33	31.27	41.67	1.80	0.00	2.34	1.56	2.00	
Kokomo MSA	37	5.92	0.00	0.00	25.42	13.51	36.06	43.24	38.52	43.24	2.50	0.00	2.04	2.80	2.43	
South Bend MSA	41	6.56	2.22	2.44	21.95	12.20	37.41	24.39	38.43	60.98	0.94	0.00	0.72	0.93	1.02	
IN Non-MSA	64	10.24	0.00	0.00	3.51	10.94	78.09	78.13	18.40	10.94	1.99	0.00	8.00	2.04	0.88	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF INDIANA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loan****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	4	80.00	12.79	0.00	41.69	25.00	29.42	75.00	16.10	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Elkhart MSA	0	0.00	0.00	0.00	25.73	0.00	69.00	0.00	5.27	0.00	0.00	0.00	0.00	0.00	0.00
Kokomo MSA	1	20.00	0.00	0.00	45.39	0.00	33.51	100.00	21.11	0.00	0.00	0.00	0.00	0.00	0.00
South Bend MSA	0	0.00	8.23	0.00	47.06	0.00	34.23	0.00	10.49	0.00	0.00	0.00	0.00	0.00	0.00
IN Non-MSA	0	0.00	0.00	0.00	13.33	0.00	74.70	0.00	11.97	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF INDIANA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	523	70.58	5.55	4.21	19.70	15.30	38.54	44.17	36.17	36.33	1.05	1.04	0.72	1.28	1.01
Limited Review:															
Elkhart MSA	76	10.26	0.00	0.00	17.23	32.89	55.32	48.68	27.45	18.42	1.58	0.00	3.44	1.46	1.05
Kokomo MSA	26	3.51	0.00	0.00	36.70	42.31	31.74	46.15	31.57	11.54	1.63	0.00	2.26	2.26	0.43
South Bend MSA	70	9.45	7.84	10.00	24.63	24.29	34.75	40.00	32.77	25.71	1.07	1.90	0.78	1.07	1.14
IN Non-MSA	46	6.21	0.00	0.00	10.63	2.17	72.09	89.13	17.28	8.70	0.78	0.00	0.00	1.15	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: STATE OF INDIANA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	7	77.78	2.31	0.00	9.75	0.00	56.91	57.14	31.01	42.86	1.08	0.00	0.00	0.72	2.74
Limited Review:															
Elkhart MSA	1	11.11	0.00	0.00	3.69	0.00	46.62	100.00	49.69	0.00	1.39	0.00	0.00	3.03	0.00
Kokomo MSA	0	0.00	0.00	0.00	5.83	0.00	26.69	0.00	67.48	0.00	0.00	0.00	0.00	0.00	0.00
South Bend MSA	1	11.11	1.29	0.00	9.02	0.00	45.86	0.00	43.83	100.00	0.97	0.00	0.00	0.00	2.04
IN Non-MSA	0	0.00	0.00	0.00	1.62	0.00	79.41	0.00	18.97	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF INDIANA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	210	59.83	21.33	15.24	17.28	44.76	20.54	15.71	40.85	24.29	0.34	0.46	0.51	0.24	0.26
Limited Review:															
Elkhart MSA	39	11.11	17.81	10.26	19.19	28.21	22.78	25.64	40.22	35.90	0.83	0.82	0.86	0.47	1.14
Kokomo MSA	22	6.27	21.69	4.55	16.63	50.00	20.91	22.73	40.77	22.73	1.96	0.93	3.16	1.75	1.35
South Bend MSA	42	11.97	20.35	7.14	18.06	38.10	20.94	14.29	40.65	40.48	0.70	0.73	0.88	0.14	0.93
IN Non-MSA	38	10.83	16.98	10.53	17.98	26.32	24.20	34.21	40.84	28.95	0.93	1.27	0.83	1.06	0.83

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.3% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF INDIANA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Indianapolis MSA	373	71.46	21.33	6.67	17.28	13.33	20.54	18.89	40.85	61.11	8.61	6.53	5.61	6.90	11.26
Limited Review:															
Elkhart MSA	36	6.90	17.81	8.57	19.19	17.14	22.78	20.00	40.22	54.29	8.46	10.53	9.62	5.80	9.09
Kokomo MSA	19	3.64	21.69	15.79	16.63	21.05	20.91	15.79	40.77	47.37	7.32	12.50	4.17	12.50	5.88
South Bend MSA	37	7.09	20.35	13.89	18.06	25.00	20.94	25.00	40.65	36.11	5.84	4.00	8.33	5.38	5.33
IN Non-MSA	57	10.92	16.98	5.45	17.98	14.55	24.20	34.55	40.84	45.45	6.73	2.94	5.63	10.34	5.93

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.3% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: STATE OF INDIANA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015								
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total **	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	Overall	Low	Mod	Mid
Full Review:																
Indianapolis MSA	423	67.68	21.33	9.49	17.28	22.38	20.54	24.33	40.85	43.80	1.28	0.93	1.20	1.53	1.26	
Limited Review:																
Elkhart MSA	60	9.60	17.81	9.09	19.19	21.82	22.78	43.64	40.22	25.45	2.01	3.23	1.32	3.29	1.26	
Kokomo MSA	37	5.92	21.69	11.43	16.63	28.57	20.91	28.57	40.77	31.43	3.06	6.38	4.08	1.42	2.94	
South Bend MSA	41	6.56	20.35	0.00	18.06	28.57	20.94	28.57	40.65	42.86	1.01	0.00	1.36	1.23	0.92	
IN Non-MSA	64	10.24	16.98	11.67	17.98	20.00	24.20	30.00	40.84	38.33	2.14	3.33	1.04	2.28	2.27	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 4.6% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF INDIANA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less	
Full Review:										
Indianapolis MSA	523	70.58	76.86	59.66	82.60	6.12	11.28	1.05	1.50	
Limited Review:										
Elkhart MSA	76	10.26	74.26	53.95	78.95	5.26	15.79	1.58	2.37	
Kokomo MSA	26	3.51	76.97	76.92	100.00	0.00	0.00	1.63	2.76	
South Bend MSA	70	9.45	74.40	57.14	78.57	2.86	18.57	1.07	1.40	
IN Non-MSA	46	6.21	77.29	65.22	86.96	10.87	2.17	0.78	1.12	

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 8.91% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF INDIANA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Indianapolis MSA	7	77.78	97.19	42.86	57.14	0.00	42.86	1.08	0.52
Limited Review:									
Elkhart MSA	1	11.11	98.77	100.00	100.00	0.00	0.00	1.39	2.94
Kokomo MSA	0	0.00	99.08	0.00	0.00	0.00	0.00	0.00	0.00
South Bend MSA	1	11.11	97.24	100.00	0.00	100.00	0.00	0.97	1.15
IN Non-MSA	0	0.00	97.89	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 11.11% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF INDIANA				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Indianapolis MSA	23	21,155	34	11,597	57	32,752	54.66	0	0
Limited Review:									
Elkhart MSA	3	299	7	8,990	10	9,289	15.50	0	0
Kokomo MSA	1	8	1	5,982	2	5,990	10.00	0	0
South Bend MSA	3	2,525	18	5,501	21	8,026	13.40	0	0
IN Non-MSA	1	10	0	0	1	10	0.02	0	0
Broader Statewide or Regional Area	69	3,833	1	15	70	3,848	6.42	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																Geography: STATE OF INDIANA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population									
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography									
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp						
Full Review:																							
Indianapolis MSA	69.25	35	58.33	5.71	22.86	45.71	25.71	0	2	0	- 1	- 1	0	8.50	24.07	36.06	31.18						
Limited Review:																							
Elkhart MSA	7.35	8	13.33	0.00	25.00	62.50	12.50	0	3	0	- 1	- 1	- 1	0.00	17.02	53.84	29.14						
Kokomo MSA	4.27	4	6.67	0.00	75.00	0.00	25.00	0	0	0	0	0	0	0.00	32.05	32.49	35.46						
South Bend MSA	13.67	6	10.00	16.67	33.33	16.67	33.33	0	0	0	0	0	0	4.59	27.75	36.27	31.40						
IN Non-MSA	5.47	7	11.67	0.00	42.86	57.14	0.00	0	0	0	0	0	0	0.00	5.22	76.71	18.07						

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF MAINE						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Portland ME MSA	41.51	531	144,218	645	40,766	4	33	20	56,476	1,200	241,493	73.10
Limited Review:												
Bangor MSA	10.13	169	14,749	122	4,769	2	600	0	0	293	20,118	4.70
Lewiston MSA	5.19	104	9,691	46	4,151	0	0	0	0	150	13,842	1.99
ME Non-MSA	43.17	725	65,722	493	27,378	30	4,916	0	0	1,248	98,016	20.20

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF MAINE						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland ME MSA	93	43.46	0.34	1.08	10.36	7.53	63.15	47.31	26.15	44.09	0.48	0.84	0.32	0.28	0.97
Limited Review:															
Bangor MSA	26	12.15	0.21	0.00	17.84	19.23	56.52	57.69	25.43	23.08	0.91	0.00	1.16	1.06	0.54
Lewiston MSA	12	5.61	0.78	0.00	7.38	0.00	67.18	58.33	24.66	41.67	0.33	0.00	0.00	0.31	0.50
ME Non-MSA	83	38.79	0.00	0.00	7.12	8.43	78.63	84.34	14.25	7.23	0.84	0.00	1.76	0.87	0.34

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF MAINE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Portland ME MSA	140	29.17	0.34	0.71	10.36	8.57	63.15	56.43	26.15	34.29	4.61	25.00	2.24	4.52	5.51	
Limited Review:																
Bangor MSA	68	14.17	0.21	1.47	17.84	17.65	56.52	50.00	25.43	30.88	9.81	0.00	12.07	8.91	10.26	
Lewiston MSA	38	7.92	0.78	0.00	7.38	7.89	67.18	65.79	24.66	26.32	7.96	0.00	21.43	7.87	5.17	
ME Non-MSA	234	48.75	0.00	0.00	7.12	10.26	78.63	77.35	14.25	12.39	11.72	0.00	15.48	11.23	12.10	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF MAINE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Portland ME MSA	294	35.38	0.34	0.34	10.36	8.50	63.15	57.14	26.15	34.01	2.38	4.76	2.24	2.13	2.95	
Limited Review:																
Bangor MSA	75	9.03	0.21	0.00	17.84	18.67	56.52	52.00	25.43	29.33	4.01	0.00	4.35	4.10	3.69	
Lewiston MSA	54	6.50	0.78	0.00	7.38	1.85	67.18	70.37	24.66	27.78	3.60	0.00	2.00	4.07	3.03	
ME Non-MSA	408	49.10	0.00	0.00	7.12	6.13	78.63	79.66	14.25	14.22	5.59	0.00	6.78	5.72	4.57	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: STATE OF MAINE								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland ME MSA	4	100.00	10.73	0.00	27.98	0.00	47.97	75.00	13.33	25.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Bangor MSA	0	0.00	0.83	0.00	28.31	0.00	57.60	0.00	13.26	0.00	0.00	0.00	0.00	0.00	0.00
Lewiston MSA	0	0.00	18.71	0.00	32.57	0.00	45.94	0.00	2.78	0.00	0.00	0.00	0.00	0.00	0.00
ME Non-MSA	0	0.00	0.00	0.00	11.32	0.00	76.97	0.00	11.71	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF MAINE								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland ME MSA	645	49.39	7.85	11.63	10.46	9.92	57.08	50.39	24.61	28.06	2.64	5.20	2.09	2.41	2.76
Limited Review:															
Bangor MSA	122	9.34	0.34	0.00	18.77	22.13	53.81	61.48	27.08	16.39	2.35	0.00	5.14	2.71	0.93
Lewiston MSA	46	3.52	8.27	13.04	11.94	2.17	64.35	60.87	15.44	23.91	2.11	4.65	0.74	2.09	2.40
ME Non-MSA	493	37.75	0.00	0.00	7.66	6.49	75.86	78.50	16.48	15.01	2.54	0.00	2.46	2.65	2.80

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF MAINE								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland ME MSA	4	11.11	2.66	25.00	7.74	0.00	64.23	0.00	25.37	75.00	4.29	50.00	0.00	0.00	10.00
Limited Review:															
Bangor MSA	2	5.56	0.28	0.00	10.20	0.00	62.04	100.00	27.48	0.00	2.44	0.00	0.00	4.17	0.00
Lewiston MSA	0	0.00	0.97	0.00	3.38	0.00	69.57	0.00	26.09	0.00	0.00	0.00	0.00	0.00	0.00
ME Non-MSA	30	83.33	0.00	0.00	5.81	26.67	81.55	73.33	12.64	0.00	2.22	0.00	13.64	2.11	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF MAINE									Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland ME MSA	93	43.46	18.96	10.75	18.25	10.75	23.60	21.51	39.19	56.99	0.59	0.36	0.37	0.51	0.78
Limited Review:															
Bangor MSA	26	12.15	21.21	3.85	17.07	23.08	21.99	26.92	39.73	46.15	1.17	0.00	1.37	1.30	1.13
Lewiston MSA	12	5.61	20.06	0.00	18.25	25.00	22.11	33.33	39.58	41.67	0.43	0.00	0.28	0.61	0.50
ME Non-MSA	83	38.79	19.47	8.43	18.26	21.69	22.05	25.30	40.21	44.58	1.02	2.40	0.59	1.18	0.98

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF MAINE								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland ME MSA	140	29.17	18.96	9.16	18.25	17.56	23.60	26.72	39.19	46.56	4.53	2.60	3.36	8.15	3.39
Limited Review:															
Bangor MSA	68	14.17	21.21	8.96	17.07	20.90	21.99	17.91	39.73	52.24	10.17	6.45	7.25	8.25	13.38
Lewiston MSA	38	7.92	20.06	2.86	18.25	28.57	22.11	28.57	39.58	40.00	8.02	0.00	7.89	9.52	8.70
ME Non-MSA	234	48.75	19.47	10.27	18.26	18.75	22.05	30.36	40.21	40.63	11.91	10.38	12.34	14.29	10.84

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 4.8% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: STATE OF MAINE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Portland ME MSA	294	35.38	18.96	8.70	18.25	17.75	23.60	21.38	39.19	52.17	2.52	3.28	2.34	1.74	2.94
Limited Review:															
Bangor MSA	75	9.03	21.21	8.33	17.07	20.83	21.99	25.00	39.73	45.83	4.49	6.76	5.77	4.00	3.93
Lewiston MSA	54	6.50	20.06	5.56	18.25	16.67	22.11	33.33	39.58	44.44	4.46	2.33	2.56	5.91	4.53
ME Non-MSA	408	49.10	19.47	7.58	18.26	16.92	22.05	30.56	40.21	44.95	6.35	8.11	6.05	6.97	5.89

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 4.0% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF MAINE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Portland ME MSA	645	49.39	77.48	62.64	88.06	5.27	6.67	2.64	3.75
Limited Review:									
Bangor MSA	122	9.34	74.71	70.49	90.16	7.38	2.46	2.35	3.95
Lewiston MSA	46	3.52	75.49	54.35	82.61	6.52	10.87	2.11	3.82
ME Non-MSA	493	37.75	77.89	61.46	87.83	7.10	5.07	2.54	3.05

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 15.47% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: STATE OF MAINE			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Portland ME MSA	4	11.11	96.26	50.00	100.00	0.00	0.00	4.29	4.88
Limited Review:									
Bangor MSA	2	5.56	96.32	50.00	0.00	0.00	100.00	2.44	4.55
Lewiston MSA	0	0.00	96.14	0.00	0.00	0.00	0.00	0.00	0.00
ME Non-MSA	30	83.33	97.50	53.33	56.67	23.33	20.00	2.22	1.65

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 5.56% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF MAINE				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Portland ME MSA	28	5,707	24	15,798	52	21,505	52.44	1	1,900
Limited Review:									
Bangor MSA	2	46	3	1,731	5	1,777	4.33	0	0
Lewiston MSA	4	244	0	0	4	244	0.59	0	0
ME Non-MSA	6	382	7	13,929	13	14,311	34.90	0	0
Broader Statewide or Regional Area	19	3,173	0	0	19	3,173	7.74	1	217

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF MAINE																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Portland ME MSA	73.10	22	42.31	13.64	4.55	54.55	27.27	0	1	0	0	- 1	0	1.64	12.85	61.95	23.56
Limited Review:																	
Bangor MSA	4.70	6	11.54	0.00	33.33	50.00	16.67	0	0	0	0	0	0	0.40	20.40	56.40	22.80
Lewiston MSA	1.99	2	3.85	50.00	0.00	50.00	0.00	0	1	0	0	- 1	0	4.96	14.53	61.04	19.47
ME Non-MSA	20.20	22	42.31	0.00	13.64	68.18	18.18	0	1	0	0	0	- 1	0.00	7.40	78.17	14.43

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF MICHIGAN												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015												
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Ann Arbor MSA	24.08	127	50,626	128	5,909	0	0	1	13,223	256	69,758	68.44
Limited Review:												
Detroit MSA	15.24	80	21,110	80	10,476	0	0	2	8,700	162	40,286	3.34
Monroe MSA	17.50	102	21,106	84	3,393	0	0	0	0	186	24,499	9.33
Warren-Farmington MSA	20.98	157	23,109	61	8,850	0	0	5	10,118	223	42,077	7.17
MI Non-MSA	22.20	159	13,073	75	3,638	2	30	0	0	236	16,741	11.73
Broader Statewide or Regional Area	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4	16,147	4	16,147	N/A

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF MICHIGAN						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Ann Arbor MSA	30	26.32	3.99	3.33	14.89	23.33	51.87	43.33	29.26	30.00	0.32	0.81	0.56	0.25	0.31
Limited Review:															
Detroit MSA	15	13.16	7.41	6.67	21.84	6.67	28.51	33.33	42.25	53.33	0.06	0.39	0.12	0.09	0.03
Monroe MSA	23	20.18	0.62	0.00	8.57	0.00	73.90	78.26	16.91	21.74	0.48	0.00	0.00	0.52	0.53
Warren-Farmington MSA	21	18.42	2.10	0.00	11.77	4.76	39.59	28.57	46.55	66.67	0.03	0.00	0.00	0.02	0.05
MI Non-MSA	25	21.93	0.00	0.00	6.36	24.00	56.06	48.00	37.58	28.00	0.82	0.00	5.41	0.78	0.40

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF MICHIGAN								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Ann Arbor MSA	45	17.79	3.99	4.44	14.89	11.11	51.87	48.89	29.26	35.56	7.87	12.50	15.63	4.79	10.43
Limited Review:															
Detroit MSA	36	14.23	7.41	2.78	21.84	2.78	28.51	2.78	42.25	91.67	1.48	1.37	0.38	0.21	2.55
Monroe MSA	21	8.30	0.62	0.00	8.57	9.52	73.90	71.43	16.91	19.05	4.93	0.00	0.00	4.70	8.57
Warren-Farmington MSA	104	41.11	2.10	0.00	11.77	1.92	39.59	32.69	46.55	65.38	2.66	0.00	1.24	2.25	3.30
MI Non-MSA	47	18.58	0.00	0.00	6.36	4.26	56.06	55.32	37.58	40.43	7.47	0.00	6.25	6.16	10.13

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF MICHIGAN				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Ann Arbor MSA	49	19.92	3.99	0.00	14.89	8.16	51.87	51.02	29.26	40.82	0.65	0.00	0.64	0.75	0.53	
Limited Review:																
Detroit MSA	25	10.16	7.41	0.00	21.84	0.00	28.51	28.00	42.25	72.00	0.11	0.00	0.00	0.18	0.10	
Monroe MSA	57	23.17	0.62	1.75	8.57	5.26	73.90	57.89	16.91	35.09	2.06	16.67	2.38	1.34	4.29	
Warren-Farmington MSA	28	11.38	2.10	0.00	11.77	3.57	39.59	32.14	46.55	64.29	0.07	0.00	0.07	0.07	0.07	
MI Non-MSA	87	35.37	0.00	0.00	6.36	4.60	56.06	54.02	37.58	41.38	2.79	0.00	2.63	2.72	2.87	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF MICHIGAN								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Ann Arbor MSA	3	25.00	20.11	33.33	30.30	0.00	36.45	66.67	13.14	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Detroit MSA	4	33.33	23.13	0.00	25.99	25.00	26.86	75.00	24.03	0.00	1.79	0.00	0.00	6.67	0.00
Monroe MSA	1	8.33	0.56	0.00	32.49	0.00	59.42	0.00	7.53	100.00	10.00	0.00	0.00	0.00	100.00
Warren-Farmington MSA	4	33.33	13.74	0.00	24.17	0.00	42.24	75.00	19.85	25.00	0.00	0.00	0.00	0.00	0.00
MI Non-MSA	0	0.00	0.00	0.00	15.90	0.00	66.74	0.00	17.36	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF MICHIGAN						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Ann Arbor MSA	127	29.74	4.81	3.15	12.50	11.81	49.75	60.63	31.46	24.41	1.00	1.73	1.10	1.05	0.85
Limited Review:															
Detroit MSA	80	18.74	10.51	3.75	18.99	12.50	26.99	28.75	42.94	55.00	0.15	0.18	0.06	0.17	0.16
Monroe MSA	84	19.67	0.77	0.00	12.00	2.38	71.00	64.29	16.22	33.33	3.31	0.00	1.35	2.84	6.39
Warren-Farmington MSA	61	14.29	3.35	0.00	14.47	16.39	35.19	29.51	46.99	54.10	0.10	0.00	0.11	0.08	0.11
MI Non-MSA	75	17.56	0.00	0.00	7.76	4.00	57.78	64.00	34.46	32.00	2.58	0.00	0.93	2.77	2.60

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF MICHIGAN								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Ann Arbor MSA	0	0.00	1.24	0.00	5.43	0.00	69.34	0.00	23.98	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Detroit MSA	0	0.00	5.75	0.00	16.14	0.00	26.28	0.00	51.65	0.00	0.00	0.00	0.00	0.00	0.00
Monroe MSA	0	0.00	0.00	0.00	2.62	0.00	88.52	0.00	8.85	0.00	0.00	0.00	0.00	0.00	0.00
Warren-Farmington MSA	0	0.00	2.42	0.00	11.44	0.00	45.91	0.00	40.23	0.00	0.00	0.00	0.00	0.00	0.00
MI Non-MSA	2	100.00	0.00	0.00	0.96	0.00	61.87	50.00	37.17	50.00	1.23	0.00	0.00	1.01	1.61

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF MICHIGAN					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015									
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Ann Arbor MSA	30	26.32	21.69	13.33	16.89	30.00	21.43	10.00	39.99	46.67	0.37	0.54	0.19	0.16	0.57	
Limited Review:																
Detroit MSA	15	13.16	24.56	13.33	15.84	33.33	17.67	13.33	41.92	40.00	0.07	0.29	0.08	0.03	0.06	
Monroe MSA	23	20.18	18.60	13.04	19.27	21.74	22.93	34.78	39.20	30.43	0.55	1.03	0.61	0.77	0.17	
Warren-Farmington MSA	21	18.42	17.41	4.76	15.93	19.05	20.23	23.81	46.43	52.38	0.04	0.00	0.07	0.04	0.03	
MI Non-MSA	25	21.93	16.13	8.00	16.75	36.00	22.08	24.00	45.04	32.00	0.98	1.09	1.28	0.78	0.89	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF MICHIGAN								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Ann Arbor MSA	45	17.79	21.69	15.91	16.89	11.36	21.43	13.64	39.99	59.09	8.05	11.11	5.88	3.45	11.35
Limited Review:															
Detroit MSA	36	14.23	24.56	0.00	15.84	11.43	17.67	8.57	41.92	80.00	1.50	0.00	0.96	0.53	2.55
Monroe MSA	21	8.30	18.60	21.05	19.27	15.79	22.93	15.79	39.20	47.37	4.74	5.00	4.44	4.65	4.88
Warren-Farmington MSA	104	41.11	17.41	0.96	15.93	3.85	20.23	18.27	46.43	76.92	2.84	0.63	0.94	2.15	4.26
MI Non-MSA	47	18.58	16.13	6.38	16.75	8.51	22.08	29.79	45.04	55.32	7.86	4.55	0.00	14.52	8.51

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF MICHIGAN								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Ann Arbor MSA	49	19.92	21.69	12.24	16.89	16.33	21.43	20.41	39.99	51.02	0.74	0.50	0.88	0.79	0.71
Limited Review:															
Detroit MSA	25	10.16	24.56	0.00	15.84	4.00	17.67	32.00	41.92	64.00	0.13	0.00	0.00	0.14	0.17
Monroe MSA	57	23.17	18.60	7.02	19.27	15.79	22.93	19.30	39.20	57.89	2.41	1.85	1.06	1.64	3.70
Warren-Farmington MSA	28	11.38	17.41	3.57	15.93	14.29	20.23	14.29	46.43	67.86	0.08	0.07	0.07	0.07	0.09
MI Non-MSA	87	35.37	16.13	6.02	16.75	21.69	22.08	28.92	45.04	43.37	2.99	2.86	2.70	2.67	3.32

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF MICHIGAN				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less	
Full Review:										
Ann Arbor MSA	128	29.91	78.05	64.06	91.41	4.69	3.91	1.00	1.56	
Limited Review:										
Detroit MSA	80	18.69	78.45	35.00	73.75	15.00	11.25	0.15	0.13	
Monroe MSA	84	19.63	80.31	58.33	91.67	4.76	3.57	3.31	3.84	
Warren-Farmington MSA	61	14.25	79.02	49.18	67.21	9.84	22.95	0.10	0.13	
MI Non-MSA	75	17.52	80.06	68.00	88.00	5.33	6.67	2.58	4.42	

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 17.76% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF MICHIGAN			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Ann Arbor MSA	0	0.00	96.83	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Detroit MSA	0	0.00	96.58	0.00	0.00	0.00	0.00	0.00	0.00
Monroe MSA	0	0.00	97.21	0.00	0.00	0.00	0.00	0.00	0.00
Warren-Farmington MSA	0	0.00	96.16	0.00	0.00	0.00	0.00	0.00	0.00
MI Non-MSA	2	100.00	98.83	100.00	100.00	0.00	0.00	1.23	2.27

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF MICHIGAN				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Ann Arbor MSA	4	162	10	16,260	14	16,422	29.54	0	0
Limited Review:									
Detroit MSA	59	12,019	1	3,212	60	15,231	27.39	0	0
Monroe MSA	0	0	2	4,007	2	4,007	7.21	0	0
Warren-Farmington MSA	6	101	1	1,447	7	1,548	2.78	0	0
MI Non-MSA	5	44	1	3,428	6	3,472	6.24	0	0
Broader Statewide or Regional Area	203	9,404	2	5,517	205	14,921	26.84	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF MICHIGAN																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Ann Arbor MSA	68.44	9	39.13	0.00	22.22	66.67	11.11	0	1	0	0	- 1	0	8.05	17.84	46.48	24.26
Limited Review:																	
Detroit MSA	3.34	3	13.04	0.00	0.00	0.00	100.00	0	0	0	0	0	0	12.53	27.09	25.88	34.50
Monroe MSA	9.33	3	13.04	0.00	33.33	33.33	33.33	0	1	0	0	0	- 1	0.96	10.81	72.72	15.51
Warren-Farmington MSA	7.17	3	13.04	0.00	33.33	33.33	33.33	0	0	0	0	0	0	4.21	13.54	38.89	43.36
MI Non-MSA	11.73	5	21.74	0.00	20.00	60.00	20.00	0	1	0	0	- 1	0	0.00	8.41	56.56	35.03

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF NEW YORK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Albany NY MSA	13.85	587	119,532	865	76,493	1	10	28	549,560	1,481	745,595	46.14
Limited Review:												
Buffalo – Niagara Falls MSA	36.53	2,071	226,014	1,780	58,078	14	434	40	146,469	3,905	430,995	19.51
Dutchess – Putnam MSA	2.42	84	13,347	166	7,744	0	0	9	23,562	259	44,653	1.41
Glens Falls MSA	0.51	25	3,214	29	4,595	0	0	0	0	54	7,809	0.25
Kingston MSA	1.82	70	6,822	119	2,530	6	68	0	0	195	9,420	1.25
New York – White Plains MSA	7.82	191	39,731	625	41,101	5	346	15	37,906	836	119,084	9.90
Rochester MSA	10.75	387	50,122	729	32,082	10	726	23	90,057	1,149	172,987	5.96
Syracuse MSA	11.11	419	43,881	749	55,909	8	354	12	35,939	1,188	136,083	7.62
Utica-Rome MSA	0.88	54	4,000	39	2,140	0	0	1	4,407	94	10,547	0.28
Watertown Ft Drum MSA	1.51	90	8,313	70	8,110	1	25	0	0	161	16,448	0.98
NY Non-MSA	12.81	721	59,139	632	29,891	14	899	2	6,558	1,369	96,487	6.71
Broader Statewide or Regional Area	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3	12,948	3	12,948	N/A

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF NEW YORK								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Albany NY MSA	143	11.93	4.37	6.99	11.32	10.49	56.55	42.66	27.76	39.86	0.50	1.15	0.19	0.45	0.63
Limited Review:															
Buffalo – Niagara Falls MSA	556	46.37	5.03	0.54	14.25	13.31	43.06	45.68	37.67	40.47	2.25	0.72	2.62	2.23	2.24
Dutchess – Putnam MSA	36	3.00	1.61	0.00	9.98	19.44	63.68	69.44	24.73	11.11	0.47	0.00	0.88	0.55	0.12
Glens Falls MSA	10	0.83	0.00	0.00	3.27	20.00	69.93	50.00	26.79	30.00	0.52	0.00	0.00	0.59	0.44
Kingston MSA	12	1.00	0.00	0.00	10.41	16.67	74.43	75.00	15.16	8.33	0.46	0.00	0.78	0.51	0.00
New York – White Plains MSA	36	3.00	1.19	0.00	6.12	2.78	14.17	27.78	78.53	69.44	0.09	0.00	0.00	0.26	0.07
Rochester MSA	97	8.09	3.16	1.03	10.89	10.31	56.00	56.70	29.95	31.96	0.43	0.00	0.57	0.47	0.35
Syracuse MSA	82	6.84	3.25	3.66	13.57	14.63	49.17	47.56	34.01	34.15	0.58	1.02	0.66	0.64	0.45
Utica-Rome MSA	9	0.75	3.17	0.00	10.40	22.22	49.69	33.33	36.74	44.44	0.14	0.00	0.46	0.10	0.12
Watertown Ft Drum MSA	24	2.00	0.00	0.00	9.18	4.17	69.59	70.83	21.23	25.00	1.10	0.00	0.81	0.90	1.95
NY Non-MSA	194	16.18	0.50	0.00	9.13	10.82	69.93	67.53	20.44	21.65	1.22	0.00	1.37	1.26	1.08

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF NEW YORK								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Albany NY MSA	171	9.72	4.37	5.26	11.32	7.02	56.55	61.40	27.76	26.32	6.21	15.15	4.08	6.79	4.90
Limited Review:															
Buffalo – Niagara Falls MSA	770	43.77	5.03	4.03	14.25	13.38	43.06	38.96	37.67	43.64	18.56	10.24	15.69	17.55	23.10
Dutchess – Putnam MSA	20	1.14	1.61	0.00	9.98	25.00	63.68	55.00	24.73	20.00	2.55	0.00	5.26	2.05	2.67
Glens Falls MSA	7	0.40	0.00	0.00	3.27	0.00	69.93	57.14	26.79	42.86	1.88	0.00	0.00	0.84	5.41
Kingston MSA	29	1.65	0.00	0.00	10.41	17.24	74.43	65.52	15.16	17.24	7.00	0.00	5.88	6.01	15.38
New York – White Plains MSA	58	3.30	1.19	0.00	6.12	10.34	14.17	25.86	78.53	63.79	2.30	0.00	2.94	4.14	1.97
Rochester MSA	152	8.64	3.16	2.63	10.89	7.89	56.00	55.26	29.95	34.21	2.28	2.15	0.98	2.13	3.39
Syracuse MSA	212	12.05	3.25	0.94	13.57	13.68	49.17	47.17	34.01	38.21	5.11	1.47	5.18	4.55	6.49
Utica-Rome MSA	26	1.48	3.17	3.85	10.40	7.69	49.69	65.38	36.74	23.08	1.89	5.00	1.82	2.00	1.48
Watertown Ft Drum MSA	34	1.93	0.00	0.00	9.18	5.88	69.59	73.53	21.23	20.59	3.32	0.00	0.00	2.75	6.45
NY Non-MSA	280	15.92	0.50	0.36	9.13	6.07	69.93	78.21	20.44	15.36	4.86	16.67	2.72	4.88	5.75

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF NEW YORK								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Albany NY MSA	272	15.69	4.37	2.94	11.32	10.66	56.55	56.99	27.76	29.41	2.56	2.55	2.86	2.65	2.29
Limited Review:															
Buffalo – Niagara Falls MSA	743	42.85	5.03	3.23	14.25	9.69	43.06	43.88	37.67	43.20	7.88	17.58	6.26	7.84	7.90
Dutchess – Putnam MSA	28	1.61	1.61	0.00	9.98	10.71	63.68	82.14	24.73	7.14	0.57	0.00	0.53	0.66	0.41
Glens Falls MSA	8	0.46	0.00	0.00	3.27	0.00	69.93	75.00	26.79	25.00	1.14	0.00	0.00	1.35	0.83
Kingston MSA	29	1.67	0.00	0.00	10.41	6.90	74.43	58.62	15.16	34.48	1.90	0.00	1.49	1.18	5.47
New York – White Plains MSA	96	5.54	1.19	4.17	6.12	3.13	14.17	10.42	78.53	82.29	0.49	0.56	0.32	0.46	0.51
Rochester MSA	136	7.84	3.16	0.00	10.89	6.62	56.00	61.76	29.95	31.62	1.52	0.00	1.12	1.62	1.54
Syracuse MSA	124	7.15	3.25	3.23	13.57	11.29	49.17	45.16	34.01	40.32	1.78	4.62	1.45	1.86	1.63
Utica-Rome MSA	19	1.10	3.17	0.00	10.40	15.79	49.69	42.11	36.74	42.11	0.89	0.00	0.85	0.62	1.26
Watertown Ft Drum MSA	32	1.85	0.00	0.00	9.18	12.50	69.59	62.50	21.23	25.00	2.52	0.00	5.08	2.05	2.92
NY Non-MSA	247	14.24	0.50	0.40	9.13	6.48	69.93	66.80	20.44	26.32	3.04	0.00	2.01	3.04	3.37

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: STATE OF NEW YORK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Albany NY MSA	1	14.29	13.50	0.00	22.87	0.00	40.10	100.00	23.53	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Buffalo - Niagara Falls MSA	2	28.57	19.63	0.00	16.67	0.00	37.14	50.00	26.56	50.00	0.00	0.00	0.00	0.00	0.00
Dutchess - Putnam MSA	0	0.00	16.37	0.00	26.21	0.00	47.71	0.00	9.71	0.00	0.00	0.00	0.00	0.00	0.00
Glens Falls MSA	0	0.00	0.00	0.00	15.97	0.00	63.91	0.00	20.12	0.00	0.00	0.00	0.00	0.00	0.00
Kingston MSA	0	0.00	0.00	0.00	24.67	0.00	65.42	0.00	9.91	0.00	0.00	0.00	0.00	0.00	0.00
New York - White Plains MSA	1	14.29	11.33	100.00	18.85	0.00	12.46	0.00	57.35	0.00	0.00	0.00	0.00	0.00	0.00
Rochester MSA	2	28.57	17.67	0.00	14.07	0.00	48.51	100.00	19.76	0.00	0.93	0.00	0.00	2.38	0.00
Syracuse MSA	1	14.29	24.54	0.00	25.39	0.00	31.05	100.00	19.02	0.00	2.22	0.00	0.00	3.85	0.00
Utica-Rome MSA	0	0.00	17.93	0.00	29.63	0.00	31.71	0.00	20.73	0.00	0.00	0.00	0.00	0.00	0.00
Watertown Ft Drum MSA	0	0.00	0.00	0.00	41.96	0.00	48.54	0.00	9.50	0.00	0.00	0.00	0.00	0.00	0.00
NY Non-MSA	0	0.00	3.82	0.00	23.25	0.00	58.46	0.00	14.47	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF NEW YORK								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Albany NY MSA	865	14.91	7.37	9.60	15.16	14.22	50.70	48.44	26.73	27.75	3.83	5.72	4.40	3.69	3.60
Limited Review:															
Buffalo - Niagara Falls MSA	1,778	30.66	8.00	6.19	14.59	13.16	40.83	37.51	36.13	43.14	8.04	7.21	8.10	7.57	8.74
Dutchess - Putnam MSA	166	2.86	5.40	12.65	13.01	13.25	59.66	44.58	21.92	29.52	1.02	4.33	1.82	0.72	1.01
Glens Falls MSA	29	0.50	0.00	0.00	10.21	13.79	67.76	72.41	22.03	13.79	1.16	0.00	0.00	1.63	0.64
Kingston MSA	119	2.05	0.00	0.00	13.12	10.92	69.58	68.07	17.30	21.01	2.15	0.00	2.09	2.02	3.20
New York - White Plains MSA	624	10.76	4.68	5.93	10.03	10.42	11.02	19.23	70.25	64.42	0.25	0.19	0.41	0.46	0.22
Rochester MSA	729	12.57	9.35	7.96	11.21	11.25	49.75	50.62	29.53	30.18	3.51	3.41	4.46	3.72	2.98
Syracuse MSA	749	12.91	13.24	11.62	14.12	11.21	43.40	45.53	29.22	31.64	4.22	3.91	5.25	4.34	4.03
Utica-Rome MSA	39	0.67	4.65	5.13	15.47	20.51	45.79	41.03	32.10	33.33	0.65	0.80	0.89	0.53	0.73
Watertown Ft Drum MSA	70	1.21	0.00	0.00	15.36	11.43	61.24	57.14	22.73	31.43	2.79	0.00	2.37	2.34	4.64
NY Non-MSA	632	10.90	1.89	1.27	12.65	8.54	65.52	68.99	19.75	21.20	2.48	2.93	2.06	2.78	2.21

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF NEW YORK					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Albany NY MSA	1	1.69	1.68	0.00	9.94	0.00	65.87	100.00	22.51	0.00	1.15	0.00	0.00	1.30	0.00
Limited Review:															
Buffalo - Niagara Falls MSA	14	23.73	2.62	0.00	5.81	0.00	50.21	35.71	41.36	64.29	8.22	0.00	0.00	5.15	15.56
Dutchess - Putnam MSA	0	0.00	0.97	0.00	7.37	0.00	67.22	0.00	24.44	0.00	0.00	0.00	0.00	0.00	0.00
Glens Falls MSA	0	0.00	0.00	0.00	2.83	0.00	68.87	0.00	28.30	0.00	0.00	0.00	0.00	0.00	0.00
Kingston MSA	6	10.17	0.00	0.00	6.25	0.00	68.57	83.33	25.18	16.67	0.00	0.00	0.00	0.00	0.00
New York - White Plains MSA	5	8.47	1.39	0.00	6.83	0.00	15.84	0.00	75.62	100.00	1.60	0.00	0.00	0.00	2.08
Rochester MSA	10	16.95	1.56	0.00	8.35	30.00	65.93	70.00	24.16	0.00	1.23	0.00	1.61	1.29	0.00
Syracuse MSA	8	13.56	1.80	0.00	9.95	0.00	58.85	37.50	29.39	62.50	2.80	0.00	0.00	0.97	6.90
Utica-Rome MSA	0	0.00	0.72	0.00	2.71	0.00	67.63	0.00	28.93	0.00	0.00	0.00	0.00	0.00	0.00
Watertown Ft Drum MSA	1	1.69	0.00	0.00	2.95	0.00	76.87	100.00	20.18	0.00	0.00	0.00	0.00	0.00	0.00
NY Non-MSA	14	23.73	0.09	0.00	5.09	0.00	75.03	100.00	19.71	0.00	1.14	0.00	0.00	1.49	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF NEW YORK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Albany NY MSA	143	11.93	20.53	12.59	18.05	27.97	21.80	18.88	39.62	40.56	0.58	0.83	0.54	0.44	0.64
Limited Review:															
Buffalo - Niagara Falls MSA	556	46.37	21.62	10.43	17.44	28.60	20.85	26.26	40.08	34.71	2.68	3.12	2.35	2.83	2.71
Dutchess - Putnam MSA	36	3.00	18.89	2.78	17.78	30.56	23.28	33.33	40.05	33.33	0.56	0.00	0.84	0.69	0.36
Glens Falls MSA	10	0.83	17.09	0.00	18.03	30.00	21.72	10.00	43.16	60.00	0.60	0.00	0.77	0.00	0.90
Kingston MSA	12	1.00	19.57	0.00	17.81	33.33	23.03	41.67	39.59	25.00	0.52	0.00	0.45	0.93	0.35
New York - White Plains MSA	36	3.00	20.62	2.78	12.23	19.44	13.76	33.33	53.40	44.44	0.10	0.00	0.46	0.25	0.06
Rochester MSA	97	8.09	20.30	10.42	17.31	23.96	22.06	23.96	40.33	41.67	0.52	0.59	0.51	0.44	0.57
Syracuse MSA	82	6.84	21.35	12.20	17.13	30.49	21.49	23.17	40.04	34.15	0.68	0.98	0.74	0.59	0.61
Utica-Rome MSA	9	0.75	21.08	11.11	16.08	22.22	20.96	33.33	41.88	33.33	0.16	0.56	0.00	0.19	0.15
Watertown Ft Drum MSA	24	2.00	20.80	0.00	18.04	20.83	21.95	20.83	39.21	58.33	1.30	0.00	2.36	1.27	1.15
NY Non-MSA	194	16.18	19.89	6.74	17.91	18.65	21.48	33.68	40.72	40.93	1.43	1.81	1.03	1.87	1.29

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.2% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF NEW YORK								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Albany NY MSA	171	9.72	20.53	13.16	18.05	24.34	21.80	19.08	39.62	43.42	6.57	5.22	7.41	5.39	7.19
Limited Review:															
Buffalo - Niagara Falls MSA	770	43.77	21.62	9.42	17.44	19.11	20.85	22.77	40.08	48.69	19.38	13.62	13.29	18.95	26.23
Dutchess - Putnam MSA	20	1.14	18.89	15.79	17.78	26.32	23.28	26.32	40.05	31.58	2.69	5.00	3.23	2.82	1.61
Glens Falls MSA	7	0.40	17.09	0.00	18.03	0.00	21.72	42.86	43.16	57.14	1.91	0.00	0.00	0.00	4.17
Kingston MSA	29	1.65	19.57	24.14	17.81	31.03	23.03	27.59	39.59	17.24	7.17	17.39	7.94	4.48	5.95
New York - White Plains MSA	58	3.30	20.62	5.26	12.23	10.53	13.76	28.07	53.40	56.14	2.60	5.00	3.17	6.45	1.81
Rochester MSA	152	8.64	20.30	12.58	17.31	21.19	22.06	16.56	40.33	49.67	2.32	3.13	1.50	1.32	3.49
Syracuse MSA	212	12.05	21.35	12.38	17.13	15.24	21.49	18.10	40.04	54.29	5.16	5.00	3.39	2.95	8.46
Utica-Rome MSA	26	1.48	21.08	0.00	16.08	20.00	20.96	16.00	41.88	64.00	1.80	0.00	1.84	1.42	2.48
Watertown Ft Drum MSA	34	1.93	20.80	0.00	18.04	26.47	21.95	17.65	39.21	55.88	3.38	0.00	4.88	3.06	3.42
NY Non-MSA	280	15.92	19.89	11.83	17.91	16.49	21.48	22.94	40.72	48.75	4.97	5.12	3.91	4.59	5.90

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.8% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: STATE OF NEW YORK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Albany NY MSA	272	15.69	20.53	12.64	18.05	24.14	21.80	28.35	39.62	34.87	2.95	3.66	3.14	2.70	2.87
Limited Review:															
Buffalo - Niagara Falls MSA	743	42.85	21.62	9.56	17.44	25.62	20.85	28.25	40.08	36.57	9.17	9.63	10.97	9.43	8.01
Dutchess - Putnam MSA	28	1.61	18.89	14.29	17.78	25.00	23.28	14.29	40.05	46.43	0.65	1.33	0.58	0.60	0.58
Glens Falls MSA	8	0.46	17.09	0.00	18.03	12.50	21.72	12.50	43.16	75.00	1.32	0.00	1.41	0.00	2.14
Kingston MSA	29	1.67	19.57	10.71	17.81	28.57	23.03	39.29	39.59	21.43	2.08	4.26	2.56	2.11	1.56
New York - White Plains MSA	96	5.54	20.62	4.30	12.23	8.60	13.76	22.58	53.40	64.52	0.56	0.41	0.82	1.11	0.47
Rochester MSA	136	7.84	20.30	7.58	17.31	18.18	22.06	31.82	40.33	42.42	1.72	1.34	1.35	2.19	1.68
Syracuse MSA	124	7.15	21.35	10.74	17.13	22.31	21.49	21.49	40.04	45.45	1.99	2.08	2.22	1.19	2.41
Utica-Rome MSA	19	1.10	21.08	5.26	16.08	26.32	20.96	15.79	41.88	52.63	0.97	0.00	1.48	0.29	1.31
Watertown Ft Drum MSA	32	1.85	20.80	6.25	18.04	15.63	21.95	21.88	39.21	56.25	3.14	3.85	4.82	2.70	2.76
NY Non-MSA	247	14.24	19.89	7.41	17.91	25.93	21.48	23.46	40.72	43.21	3.48	4.48	4.42	3.20	3.16

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF NEW YORK									
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Albany NY MSA	865	14.91	75.15	53.64	83.70	6.82	9.48	3.83	5.01
Limited Review:									
Buffalo - Niagara Falls MSA	1,780	30.67	75.31	65.56	94.61	2.64	2.75	8.04	13.38
Dutchess - Putnam MSA	166	2.86	80.80	63.86	93.37	1.20	5.42	1.02	1.64
Glens Falls MSA	29	0.50	76.81	44.83	68.97	6.90	24.14	1.16	1.13
Kingston MSA	119	2.05	80.84	67.23	99.16	0.00	0.84	2.15	3.20
New York - White Plains MSA	625	10.77	74.28	62.56	88.64	3.68	7.68	0.25	0.40
Rochester MSA	729	12.56	76.73	60.77	92.32	3.02	4.66	3.51	5.66
Syracuse MSA	749	12.91	75.39	59.95	86.52	4.54	8.95	4.22	6.68
Utica-Rome MSA	39	0.67	74.44	64.10	82.05	12.82	5.13	0.65	1.00
Watertown Ft Drum MSA	70	1.21	71.95	57.14	81.43	7.14	11.43	2.79	3.14
NY Non-MSA	632	10.89	75.70	60.13	92.56	2.53	4.91	2.48	3.46

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 15.97% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF NEW YORK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Albany NY MSA	1	1.69	97.19	100.00	100.00	0.00	0.00	1.15	2.56
Limited Review:									
Buffalo - Niagara Falls MSA	14	23.73	95.97	57.14	92.86	7.14	0.00	8.22	9.23
Dutchess - Putnam MSA	0	0.00	97.48	0.00	0.00	0.00	0.00	0.00	0.00
Glens Falls MSA	0	0.00	98.11	0.00	0.00	0.00	0.00	0.00	0.00
Kingston MSA	6	10.17	97.14	100.00	100.00	0.00	0.00	0.00	0.00
New York - White Plains MSA	5	8.47	95.04	80.00	60.00	40.00	0.00	1.60	7.41
Rochester MSA	10	16.95	95.67	80.00	80.00	20.00	0.00	1.23	1.39
Syracuse MSA	8	13.56	96.59	62.50	75.00	25.00	0.00	2.80	1.10
Utica-Rome MSA	0	0.00	98.19	0.00	0.00	0.00	0.00	0.00	0.00
Watertown Ft Drum MSA	1	1.69	97.73	100.00	100.00	0.00	0.00	0.00	0.00
NY Non-MSA	14	23.73	97.34	92.86	85.71	7.14	7.14	1.14	1.72

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 6.78% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF NEW YORK				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Albany NY MSA	2	4,013	96	96,099	98	100,112	335.77.84	0	0
Limited Review:									
Buffalo - Niagara Falls MSA	9	12,599	40	36,344	49	48,943	17.49	0	0
Dutchess - Putnam MSA	1	190	12	180	13	370	0.13	0	0
Glens Falls MSA	0	0	0	0	0	0	0.00	0	0
Kingston MSA	0	0	6	77	6	77	0.03	0	0
New York - White Plains MSA	21	8,375	28	11,004	49	19,379	6.92	2	1,024
Rochester MSA	21	7,124	13	5,076	34	12,200	4.36	0	0
Syracuse MSA	12	20,892	18	10,523	30	31,415	11.22	0	0
Utica-Rome MSA	4	3,887	3	6,350	7	10,237	3.66	0	0
Watertown Ft Drum MSA	4	2,816	4	570	8	3,386	1.21	0	0
NY Non-MSA	7	7,985	9	17,447	16	25,432	9.08	0	0
Broader Statewide or Regional Area	46	16,274	3	12,085	49	28,359	10.13	1	1,584

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF NEW YORK																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Albany NY MSA	46.14	37	15.95	10.81	16.22	51.35	21.62	0	3	- 1	0	- 1	- 1	9.63	14.16	50.96	24.89
Limited Review:																	
Buffalo - Niagara Falls MSA	19.51	57	24.57	7.02	17.54	45.61	29.82	0	13	0	- 3	- 6	- 4	9.57	17.03	39.03	33.16
Dutchess - Putnam MSA	1.41	7	3.02	0.00	28.57	57.14	14.29	0	0	0	0	0	0	5.22	12.64	60.14	21.48
Glens Falls MSA	0.25	1	0.43	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	6.81	67.53	25.66
Kingston MSA	1.25	9	3.88	0.00	22.22	55.56	22.22	0	0	0	0	0	0	0.00	12.30	72.27	15.43
New York - White Plains MSA	9.90	30	12.93	0.00	13.33	20.00	66.67	0	2	- 1	- 1	0	0	10.35	17.12	14.93	57.34
Rochester MSA	5.96	23	9.91	4.35	21.74	47.83	26.09	0	0	0	0	0	0	8.67	13.15	51.54	26.32
Syracuse MSA	7.62	25	10.78	16.00	16.00	44.00	24.00	0	2	0	- 1	- 1	0	10.26	16.23	44.09	29.35
Utica-Rome MSA	0.28	2	0.86	0.00	0.00	50.00	50.00	0	0	0	0	0	0	7.68	16.52	42.59	30.62
Watertown Ft Drum MSA	0.98	7	3.02	0.00	28.57	28.57	42.86	0	0	0	0	0	0	0.00	24.21	58.69	17.09
NY Non-MSA	6.71	34	14.66	2.94	17.65	55.88	23.53	0	4	- 1	- 2	- 1	0	1.52	11.80	66.68	19.10

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF OHIO						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Cleveland MSA	40.27	2,431	262,504	2,042	167,253	1	25	43	163,747	4,517	593,529	65.19
Toledo MSA	11.09	727	66,880	510	24,388	4	56	3	22,715	1,244	114,039	5.84
Limited Review:												
Akron MSA	9.12	492	51,094	527	61,168	3	694	1	7,900	1,023	120,856	5.76
Canton MSA	5.97	264	25,312	406	25,062	0	0	0	0	670	50,374	2.94
Cincinnati	8.40	414	73,085	519	51,212	3	37	6	55,477	942	179,811	3.65
Columbus MSA	8.63	463	271,741	486	58,306	0	0	19	73,688	968	403,735	6.92
Dayton MSA	5.60	244	48,482	378	46,224	0	0	6	19,830	628	114,536	4.45
Mansfield MSA	1.62	100	6,033	81	7,143	1	5	0	0	182	13,181	0.95
Springfield MSA	0.72	51	2,617	30	1,442	0	0	0	0	81	4,059	0.54
Youngstown MSA	1.85	112	10,050	92	10,239	4	223	0	0	208	20,512	0.56
OH Non-MSA	6.73	459	43,159	280	13,754	13	2,154	3	8,033	755	67,100	3.22
Broader Statewide or Regional Area	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12	34,171	12	34,171	N/A

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF OHIO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland MSA	483	35.65	5.68	2.90	13.81	9.73	41.98	38.92	38.53	48.45	0.95	1.72	1.04	0.83	1.02
Toledo MSA	241	17.79	5.77	0.00	12.85	8.71	48.96	46.06	32.41	45.23	2.18	0.00	2.72	2.12	2.23
Limited Review:															
Akron MSA	103	7.60	4.58	2.91	18.89	12.62	42.20	38.83	34.33	45.63	0.59	0.58	0.39	0.52	0.74
Canton MSA	89	6.57	3.09	1.12	9.84	7.87	60.24	57.30	26.83	33.71	1.05	3.85	2.69	0.86	1.14
Cincinnati	101	7.45	3.10	1.98	15.79	7.92	44.12	48.51	37.00	41.58	0.25	0.41	0.10	0.32	0.22
Columbus MSA	136	10.04	5.93	2.21	17.64	16.18	31.42	26.47	45.00	55.15	0.26	0.25	0.50	0.22	0.23
Dayton MSA	50	3.69	5.13	8.00	19.19	14.00	40.72	50.00	34.96	28.00	0.14	0.00	0.17	0.19	0.10
Mansfield MSA	13	0.96	0.00	0.00	20.04	0.00	49.63	23.08	30.33	76.92	0.47	0.00	0.00	0.15	1.09
Springfield MSA	10	0.74	4.94	0.00	12.97	20.00	44.52	40.00	37.57	40.00	0.38	0.00	0.62	0.40	0.32
Youngstown MSA	39	2.88	5.33	0.00	13.31	5.13	55.54	41.03	25.82	53.85	0.52	0.00	0.38	0.31	0.93
OH Non-MSA	90	6.64	0.65	0.00	8.17	4.44	63.59	63.33	27.59	32.22	0.70	0.00	0.55	0.67	0.79

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF OHIO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland MSA	1,171	51.86	5.68	5.47	13.81	12.72	41.98	33.90	38.53	47.91	22.11	25.17	18.77	21.02	23.85
Toledo MSA	180	7.97	5.77	3.89	12.85	8.33	48.96	43.89	32.41	43.89	10.14	2.86	5.32	9.20	14.57
Limited Review:															
Akron MSA	122	5.40	4.58	1.64	18.89	15.57	42.20	30.33	34.33	52.46	9.08	5.26	10.16	5.99	12.81
Canton MSA	51	2.26	3.09	1.96	9.84	5.88	60.24	64.71	26.83	27.45	3.67	3.70	1.82	3.45	5.62
Cincinnati	185	8.19	3.10	1.62	15.79	5.95	44.12	43.78	37.00	48.65	6.09	6.98	3.57	6.23	6.58
Columbus MSA	163	7.22	5.93	3.68	17.64	9.82	31.42	26.38	45.00	60.12	6.63	4.41	4.64	5.37	8.20
Dayton MSA	90	3.99	5.13	8.89	19.19	18.89	40.72	31.11	34.96	41.11	5.90	22.22	7.84	3.44	6.80
Mansfield MSA	47	2.08	0.00	0.00	20.04	17.02	49.63	44.68	30.33	38.30	14.74	0.00	22.58	12.90	13.64
Springfield MSA	28	1.24	4.94	0.00	12.97	10.71	44.52	35.71	37.57	53.57	5.65	0.00	12.00	3.81	6.45
Youngstown MSA	30	1.33	5.33	0.00	13.31	6.67	55.54	46.67	25.82	46.67	2.94	0.00	1.41	2.72	3.98
OH Non-MSA	191	8.46	0.65	0.00	8.17	4.19	63.59	54.97	27.59	40.84	10.48	0.00	5.45	8.87	15.49

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF OHIO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland MSA	769	36.32	5.68	2.08	13.81	7.02	41.98	41.61	38.53	49.28	2.05	1.70	1.67	2.05	2.15
Toledo MSA	306	14.45	5.77	1.31	12.85	6.21	48.96	44.77	32.41	47.71	3.37	1.45	2.17	3.03	4.16
Limited Review:															
Akron MSA	267	12.61	4.58	0.75	18.89	13.48	42.20	42.32	34.33	43.45	2.00	0.75	1.56	2.18	2.03
Canton MSA	124	5.86	3.09	0.81	9.84	3.23	60.24	58.06	26.83	37.90	1.79	0.00	0.88	1.59	2.43
Cincinnati MSA	125	5.90	3.10	0.00	15.79	11.20	44.12	43.20	37.00	45.60	0.38	0.00	0.29	0.32	0.48
Columbus MSA	151	7.13	5.93	2.65	17.64	11.26	31.42	30.46	45.00	55.63	0.44	0.36	0.38	0.37	0.51
Dayton MSA	102	4.82	5.13	2.94	19.19	13.73	40.72	38.24	34.96	45.10	0.90	1.26	0.73	0.79	1.06
Mansfield MSA	40	1.89	0.00	0.00	20.04	37.50	49.63	30.00	30.33	32.50	2.60	0.00	7.84	1.74	1.97
Springfield MSA	13	0.61	4.94	7.69	12.97	7.69	44.52	23.08	37.57	61.54	0.78	0.00	0.79	0.39	1.22
Youngstown MSA	43	2.03	5.33	0.00	13.31	0.00	55.54	55.81	25.82	44.19	0.63	0.00	0.00	0.55	1.02
OH Non-MSA	177	8.36	0.65	0.56	8.17	3.95	63.59	64.97	27.59	30.51	1.75	0.00	0.34	1.88	1.83

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF OHIO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland MSA	8	29.63	15.05	37.50	27.16	0.00	38.98	25.00	18.81	37.50	2.63	0.00	0.00	3.33	6.67
Toledo MSA	0	0.00	12.49	0.00	26.96	0.00	44.10	0.00	16.45	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Akron MSA	0	0.00	15.36	0.00	23.22	0.00	36.44	0.00	24.98	0.00	0.00	0.00	0.00	0.00	0.00
Canton MSA	0	0.00	12.01	0.00	13.54	0.00	42.53	0.00	31.92	0.00	0.00	0.00	0.00	0.00	0.00
Cincinnati MSA	3	11.11	16.10	0.00	30.03	0.00	37.12	66.67	16.75	33.33	0.94	0.00	0.00	1.35	2.78
Columbus MSA	13	48.15	23.06	0.00	27.13	38.46	30.40	23.08	19.42	38.46	3.61	0.00	2.70	3.57	7.50
Dayton MSA	2	7.41	11.26	0.00	28.35	50.00	39.42	0.00	20.97	50.00	2.17	0.00	0.00	0.00	12.50
Mansfield MSA	0	0.00	0.00	0.00	45.41	0.00	40.13	0.00	14.46	0.00	0.00	0.00	0.00	0.00	0.00
Springfield MSA	0	0.00	18.92	0.00	15.56	0.00	45.05	0.00	20.47	0.00	0.00	0.00	0.00	0.00	0.00
Youngstown MSA	0	0.00	12.17	0.00	21.29	0.00	49.03	0.00	17.50	0.00	0.00	0.00	0.00	0.00	0.00
OH Non-MSA	1	3.70	2.70	0.00	17.77	0.00	58.25	100.00	21.28	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF OHIO						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland MSA	2,035	38.09	7.53	6.54	13.00	11.20	38.46	33.86	40.64	48.40	3.74	4.13	3.63	3.14	4.23
Toledo MSA	510	9.55	6.44	3.53	13.84	13.14	44.91	38.63	34.54	44.71	4.41	3.50	5.28	3.82	5.09
Limited Review:															
Akron MSA	527	9.86	7.48	9.11	16.15	14.42	36.08	30.36	40.30	46.11	3.01	5.07	3.21	2.58	3.10
Canton MSA	406	7.60	6.47	8.87	9.38	6.90	52.56	41.87	31.59	42.36	4.31	7.12	4.76	3.67	4.84
Cincinnati MSA	519	9.71	6.37	5.20	20.34	18.88	37.80	36.03	35.46	39.88	1.13	1.25	1.15	1.11	1.15
Columbus MSA	485	9.08	9.01	9.07	19.09	14.85	27.92	30.31	43.58	45.77	1.13	1.51	0.61	1.54	1.13
Dayton MSA	378	7.07	7.43	8.20	18.69	16.40	38.75	38.10	35.08	37.30	2.21	2.26	1.93	2.49	2.08
Mansfield MSA	81	1.52	0.00	0.00	27.34	34.57	45.15	34.57	27.51	30.86	3.02	0.00	3.98	2.15	3.67
Springfield MSA	30	0.56	8.32	10.00	17.66	20.00	34.31	36.67	39.71	33.33	0.99	3.00	0.84	0.84	0.89
Youngstown MSA	92	1.72	7.97	6.52	11.92	7.61	47.82	53.26	32.29	32.61	0.93	1.37	0.95	0.82	0.98
OH Non-MSA	280	5.24	0.92	0.36	10.15	7.50	62.35	65.00	26.58	27.14	2.29	2.50	1.96	2.52	2.08

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF OHIO								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland MSA	1	3.45	2.54	0.00	7.81	0.00	44.44	100.00	45.17	0.00	0.88	0.00	0.00	1.92	0.00
Toledo MSA	4	13.79	1.54	0.00	4.87	0.00	63.02	25.00	30.57	75.00	0.21	0.00	0.00	0.27	0.00
Limited Review:															
Akron MSA	3	10.34	1.44	0.00	12.49	0.00	50.76	100.00	35.31	0.00	10.00	0.00	0.00	15.79	0.00
Canton MSA	0	0.00	1.26	0.00	5.72	0.00	70.79	0.00	22.22	0.00	0.00	0.00	0.00	0.00	0.00
Cincinnati MSA	3	10.34	2.54	0.00	11.91	33.33	51.62	66.67	33.93	0.00	1.68	0.00	10.00	1.33	0.00
Columbus MSA	0	0.00	5.09	0.00	12.36	0.00	35.47	0.00	46.97	0.00	0.00	0.00	0.00	0.00	0.00
Dayton MSA	0	0.00	2.66	0.00	11.07	0.00	48.63	0.00	37.64	0.00	0.00	0.00	0.00	0.00	0.00
Mansfield MSA	1	3.45	0.00	0.00	6.19	0.00	60.09	0.00	33.72	100.00	0.00	0.00	0.00	0.00	0.00
Springfield MSA	0	0.00	2.49	0.00	4.52	0.00	33.48	0.00	59.50	0.00	0.00	0.00	0.00	0.00	0.00
Youngstown MSA	4	13.79	2.15	0.00	5.39	0.00	66.52	100.00	25.94	0.00	5.88	0.00	0.00	7.32	0.00
OH Non-MSA	13	44.83	0.21	0.00	4.13	0.00	61.08	92.31	34.57	7.69	2.70	0.00	0.00	4.47	0.53

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: STATE OF OHIO						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland MSA	483	35.65	21.71	12.55	17.29	19.87	20.69	22.18	40.30	45.40	1.11	1.62	0.99	1.03	1.12
Toledo MSA	241	17.79	21.88	12.45	16.99	36.93	20.48	24.48	40.65	26.14	2.53	3.10	3.85	2.20	1.80
Limited Review:															
Akron MSA	103	7.60	20.77	10.68	17.80	16.50	22.01	26.21	39.42	46.60	0.70	0.46	0.36	0.90	0.84
Canton MSA	89	6.57	19.27	4.49	19.02	31.46	21.68	23.60	40.03	40.45	1.23	0.73	1.20	1.20	1.35
Cincinnati MSA	101	7.45	20.82	15.84	16.86	26.73	20.55	24.75	41.77	32.67	0.30	0.35	0.34	0.30	0.26
Columbus MSA	136	10.04	21.30	8.82	16.47	29.41	20.01	21.32	42.22	40.44	0.33	0.37	0.40	0.30	0.31
Dayton MSA	50	3.69	21.48	16.00	18.07	32.00	20.22	24.00	40.24	28.00	0.17	0.25	0.25	0.14	0.12
Mansfield MSA	13	0.96	18.37	7.69	20.51	23.08	21.55	15.38	39.57	53.85	0.56	1.04	0.78	0.33	0.49
Springfield MSA	10	0.74	19.82	0.00	17.52	50.00	22.90	30.00	39.76	20.00	0.46	0.00	0.83	0.59	0.21
Youngstown MSA	39	2.88	20.65	5.13	17.85	20.51	22.02	33.33	39.48	41.03	0.62	0.63	0.61	0.60	0.64
OH Non-MSA	90	6.64	17.95	6.67	17.69	36.67	21.65	23.33	42.72	33.33	0.83	0.29	1.16	0.56	0.89

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF OHIO										Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Cleveland MSA	1,171	51.86	21.71	6.29	17.29	15.41	20.69	22.94	40.30	55.36	22.41	11.83	17.20	21.71	27.88	
Toledo MSA	180	7.97	21.88	8.94	16.99	21.79	20.48	14.53	40.65	54.75	10.61	8.11	8.19	7.58	15.71	
Limited Review:																
Akron MSA	122	5.40	20.77	6.90	17.80	24.14	22.01	19.83	39.42	49.14	9.15	4.35	11.02	6.99	10.92	
Canton MSA	51	2.26	19.27	2.17	19.02	21.74	21.68	30.43	40.03	45.65	3.66	1.06	2.50	4.85	5.44	
Cincinnati MSA	185	8.19	20.82	1.65	16.86	8.24	20.55	15.93	41.77	74.18	6.39	0.66	3.46	4.17	9.79	
Columbus MSA	163	7.22	21.30	3.73	16.47	12.42	20.01	18.01	42.22	65.84	7.01	2.36	4.29	5.45	9.57	
Dayton MSA	90	3.99	21.48	5.56	18.07	13.33	20.22	23.33	40.24	57.78	7.03	3.70	7.55	4.65	8.65	
Mansfield MSA	47	2.08	18.37	0.00	20.51	24.44	21.55	33.33	39.57	42.22	15.17	0.00	18.42	20.00	14.67	
Springfield MSA	28	1.24	19.82	7.41	17.52	14.81	22.90	11.11	39.76	66.67	5.88	0.00	5.88	4.44	7.69	
Youngstown MSA	30	1.33	20.65	0.00	17.85	17.24	22.02	13.79	39.48	68.97	3.06	0.00	0.00	1.09	6.48	
OH Non-MSA	191	8.46	17.95	5.85	17.69	17.55	21.65	26.60	42.72	50.00	10.64	7.46	9.15	9.94	12.38	

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF OHIO						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland MSA	769	36.32	21.71	7.48	17.29	14.22	20.69	27.71	40.30	50.59	2.17	2.30	1.51	2.46	2.24
Toledo MSA	306	14.45	21.88	9.33	16.99	17.33	20.48	31.00	40.65	42.33	3.77	5.57	2.80	4.30	3.51
Limited Review:															
Akron MSA	267	12.61	20.77	9.41	17.80	17.65	22.01	27.84	39.42	45.10	2.23	2.12	2.01	2.67	2.09
Canton MSA	124	5.86	19.27	8.94	19.02	21.95	21.68	24.39	40.03	44.72	2.02	2.65	1.85	2.00	1.99
Cincinnati MSA	125	5.90	20.82	8.87	16.86	28.23	20.55	24.19	41.77	38.71	0.46	0.24	0.72	0.40	0.43
Columbus MSA	151	7.13	21.30	6.08	16.47	16.89	20.01	29.05	42.22	47.97	0.54	0.58	0.33	0.55	0.60
Dayton MSA	102	4.82	21.48	14.00	18.07	25.00	20.22	23.00	40.24	38.00	1.10	1.51	1.41	1.13	0.88
Mansfield MSA	40	1.89	18.37	10.53	20.51	15.79	21.55	28.95	39.57	44.74	2.93	5.08	1.49	3.74	2.64
Springfield MSA	13	0.61	19.82	15.38	17.52	7.69	22.90	23.08	39.76	53.85	0.94	1.22	0.56	0.39	1.37
Youngstown MSA	43	2.03	20.65	7.14	17.85	16.67	22.02	33.33	39.48	42.86	0.70	0.79	0.74	0.57	0.74
OH Non-MSA	177	8.36	17.95	10.53	17.69	19.88	21.65	26.90	42.72	42.69	1.88	2.87	1.54	2.22	1.64

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 5.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF OHIO			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Cleveland MSA	2,042	38.16	77.40	55.83	85.50	5.14	9.35	3.74	4.82
Toledo MSA	510	9.53	75.16	65.69	93.14	1.96	4.90	4.41	6.63
Limited Review:									
Akron MSA	527	9.85	78.38	53.51	80.27	6.07	13.66	3.01	4.00
Canton MSA	406	7.59	77.89	56.65	89.90	4.19	5.91	4.31	6.16
Cincinnati MSA	519	9.70	76.60	48.75	82.08	4.82	13.10	1.13	1.17
Columbus MSA	486	9.08	77.15	47.33	79.01	6.38	14.61	1.13	1.47
Dayton MSA	378	7.06	77.00	53.17	79.10	5.03	15.87	2.21	2.77
Mansfield MSA	81	1.51	75.51	59.26	87.65	2.47	9.88	3.02	4.30
Springfield MSA	30	0.56	76.97	56.67	86.67	6.67	6.67	0.99	1.54
Youngstown MSA	92	1.72	77.48	57.61	80.43	5.43	14.13	0.93	1.31
OH Non-MSA	280	5.23	76.64	67.14	92.14	2.86	5.00	2.29	3.28

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 17.08% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF OHIO			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Cleveland MSA	1	3.45	96.73	0.00	100.00	0.00	0.00	0.88	0.00
Toledo MSA	4	13.79	96.80	100.00	100.00	0.00	0.00	0.21	0.25
Limited Review:									
Akron MSA	3	10.34	97.33	100.00	33.33	33.33	33.33	10.00	14.29
Canton MSA	0	0.00	98.23	0.00	0.00	0.00	0.00	0.00	0.00
Cincinnati MSA	3	10.34	97.18	66.67	100.00	0.00	0.00	1.68	1.61
Columbus MSA	0	0.00	95.77	0.00	0.00	0.00	0.00	0.00	0.00
Dayton MSA	0	0.00	97.20	0.00	0.00	0.00	0.00	0.00	0.00
Mansfield MSA	1	3.45	98.39	0.00	100.00	0.00	0.00	0.00	0.00
Springfield MSA	0	0.00	98.42	0.00	0.00	0.00	0.00	0.00	0.00
Youngstown MSA	4	13.79	98.11	100.00	75.00	25.00	0.00	5.88	14.29
OH Non-MSA	13	44.83	98.47	84.62	61.54	0.00	38.46	2.70	3.33

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 10.34% of small loans to farms originated and purchased by the bank.

NOTE – PULL IN MIKE'S REVISED INVESTMENT TABLE

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF OHIO				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cleveland MSA	62	39,534	112	147,281	174	186,815	50.57	2	3,297
Toledo MSA	30	13,051	20	5,891	50	18,942	5.13	0	0
Limited Review:									
Akron MSA	30	6,017	22	17,177	52	23,194	6.28	0	0
Canton MSA	12	4,673	4	4,207	16	8,880	2.4	0	0
Cincinnati MSA	35	7,498	33	18,683	68	26,181	7.09	0	0
Columbus MSA	54	21,920	50	8,646	104	30,566	8.28	2	2,018
Dayton MSA	32	8,093	29	11,565	61	19,658	5.32	0	0
Mansfield MSA	8	486	3	2,004	11	2,490	.067	0	0
Springfield MSA	5	1,896	3	2,066	8	3,962	1.07	0	0
Youngstown MSA	20	1,777	6	170	26	1,947	0.53	0	0
OH Non-MSA	16	1,516	7	10,083	23	11,599	3.14	0	0
Broader Statewide or Regional Area	134	21,665	3	13,494	137	35,159	9.52	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF OHIO																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cleveland MSA	65.19	78	33.62	8.97	15.38	39.74	35.90	4	5	- 1	1	- 2	1	10.38	17.42	38.71	33.49
Toledo MSA	5.84	21	9.05	0.00	28.57	42.86	28.57	0	3	- 1	- 1	- 1	0	9.43	16.63	45.30	27.78
Limited Review:																	
Akron MSA	5.76	18	7.76	5.56	16.67	38.89	38.89	0	0	0	0	0	0	9.27	20.30	39.41	31.03
Canton MSA	2.94	13	5.60	7.69	0.00	61.54	30.77	0	0	0	0	0	0	4.77	12.26	57.20	25.78
Cincinnati MSA	3.65	25	10.78	0.00	28.00	44.00	28.00	0	0	0	0	0	0	7.33	19.82	40.28	31.83
Columbus MSA	6.92	26	11.21	11.54	11.54	30.77	46.15	0	1	- 1	0	0	0	12.24	20.62	29.78	36.86
Dayton MSA	4.45	17	7.33	5.88	11.76	47.06	35.29	0	1	- 1	0	0	0	8.12	23.32	38.53	30.04
Mansfield MSA	0.95	5	2.16	0.00	40.00	40.00	20.00	0	0	0	0	0	0	0.00	27.88	45.91	26.21
Springfield MSA	0.54	3	1.29	0.00	66.67	33.33	0.00	0	0	0	0	0	0	10.36	16.17	41.08	32.38
Youngstown MSA	0.56	6	2.59	0.00	0.00	50.00	50.00	0	0	0	0	0	0	8.19	15.72	52.82	23.27
OH Non-MSA	3.22	20	8.62	0.00	15.00	75.00	10.00	0	1	0	- 1	0	0	1.27	9.67	63.84	25.21

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF OREGON						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Salem MSA	36.61	265	96,853	177	23,253	59	15,285	2	5,820	503	141,211	28.34
Limited Review:												
Albany OR MSA	19.21	126	20,561	114	7,626	24	3,496	0	0	264	31,683	17.20
Corvallis MSA	2.98	22	3,746	18	2,341	1	150	0	0	41	6,237	1.56
Eugene - Springfield MSA	23.00	154	35,244	153	7,374	8	663	1	5,800	316	49,081	22.84
Grants Pass MSA	2.33	25	2,140	6	1,123	0	0	1	6,914	32	10,177	4.11
Medford MSA	12.52	90	13,936	76	6,724	0	0	6	34,638	172	55,298	21.84
OR Non-MSA	3.35	17	2,832	27	4,374	0	0	2	3,050	46	10,256	4.12
Broader Statewide or Regional Area	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9	37,312	9	37,312	N/A

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF OREGON						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Salem MSA	45	33.09	0.00	0.00	11.87	8.89	60.16	57.78	27.96	33.33	0.46	0.00	0.32	0.44	0.54
Limited Review:															
Albany OR MSA	11	8.09	0.00	0.00	10.10	18.18	75.16	63.64	14.74	18.18	0.25	0.00	0.57	0.18	0.32
Corvallis MSA	7	5.15	0.96	0.00	20.40	0.00	48.43	85.71	30.21	14.29	0.26	0.00	0.00	0.35	0.29
Eugene - Springfield MSA	46	33.82	1.36	2.17	16.51	28.26	57.92	54.35	24.22	15.22	0.44	1.72	0.58	0.44	0.28
Grants Pass MSA	1	0.74	0.00	0.00	10.26	0.00	79.54	0.00	10.20	100.00	0.00	0.00	0.00	0.00	0.00
Medford MSA	23	16.91	0.22	0.00	7.54	17.39	71.50	30.43	20.74	52.17	0.40	0.00	1.12	0.09	1.02
OR Non-MSA	3	2.21	0.00	0.00	0.00	0.00	60.54	100.00	39.46	0.00	0.57	0.00	0.00	0.88	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF OREGON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Salem MSA	57	33.73	0.00	0.00	11.87	8.77	60.16	56.14	27.96	35.09	8.39	0.00	4.35	9.44	7.56
Limited Review:															
Albany OR MSA	36	21.30	0.00	0.00	10.10	8.33	75.16	72.22	14.74	19.44	16.13	0.00	14.29	11.86	30.00
Corvallis MSA	4	2.37	0.96	0.00	20.40	0.00	48.43	50.00	30.21	50.00	4.65	0.00	0.00	0.00	11.11
Eugene - Springfield MSA	31	18.34	1.36	0.00	16.51	16.13	57.92	61.29	24.22	22.58	4.89	0.00	6.00	4.12	6.45
Grants Pass MSA	16	9.47	0.00	0.00	10.26	0.00	79.54	68.75	10.20	31.25	7.69	0.00	0.00	7.58	11.11
Medford MSA	21	12.43	0.22	0.00	7.54	0.00	71.50	71.43	20.74	28.57	5.24	0.00	0.00	4.38	8.62
OR Non-MSA	4	2.37	0.00	0.00	0.00	0.00	60.54	25.00	39.46	75.00	9.68	0.00	0.00	0.00	42.86

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF OREGON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Salem MSA	154	40.21	0.00	0.00	11.87	12.34	60.16	59.09	27.96	28.57	2.37	0.00	2.68	2.46	2.07
Limited Review:															
Albany OR MSA	78	20.37	0.00	0.00	10.10	3.85	75.16	88.46	14.74	7.69	3.37	0.00	0.83	4.14	2.02
Corvallis MSA	11	2.87	0.96	0.00	20.40	0.00	48.43	81.82	30.21	18.18	1.61	0.00	0.00	2.67	1.13
Eugene - Springfield MSA	76	19.84	1.36	0.00	16.51	14.47	57.92	61.84	24.22	23.68	1.30	0.00	1.41	1.49	0.79
Grants Pass MSA	8	2.09	0.00	0.00	10.26	12.50	79.54	87.50	10.20	0.00	0.59	0.00	0.00	0.72	0.00
Medford MSA	46	12.01	0.22	0.00	7.54	0.00	71.50	73.91	20.74	26.09	1.50	0.00	0.00	1.72	1.47
OR Non-MSA	10	2.61	0.00	0.00	0.00	0.00	60.54	60.00	39.46	40.00	1.35	0.00	0.00	1.39	1.28

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF OREGON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Salem MSA	9	81.82	0.00	0.00	36.80	44.44	44.03	55.56	19.17	0.00	3.64	0.00	0.00	8.00	0.00
Limited Review:															
Albany OR MSA	1	9.09	0.00	0.00	33.18	0.00	55.88	100.00	10.93	0.00	7.14	0.00	0.00	16.67	0.00
Corvallis MSA	0	0.00	19.29	0.00	49.15	0.00	12.90	0.00	18.66	0.00	0.00	0.00	0.00	0.00	0.00
Eugene - Springfield MSA	1	9.09	8.61	0.00	35.48	0.00	35.28	0.00	20.64	100.00	1.47	0.00	0.00	0.00	9.09
Grants Pass MSA	0	0.00	0.00	0.00	4.01	0.00	95.34	0.00	0.65	0.00	0.00	0.00	0.00	0.00	0.00
Medford MSA	0	0.00	3.57	0.00	27.55	0.00	56.62	0.00	12.25	0.00	0.00	0.00	0.00	0.00	0.00
OR Non-MSA	0	0.00	0.00	0.00	0.00	0.00	75.17	0.00	24.83	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF OREGON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Salem MSA	177	31.00	0.00	0.00	21.00	19.21	56.72	58.76	22.28	22.03	1.61	0.00	1.71	1.84	1.24
Limited Review:															
Albany OR MSA	114	19.96	0.00	0.00	16.61	8.77	68.48	82.46	14.91	8.77	3.61	0.00	2.65	4.25	2.28
Corvallis MSA	18	3.15	11.86	16.67	24.87	27.78	40.68	38.89	22.58	16.67	0.74	1.25	0.32	1.17	0.34
Eugene - Springfield MSA	153	26.80	3.39	4.58	27.07	30.07	45.51	43.79	24.03	21.57	1.34	2.47	1.58	1.10	1.53
Grants Pass MSA	6	1.05	0.00	0.00	8.45	0.00	85.01	83.33	6.54	16.67	0.16	0.00	0.00	0.20	0.00
Medford MSA	76	13.31	5.32	7.89	10.86	15.79	66.95	56.58	16.87	19.74	1.11	2.48	2.07	0.94	1.17
OR Non-MSA	27	4.73	0.00	0.00	0.00	0.00	69.59	70.37	30.41	29.63	2.67	0.00	0.00	2.74	2.90

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF OREGON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Salem MSA	59	64.13	0.00	0.00	8.07	0.00	71.77	79.66	20.16	20.34	8.47	0.00	0.00	8.09	14.58
Limited Review:															
Albany OR MSA	24	26.09	0.00	0.00	2.45	0.00	86.11	95.83	11.44	4.17	15.32	0.00	0.00	16.33	10.00
Corvallis MSA	1	1.09	0.91	0.00	15.07	0.00	66.67	100.00	17.35	0.00	2.78	0.00	0.00	3.45	0.00
Eugene - Springfield MSA	8	8.70	1.94	0.00	14.90	37.50	63.13	62.50	20.03	0.00	6.12	0.00	20.00	5.88	0.00
Grants Pass MSA	0	0.00	0.00	0.00	16.15	0.00	75.64	0.00	8.22	0.00	0.00	0.00	0.00	0.00	0.00
Medford MSA	0	0.00	1.55	0.00	5.70	0.00	76.48	0.00	16.27	0.00	0.00	0.00	0.00	0.00	0.00
OR Non-MSA	0	0.00	0.00	0.00	0.00	0.00	71.15	0.00	28.85	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF OREGON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Salem MSA	45	33.09	19.90	4.44	18.83	11.11	21.12	28.89	40.15	55.56	0.56	1.50	0.48	0.46	0.60
Limited Review:															
Albany OR MSA	11	8.09	19.96	0.00	18.54	27.27	21.73	9.09	39.78	63.64	0.31	0.00	0.74	0.26	0.16
Corvallis MSA	7	5.15	21.78	0.00	16.30	0.00	21.56	0.00	40.36	100.00	0.31	0.00	0.00	0.00	0.57
Eugene - Springfield MSA	46	33.82	21.30	0.00	18.15	19.57	20.98	19.57	39.57	60.87	0.52	0.00	0.17	0.19	0.83
Grants Pass MSA	1	0.74	21.24	0.00	17.75	0.00	21.10	0.00	39.91	100.00	0.00	0.00	0.00	0.00	0.00
Medford MSA	23	16.91	19.75	9.09	18.89	27.27	20.55	9.09	40.81	54.55	0.44	2.99	0.53	0.14	0.46
OR Non-MSA	3	2.21	13.67	0.00	16.60	0.00	21.57	0.00	48.16	100.00	0.75	0.00	0.00	0.00	1.02

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF OREGON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Salem MSA	57	33.73	19.90	3.85	18.83	15.38	21.12	23.08	40.15	57.69	8.67	11.11	13.79	6.10	8.89
Limited Review:															
Albany OR MSA	36	21.30	19.96	2.78	18.54	19.44	21.73	16.67	39.78	61.11	18.29	33.33	11.11	9.09	22.92
Corvallis MSA	4	2.37	21.78	0.00	16.30	25.00	21.56	25.00	40.36	50.00	5.13	0.00	0.00	0.00	9.52
Eugene - Springfield MSA	31	18.34	21.30	6.45	18.15	25.81	20.98	16.13	39.57	51.61	5.05	8.33	3.92	3.75	5.84
Grants Pass MSA	16	9.47	21.24	6.25	17.75	18.75	21.10	37.50	39.91	37.50	8.11	50.00	7.14	0.00	8.33
Medford MSA	21	12.43	19.75	4.76	18.89	19.05	20.55	52.38	40.81	23.81	5.37	0.00	10.34	11.36	2.50
OR Non-MSA	4	2.37	13.67	0.00	16.60	0.00	21.57	0.00	48.16	100.00	11.11	0.00	0.00	0.00	13.04

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: STATE OF OREGON				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Salem MSA	154	40.21	19.90	1.99	18.83	13.91	21.12	29.14	40.15	54.97	2.86	1.49	2.23	3.92	2.67
Limited Review:															
Albany OR MSA	78	20.37	19.96	6.49	18.54	10.39	21.73	32.47	39.78	50.65	4.18	6.82	0.68	5.13	4.66
Corvallis MSA	11	2.87	21.78	0.00	16.30	18.18	21.56	36.36	40.36	45.45	1.82	0.00	2.20	2.16	1.71
Eugene - Springfield MSA	76	19.84	21.30	2.63	18.15	18.42	20.98	25.00	39.57	53.95	1.57	1.26	2.14	1.56	1.44
Grants Pass MSA	8	2.09	21.24	0.00	17.75	12.50	21.10	25.00	39.91	62.50	0.74	0.00	1.05	0.75	0.69
Medford MSA	46	12.01	19.75	4.65	18.89	16.28	20.55	18.60	40.81	60.47	1.66	2.82	1.87	1.11	1.74
OR Non-MSA	10	2.61	13.67	10.00	16.60	0.00	21.57	20.00	48.16	70.00	1.63	0.00	0.00	0.00	2.52

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.8% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF OREGON			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Salem MSA	177	31.00	79.53	59.32	79.66	5.08	15.25	1.61	2.31
Limited Review:									
Albany OR MSA	114	19.96	81.46	54.39	90.35	2.63	7.02	3.61	4.53
Corvallis MSA	18	3.15	80.47	55.56	83.33	5.56	11.11	0.74	0.77
Eugene - Springfield MSA	153	26.80	79.93	67.97	94.12	2.61	3.27	1.34	1.98
Grants Pass MSA	6	1.05	83.29	83.33	83.33	0.00	16.67	0.16	0.17
Medford MSA	76	13.31	81.75	67.11	85.53	2.63	11.84	1.11	1.47
OR Non-MSA	27	4.73	81.45	48.15	70.37	11.11	18.52	2.67	1.74

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 12.08% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: STATE OF OREGON									
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015									
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Salem MSA	59	64.13	92.60	47.46	16.95	32.20	50.85	8.47	9.29
Limited Review:									
Albany OR MSA	24	26.09	96.15	58.33	58.33	29.17	12.50	15.32	18.75
Corvallis MSA	1	1.09	96.12	0.00	0.00	100.00	0.00	2.78	0.00
Eugene - Springfield MSA	8	8.70	96.63	37.50	62.50	37.50	0.00	6.12	3.77
Grants Pass MSA	0	0.00	96.60	0.00	0.00	0.00	0.00	0.00	0.00
Medford MSA	0	0.00	97.10	0.00	0.00	0.00	0.00	0.00	0.00
OR Non-MSA	0	0.00	92.69	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 6.52% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF OREGON				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Salem MSA	0	0	2	15	2	15	0.02	0	0
Limited Review:									
Albany OR MSA	1	1,165	0	0	1	1,165	1.81	0	0
Corvallis MSA	0	0	0	0	0	0	0.00	0	0
Eugene - Springfield MSA	5	2,073	2	14,569	7	16,642	25.84	0	0
Grants Pass MSA	0	0	1	8,400	1	8,400	13.04	0	0
Medford MSA	4	7,166	5	24,490	9	31,656	49.14	0	0
OR Non-MSA	1	2,880	0	0	1	2,880	4.47	0	0
Broader Statewide or Regional Area	34	3,658	0	0	34	3,658	5.68	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF OREGON																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Salem MSA	28.34	8	29.63	0.00	12.50	62.50	25.00	0	1	0	0	- 1	0	0.00	21.03	56.99	21.98
Limited Review:																	
Albany OR MSA	17.20	4	14.81	0.00	25.00	75.00	0.00	0	1	0	0	0	- 1	0.00	15.69	70.41	13.90
Corvallis MSA	1.56	1	3.70	0.00	100.00	0.00	0.00	0	0	0	0	0	0	6.43	32.25	36.77	24.54
Eugene - Springfield MSA	22.84	7	25.93	0.00	42.86	42.86	14.29	0	1	0	0	- 1	0	2.90	21.40	53.69	22.01
Grants Pass MSA	4.11	1	3.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	10.09	81.34	8.57
Medford MSA	21.84	5	18.52	20.00	0.00	80.00	0.00	0	0	0	0	0	0	0.88	11.86	69.85	17.41
OR Non-MSA	4.12	1	3.70	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	70.27	29.73

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF UTAH						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Salt Lake MSA	60.11	469	90,437	625	62,584	0	0	12	33,497	1,106	186,518	88.32
Limited Review:												
Logan MSA	1.36	12	2,052	12	1,565	0	0	1	2,650	25	6,267	0.86
Ogden MSA	24.95	233	59,717	210	13,364	14	1,503	2	8,442	459	83,026	6.57
Provo MSA	9.18	90	42,522	78	3,708	0	0	1	2,937	169	49,167	1.78
UT Non-MSA	4.40	41	9,154	36	2,090	4	135	0	0	81	11,379	2.47

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF UTAH								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Salt Lake MSA	71	55.47	1.96	0.00	13.10	18.31	53.77	35.21	31.17	46.48	0.12	0.00	0.14	0.08	0.18
Limited Review:															
Logan MSA	2	1.56	0.00	0.00	16.72	50.00	60.17	50.00	23.11	0.00	0.00	0.00	0.00	0.00	0.00
Ogden MSA	41	32.03	0.71	0.00	14.83	24.39	56.27	36.59	28.18	39.02	0.17	0.00	0.09	0.12	0.34
Provo MSA	10	7.81	1.18	0.00	11.99	20.00	56.52	40.00	30.31	40.00	0.03	0.00	0.00	0.02	0.07
UT Non-MSA	4	3.13	0.00	0.00	5.64	0.00	44.22	25.00	50.14	75.00	0.07	0.00	0.00	0.00	0.11

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF UTAH								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Salt Lake MSA	145	50.70	1.96	2.07	13.10	5.52	53.77	50.34	31.17	42.07	3.79	3.57	1.22	4.10	4.16
Limited Review:															
Logan MSA	5	1.75	0.00	0.00	16.72	0.00	60.17	80.00	23.11	20.00	0.00	0.00	0.00	0.00	0.00
Ogden MSA	75	26.22	0.71	0.00	14.83	5.33	56.27	56.00	28.18	38.67	2.83	0.00	0.85	3.64	2.37
Provo MSA	44	15.38	1.18	0.00	11.99	4.55	56.52	47.73	30.31	47.73	1.66	0.00	0.00	1.39	2.55
UT Non-MSA	17	5.94	0.00	0.00	5.64	0.00	44.22	23.53	50.14	76.47	6.49	0.00	0.00	3.33	9.52

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF UTAH						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Salt Lake MSA	252	59.02	1.96	2.38	13.10	8.73	53.77	64.29	31.17	24.60	0.87	1.22	0.66	1.05	0.62
Limited Review:															
Logan MSA	5	1.17	0.00	0.00	16.72	0.00	60.17	40.00	23.11	60.00	0.18	0.00	0.00	0.15	0.40
Ogden MSA	115	26.93	0.71	1.74	14.83	10.43	56.27	56.52	28.18	31.30	0.50	4.00	0.48	0.51	0.44
Provo MSA	35	8.20	1.18	2.86	11.99	5.71	56.52	34.29	30.31	57.14	0.21	1.30	0.00	0.13	0.38
UT Non-MSA	20	4.68	0.00	0.00	5.64	0.00	44.22	35.00	50.14	65.00	0.73	0.00	0.00	0.54	0.89

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF UTAH										Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Salt Lake MSA	1	25.00	14.11	0.00	37.18	0.00	40.73	100.00	7.98	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Logan MSA	0	0.00	13.91	0.00	76.22	0.00	8.79	0.00	1.08	0.00	0.00	0.00	0.00	0.00	0.00	
Ogden MSA	2	50.00	5.59	0.00	47.47	0.00	37.03	50.00	9.90	50.00	4.00	0.00	0.00	0.00	100.00	
Provo MSA	1	25.00	34.18	0.00	32.66	100.00	28.91	0.00	4.25	0.00	3.33	0.00	9.09	0.00	0.00	
UT Non-MSA	0	0.00	0.00	0.00	2.50	0.00	61.16	0.00	36.34	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF UTAH								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Salt Lake MSA	622	64.93	4.60	4.98	18.56	27.81	44.36	42.77	31.97	24.44	1.43	1.89	2.08	1.35	1.12
Limited Review:															
Logan MSA	12	1.25	1.23	0.00	33.45	16.67	44.71	83.33	20.61	0.00	0.45	0.00	0.28	0.78	0.00
Ogden MSA	210	21.92	3.12	5.24	16.96	17.14	48.17	53.81	31.75	23.81	1.33	1.88	1.42	1.47	1.11
Provo MSA	78	8.14	2.91	1.28	15.34	37.18	49.72	39.74	32.04	21.79	0.54	0.33	1.36	0.47	0.32
UT Non-MSA	36	3.76	0.00	0.00	5.67	5.56	38.34	33.33	55.99	61.11	0.90	0.00	2.90	0.60	1.02

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF UTAH								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Salt Lake MSA	0	0.00	3.20	0.00	15.43	0.00	47.06	0.00	34.19	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Logan MSA	0	0.00	0.00	0.00	11.97	0.00	71.62	0.00	16.41	0.00	0.00	0.00	0.00	0.00	0.00
Ogden MSA	14	77.78	1.66	0.00	9.21	0.00	63.17	78.57	25.96	21.43	5.79	0.00	0.00	6.25	6.25
Provo MSA	0	0.00	1.10	0.00	9.06	0.00	64.86	0.00	24.97	0.00	0.00	0.00	0.00	0.00	0.00
UT Non-MSA	4	22.22	0.00	0.00	2.23	0.00	37.05	50.00	60.71	50.00	5.13	0.00	0.00	9.09	3.85

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF UTAH								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Salt Lake MSA	71	55.47	18.10	7.04	18.80	23.94	23.10	12.68	40.01	56.34	0.14	0.10	0.12	0.05	0.24
Limited Review:															
Logan MSA	2	1.56	19.03	0.00	19.31	50.00	22.01	50.00	39.65	0.00	0.00	0.00	0.00	0.00	0.00
Ogden MSA	41	32.03	16.19	17.07	19.62	31.71	24.98	9.76	39.20	41.46	0.20	0.31	0.16	0.06	0.36
Provo MSA	10	7.81	18.26	0.00	19.05	20.00	23.60	20.00	39.10	60.00	0.04	0.00	0.00	0.03	0.08
UT Non-MSA	4	3.13	15.72	0.00	12.96	0.00	16.38	25.00	54.93	75.00	0.08	0.00	0.00	0.00	0.10

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF UTAH								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Salt Lake MSA	145	50.70	18.10	4.51	18.80	17.29	23.10	27.07	40.01	51.13	3.60	2.70	2.44	4.31	3.89
Limited Review:															
Logan MSA	5	1.75	19.03	0.00	19.31	0.00	22.01	40.00	39.65	60.00	0.00	0.00	0.00	0.00	0.00
Ogden MSA	75	26.22	16.19	6.76	19.62	12.16	24.98	28.38	39.20	52.70	3.17	4.69	2.21	2.52	3.78
Provo MSA	44	15.38	18.26	2.27	19.05	4.55	23.60	25.00	39.10	68.18	1.76	0.00	0.86	0.88	2.59
UT Non-MSA	17	5.94	15.72	0.00	12.96	0.00	16.38	29.41	54.93	70.59	6.67	0.00	0.00	0.00	9.80

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 4.5% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF UTAH								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Salt Lake MSA	252	59.02	18.10	9.35	18.80	22.76	23.10	25.20	40.01	42.68	1.03	1.02	1.18	0.91	1.04
Limited Review:															
Logan MSA	5	1.17	19.03	0.00	19.31	20.00	22.01	40.00	39.65	40.00	0.24	0.00	0.00	0.42	0.27
Ogden MSA	115	26.93	16.19	8.18	19.62	13.64	24.98	32.73	39.20	45.45	0.61	0.35	0.43	0.68	0.74
Provo MSA	35	8.20	18.26	8.57	19.05	8.57	23.60	11.43	39.10	71.43	0.27	0.00	0.24	0.07	0.42
UT Non-MSA	20	4.68	15.72	0.00	12.96	5.26	16.38	26.32	54.93	68.42	0.84	0.00	0.00	1.39	0.82

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

**** As a percentage of loans with borrower income information available. No information was available for 2.8% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF UTAH				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less	
Full Review:										
Salt Lake MSA	625	65.04	77.58	59.36	84.32	3.36	12.32	1.43	1.91	
Limited Review:										
Logan MSA	12	1.25	80.02	16.67	91.67	0.00	8.33	0.45	0.21	
Ogden MSA	210	21.85	80.48	59.05	91.90	2.86	5.24	1.33	1.77	
Provo MSA	78	8.12	81.40	56.41	93.59	1.28	5.13	0.54	0.67	
UT Non-MSA	36	3.75	78.76	61.11	86.11	5.56	8.33	0.90	1.20	

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 15.09% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: STATE OF UTAH				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015		
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Salt Lake MSA	0	0.00	95.71	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Logan MSA	0	0.00	97.78	0.00	0.00	0.00	0.00	0.00	0.00
Ogden MSA	14	77.78	97.58	71.43	71.43	14.29	14.29	5.79	8.54
Provo MSA	0	0.00	96.35	0.00	0.00	0.00	0.00	0.00	0.00
UT Non-MSA	4	22.22	97.77	100.00	100.00	0.00	0.00	5.13	6.06

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 5.56% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF UTAH				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Salt Lake MSA	8	7,991	44	12,032	52	20,023	47.20	0	0
Limited Review:									
Logan MSA	0	0	0	0	0	0	0.00	0	0
Ogden MSA	2	6,552	4	30	6	6,582	15.52	0	0
Provo MSA	0	0	4	40	4	40	0.09	0	0
UT Non-MSA	1	1,775	2	11,456	3	13,231	31.19	0	0
Broader Statewide or Regional Area	14	288	3	2,257	17	2,545	6.0	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: STATE OF UTAH				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
Full Review:																								
Salt Lake MSA	88.32	19	55.88	10.53	21.05	31.58	36.84	0	1	0	0	- 1	0	3.90	17.59	51.26	26.89							
Limited Review:																								
Logan MSA	0.86	1	2.94	0.00	100.00	0.00	0.00	0	0	0	0	0	0	2.41	29.73	50.31	17.54							
Ogden MSA	6.57	8	23.53	0.00	37.50	62.50	0.00	0	1	0	0	- 1	0	1.93	18.11	53.37	26.58							
Provo MSA	1.78	3	8.82	0.00	66.67	33.33	0.00	0	0	0	0	0	0	6.69	15.99	50.84	26.48							
UT Non-MSA	2.47	3	8.82	0.00	33.33	0.00	66.67	0	1	0	0	- 1	0	0.00	7.73	44.16	48.11							

Table 1. Lending Volume

LENDING VOLUME													Geography: STATE OF VERMONT				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***								
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)									
Full Review:																				
Burlington MSA	73.51	96	14,742	166	17,555	1	25	20	134,955	283	167,277	85.25								
Limited Review:																				
VT Non-MSA	26.49	51	5,683	51	3,559	0	0	0	0	102	9,242	14.75								
Broader Statewide or Regional Area	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1	6,787	1	6,787	N/A								

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF VERMONT								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Burlington MSA	12	70.59	0.40	0.00	16.34	41.67	56.56	33.33	26.70	25.00	0.03	0.00	0.00	0.00	0.13
Limited Review:															
VT Non-MSA	5	29.41	0.00	0.00	7.17	20.00	72.59	80.00	20.24	0.00	0.15	0.00	0.67	0.15	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF VERMONT								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Burlington MSA	24	51.06	0.40	0.00	16.34	4.17	56.56	83.33	26.70	12.50	1.58	0.00	0.87	1.93	1.32
Limited Review:															
VT Non-MSA	23	48.94	0.00	0.00	7.17	8.70	72.59	73.91	20.24	17.39	2.56	0.00	0.00	3.31	1.55

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF VERMONT								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Burlington MSA	59	71.95	0.40	0.00	16.34	15.25	56.56	64.41	26.70	20.34	1.50	0.00	1.11	1.62	1.46
Limited Review:															
VT Non-MSA	23	28.05	0.00	0.00	7.17	0.00	72.59	69.57	20.24	30.43	0.80	0.00	0.00	0.73	1.15

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF VERMONT								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Burlington MSA	1	100.00	3.99	0.00	31.67	100.00	53.42	0.00	10.91	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
VT Non-MSA	0	0.00	0.00	0.00	19.73	0.00	55.64	0.00	24.63	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES				Geography: STATE OF VERMONT				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Burlington MSA	166	76.50	1.10	0.00	20.68	15.66	51.55	61.45	26.49	22.89	2.14	0.00	2.34	2.48	1.56
Limited Review:															
VT Non-MSA	51	23.50	0.00	0.00	11.81	11.76	67.39	74.51	20.81	13.73	0.70	0.00	0.63	0.88	0.27

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF VERMONT								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Burlington MSA	1	100.00	0.60	0.00	22.83	0.00	51.09	100.00	25.48	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
VT Non-MSA	0	0.00	0.00	0.00	3.15	0.00	72.62	0.00	24.23	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF VERMONT								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Burlington MSA	12	70.59	18.13	8.33	18.89	33.33	23.47	16.67	39.51	41.67	0.04	0.00	0.00	0.00	0.10
Limited Review:															
VT Non-MSA	5	29.41	17.45	0.00	18.30	40.00	22.55	20.00	41.70	40.00	0.18	0.00	0.68	0.22	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF VERMONT						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Burlington MSA	24	51.06	18.13	16.67	18.89	12.50	23.47	29.17	39.51	41.67	1.63	0.00	1.55	1.13	2.34
Limited Review:															
VT Non-MSA	23	48.94	17.45	8.70	18.30	21.74	22.55	21.74	41.70	47.83	2.64	3.13	3.85	3.41	1.83

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF VERMONT								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Burlington MSA	59	71.95	18.13	8.62	18.89	12.07	23.47	34.48	39.51	44.83	1.64	1.01	0.48	2.51	1.91
Limited Review:															
VT Non-MSA	23	28.05	17.45	4.76	18.30	38.10	22.55	23.81	41.70	33.33	0.75	0.00	1.78	0.90	0.46

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF VERMONT			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Burlington MSA	166	76.50	77.92	55.42	81.33	5.42	13.25	2.14	2.92
Limited Review:									
VT Non-MSA	51	23.50	78.33	68.63	82.35	5.88	11.76	0.70	0.95

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 12.90% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: STATE OF VERMONT			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Burlington MSA	1	100.00	97.95	100.00	100.00	0.00	0.00	0.00	0.00
Limited Review:									
VT Non-MSA	0	0.00	97.64	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF VERMONT				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Burlington MSA	9	4,569	34	13,669	43	18,238	67.13	0	0
Limited Review:									
VT Non-MSA	10	1,449	4	5,902	14	7,351	27.06	0	0
Broader Statewide or Regional Area	16	1,579	0	0	16	1,579	5.81	1	1

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: STATE OF VERMONT				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015									
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Burlington MSA	85.25	8	66.67	0.00	12.50	75.00	12.50	0	1	0	- 1	0	0	1.54	20.24	53.87	24.35
Limited Review:																	
VT Non-MSA	14.75	4	33.33	0.00	75.00	25.00	0.00	0	0	0	0	0	0	0.00	10.47	71.90	17.63

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF WASHINGTON						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Seattle MSA	51.44	1,452	453,770	1,950	152,018	4	728	63	399,982	3,469	1,006,498	70.77
Limited Review:												
Bellingham MSA	3.23	63	14,140	152	9,163	2	300	1	2,835	218	26,438	2.20
Bremerton MSA	3.04	119	32,309	80	3,224	1	10	5	12,398	205	47,941	1.04
Kennewick MSA	1.44	62	41,635	29	2,169	6	1,702	0	0	97	45,506	0.66
Longview MSA	0.47	21	3,148	11	169	0	0	0	0	32	3,317	0.39
Mt Vernon MSA	1.30	42	7,442	44	1,514	1	500	1	5,000	88	14,456	0.60
Olympia MSA	5.20	195	44,812	155	11,162	0	0	1	13,500	351	69,474	2.67
Spokane MSA	1.35	41	4,656	49	5,791	1	22	0	0	91	10,469	0.74
Tacoma MSA	16.30	651	127,853	444	30,394	2	4	2	6,978	1,099	165,229	13.51
Wenatchee MSA	0.65	24	5,434	15	1,332	5	1,012	0	0	44	7,778	0.53
Yakima MSA	5.07	169	19,999	121	13,289	47	12,093	5	21,515	342	66,896	1.76
WA Non-MSA	10.50	398	52,131	223	16,808	87	20,506	0	0	708	89,445	5.13

* Loan Data as of December 31, 2015. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2011 to December 31, 2015.

*** Deposit Data as of June 30, 2015. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF WASHINGTON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle MSA	342	50.59	1.84	2.63	15.62	28.07	49.34	46.20	33.20	23.10	0.38	0.54	0.74	0.38	0.21
Limited Review:															
Bellingham MSA	10	1.48	0.10	0.00	16.79	20.00	60.32	40.00	22.79	40.00	0.03	0.00	0.00	0.05	0.00
Bremerton MSA	22	3.25	0.00	0.00	13.17	13.64	61.74	54.55	25.09	31.82	0.27	0.00	0.14	0.22	0.50
Kennewick MSA	11	1.63	1.55	0.00	17.33	27.27	31.68	18.18	49.44	54.55	0.06	0.00	0.23	0.00	0.05
Longview MSA	6	0.89	3.68	0.00	11.36	16.67	61.41	50.00	23.55	33.33	0.12	0.00	0.58	0.09	0.00
Mt Vernon MSA	12	1.78	0.00	0.00	9.86	16.67	67.82	50.00	22.32	33.33	0.35	0.00	0.56	0.14	1.11
Olympia MSA	45	6.66	0.31	0.00	11.20	15.56	60.68	53.33	27.81	31.11	0.41	0.00	0.73	0.31	0.48
Spokane MSA	9	1.33	0.00	0.00	34.09	44.44	48.48	55.56	17.42	0.00	0.99	0.00	1.47	1.40	0.00
Tacoma MSA	127	18.79	0.84	1.57	15.39	21.26	53.64	44.09	30.13	33.07	0.38	0.37	0.30	0.37	0.42
Wenatchee MSA	6	0.89	0.00	0.00	0.00	0.00	85.39	83.33	14.61	16.67	0.18	0.00	0.00	0.21	0.00
Yakima MSA	20	2.96	1.28	0.00	25.17	20.00	35.06	45.00	38.49	35.00	0.09	0.00	0.00	0.27	0.00
WA Non-MSA	66	9.76	0.01	0.00	9.80	9.09	64.78	60.61	25.41	30.30	0.43	0.00	0.87	0.36	0.45

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: STATE OF WASHINGTON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle MSA	278	43.30	1.84	3.60	15.62	17.63	49.34	45.32	33.20	33.45	3.37	2.56	4.63	3.38	2.80
Limited Review:															
Bellingham MSA	13	2.02	0.10	0.00	16.79	15.38	60.32	46.15	22.79	38.46	1.91	0.00	4.65	1.31	1.52
Bremerton MSA	26	4.05	0.00	0.00	13.17	0.00	61.74	61.54	25.09	38.46	4.24	0.00	0.00	3.50	7.78
Kennewick MSA	10	1.56	1.55	0.00	17.33	10.00	31.68	50.00	49.44	40.00	1.81	0.00	3.13	2.94	0.74
Longview MSA	6	0.93	3.68	16.67	11.36	0.00	61.41	66.67	23.55	16.67	3.49	0.00	0.00	4.00	4.55
Mt Vernon MSA	6	0.93	0.00	0.00	9.86	0.00	67.82	66.67	22.32	33.33	1.23	0.00	0.00	0.94	2.38
Olympia MSA	32	4.98	0.31	0.00	11.20	15.63	60.68	71.88	27.81	12.50	6.03	0.00	15.00	6.09	3.13
Spokane MSA	11	1.71	0.00	0.00	34.09	27.27	48.48	72.73	17.42	0.00	11.11	0.00	12.50	18.52	0.00
Tacoma MSA	132	20.56	0.84	0.76	15.39	18.94	53.64	46.21	30.13	34.09	7.79	0.00	6.96	7.03	9.44
Wenatchee MSA	3	0.47	0.00	0.00	0.00	0.00	85.39	66.67	14.61	33.33	1.94	0.00	0.00	1.22	4.76
Yakima MSA	46	7.17	1.28	0.00	25.17	34.78	35.06	36.96	38.49	28.26	5.11	0.00	5.88	7.63	3.09
WA Non-MSA	79	12.31	0.01	0.00	9.80	10.13	64.78	72.15	25.41	17.72	8.25	0.00	10.81	9.37	5.23

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of owner-occupied units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

**** Data shown includes only one-to-four family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF WASHINGTON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle MSA	824	43.25	1.84	1.94	15.62	17.11	49.34	50.24	33.20	30.70	1.05	1.38	1.29	1.14	0.82
Limited Review:															
Bellingham MSA	40	2.10	0.10	0.00	16.79	20.00	60.32	50.00	22.79	30.00	0.81	0.00	1.03	0.64	1.07
Bremerton MSA	70	3.67	0.00	0.00	13.17	7.14	61.74	67.14	25.09	25.71	1.41	0.00	0.83	1.56	1.37
Kennewick MSA	38	1.99	1.55	2.63	17.33	10.53	31.68	36.84	49.44	50.00	1.16	0.00	0.41	1.41	1.29
Longview MSA	9	0.47	3.68	11.11	11.36	0.00	61.41	55.56	23.55	33.33	0.56	2.86	0.00	0.44	0.82
Mt Vernon MSA	24	1.26	0.00	0.00	9.86	8.33	67.82	70.83	22.32	20.83	1.15	0.00	0.00	1.40	0.85
Olympia MSA	117	6.14	0.31	0.00	11.20	17.95	60.68	61.54	27.81	20.51	1.97	0.00	2.68	1.93	1.72
Spokane MSA	21	1.10	0.00	0.00	34.09	9.52	48.48	90.48	17.42	0.00	2.90	0.00	0.00	6.38	0.00
Tacoma MSA	391	20.52	0.84	0.51	15.39	9.21	53.64	61.13	30.13	29.16	1.96	1.22	0.98	2.41	1.66
Wenatchee MSA	15	0.79	0.00	0.00	0.00	0.00	85.39	93.33	14.61	6.67	0.97	0.00	0.00	0.97	1.00
Yakima MSA	103	5.41	1.28	0.00	25.17	33.01	35.06	35.92	38.49	31.07	3.26	0.00	7.08	3.21	1.68
WA Non-MSA	253	13.28	0.01	0.00	9.80	8.70	64.78	75.49	25.41	15.81	2.56	0.00	2.16	3.12	1.41

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF WASHINGTON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle MSA	8	57.14	10.52	12.50	27.43	0.00	41.24	50.00	20.82	37.50	0.52	1.82	0.00	0.83	0.00
Limited Review:															
Bellingham MSA	0	0.00	4.39	0.00	44.38	0.00	40.15	0.00	11.08	0.00	0.00	0.00	0.00	0.00	0.00
Bremerton MSA	1	7.14	0.00	0.00	37.78	100.00	53.57	0.00	8.66	0.00	4.76	0.00	7.69	0.00	0.00
Kennewick MSA	3	21.43	12.09	0.00	24.65	0.00	37.20	33.33	26.06	66.67	9.09	0.00	0.00	16.67	11.11
Longview MSA	0	0.00	5.62	0.00	42.87	0.00	49.25	0.00	2.26	0.00	0.00	0.00	0.00	0.00	0.00
Mt Vernon MSA	0	0.00	0.00	0.00	28.11	0.00	70.15	0.00	1.74	0.00	0.00	0.00	0.00	0.00	0.00
Olympia MSA	1	7.14	3.61	0.00	30.64	0.00	51.88	0.00	13.87	100.00	0.00	0.00	0.00	0.00	0.00
Spokane MSA	0	0.00	0.00	0.00	83.19	0.00	16.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tacoma MSA	1	7.14	8.38	0.00	35.11	100.00	46.76	0.00	9.75	0.00	0.00	0.00	0.00	0.00	0.00
Wenatchee MSA	0	0.00	0.00	0.00	0.00	0.00	97.13	0.00	2.87	0.00	0.00	0.00	0.00	0.00	0.00
Yakima MSA	0	0.00	15.88	0.00	36.61	0.00	34.77	0.00	12.73	0.00	0.00	0.00	0.00	0.00	0.00
WA Non-MSA	0	0.00	0.65	0.00	24.09	0.00	64.35	0.00	10.91	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2014 Peer Mortgage Data -- US and PR

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: STATE OF WASHINGTON						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle MSA	1,949	59.57	4.69	4.82	17.27	17.80	44.19	45.82	33.72	31.55	1.71	2.17	1.70	1.83	1.57
Limited Review:															
Bellingham MSA	152	4.65	5.57	4.61	20.94	25.00	55.07	42.11	18.42	28.29	1.66	2.40	2.64	0.98	2.86
Bremerton MSA	80	2.44	0.00	0.00	14.62	5.00	54.32	53.75	31.06	41.25	1.32	0.00	0.63	1.09	2.13
Kennewick MSA	29	0.89	2.05	3.45	24.77	31.03	28.76	27.59	44.37	37.93	0.30	0.00	0.46	0.14	0.33
Longview MSA	11	0.34	9.75	0.00	24.71	9.09	50.88	90.91	14.66	0.00	0.28	0.00	0.35	0.38	0.00
Mt Vernon MSA	44	1.34	0.00	0.00	16.59	4.55	63.77	72.73	19.63	22.73	1.40	0.00	0.56	1.55	1.30
Olympia MSA	155	4.74	2.66	0.00	19.45	16.13	50.14	64.52	27.75	19.35	2.10	0.00	2.09	2.89	1.07
Spokane MSA	49	1.50	0.00	0.00	42.91	67.35	42.05	32.65	15.05	0.00	5.32	0.00	9.30	4.25	0.00
Tacoma MSA	444	13.57	4.51	4.50	19.09	17.34	49.58	53.15	26.82	25.00	2.03	2.43	1.76	2.16	1.98
Wenatchee MSA	15	0.46	0.00	0.00	0.00	0.00	88.73	60.00	11.27	40.00	0.38	0.00	0.00	0.23	1.78
Yakima MSA	121	3.70	7.65	2.48	28.76	27.27	32.99	45.45	30.61	24.79	2.31	0.93	2.75	3.40	1.20
WA Non-MSA	223	6.82	0.22	0.00	13.31	13.00	62.59	74.89	23.88	12.11	1.57	0.00	1.52	1.97	0.90

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: STATE OF WASHINGTON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle MSA	4	2.56	2.24	0.00	14.97	0.00	51.70	100.00	31.07	0.00	1.11	0.00	0.00	2.10	0.00
Limited Review:															
Bellingham MSA	2	1.28	0.41	0.00	14.51	0.00	74.09	100.00	10.98	0.00	0.54	0.00	0.00	0.64	0.00
Bremerton MSA	1	0.64	0.00	0.00	7.58	0.00	59.43	100.00	33.00	0.00	2.78	0.00	0.00	9.09	0.00
Kennewick MSA	6	3.85	1.02	0.00	14.46	0.00	51.12	66.67	33.40	33.33	1.79	0.00	0.00	1.64	2.78
Longview MSA	0	0.00	8.04	0.00	13.07	0.00	58.29	0.00	20.60	0.00	0.00	0.00	0.00	0.00	0.00
Mt Vernon MSA	1	0.64	0.00	0.00	8.95	0.00	57.52	100.00	33.52	0.00	0.96	0.00	0.00	1.64	0.00
Olympia MSA	0	0.00	0.84	0.00	12.62	0.00	61.15	0.00	25.39	0.00	0.00	0.00	0.00	0.00	0.00
Spokane MSA	1	0.64	0.00	0.00	24.91	0.00	67.13	100.00	7.96	0.00	3.85	0.00	0.00	5.88	0.00
Tacoma MSA	2	1.28	1.47	0.00	15.77	0.00	55.56	50.00	27.21	50.00	0.00	0.00	0.00	0.00	0.00
Wenatchee MSA	5	3.21	0.00	0.00	0.00	0.00	87.20	80.00	12.80	20.00	2.42	0.00	0.00	3.00	0.00
Yakima MSA	47	30.13	1.72	0.00	16.38	17.02	57.44	53.19	24.46	29.79	7.41	0.00	7.55	6.13	12.73
WA Non-MSA	87	55.77	0.00	0.00	10.62	26.44	67.03	60.92	22.35	12.64	5.75	0.00	8.93	5.77	3.91

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF WASHINGTON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle MSA	342	50.59	20.39	11.18	17.77	30.88	22.17	15.29	39.67	42.65	0.43	0.87	0.72	0.24	0.36
Limited Review:															
Bellingham MSA	10	1.48	20.19	0.00	17.67	0.00	23.83	30.00	38.31	70.00	0.04	0.00	0.00	0.00	0.08
Bremerton MSA	22	3.25	17.87	18.18	18.99	13.64	22.92	13.64	40.22	54.55	0.31	0.48	0.10	0.09	0.58
Kennewick MSA	11	1.63	18.92	0.00	16.76	54.55	18.77	18.18	45.55	27.27	0.07	0.00	0.34	0.00	0.00
Longview MSA	6	0.89	20.72	16.67	17.78	16.67	20.56	16.67	40.95	50.00	0.15	1.85	0.00	0.00	0.16
Mt Vernon MSA	12	1.78	18.77	16.67	17.29	25.00	25.39	8.33	38.55	50.00	0.41	0.00	0.26	0.19	0.70
Olympia MSA	45	6.66	19.17	0.00	17.53	35.56	23.91	2.22	39.39	62.22	0.48	0.00	0.75	0.08	0.74
Spokane MSA	9	1.33	23.63	0.00	20.80	55.56	21.71	0.00	33.86	44.44	1.19	0.00	3.30	0.00	1.15
Tacoma MSA	127	18.79	19.72	8.06	18.37	37.10	22.09	16.94	39.83	37.90	0.44	0.20	0.68	0.34	0.43
Wenatchee MSA	6	0.89	17.53	0.00	18.93	0.00	22.41	0.00	41.14	100.00	0.21	0.00	0.00	0.00	0.34
Yakima MSA	20	2.96	22.37	10.00	16.86	30.00	19.89	20.00	40.88	40.00	0.10	0.00	0.29	0.00	0.10
WA Non-MSA	66	9.76	19.82	12.12	17.76	30.30	21.60	25.76	40.82	31.82	0.52	1.95	0.81	0.31	0.37

* Based on 2014 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF WASHINGTON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle MSA	278	43.30	20.39	9.16	17.77	19.78	22.17	19.05	39.67	52.01	3.43	5.75	4.50	2.01	3.48
Limited Review:															
Bellingham MSA	13	2.02	20.19	8.33	17.67	8.33	23.83	25.00	38.31	58.33	2.03	0.00	0.00	1.49	3.25
Bremerton MSA	26	4.05	17.87	19.23	18.99	19.23	22.92	7.69	40.22	53.85	4.53	2.30	11.11	1.47	5.50
Kennewick MSA	10	1.56	18.92	0.00	16.76	30.00	18.77	50.00	45.55	20.00	1.87	0.00	6.52	0.00	1.39
Longview MSA	6	0.93	20.72	0.00	17.78	16.67	20.56	16.67	40.95	66.67	4.00	0.00	7.69	6.67	2.22
Mt Vernon MSA	6	0.93	18.77	16.67	17.29	16.67	25.39	33.33	38.55	33.33	1.27	0.00	3.70	2.22	0.00
Olympia MSA	32	4.98	19.17	21.88	17.53	18.75	23.91	15.63	39.39	43.75	6.52	11.76	10.71	4.65	5.21
Spokane MSA	11	1.71	23.63	0.00	20.80	36.36	21.71	36.36	33.86	27.27	11.67	0.00	27.27	12.50	6.67
Tacoma MSA	132	20.56	19.72	10.08	18.37	20.93	22.09	27.13	39.83	41.86	8.11	1.39	14.63	7.96	7.38
Wenatchee MSA	3	0.47	17.53	0.00	18.93	33.33	22.41	0.00	41.14	66.67	2.02	0.00	8.33	0.00	1.75
Yakima MSA	46	7.17	22.37	6.67	16.86	11.11	19.89	28.89	40.88	53.33	5.00	0.00	6.06	7.32	4.17
WA Non-MSA	79	12.31	19.82	11.54	17.76	23.08	21.60	26.92	40.82	38.46	8.37	9.46	12.99	8.57	6.50

* Based on 2014 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF WASHINGTON								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle MSA	824	43.25	20.39	8.91	17.77	19.80	22.17	25.50	39.67	45.79	1.20	1.42	1.54	1.23	1.04
Limited Review:															
Bellingham MSA	40	2.10	20.19	10.26	17.67	12.82	23.83	23.08	38.31	53.85	1.00	2.24	1.12	0.60	1.01
Bremerton MSA	70	3.67	17.87	10.29	18.99	22.06	22.92	22.06	40.22	45.59	1.88	3.88	2.55	1.67	1.51
Kennewick MSA	38	1.99	18.92	13.16	16.76	18.42	18.77	26.32	45.55	42.11	1.46	1.72	1.03	1.09	1.80
Longview MSA	9	0.47	20.72	0.00	17.78	33.33	20.56	22.22	40.95	44.44	0.72	0.00	1.65	0.96	0.44
Mt Vernon MSA	24	1.26	18.77	17.39	17.29	4.35	25.39	26.09	38.55	52.17	1.40	3.17	0.00	1.06	1.75
Olympia MSA	117	6.14	19.17	14.16	17.53	20.35	23.91	24.78	39.39	40.71	2.72	4.63	3.33	2.60	2.03
Spokane MSA	21	1.10	23.63	9.52	20.80	42.86	21.71	33.33	33.86	14.29	3.85	3.45	6.25	5.75	0.86
Tacoma MSA	391	20.52	19.72	10.90	18.37	17.82	22.09	31.12	39.83	40.16	2.61	3.64	3.00	2.78	2.27
Wenatchee MSA	15	0.79	17.53	7.14	18.93	14.29	22.41	14.29	41.14	64.29	1.02	0.00	0.00	0.78	1.54
Yakima MSA	103	5.41	22.37	8.82	16.86	14.71	19.89	22.55	40.88	53.92	4.05	5.68	3.96	4.24	3.80
WA Non-MSA	253	13.28	19.82	7.41	17.76	22.63	21.60	27.16	40.82	42.80	3.34	1.94	5.07	3.72	2.83

* Based on 2014 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF WASHINGTON			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Seattle MSA	1,950	59.58	81.01	58.46	87.79	3.90	8.31	1.71	2.10
Limited Review:									
Bellingham MSA	152	4.64	83.07	55.92	89.47	5.92	4.61	1.66	1.97
Bremerton MSA	80	2.44	83.79	63.75	92.50	3.75	3.75	1.32	1.62
Kennewick MSA	29	0.89	79.64	58.62	82.76	10.34	6.90	0.30	0.17
Longview MSA	11	0.34	79.74	72.73	100.00	0.00	0.00	0.28	0.68
Mt Vernon MSA	44	1.34	80.48	65.91	97.73	0.00	2.27	1.40	1.63
Olympia MSA	155	4.74	81.12	63.23	89.03	3.23	7.74	2.10	2.33
Spokane MSA	49	1.50	83.85	57.14	83.67	4.08	12.24	5.32	7.55
Tacoma MSA	444	13.57	81.19	62.16	88.29	3.38	8.33	2.03	2.53
Wenatchee MSA	15	0.46	80.30	46.67	86.67	0.00	13.33	0.38	0.51
Yakima MSA	121	3.70	77.01	49.59	77.69	9.92	12.40	2.31	2.81
WA Non-MSA	223	6.81	81.87	68.16	87.44	4.04	8.52	1.57	1.88

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2015).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 18.03% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: STATE OF WASHINGTON			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Seattle MSA	4	2.56	95.60	100.00	25.00	50.00	25.00	1.11	2.40
Limited Review:									
Bellingham MSA	2	1.28	95.75	100.00	0.00	100.00	0.00	0.54	0.98
Bremerton MSA	1	0.64	97.64	100.00	100.00	0.00	0.00	2.78	5.00
Kennewick MSA	6	3.85	92.46	50.00	0.00	33.33	66.67	1.79	1.79
Longview MSA	0	0.00	93.47	0.00	0.00	0.00	0.00	0.00	0.00
Mt Vernon MSA	1	0.64	92.76	0.00	0.00	0.00	100.00	0.96	0.00
Olympia MSA	0	0.00	96.07	0.00	0.00	0.00	0.00	0.00	0.00
Spokane MSA	1	0.64	99.65	0.00	100.00	0.00	0.00	3.85	0.00
Tacoma MSA	2	1.28	95.34	0.00	100.00	0.00	0.00	0.00	0.00
Wenatchee MSA	5	3.21	94.17	60.00	20.00	40.00	40.00	2.42	3.66
Yakima MSA	47	30.13	90.06	63.83	10.64	46.81	42.55	7.41	10.53
WA Non-MSA	87	55.77	96.02	65.52	22.99	35.63	41.38	5.75	11.43

* Based on 2014 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2015).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 10.90% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF WASHINGTON				Evaluation Period: OCTOBER 1, 2011 TO DECEMBER 31, 2015			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Seattle MSA	29	22,719	94	75,148	123	97,867	61.20	1	274
Limited Review:									
Bellingham MSA	3	627	3	8,189	6	8,816	5.51	0	0
Bremerton MSA	5	57	1	6,814	6	6,871	4.30	0	0
Kennewick MSA	0	0	2	1,000	2	1,000	0.63	0	0
Longview MSA	0	0	0	0	0	0	0.00	0	0
Mt Vernon MSA	0	0	0	0	0	0	0.00	0	0
Olympia MSA	0	0	4	5,579	4	5,579	3.49	0	0
Spokane MSA	0	0	4	20	4	20	0.01	0	0
Tacoma MSA	0	0	45	8,969	45	8,969	5.61	0	0
Wenatchee MSA	0	0	0	0	0	0	0.00	0	0
Yakima MSA	3	13,730	6	30	9	13,760	8.61	0	0
WA Non-MSA	2	5,325	3	6,896	5	12,221	7.64	0	0
Broader Statewide or Regional Area	6	2,206	4	2,595	10	4,801	3.00	0	0

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: STATE OF WASHINGTON		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population								
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography								
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp					
Full Review:																						
Seattle MSA	70.77	81	52.60	9.88	19.75	46.91	23.46	0	1	0	- 1	0	0	4.50	20.34	47.23	27.72					
Limited Review:																						
Bellingham MSA	2.20	6	3.90	16.67	16.67	50.00	16.67	0	0	0	0	0	0	0.81	22.82	57.66	18.71					
Bremerton MSA	1.04	5	3.25	0.00	20.00	60.00	20.00	0	0	0	0	0	0	0.00	19.47	57.87	22.66					
Kennewick MSA	0.66	3	1.95	0.00	100.00	0.00	0.00	0	0	0	0	0	0	4.88	20.60	33.12	41.40					
Longview MSA	0.39	1	0.65	0.00	0.00	100.00	0.00	0	0	0	0	0	0	6.44	17.22	58.17	18.18					
Mt Vernon MSA	0.60	4	2.60	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	12.79	69.18	18.03					
Olympia MSA	2.67	7	4.55	0.00	28.57	57.14	14.29	0	1	0	0	- 1	0	0.68	14.60	60.17	24.56					
Spokane MSA	0.74	1	0.65	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	37.75	44.37	17.87					
Tacoma MSA	13.51	26	16.88	11.54	19.23	50.00	19.23	0	1	- 1	0	0	0	2.52	22.24	50.77	24.47					
Wenatchee MSA	0.53	1	0.65	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	89.72	10.28					
Yakima MSA	1.76	5	3.25	20.00	40.00	20.00	20.00	0	0	0	0	0	0	4.13	34.16	34.40	27.32					
WA Non-MSA	5.13	14	9.09	0.00	21.43	78.57	0.00	0	1	0	0	- 1	0	0.33	15.50	62.96	21.21					

Appendix E: Definitions and Common Abbreviations

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

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

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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: 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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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.

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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 One 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.