



CRA PUBLIC FILE

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Bank Contact Information

North Brookfield Savings Bank
35 Summer Street
North Brookfield, MA 01535
508.867.7442

Or:

Michelle Ramos
Compliance Officer
35 Summer Street
North Brookfield, MA 01535

North Brookfield Savings Bank will maintain a copy of this file for public inspection upon request and at no cost at its main office. North Brookfield Savings Bank will also maintain a copy of its most recent CRA Performance Evaluation, and a list of services provided at each branch office. North Brookfield Savings Bank will comply with any CRA public file requests within five calendar days and update this file no later than April 1 of each calendar year.



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Written Comments from the Public Calendar Years 2021 - 2023

North Brookfield Savings Bank did not receive any written comments from the public during the two calendar years from 2021 – 2023.



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CRA Performance Evaluation

North Brookfield Savings Bank's most recent CRA Performance Evaluation completed on November 28, 2022, by the Federal Reserve Bank of Boston and the Division of Banks, is attached after this page. North Brookfield Savings Bank received a rating of **Satisfactory**.

If you have any questions regarding this performance evaluation, please contact us at:

North Brookfield Savings Bank
35 Summer Street
North Brookfield, MA 01535

Or:

Michelle Ramos
Compliance Officer
35 Summer Street
North Brookfield, MA 01535

PUBLIC DISCLOSURE

November 28, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

North Brookfield Savings Bank
RSSD # 528102

35 Summer Street
North Brookfield, Massachusetts 01535

Federal Reserve Bank of Boston
600 Atlantic Avenue
Boston, Massachusetts 02210

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S CRA RATING: This institution is rated SATISFACTORY.

North Brookfield Savings Bank (North Brookfield or the bank) demonstrates an adequate responsiveness to the credit needs of its assessment area based on the following findings:

- A reasonable loan-to-deposit ratio (LTD) (considering seasonal variations) given the bank's size, financial condition, the credit needs of its assessment area(s), and taking into account, as appropriate, other lending-related activities such as loan originations for sale to the secondary markets and community development loans and qualified investments.
- A majority of the bank's loans and, as appropriate, other lending-related activities, are in its assessment area.
- A distribution of loans to and, as appropriate, other lending-related activities for individuals of different income levels (including low- and moderate-income individuals) and businesses and farms of different sizes that is reasonable given the demographics of the bank's assessment area.
- A reasonable geographic distribution of loans given the bank's assessment area.
- There have been no complaints regarding the bank's CRA performance since the last CRA examination.

SCOPE OF EXAMINATION

North Brookfield's CRA performance was reviewed in accordance with the Federal Financial Institutions Examination Council (FFIEC) Examination Procedures for Small Institutions¹ and was evaluated based on the following performance criteria: LTD ratio, assessment area concentration of loans, loan distribution according to the income of the borrower, geographic distribution of loans, and response to CRA-related complaints. The data used for the evaluation and the applicable timeframe are discussed below.

The bank's performance was based on residential mortgage loans originated from January 1, 2018 to December 31, 2021. Although the geographic and borrower distribution tables in this evaluation only include 2020 and 2021 data, the bank's performance in 2018 and 2019 was also considered when arriving at conclusions. While both the number and dollar volume of loans were reviewed, the number of originations was weighted more heavily as the number of loans is more indicative of loan demand.

Home mortgage lending reviewed during the evaluation was obtained from Loan Application Registers (LARs), maintained by the bank pursuant to the Home Mortgage Disclosure Act (HMDA). Residential loans with a purpose of "other" and/or "not applicable" were excluded from the analysis. The bank's residential lending activity was compared to the aggregate of all lenders operating within the assessment area. Aggregate data was obtained from the Consumer Financial Protection Bureau (CFPB) and consists of lending information from all HMDA reporters that originated or purchased residential mortgage loans in the assessment area. "Other" and "not applicable" loans have also been excluded from the aggregate data. The bank's residential mortgage lending performance was also compared to demographics from the 2015 American Community Survey (ACS).

The bank's net LTD ratio was calculated from the FFIEC Report of Income and Condition (Call Reports) from September 30, 2018 to September 30, 2022. Assessment area concentration totals and percentages included loans originated from January 1, 2018 through December 31, 2021.

North Brookfield's CRA performance was last examined by the Federal Reserve Bank of Boston on September 17, 2018. The examination resulted in a "Satisfactory" rating.

¹ "Small institution" means a bank or savings association that, as of December 31, of either of the prior two calendar years, had assets of less than \$1.503 billion. As the bank's assets were also below \$376 million, the bank was not considered an intermediate small institution.

DESCRIPTION OF INSTITUTION

North Brookfield is a state-chartered mutual savings bank headquartered in North Brookfield, Massachusetts. The bank has one wholly owned subsidiary, North Brookfield Savings Security Corporation, which is a Massachusetts Securities Corporation, established to engage in securities transactions.

The bank's corporate office, main branch, and residential loan center is located at 35 Summer Street in North Brookfield, MA. Including the main office, the bank maintains eight full-service branches, four of which are in the Springfield, MA Metropolitan Statistical Area (MSA). These locations are in the towns of Palmer (2), Belchertown (1), and Ware (1). The remaining locations are in the Worcester, MA-CT MSA and are in the towns of North Brookfield (2), East Brookfield (1), and West Brookfield (1). All locations have an ATM and offer lobby and drive-up hours Monday through Saturday, except for the Palmer office.

The bank offers traditional consumer and business banking products, which are available throughout the bank's assessment area and at every location. Personal deposit products include checking and savings accounts, money market accounts, individual retirement accounts, and student banking accounts, and personal loan products include mortgages, home equity loans, automobile loans, and personal loans. The bank also offers business deposit products including checking and savings account and a money market product. Business loan products include commercial real estate loans, business loans and lines of credit, and small business loans. The bank also offers online and mobile banking services.

In response to the COVID-19 pandemic, the bank was an active originator of Payment Protection Program (PPP) loans during the review period. PPP loans are administered by the Small Business Administration (SBA) as part of the Coronavirus Aid, Relief, and Economic Security Act and are designed to help businesses retain workers and staff during the economic hardship resulting from the COVID-19 pandemic. In general, PPP loans may be considered particularly responsive to small businesses with annual revenues of \$1 million or less or to businesses located in low- or moderate-income geographies. Additionally, such loans generally help retain jobs for low- or moderate-income individuals or in low or moderate-income geographies and may help revitalize or stabilize low- or moderate-income geographies. According to publicly available SBA PPP loan data, the bank originated 378 PPP loans during the evaluation period.

As of September 30, 2022, bank assets totaled \$362.5 million, loans totaled \$238.5 million, and deposits totaled \$326.3 million. Since the last evaluation as of June 30, 2018, bank assets increased by 19.4 percent, which was primarily driven by a \$34.5 million, or 62.9 percent, increase in securities and a \$20.2 million, or 9.2 percent, increase in loans. The \$20.2 million increase in loans is primarily attributed to a \$15.9 million, or 11.2 percent, increase in closed end first lien loans secured by 1-4 family residential properties. Total deposits increased steadily from the March 31, 2020 Call Report, increasing from \$247.6 million to a high of \$326.3 million, as of September 30, 2022. This increase in deposits was likely the result of increased savings, stimulus checks, and unemployment benefits from the COVID-19 pandemic.

Table 1 shows the bank's loan portfolio composition as of September 30, 2022. Residential loans, which include 1-4 family open-end and closed-end loans, account for the largest share of loans with 70.8 percent.

Table 1		
Loan Distribution as of September 30, 2022		
Loan Type	Dollar Amount \$(000s)	Percent of Total Loans (%)
Residential RE	168,911	70.8
Agriculture	2,895	1.2
Commercial*	60,141	25.2
Consumer	6,561	2.8
Other	12	0.0
Total Loans	238,520	100.0%

Call Report as of September 30, 2022

**May include construction, land development, and other land loans reported on the HMDA LAR*

Total percentages shown may vary by 0.1 percent due to automated rounding differences.

As mentioned above, since the last examination the bank's loans increased by \$20.2 million, or 9.2 percent, which was primarily attributed to a \$15.9 million increase in closed first lien loans secured by 1-4 family residential properties. Numerous other loan types have also increased by dollar volume since the last examination: other nonfarm nonresidential loans increased by \$4.3 million, or 29.9 percent; multifamily loans increased by \$3.3 million, or 18.8 percent; and automobile loans increased by \$2.3 million, or 105.4 percent.

The bank operates in a competitive market for both deposits and home mortgage loans. As of June 30, 2022, of the 13 institutions with branches in the assessment area, North Brookfield ranks 3rd in deposit market share, with 10.9 percent. Country Bank for Savings ranks 1st, with 36.4 percent, and Cornerstone Bank ranks 2nd, with 23.7 percent. The top three banks with the largest deposit market share are all community banks with most of their branches within the assessment area.

The bank competes against numerous national and regional mortgage companies and national, regional, and community banks for home mortgage loans within the assessment area. During the evaluation period, national mortgage lenders such as Rocket Mortgage, LLC, Fairway Independent Mortgage Corporation, and Freedom Mortgage Corporation were consistently in the top 5 home mortgage originators in the assessment area. Community banks such as Cornerstone Bank and Country Bank for Savings were also consistently within the top ten lenders in the assessment area. As of 2021, North Brookfield ranked 18th of 325 HMDA reporters for home mortgage originations and purchases within the assessment area.

Considering the bank's financial capacity, local economic conditions, assessment area demographics, and the competitive market in which it operates, the bank demonstrated an ability to meet the credit needs of the assessment area. There are no legal or financial impediments that would impact the bank's ability to meet the credit needs of the assessment areas in which it operates.

DESCRIPTION OF ASSESSMENT AREA

Table 2 illustrates the composition of North Brookfield’s assessment area.

Table 2 Assessment Area		
MSA	Counties	Cities/Towns
Worcester, MA-CT MSA	<i>Worcester</i>	Athol, Barre, Brookfield, Charlton, East Brookfield, Hardwick, Hubbardston, Leicester, New Braintree, North Brookfield, Oakham, Paxton, Petersham, Phillipston, Rutland, Spencer, Sturbridge, Templeton, Warren, West Brookfield
Springfield, MA MSA	<i>Hampden</i>	Brimfield, Palmer
	<i>Hampshire</i>	Belchertown, Ware

The assessment area includes portions of both the Worcester, MA-CT and Springfield, MA MSAs and portions of Hampden, Hampshire, and Worcester counties. The assessment area includes 24 of the 172 census tracts in Worcester County, 4 of the 103 census tracts in Hampden County, and 4 of the 36 census tracts in Hampshire County. The assessment area has not changed since the previous examination.

Table 3 provides relevant demographic data on the bank’s delineated assessment area.

Table 3 Assessment Area Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	7,607	18.4
Moderate	5	15.6	5,618	13.6	701	12.5	6,853	16.6
Middle	21	65.6	24,895	60.3	1,359	5.5	8,899	21.5
Upper	6	18.8	10,800	26.1	303	2.8	17,954	43.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	32	100.0	41,313	100.0	2,363	5.7	41,313	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	10,666	5,472	11.9	51.3	3,716	34.8	1,478	13.9
Middle	40,793	28,814	62.6	70.6	8,231	20.2	3,748	9.2
Upper	14,931	11,737	25.5	78.6	2,245	15.0	949	6.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	66,390	46,023	100.0	69.3	14,192	21.4	6,175	9.3
Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Assessment Area Composition

The assessment area contains 32 census tracts, of which 5 are moderate-income, at 15.6 percent, 21 are middle-income, at 65.6 percent, and 6 are upper-income, at 18.8 percent. There are no low-income census tracts in the assessment area. The moderate-income tracts are in Athol (2), Spencer (1), Ware (1), and Warren (1).

Housing

There are 66,390 housing units in the assessment area, of which 69.3 percent are owner-occupied, 21.4 percent are rental units, and 9.3 percent are vacant. Of the owner-occupied units, 11.9 percent are in moderate-income tracts. Further, within the moderate-income census tracts in the assessment area, 51.3 percent are owner-occupied. Compared to the percentage of owner-occupied units in middle- and upper-income tracts, in which 70.6 percent and 78.6 of housing units are owner-occupied, respectively, the opportunities to originate home mortgage loans in the moderate-income tracts are limited.

Based on the 2021 FFIEC Census data, the median housing value in the assessment area was \$230,200. The median housing value of the counties comprising the assessment area ranged from \$196,400 in Hampden County to \$265,400 in Hampshire County. The median housing value for Worcester County was \$265,400. The median housing value in the assessment area ranged from \$167,364 in the moderate-income tracts, all of which are in Worcester County, to a high of \$284,027 in the upper-income tracts.

According to more recent data from The Warren Group, Peabody, MA, the median sales price of single-family homes and condominiums in Worcester County increased from \$239,900 in 2018 to \$328,925 in 2021. Additionally, from 2018 to 2021, the median sales price increased in each county comprising a portion of the assessment area as follows: 37.1 percent in Worcester County, 31.4 percent in Hampden County, and 29.4 percent in Hampshire County. While the median sales prices in each county comprising a portion of the assessment area increased throughout the evaluation period, the average median home sale price in the four towns with moderate-income census tracts during the evaluation period was \$193,103. The median home values and sales prices throughout the assessment area did increase at a greater rate compared to median family incomes during the evaluation period. However, as discussed below, the relative cost of homeownership based on borrower incomes alone, in general, should not have been prohibitive for low- and moderate-income borrowers, particularly within the moderate-income tracts.

Population

The assessment area is comprised of 157,161 individuals, of which 14.1 percent reside in moderate-income tracts, 60.9 percent reside in middle-income tracts, and 25.0 percent reside in upper-income tracts. There are 60,215 households in the assessment area, of which 15.3 percent reside in moderate-income tracts, 61.5 percent reside in middle-income tracts, and 23.2 percent reside in upper-income tracts. Of the households in the assessment area, 41,313 are families, of which 13.6 percent reside in moderate-income tracts, 60.3 percent reside in middle-income tracts, and 26.1 percent reside in upper-income tracts. There are 2,363 families in the assessment area living below the poverty level, of which 701 families, or 29.7 percent of the total, reside in the moderate-income tracts.

Income

The FFIEC adjusts the median family income (MFI) of metropolitan areas annually, based on estimates. The MFI for low-income is defined as family income less than 50 percent of the area median income; moderate-income is defined as income of at least 50 percent and less than 80 percent of median income; middle-income is defined as income of at least 80 percent but less than 120 percent of median income; and upper-income is defined as 120 percent of median income and above.

Table 4 displays the MFI incomes for each MSA comprising a portion of the assessment area and the state non-MSA/MD family income for Massachusetts.

Table 4				
Median Family Income				
MSA/MD	2018	2019	2020	2021
Worcester, MA-CT	\$86,900	\$95,300	\$95,300	\$96,700
Springfield, MA	\$73,900	\$76,700	\$76,900	\$81,300
Massachusetts*	\$80,700	\$102,600	\$109,900	\$111,700
<i>FFIEC median family income estimates</i>				
<i>*Represents non-MSA portions of the state</i>				

As shown above, the MFI for each MSA comprising a portion of the assessment area and the Massachusetts non-MSA increased each year during the evaluation period except for the Worcester, MA-CT MSA remaining unchanged from 2019 to 2020. From 2018 to 2021, the MFI for each MSA and the non-MSA portion of Massachusetts increased as follows: 11.3 percent for the Worcester, MA-CT MSA, 10.0 percent for the Springfield, MA MSA, and 38.4 percent for the non-MSA portion of Massachusetts. Although the MFIs of the MSAs comprising portions of the assessment area increased during the evaluation period, the median sales price of homes and median home values, as discussed above, outpaced the increases in the MFIs. This suggests an increased difficulty of home affordability for low- and moderate-income borrowers. However, based on the relative home values, despite the percentage increases during the evaluation period, the cost of homeownership, in general, should not have been prohibitive for low- and moderate-income borrowers, particularly within the moderate-income tracts.

Employment Statistics

According to the 2015 ACS, the unemployment rate in the assessment area was 7.5 percent. The unemployment rate in the counties comprising of portions of the assessment area were as follows: 10.0 percent in Hampden County, 7.2 percent in Hampshire County, and 7.8 percent in Worcester County. More recent data from the Bureau of Labor Statistics shows the 2021 average annual unemployment rate for counties comprising portions of the assessment area of 6.2 percent, which is slightly less than the average annual unemployment rate for the Springfield, MA MSA at 6.5 percent, but slightly above the Worcester, MA-CT MSA at 5.9 percent. Based on the same data, the average annual unemployment rate for the Commonwealth of Massachusetts was 5.7 percent. Unemployment rates in the assessment area and the counties comprising portions of the assessment increased substantially in 2020 due to COVID-19. Although unemployment rates in 2021 have declined since 2020, they are still above 2019 unemployment levels.

Community Contacts

As part of the evaluation process, third parties that are active in community affairs are contacted to assist in assessing the housing and credit needs in the bank’s assessment area. Relevant information from this practice assists in determining whether local financial institutions are responsive to the credit needs of the community, and whether additional opportunities are available.

A community contact was conducted with the president of a local Community Development Financial Institution that works to strengthen communities by creating economic opportunities for low-and-moderate income individuals, women, people of color, and immigrants in western Massachusetts. The contact noted the region experiences high levels of racial, ethnic, and socio-economic disparities, especially in the Springfield and Holyoke areas. The organization frequently works with banks and noted the great activities and opportunities that community banks offer the region, especially as they have a strong community focus as it relates to philanthropic work. The contact stated that flexibility in products and offerings are essential for western Massachusetts given its diverse socioeconomic and racial demographics. In addition, programs that promote upward mobility, a community-focused approach to lending, and financial literacy courses are all areas of necessity.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Loan-to-Deposit Ratio

This performance criterion determines the percentage of the bank’s deposit base that is reinvested in the form of loans and evaluates its appropriateness. The bank demonstrates a reasonable loan-to-deposit ratio (considering seasonal variations) given the bank's size, financial condition, the credit needs of its assessment area(s), and taking into account, as appropriate, other lending-related activities such as loan originations for sale to the secondary markets and community development loans and qualified investments.

The bank’s net LTD figures are calculated from the bank’s latest 17 quarterly FFIEC Call Reports from September 30, 2018 to September 30, 2022. The ratio is based on total loans net of unearned income and net of the allowance for loan and lease losses as a percentage of total deposits.

Table 5 provides a comparison of the bank’s average LTD ratio to similarly sized institutions operating within the assessment area.

Table 5		
Loan-to-Deposit Ratio Comparison		
Institutions	Total Assets* \$(000's)	Average LTD Ratio** (%)
Milford Federal Bank	465,839	101.5
Bay State Savings Bank	497,041	99.9
North Brookfield Savings Bank	362,481	83.2
Dean Bank	436,642	81.0
Charles River Bank	326,863	76.7

*Call Report as of September 30, 2022

**Call Reports from September 30, 2018 to September 30, 2022.

The bank’s average LTD ratio for the evaluation period was 83.2 percent. The ratio reached a high of 94.5 percent, as of September 30, 2019, and a low of 71.3 percent, as of June 30, 2022. As of September 30, 2019, the ratio began a steady decline and as of September 30, 2022, was at 72.7 percent. The decreasing LTD ratio generally coincided with the steady increase in total deposits as from December 31, 2019 to September 30, 2022 and the slight decline in loans during the same period.

Assessment Area Concentration

This criterion evaluates the concentration of loans originated by the bank within its assessment area. As shown below, a majority of its loans and, as appropriate, other lending-related activities, are in its assessment area. Table 6 presents the bank’s levels of lending inside and outside the assessment area for the entire evaluation period.

Table 6 Lending Inside and Outside the Assessment Area												
Loan Type	Inside				Outside				Total			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase	153	70.5	34,910	67.4	64	29.5	16,856	32.6	217	100.0	51,766	100.0
Home Improvement	34	94.4	1,531	91.3	2	5.6	145	8.7	36	100.0	1,676	100.0
Multi-Family Housing	8	57.1	2,060	48.6	6	42.9	2,175	51.4	14	100.0	4,235	100.0
Refinancing	279	79.0	48,851	69.8	74	21.0	21,104	30.2	353	100.0	69,955	100.0
Total	474	76.5	87,352	68.4	146	23.5	40,280	31.6	620	100.0	127,632	100.0

HMDA for 2018 - 2021.

Total percentages shown may vary by 0.1 percent due to automated rounding differences.

During the evaluation period, the bank originated a total of 474 home mortgage loans, or 76.5 percent, inside the assessment area. The bank originated 69 loans, or 65.1 percent, inside the assessment area in 2018, 137 loans, or 76.1 percent, in 2019, 149 loans, or 81.0 percent, in 2020, and 119 loans, or 79.3 percent, in 2021. Refinance loans accounted for the largest share of lending for each year and in total for loans originated inside the assessment area.

Overall lending inside the assessment area increased by 98.6 percent from 2018 to 2019. During this time home mortgage loans increased from 30 loans to 44 loans and refinance loans increased from 30 loans to 72 loans, respectively. From 2019 to 2020, home purchase loans increased slightly from while refinance loans increased from 72 loans to 93 loans, or by 29.2 percent. Overall lending in the assessment area decreased from 2020 to 2021; home purchase loans decreased from 50 loans to 29 loans and refinance loans decreased slightly from 93 loans to 84 loans, respectively.

Borrower Profile

This criterion analyzes the distribution of loans to borrowers of different income levels. The bank demonstrates a distribution of loans to and, as appropriate, other lending-related activities for individuals of different income levels (including low- and moderate-income individuals) that is reasonable given the demographics of the bank’s assessment area.

Table 7 provides a comparison of the bank’s lending by income level of the borrower to the income distribution of families in the assessment area and demographic data. The table further outlines the bank’s performance by loan type in comparison to the aggregate group.

Table 7 Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	6	12.0	8.5	852	7.5	5.3	2	6.9	7.7	293	3.6	4.7	18.4
Moderate	14	28.0	28.1	2,528	22.3	23.6	10	34.5	27.7	2,330	28.6	23.7	16.6
Middle	13	26.0	26.4	3,185	28.1	27.9	7	24.1	24.4	2,125	26.1	24.6	21.5
Upper	15	30.0	24.9	4,493	39.7	30.9	10	34.5	24.9	3,399	41.7	31.3	43.5
Unknown	2	4.0	12.1	269	2.4	12.4	0	0.0	15.2	0	0.0	15.7	0.0
Total	50	100.0	100.0	11,327	100.0	100.0	29	100.0	100.0	8,147	100.0	100.0	100.0
Refinance Loans													
Low	10	10.8	4.8	815	4.7	2.8	10	11.9	6.6	1,315	8.5	4.2	18.4
Moderate	14	15.1	15.3	2,118	12.1	12.2	21	25.0	20.3	3,374	21.9	16.8	16.6
Middle	24	25.8	25.8	4,394	25.2	24.3	26	31.0	24.5	4,786	31.1	24.3	21.5
Upper	44	47.3	38.0	9,988	57.2	43.1	27	32.1	31.5	5,925	38.5	36.2	43.5
Unknown	1	1.1	16.0	148	0.8	17.5	0	0.0	17.1	0	0.0	18.5	0.0
Total	93	100.0	100.0	17,462	100.0	100.0	84	100.0	100.0	15,399	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	7.3	0	0.0	6.9	1	16.7	9.5	10	2.1	6.6	18.4
Moderate	2	40.0	16.4	44	40.4	14.3	3	50.0	17.6	360	76.6	12.1	16.6
Middle	2	40.0	31.1	43	39.4	27.1	1	16.7	27.5	50	10.6	27.7	21.5
Upper	1	20.0	43.4	22	20.2	48.9	1	16.7	43.4	50	10.6	50.3	43.5
Unknown	0	0.0	1.8	0	0.0	2.8	0	0.0	2.0	0	0.0	3.4	0.0
Total	5	100.0	100.0	109	100.0	100.0	6	100.0	100.0	470	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	16	10.8	6.2	1,666	5.8	3.8	13	10.9	7.1	1,618	6.7	4.4	18.4
Moderate	30	20.3	19.6	4,690	16.2	16.5	34	28.6	22.5	6,064	25.2	19.4	16.6
Middle	39	26.4	25.7	7,622	26.4	25.4	34	28.6	24.5	6,961	29.0	24.4	21.5
Upper	60	40.5	32.8	14,503	50.2	37.8	38	31.9	29.9	9,374	39.0	34.4	43.5
Unknown	3	2.0	15.7	417	1.4	16.5	0	0.0	16.1	0	0.0	17.4	0.0
Total	148	100.0	100.0	28,898	100.0	100.0	119	100.0	100.0	24,017	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Although not included in the table above, this evaluation included an analysis of the bank’s borrower distribution of home mortgage lending in 2018 and 2019. Within the assessment area, 18.4 percent of families are low-income, and both the bank and the aggregate lending percentages were below this demographic comparator during the evaluation period. Given the general financial challenges of low-income borrowers, it is not expected that the bank or the aggregate percentages would be comparable to the percentage of low-income families in the assessment area. Additionally, as the share of low- and moderate-income families by number in the assessment area is relatively even, the bank’s performance in lending to low- and moderate-income borrowers is weighted equally.

In 2018, the bank originated 2 loans, or 2.9 percent, to low-income borrowers, which trailed the aggregate at 7.8 percent. For the same year, the bank originated 15 loans, or 22.1 percent, to moderate-income borrowers, which was slightly below the aggregate at 22.5 percent, but exceeded the percentage of moderate-income families in the assessment area at 16.6 percent. In

2019, the bank increased the number of loans to low-income borrowers to 14, or 10.7 percent, which exceeded the aggregate at 8.5 percent. For the same year, the bank originated 20 loans, or 15.3 percent, to moderate-income borrowers, which trailed the aggregate at 23.0 percent.

In 2020, the bank originated 16 loans, or 10.8 percent, to low-income borrowers, which exceeded the aggregate, at 6.2 percent. For the same year, the bank originated 30 loans, or 20.3 percent, to moderate-income borrowers, which exceeded the aggregate, at 19.6 percent. In 2021, the bank originated 13 loans, or 10.9 percent, to low-income borrowers, which exceeded the aggregate, at 7.1 percent. For the same year, the bank originated 34 loans, or 28.6 percent, to moderate-income borrowers, which exceeded the aggregate, at 22.5 percent.

Considering each year of the evaluation period and the weighting of the bank's performance to low- and moderate-income borrowers, the borrower distribution is reasonable. Over the evaluation period, the bank's lending percentage to low-income borrowers increased year-over-year from 2.9 percent in 2018 to 10.9 percent in 2021. Although the bank exceeded the aggregate in lending to low-income borrowers from 2019 to 2021, the bank's performance was 4.9 percentage points below the aggregate in 2018. The bank exceeded the aggregate lending performance to moderate-income borrowers in 2020 and 2021, however, it was 0.4 percentage points below the aggregate in 2018 and 7.7 percentage points below the aggregate in 2019. Of note is that the number of loans originated to moderate-income borrowers increased each year during the evaluation period.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of loans to census tracts of all income levels. The bank demonstrates a reasonable geographic distribution of loans given the bank's assessment area.

Table 8 provides a comparison of the bank's lending by census tract income level to the aggregate lending data and demographics of the assessment area.

Table 8 Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	16.0	14.5	1,459	12.9	11.1	2	6.9	15.0	466	5.7	12.2	11.9
Middle	37	74.0	57.8	8,355	73.8	55.7	22	75.9	59.9	6,071	74.5	58.2	62.6
Upper	5	10.0	27.7	1,513	13.4	33.2	5	17.2	25.1	1,611	19.8	29.6	25.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	50	100.0	100.0	11,327	100.0	100.0	29	100.0	100.0	8,147	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	5.4	7.3	664	3.8	5.4	8	9.5	8.7	1,221	7.9	6.7	11.9
Middle	74	79.6	54.4	13,257	75.9	50.8	70	83.3	56.2	13,236	86.0	52.8	62.6
Upper	14	15.1	38.3	3,541	20.3	43.8	6	7.1	35.1	943	6.1	40.4	25.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	93	100.0	100.0	17,462	100.0	100.0	84	100.0	100.0	15,399	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.5	0	0.0	7.4	0	0.0	9.8	0	0.0	6.9	11.9
Middle	5	100.0	54.8	109	100.0	50.8	6	100.0	57.8	470	100.0	58.5	62.6
Upper	0	0.0	34.7	0	0.0	41.7	0	0.0	32.4	0	0.0	34.6	25.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	109	100.0	100.0	6	100.0	100.0	470	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	42.9	0	0.0	38.8	0	0.0	36.6	0	0.0	28.5	25.8
Middle	0	0.0	42.9	0	0.0	38.3	0	0.0	43.9	0	0.0	58.2	56.8
Upper	1	100.0	14.3	430	100.0	22.9	0	0.0	19.5	0	0.0	13.3	17.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	430	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	13	8.7	10.2	2,124	7.2	8.1	10	8.4	11.0	1,687	7.0	9.3	11.9
Middle	116	77.9	55.8	21,721	74.1	52.7	98	82.4	57.6	19,777	82.3	55.2	62.6
Upper	20	13.4	34.0	5,484	18.7	39.2	11	9.2	31.5	2,553	10.6	35.5	25.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	149	100.0	100.0	29,328	100.0	100.0	119	100.0	100.0	24,017	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

As the assessment area does not contain any low-income census tracts, the geographic distribution was evaluated primarily based on the bank's performance in originating home

mortgage loans in the moderate-income tracts. In 2018, the bank originated 11 loans, or 15.9 percent, in moderate-income tracts, which exceeded the aggregate at 11.9 percent. In 2019, the bank increased the number of loans originated in moderate-income tracts to 20 loans, or 14.6 percent, which again exceeded the aggregate at 11.4 percent. In 2020, the volume of loans originated in moderate-income tracts decreased to 13 loans, or 8.7 percent, which trailed the aggregate, at 10.2 percent. In 2021, the bank originated 10 loans, or 8.4 percent, in moderate-income tracts, which trailed the aggregate, at 11.0 percent. Examiners did not identify any conspicuous gaps in the bank's penetration of the moderate-income census tracts.

Even though the bank's home mortgage lending percentages in the moderate-income tracts declined each year of the evaluation period, bank outperformed the aggregate in 2018 and 2019. Of note is that the bank's lending percentages in middle-income tracts was significantly higher in the middle-income tracts compared to the aggregate for each year of the evaluation period and notably trailed the aggregate in the percentage of loans originated in upper-income tracts. Considering the bank's performance in the moderate-income tracts paired with the general concentration of loans in the middle-income tracts compared to the upper-income tracts, the bank's geographic distribution of home mortgage loans is reasonable.

Response to Complaints

There have been no complaints regarding the bank's CRA performance since the previous CRA examination.

CONCLUSION

The bank's Satisfactory performance in meeting the credit needs in the assessment area is demonstrated by its record of extending loans to borrowers of different incomes, especially low- and moderate-income borrowers. The bank has also met the credit needs in its assessment area by making the majority of its loans within its assessment area. The bank exhibited a reasonable distribution of loans across census tract income levels, particularly in moderate-income tracts, and has maintained a reasonable LTD ratio.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

A substantive violation of Section 5(a) of the Federal Trade Commission Act involving unfair or deceptive practices was identified in the concurrent consumer compliance examination. Bank management is committed to correcting the violation. The violation did not impact the bank's CRA rating.

APPENDIX

GLOSSARY

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

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

Census tract: A small subdivision of metropolitan and nonmetropolitan counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending on 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 contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

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

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

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, the FDIC, and the OCC, based on:
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

Demographics: The statistical characteristics of human populations (such as age, race, sex, income, etc.) used especially to identify markets.

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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 nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

Full-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

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

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

Household: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Is calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a

dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent in the case of a geography.

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

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

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

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.

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the

context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Small businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were \$1 million or less.

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports 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 secured by either nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports 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.

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

Upper-income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more, in the case of a geography.

For additional information, please see the Definitions section of Regulation BB at 12 C.F.R. 228.12

PUBLIC DISCLOSURE

November 28, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

North Brookfield Savings Bank
Certificate Number: 90258

35 Summer Street
North Brookfield, Massachusetts 01535

Division of Banks
1000 Washington Street, 10th Floor
Boston, Massachusetts 02118

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the Division of Banks concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

This document is an evaluation of the CRA performance of **North Brookfield Savings Bank** prepared by the Massachusetts Division of Banks, the institution's supervisory agency as of **November 28, 2022**. The Division rates the CRA performance of an institution consistent with the provisions set forth in Massachusetts Regulation 209 CMR 46.00.

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in the group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income borrowers, in a manner consistent with its resources and capabilities. North Brookfield Savings Bank's performance under this test is summarized below:

- The average net loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.
- The bank made a majority of its home mortgage loans by number and dollar volume, within the assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects good penetration among individuals of different income levels (including low- and moderate-income).
- The institution did not receive any CRA-related complaints during the evaluation period; therefore, this criterion did not affect the Lending Test rating.
- Fair lending policies and procedures need improvement.

DESCRIPTION OF INSTITUTION

Background

North Brookfield Savings Bank is a state-chartered mutual savings bank originally chartered in 1854 and is headquartered at 35 Summer Street in North Brookfield, Massachusetts. The bank has one wholly owned subsidiary, North Brookfield Securities Corporation, established for the purpose of conducting securities transactions. The bank received a “Satisfactory” rating at its previous CRA evaluation conducted by the Division, dated September 17, 2018, based on Interagency Small Institution Examination Procedures.

Operations

The bank’s main office and full-service branch at 9 Gilbert Street, North Brookfield, operates in a middle-income census tract. The bank maintains six other full-service branches as well as a separate corporate office center. One branch (Ware) is located in a moderate-income census tract, four branches (East Brookfield, Palmer, Three Rivers, and West Brookfield) are in middle-income census tracts, and one branch (Belchertown) is in an upper-income census tract. The corporate office center at 35 Summer Street includes a loan center and operations center and is in a middle-income census tract. The bank did not open nor close any branches during the evaluation period.

The bank’s branches operate with similar schedules across branches with minor variations from one another, though all maintain minimum office hours of 9:00 a.m. to 4:00 p.m. Monday through Friday with some branches holding extended hours to 5:00 or 6:00 PM one or two nights per week and Saturday morning. With the exception of Palmer, all branches offer drive-up teller services and Saturday hours of 9:00 a.m. to 12:00 p.m. Drive-up teller hours primarily mirror lobby hours while the main branch, East Brookfield, and West Brookfield drive-up tellers have extended hours.

North Brookfield Savings Bank is a full-service financial institution offering personal and business deposit products and services. Loan products include residential mortgages, including fixed, adjustable-rate and first-time home buyer mortgages, construction loans, land loans, and home equity loans and lines of credit. The bank also offers secured and unsecured personal loans, Mass Save HEAT loans, auto and motorcycle loans, boat loans, recreational vehicle loans, credit builder loans, and credit cards. In addition, the bank offers commercial and small business lines of credit, term loans, Small Business Administration (SBA) loans, and commercial real estate loans.

The bank offers deposit products and services, including checking and savings accounts, business checking and savings accounts, certificates of deposit, and money market accounts. Other personal products include individual retirement accounts and student banking accounts. Other services include free online banking and bill payment, mobile banking with deposit and loan payments, mobile banking application, mobile wallet, direct deposit, early payday, debit cards, and free 24-hour telephone banking. ATM availability is expanded globally by the bank’s participation in SUM (surcharge-free), NYCE (surcharge-free), MoneyPass, and Plus networks.

Ability and Capacity

As of September 30, 2022, the bank had total assets of approximately \$362.5 million, total deposits of approximately \$326.3 million, and total loans of \$238.5 million. Since the previous evaluation, total assets increased by 19.4 percent, and total loans increased by 9.3 percent.

The bank is primarily a residential lender, with its loan portfolio primarily being comprised of loans secured by 1-4 family residential properties representing 70.8 percent of all loans, followed by loans secured by commercial real estate representing 13.8 percent. The following table provides additional details regarding the bank's loan portfolio.

Loan Portfolio Distribution as of 09/30/2022		
Loan Category	\$(000s)	%
Construction, Land Development, Other and Land Loans	3,851	1.6
Secured by Farmland	2,895	1.2
Secured by 1-4 Family Residential Properties	168,911	70.8
Secured by Multifamily (5 or more) Residential Properties	20,689	8.7
Secured by Nonfarm Nonresidential Properties	32,921	13.8
Total Real Estate Loans	229,267	96.1
Commercial and Industrial Loans	2,680	1.1
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	6,561	2.8
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	12	0.0
Less: Unearned Income	0	0.0
Total Loans	238,520	100.0
<i>Source: Reports of Condition and Income</i>		

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires financial institutions to define an assessment area within which its CRA performance will be evaluated. North Brookfield Savings Bank designated a single contiguous assessment area that includes 32 census tracts and includes a portion of the Worcester MA-CT MSA (49340) and a portion of the Springfield MA MSA (44140). The assessment area consists of the following twenty towns located in Worcester County: Athol, Barre, Brookfield, Charlton, East Brookfield, Hardwick, Hubbardston, Leicester, New Braintree, North Brookfield, Oakham, Paxton, Petersham, Phillipston, Rutland, Spencer, Sturbridge, Templeton, Warren, and West Brookfield. The two Hamden County municipalities of Brimfield and Palmer, as well as the two Hampshire County municipalities of Belchertown and Ware, are also included in the bank's assessment area.

Economic and Demographic Data

The bank's assessment area consists of 32 census tracts that reflect the following income designations according to the 2015 ACS Census Data:

- 0 low-income tracts
- 5 moderate-income tracts
- 21 middle-income tracts
- 6 upper-income tracts

The moderate-income census tracts were located in Athol (two), Spencer, Ware, and Warren. The bank maintains a branch in Ware. The assessment area contained no majority minority census tracts; however, there are several opportunity zones. The opportunity zones are areas of economic need recommended by the Governor of Massachusetts and approved by the U.S. Department of Treasury. Many of these zones have the lowest median family income within MA. Within the bank's assessment area, there are five census tracts designated as opportunity zones. They are located in Athol (two), Palmer, Spencer, and Ware.

The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Assessment Area						
Assessment Area: No Brookfield (32 CTs)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	15.6	65.6	18.8	0.0
Population by Geography	157,161	0.0	14.1	60.9	25.0	0.0
Housing Units by Geography	66,390	0.0	16.1	61.4	22.5	0.0
Owner-Occupied Units by Geography	46,023	0.0	11.9	62.6	25.5	0.0
Occupied Rental Units by Geography	14,192	0.0	26.2	58.0	15.8	0.0
Vacant Units by Geography	6,175	0.0	23.9	60.7	15.4	0.0
Businesses by Geography	9,475	0.0	11.1	59.8	29.1	0.0
Farms by Geography	511	0.0	3.5	66.7	29.7	0.0
Family Distribution by Income Level	41,313	18.4	16.6	21.5	43.4	0.0
Household Distribution by Income Level	60,215	22.7	14.5	17.6	45.2	0.0
Median Family Income MSA - 44140 Springfield, MA MSA		\$67,203	Median Housing Value			\$227,090
Median Family Income MSA - 49340 Worcester, MA-CT MSA		\$81,137	Median Gross Rent			\$819
			Families Below Poverty Level			5.7%
<i>Source: 2015 ACS and 2020 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The FFIEC median family income level is used to analyze home mortgage loans under the Borrower Profile criterion. The low-, moderate-, middle-, and upper-income categories for North Brookfield Savings Bank are presented in the following table.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Springfield, MA MSA Median Family Income (44140)				
2020 (\$76,900)	<\$38,450	\$38,450 to <\$61,520	\$61,520 to <\$92,280	≥\$92,280
2021 (\$81,300)	<\$40,650	\$40,650 to <\$65,040	\$65,040 to <\$97,560	≥\$97,560
Worcester, MA-CT MSA Median Family Income (49340)				
2020 (\$95,300)	<\$47,650	\$47,650 to <\$76,240	\$76,240 to <\$114,360	≥\$114,360
2021 (\$96,700)	<\$48,350	\$48,350 to <\$77,360	\$77,360 to <\$116,040	≥\$116,040
<i>Source: FFIEC</i>				

There are 66,390 housing units in the assessment area. Of these, 69.3 percent are owner-occupied, 21.4 percent are occupied rental units, and 9.3 percent are vacant. The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units. Data

obtained from the U.S. Bureau of Labor and Statistics indicates that the September 2022 unemployment rate, not seasonally adjusted, was 3.1 percent for Massachusetts statewide and 3.3 percent for Worcester County, 4.2 for Hampden County, and 2.7 for Hampshire County.

Competition

North Brookfield Savings Bank faces strong competition from other financial institutions that originated loans within the assessment area. In 2021, 326 lenders reported 8,852 home mortgage loans. North Brookfield Savings Bank ranked 18th, reporting 125 home mortgage loans totaling \$24.4 million. This represents 1.4 percent market share by number. The majority of top ranked lenders are comprised of large community banks and non-depository lenders, such as Rocket Mortgage LLC, Fairway Independent Mortgage Corporation, Cornerstone Bank, Freedom Mortgage Corporation, and United Shore Financial Service, LLC. The top ten lenders in the assessment area had a combined market share of 22.6 percent.

Community Contact

As part of the evaluation process, examiners contact third parties active in the assessment area to understand the credit and community development needs of the area. The information obtained helps to determine whether local financial institutions are responsive to those needs. The information also shows what credit and community development opportunities are available.

Examiners contacted a representative from a nonprofit community development financial institution (CDFI) serving Berkshire, Franklin, Hampden, and Hampshire Counties. The organization provides services to low- and moderate-income people, women, people of color and immigrants in Western Massachusetts. The contact described an increase in start-up small businesses over the last two years by individuals pivoting from jobs lost due to the COVID-19 pandemic. The contact noted the area is comprised of a high Puerto Rican population along with other minorities, leading to a lack of understanding of banks and the banking system. Additionally noted, language and cultural barriers for individuals and small business owners present significant challenges for those with limited English Proficiency (LEP). The contact noted a need for financial institutions to reach out and to develop relationships with these communities. The contact also identified the need for non-traditional forms of lending to small businesses that do not meet traditional lending guidelines as commerce returns to the area following the pandemic. Also, small business entrepreneurs would benefit greatly from financial literacy education administered potentially through CDFI nonprofits or other such organizations.

Credit and Community Development Needs and Opportunities

Examiners considered information gathered from the community contact, the bank, and available economic and demographic data to determine the assessment area's primary credit and community development needs. Examiners determined that affordable housing, in the form of credit builder programs, and, for both individuals and small businesses, financial literacy and increased community organization partnerships are primary community development needs. Additionally, direct charitable donations would provide helpful support.

Furthermore, pandemic relief through community development programs remains a current need for residents and businesses. Financial institutions have an opportunity to provide much-needed grants to community development organizations that specialize in providing community services to low- and moderate-income individuals who have been negatively impacted by the COVID-19 pandemic. Finally, economic development opportunities exist in the form of loans to small businesses to support job retention of low- and moderate-income individuals and within low- and moderate-income geographies.

SCOPE OF EVALUATION

General Information

The Community Reinvestment Act (CRA) requires the Massachusetts Division of Banks (“Division”) to use their authority when examining financial institutions subject to their supervision, to assess the institution's record of meeting the needs of its entire assessment area, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the Division must prepare a written evaluation of the institution's record of meeting the credit needs of its membership.

This evaluation covers the period from the prior evaluation dated September 17, 2018, to the current evaluation dated November 28, 2022. The Massachusetts Division of Banks (“Division”) conducted this evaluation concurrently with the Federal Reserve Bank of Boston using the Interagency Small Institution Examination procedures. The procedures encompass the Lending Test.

The Lending Test considered the institution’s performance according to the following criteria.

- Loan-to-deposit ratio
- Assessment area concentration
- Geographic distribution
- Borrower profile
- Response to CRA-related complaints
- Fair lending policies and procedures

Loan Products Reviewed

Examiners determined that the bank’s major product line is home mortgage lending. This conclusion considered the bank’s business strategy and the number and dollar volume of loans originated during the evaluation period.

Examiners evaluated the bank’s home mortgage lending performance from January 1, 2020 to December 31, 2021. Loan data for 2020 and 2021 was obtained from the Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LARs) for the respective periods. The bank reported 189 home mortgage loans totaling \$39.3 million in 2020 and 156 loans totaling \$32.1 million in 2021. The bank’s home mortgage lending performance was compared to the 2020 and 2021 aggregate lending data and demographic data.

Demographic information referenced in this evaluation was obtained using 2015 American Community Survey (ACS) data, Dun & Bradstreet and the U.S. Bureau of Labor Statistics (BLS). Financial data about the bank came from the September 20, 2022, Report of Income and Condition (Call Report.) Although the total dollar amounts of loans are discussed, the evaluation focuses on the bank’s lending performance by the number of loans originated during the review period.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

North Brookfield Savings Bank demonstrated satisfactory performance under the Lending Test. Loan-to-Deposit, Assessment Area Concentration, and Geographic Distribution primarily support this conclusion.

Loan-to-Deposit Ratio

The bank's average net loan-to-deposit ratio (LTD) is reasonable given the institution's size, financial condition, and assessment area credit needs. The bank's net LTD ratio, calculated from Call Report data, averaged 83.7 percent over the past 17 calendar quarters from September 30, 2018, to September 30, 2022. This ratio ranged from a high of 94.5 percent as of September 30, 2019, to a low of 71.3 percent as of June 30, 2022, and showed an overall decreasing trend during the evaluation period. The trend was attributed to impacts from the COVID-19 pandemic that included increasing deposit levels from stimulus funds to individuals and businesses as well as decreased loan levels surrounding focus on the Small Business Administration's (SBA) Payroll Protection Program loan program.

The bank's average LTD ratio was compared to that of three similarly situated institutions based on asset size, lending focus, geographic location, and branching structure. North Brookfield Bank's average LTD ratio is above two similarly situated institutions.

Loan-to-Deposit (LTD) Ratio Comparison		
Institution	Total Assets as of 9/30/2022 (\$000s)	Average Net LTD Ratio (%)
Charles River Bank	326,863	76.7
Dean Co-Operative Bank	436,642	80.1
North Brookfield Savings Bank	362,481	83.7
Bay State Savings Bank	497,041	99.9

Source: Reports of Condition and Income 09/30/2018 - 09/30/2022

Assessment Area Concentration

The bank made a majority of its home mortgage loans, by number and dollar volume, within its assessment area. See the following table for details.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2020	152	80.4	37	19.6	189	29,349	74.6	9,988	25.4	39,337
2021	125	80.1	31	19.9	156	24,200	75.5	7,874	24.6	32,074
Total	277	80.3	68	19.7	345	53,550	75.0	17,862	25.0	71,412

Source: Bank Data; Due to rounding, totals may not equal 100.0%

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The bank's assessment area includes no low-income census tracts.

As there are zero low-income census tracts within the bank's assessment area, there is no lending performance in low-income census tracts under this criterion. In 2020 and 2021, the bank originated 8.6 and 9.6 percent, respectively, of its home mortgage loans within moderate-income census tracts. This performance is below both the aggregate and demographic performances. While the performance decreased by number year over year, the performance increased by percentage. Market share data further supports the bank's performance in moderate-income census tracts. In 2020, North Brookfield Savings Bank had a market share of 1.9 percent in moderate-income census tracts within the assessment area, ranking 10th out of 172 lenders. The bank's market share declined slightly to 1.8 percent in 2021, with a ranking of 11th with an increased number of lenders in the assessment area of 197.

The following table illustrates the bank's dispersion of home mortgage loans by census tract income level within the assessment area.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	0.0	0	0.0	0	0.0
Moderate						
2020	11.9	10.2	13	8.6	2,124	7.2
2021	11.9	10.9	12	9.6	1,749	7.2
Middle						
2020	62.6	56.2	118	77.6	21,687	73.9
2021	62.6	57.9	100	80.0	19,820	81.9
Upper						
2020	25.5	33.6	21	13.8	5,539	18.9
2021	25.5	31.2	13	10.4	2,631	10.9
Not Available						
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	0.0	0	0.0	0	0.0
Totals						
2020	100.0	100.0	152	100.0	29,350	100.0
2021	100.0	100.0	125	100.0	24,200	100.0

Source: 2015 ACS; Bank Data, 2020 & 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Borrower Profile

The bank's performance within distribution of borrowers over the evaluation period reflects, given the demographics of the assessment area, good penetration among individuals of different income levels.

For performance in originations or purchases of home mortgage loans within the assessment area to low-income borrowers, the bank's 2020 performance of 10.5 percent and 2021 performance of 10.4 percent exceeded aggregate performance, however, it trailed the assessment area demographic.

Additional factors support the bank's performance under this criterion. The bank's assessment area does not include any low-income census tracts. The median housing value in the assessment area is \$227,090. Low-income borrowers would likely not be able to qualify for such a mortgage under conventional underwriting standards. In addition, 5.7 percent of families within the assessment area are classified as being below the poverty level.

In 2020, the bank originated 20.4 percent of its home mortgage loans within the assessment area to moderate-income borrowers. This is above both the aggregate and the assessment area demographics. In 2021, the bank's lending to moderate-income borrowers increased to 28.8 percent. This was also above both aggregate and assessment area demographics.

North Brookfield Savings Bank ranked 11th out of 140 lenders that originated or purchased a home mortgage loan in the assessment area to low-income borrowers with 1.8 percent market share, and 11th out of 197 lenders that originated a home mortgage loan to moderate-income borrowers with 1.8 percent market share.

The following table illustrates the bank’s dispersion of home mortgage loans by borrower income level within the assessment area.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2020	18.4	6.3	16	10.5	1,666	5.7
2021	18.4	7.1	13	10.4	1,618	6.7
Moderate						
2020	16.6	19.6	31	20.4	4,850	16.5
2021	16.6	22.5	36	28.8	6,102	25.2
Middle						
2020	21.5	25.6	39	25.7	7,622	26.0
2021	21.5	24.4	36	28.8	7,011	29.0
Upper						
2020	43.4	32.8	62	40.8	14,364	48.9
2021	43.4	29.8	40	32.0	9,469	39.1
Not Available						
2020	0.0	15.7	4	2.6	847	2.9
2021	0.0	16.2	0	0.0	0	0.0
Totals						
2020	100.0	100.0	152	100.0	29,349	100.0
2021	100.0	100.0	125	100.0	24,200	100.0

Source: 2015 ACS; Bank Data, 2020 & 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Response to Complaints

The bank has not received any CRA-related complaints since the last CRA evaluation; therefore, this criterion did not affect the CRA rating.

Fair Lending Policies and Procedures

The Division of Banks provides comments regarding the institution’s fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-106. A review of the bank’s public comment file indicated the bank received no complaints pertaining to the institution’s CRA performance since the previous examination. The fair lending review was conducted in accordance with the Federal Financial Institutions Examination Council (FFIEC) Interagency Fair Lending Examination Procedures.

While no violations of anti-discrimination laws were identified, based on these exam procedures, weaknesses were identified in the bank’s record relative to fair lending policies and practices, and the bank is aware of needed improvements within their fair lending program to adhere to regulatory expectations outlined in the Division’s Regulatory Bulletin 1.3-106 and interagency procedures.

Minority Application Flow

The bank’s HMDA LARs for 2020 and 2021 were reviewed to determine if the application flow from the different racial groups within the bank’s assessment area was reflective of the assessment area’s demographics.

According to the 2015 ACS Census Data, the bank’s assessment area contained a total population of 157,161 individuals, of which 5.6 percent are minorities. The minority population represented is 0.7 percent Black/African American, 1.0 percent Asian/Pacific Islander, 0.1 percent American Indian/Alaskan Native, 2.8 percent Hispanic or Latino, and 1.0 percent other.

The bank’s level of lending in 2020 and 2021 was compared with that of the 2020 and 2021 aggregate’s lending performance. The comparison of this data assists in deriving reasonable expectations for the rate of applications the bank received from minority home mortgage loan applicants. Refer to the table below for information on the bank’s minority application flow as well as the aggregate lenders in the bank’s assessment area.

MINORITY APPLICATION FLOW						
RACE	Bank 2020 HMDA		2020 Aggregate Data	Bank 2021 HMDA		2021 Aggregate Data
	#	%	%	#	%	%
American Indian/ Alaska Native	2	0.9	0.3	0	0.0	0.4
Asian	0	0.0	1.3	1	0.5	1.4
Black/ African American	0	0.0	1.3	1	0.5	2.0
Hawaiian/Pacific Islander	0	0.0	0.1	0	0.0	0.1
2 or more Minority	0	0.0	0.1	0	0.0	0.1
Joint Race (White/Minority)	1	0.4	1.2	0	0.0	1.0
Total Racial Minority	3	1.3	4.3	2	1.0	5.0
White	187	82.0	74.5	171	84.2	71.8
Race Not Available	38	16.7	21.2	30	14.8	23.2
Total	228	100.0	100.0	203	100.0	100.0
ETHNICITY						
Hispanic or Latino	3	1.3	3.6	1	0.5	4.3
Joint (Hisp/Lat /Not Hisp/Lat)	1	0.4	1.4	0	0.0	1.3
Total Ethnic Minority	4	1.7	5.0	1	0.5	5.6
Not Hispanic or Latino	160	70.2	72.3	155	76.4	70.9
Ethnicity Not Available	64	28.1	22.7	47	23.1	23.5
Total	228	100.0	100.0	203	100.0	100.0
<i>Source: ACS Census 2015, HMDA Aggregate Data 2020 and 2021, HMDA LAR Data 2020 and 20221</i>						

In 2020, the bank received 228 HMDA reportable loan applications within its assessment area. Of these applications, three applications or 1.3 percent were received from racial minority applicants. This was below aggregate performance of 4.3 percent of its applications from racial minority applicants. For the same period, the bank received 4 or 1.7 percent of all applications from ethnic groups of Hispanic origin within its assessment area. This was also below an aggregate ethnic minority application rate of 5.0 percent.

In 2021, the bank received 203 HMDA reportable loan applications within its assessment area. Of these applications, 2 or 1.0 percent were received from racial minority applicants. The aggregate received 5.0 percent of its applications from racial minority applicants. For the same period, the bank received one application or 0.5 percent of all applications from ethnic groups of Hispanic origin within its assessment area. This was below an aggregate ethnic minority application rate of 5.6 percent.

In the minority application flow analysis, examiners also considered the demographic composition of the assessment area, comparisons to aggregate data (increasing trend), and the bank's fair lending controls. Performance in 2020 and 2021 reflect a minority application flow well below aggregate lending. Examiners encourage bank management to be cognizant of business strategies that will aid in improving the minority application flow.

GLOSSARY

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

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five-year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the institution under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

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.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g, geographic distribution, borrower profile, 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 do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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.

Rated Area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Upper-Income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 167, Section 14, as amended, requires all financial institution to take the following actions within 30 business days of receipt of the CRA evaluation of their institution:

- 1) Make its most current CRA performance evaluation available to the public;
- 2) At a minimum, place the evaluation in the institution's CRA public file located at the head office and at a designated office in each assessment area;
- 3) Add the following language to the institution's required CRA public notice that is posted in each depository facility:

"You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Massachusetts Division of Banks, at (35 Summer Street North Brookfield, Massachusetts 015351).

[Please Note: If the institution has more than one assessment area, each office (other than off-premises electronic deposit facilities) in that community shall also include the address of the designated office for that assessment area.]

- 4) Provide a copy of its current evaluation to the public, upon request. In connection with this, the institution is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the institution's evaluation, as prepared by its supervisory agencies, may not be altered or abridged in any manner. The institution is encouraged to include its response to the evaluation in its CRA public file.



CRA PUBLIC FILE

**Banking Center Locations and Hours of Operation
As of: June 24, 2024**

Branch Name	Address	City	State	Zip	County Name	State Code	MSA/MD Code	Census Tract	Census Tract Income	Lobby Hours	Drive-Thru Hours
Corporate Offices & Residential Loan Center	35 Summer St	North Brookfield	MA	01535	Worcester	25	49340	7251.00	Middle	M-F 8:30 am- 4:30 pm	N/A
Commercial Business Center	40 Main St, Route 9	Ware	MA	01082	Hampshire	25	44140	8201.02	Moderate	M-F 8:30 am-4:30 pm	N/A
North Brookfield Branch	9 Gilbert St	North Brookfield	MA	01535	Worcester	25	49340	7251.00	Middle	M-W 8:30 am- 4 pm Th-F 8:30 am- 5 pm Sat 9am - 12pm	M-W 8:30 am- 4 pm Th-F 8:30 am- 5 pm Sat 9am - 12pm
East Brookfield Branch	100 West Main St, Route 9	East Brookfield	MA	01515	Worcester	25	49340	7591.00	Middle	M-W 8:30 am- 4 pm Th-F 8:30 am- 5 pm Sat 9am - 12pm	M-W 8:30 am- 4 pm Th-F 8:30 am- 5 pm Sat 9am - 12pm
West Brookfield Branch	128 West Main St, Route 9	West Brookfield	MA	01585	Worcester	25	49340	7241.00	Middle	M-W 8:30 am- 4 pm Th-F 8:30 am- 5 pm Sat 9am - 12pm	M-W 8:30 am- 4 pm Th-F 8:30 am- 5 pm Sat 9am - 12pm
Ware Branch	40 Main St, Route 9	Ware	MA	01082	Hampshire	25	44140	8201.02	Moderate	M-W 9 am- 4 pm T-F 9 am- 5 pm Sat 9am - 12pm	M-W 9 am- 4 pm T-F 9 am- 5 pm Sat 9am - 12pm



North
Brookfield
SAVINGS BANK

Branch Name	Address	City	State	Zip	County Name	State Code	MSA/MD Code	Census Tract	Census Tract Income	Lobby Hours	Drive-Thru Hours
Belchertown Branch	4 Daniel Shays Highway, Routes 9 & 202	Belchertown	MA	01007	Hampshire	25	44140	8202.05	Upper	M-W 9 am- 4 pm Thur 9 am- 4 pm Fri 9 am- 4 pm Sat 9am - 12pm	M-W 9 am- 4 pm Thur 9 am- 4 pm Fri 9 am- 4 pm Sat 9am - 12pm
Three Rivers Branch	2060 Main St	Three Rivers	MA	01080	Hampden	25	44140	8103.00	Middle	M-W 8:30 am- 4 pm Th-F 8:30 am- 5 pm Sat 9am - 12pm	M-W 8:30 am- 4 pm Th-F 8:30 am- 5 pm Sat 9am - 12pm



CRA PUBLIC FILE

Banking Centers Opened and Closed Calendar Years 2021 – 2023

Branch Name	Address	City	State	Zip	County Name	State Code	MSA/MD Code	Census Tract	Census Tract Income	Date Purchased / Opened	Date Sold / Closed
Palmer, MA	1051 Thorndike Street	Palmer	MA	01069	Hampden	25	44140	8101.00	Upper	N/A	01.06.2023



Start their financial success story today.

It is never too early to start teaching children the basics of banking and to give them the confidence that comes along with earning, saving and spending wisely. Plus, we believe that students should be able to take advantage of the benefits of savings and checking accounts, so that is why we have created these specially tailored products just for them!

High Five Savings

This savings account is available to children and young adults under 19 years of age.

- **PREMIUM RATE*** for balances up to \$500
- Minimum to open: \$1
- NO minimum weekly deposit required
- NO monthly service charges
- FREE telephone banking
- FREE Online Banking
- FREE Mobile Banking with Mobile Check Deposit
- Direct deposit
- Cash for good grades

**This account is available to children and young adults under 19 years of age whose parent or legal guardian co-owns the account with them. Balances of up to \$500 will earn the current premium rate; balances over \$500 earn the statement savings account rate. Rate is variable. Account converts to statement savings when owner reaches age 19. The account can be opened at any time during the year. Limit of one account per minor tax owner. Transaction limitations apply. Rate subject to change after account is opened. Fees may reduce the earnings on these accounts.*

Teen Checking

This non-interest bearing account, available to teens ages 15-18, offers the following benefits:

- Minimum to open: \$10
- FREE basic style checks up to conversion of account at age 19
- FREE unlimited checking
- FREE ATM transactions at SUM® and MoneyPass® ATMs
- FREE Debit card
- FREE Online Banking
- FREE Mobile Banking with Mobile Check Deposit
- FREE telephone banking
- eStatements for monthly account statement
- Cash for good grades

This account is available to teens aged 15 – 18 whose parent or legal guardian co-owns the account with them. Overdraft privilege is not available for the Teen Checking account. Account converts to Free Checking Plus account when owner reaches age 19.

(OVER)

Cash for Good Grades

Start earning cash today!

North Brookfield Savings Bank is proud to offer our Cash for Good Grades incentive as a way to encourage students to do their best in school and allow them to earn some extra money to save.

The Cash for Good Grades incentive is a maximum of \$20 per school year, with a maximum of \$5 per quarter.

To receive Cash for Good Grades, report cards showing a GPA of at least 3.0 or equivalent must be submitted to a North Brookfield Savings Bank branch location. The incentive will be deposited into the student's account.



CORPORATE OFFICES
35 Summer Street, North Brookfield
508-867-7442

**LOAN CENTER
MORTGAGE & BUSINESS CENTER**
35 Summer Street, North Brookfield
508-867-1302

NORTH BROOKFIELD BRANCH
9 Gilbert Street
508-867-7443

EAST BROOKFIELD BRANCH
100 West Main Street, Rt. 9
508-867-1322

WEST BROOKFIELD BRANCH
128 West Main Street, Rt. 9
508-867-5821

WARE BRANCH
40 Main Street, Rt. 9
413-967-6271

WARE BUSINESS CENTER
40 Main Street, Rt. 9
508-637-7500

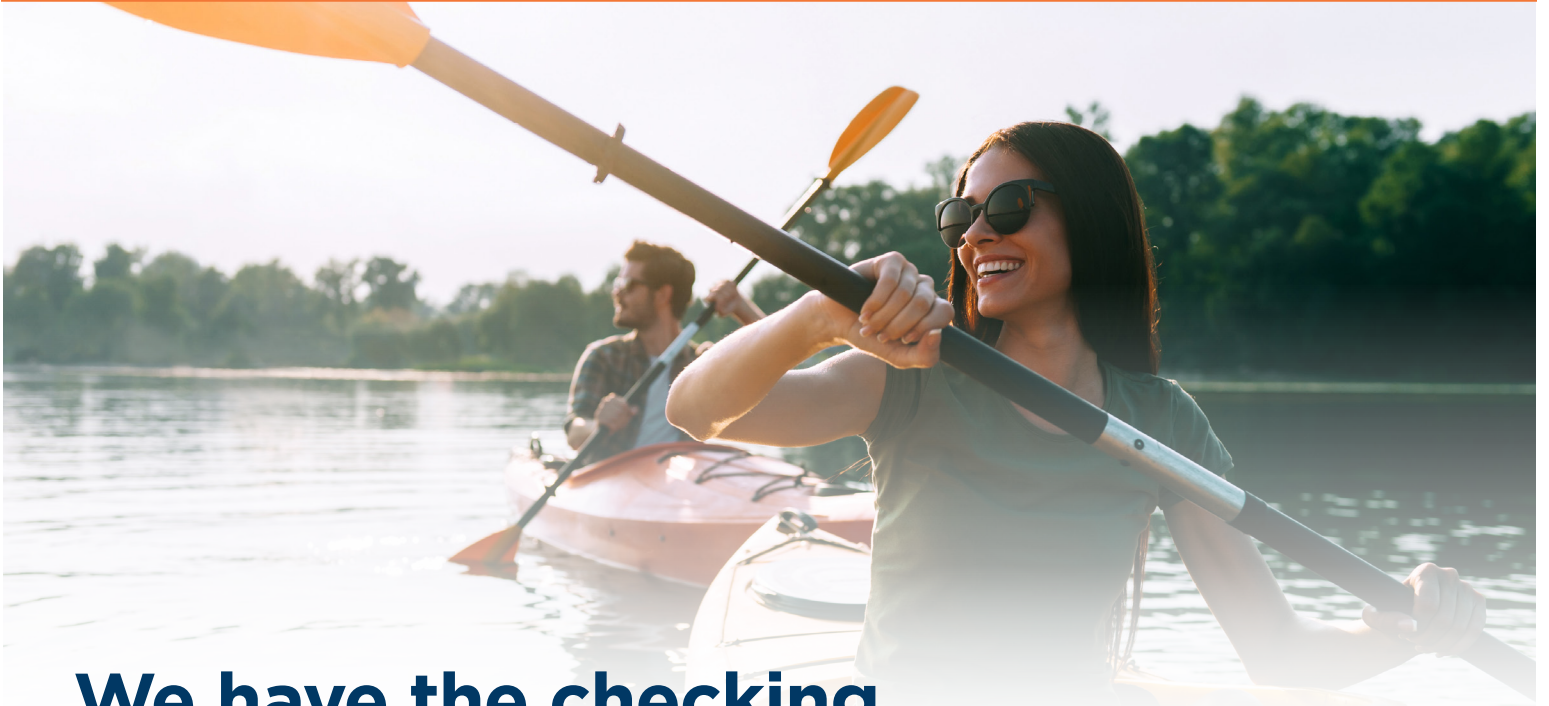
**BELCHERTOWN BRANCH
& BUSINESS CENTER**
4 Daniel Shays Highway, Rts. 9 & 202
413-323-8416

THREE RIVERS BRANCH
2060 Main Street
413-283-5681



North
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#804 03/22



We have the checking account that is right for you.

With a variety of checking accounts to choose from you are sure to find a account that will fit your specific financial needs.

FREE Checking Plus

If a checking account that's truly free is what you have been searching for, then our Free Checking account is right for you. This non-interest bearing account offers the following benefits:

- Minimum to open: \$50
- FREE unlimited checking
- FREE first order of basic style checks
- FREE ATM transactions at SUM® and MoneyPass® participating ATMs
- FREE Debit Card
- FREE Online Banking and Bill Pay
- FREE Mobile Banking with Mobile Check Deposit
- FREE telephone banking
- FREE night depository
- Direct deposit / Automatic withdrawal
- NO monthly service charges

18/65 FREE Checking Plus

This non-interest bearing account is designed for those under the age of 18 and over the age of 65.

- Minimum to open: \$50
- You can take advantage of all of the benefits of our Free Checking Plus account in addition to...
- FREE basic styles checks for life

NOW Account

This interest bearing account offers the following benefits:

- Minimum to open: \$50
- FREE use of NBSB ATMs
- FREE Debit Card
- FREE Online Banking and Bill Pay
- FREE Mobile Banking with Mobile Check Deposit
- FREE telephone banking
- FREE night depository
- Direct deposit / Automatic withdrawal
- NO per check charges

(OVER)

Business **FREE** Checking Plus

This non-interest bearing account offers the following benefits:

- Minimum to open: \$50
- FREE unlimited checking
- NO monthly service charges
- NO per check charges
- FREE ATM transactions at SUM® and MoneyPass® ATMs
- FREE Online Banking and Bill Pay
- FREE Mobile Banking with Mobile Check Deposit
- FREE Debit card
- Direct deposit / Automatic withdrawal
- FREE telephone banking
- FREE night depository

Teen Checking

This non-interest bearing account, available to teens ages 15-18, offers the following benefits:

- Minimum to open: \$10
- FREE basic style checks up to conversion of account at age 19
- FREE unlimited checking
- FREE ATM transactions at SUM® and MoneyPass® ATMs
- FREE Debit card
- FREE Online Banking and Bill Pay
- FREE Mobile Banking with Mobile Check Deposit
- FREE telephone banking
- eStatements for monthly account statement

This account is available to teens aged 15 - 18 whose parent or legal guardian co-owns the account with them. Overdraft privilege is not available for the Teen Checking account. Account converts to Free Checking Plus account when owner reaches age 19.

Tiered Money Market Checking

Variable rate account . Earn premium interest rates and have full access to your funds at any time.

- Minimum to open: \$50
- NO monthly service charges
- FREE first order of basic style checks
- FREE Online Banking
- FREE Mobile Banking with Mobile Check Deposit
- Direct deposit
- FREE telephone banking

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Learn more by visiting NorthBrookfieldSavingsBank.com or speaking with a NBSB representative.



Club Accounts

Save for vacation or the holidays and receive your funds by check automatically.

- Minimum to open: \$10
- NO minimum weekly deposit required
- NO monthly service charges
- FREE Online Banking
- FREE Mobile Banking with Mobile Check Deposit
- Direct deposit
- Automatic annual renewal

*Vacation Club checks received by June 1
Holiday Club checks received by November 1*

High Five Savings

This savings account is available to children and young adults under 19 years of age*.

- **PREMIUM RATE* for balances up to \$500**
- Minimum to open: \$1
- NO minimum weekly deposit required
- NO monthly service charges
- FREE telephone banking
- FREE Online Banking
- FREE Mobile Banking with Mobile Check Deposit
- Direct deposit

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Earn cash for good grades!

Cash for good grades incentive is a maximum of \$20 per school year, with a maximum of \$5 per quarter. To receive Cash for Good Grades, report cards showing a GPA of at least 3.0 or equivalent must be submitted to a NBSB branch location. The incentive will be deposited into the student's account.

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Learn more by visiting NorthBrookfieldSavingsBank.com or speaking with a NBSB representative.





Retirement - It's never too early to start saving

The time is now to begin investing in your retirement. To help insure that those “Golden Years” are GOLDEN, it’s never too early to begin. Starting now, is the key to success.

An average, middle aged, two income American family lives paycheck-to-paycheck. With life expectancies increasing, how will you be prepared for a retirement that could potentially span twenty, maybe thirty years? How will you keep your welfare, as well as the welfare of your family, in mind when choosing your investments?

Depending on your needs and status, a Traditional or Roth IRA can help you save and make a big difference in your future!

IRA Accounts

An Individual Retirement Account (IRA) will help you save for retirement by maximizing the forces of compound interest and tax savings.

While all IRAs are designed to help you save for retirement, each one has unique benefits and eligibility requirements. Choosing the right IRA is simple once you understand what sets them apart.

Traditional IRA

Traditional IRAs allow you to defer taxes on the earnings on your contributions until they are withdrawn. Also, certain contributions may be tax deductible in the tax year for which you make them. You can contribute to a Traditional IRA up to the maximum amount allowed by the IRS and your income.

Roth IRA

Roth IRAs allow you to make only nondeductible contributions and feature tax-free withdrawals for certain distribution reasons after a five-year holding period. Since Roth contributions are nondeductible and taxed in the year they are earned, if you expect to be in a higher tax bracket when you retire, you may benefit more from a Roth IRA than from a traditional IRA. You can contribute to a Roth IRA at any age, up to the maximum amount allowed by the IRS. However, your income does limit how much you can contribute.

SEP IRA

Simplified Employee Pension (SEP) IRAs are for business owners who want to provide retirement benefits for themselves and their employees.

(OVER)

Easy to Save Features

We make saving for retirement easier with our flexible, convenient, and value-added features. With NBSB's IRA accounts you have no annual plan fee and you can easily establish direct deposit or automatic transfers into your account.

IRA's can be established with as little as \$10.

- IRA Regular Savings – minimum to open \$10
- Tiered Money Market IRA – minimum to open \$10
- IRA Certificate – minimum to open \$500

Benefits of an IRA

With a wide variety of competitive, safe, and fully insured IRA investment accounts, we can help you reach your goals.

- Tiered Money Market Checking
- Certificates of Deposit (CDs)
- Savings Accounts

If you already have an IRA, you can make it easier to manage by transferring it from other institutions into one consolidated account.

Contributions to Your IRA

It's up to you how you would like to contribute to your IRA. You may contribute any amount up to 100% of your compensation or contribution limit, whichever is less, to a traditional IRA, or aggregated between a traditional and a Roth IRA. But remember, you still benefit from making yearly contributions even if you can't contribute the maximum amount.

Contribution Tax Deduction

Contributions to Traditional IRA/SEP IRA may be tax deductible. Consult a tax adviser for further information regarding the deductibility of interest and charges.

IRA Rollovers

If you're changing employers, an IRA rollover makes sense. If you are retiring or changing jobs and anticipate withdrawing money from your employer's retirement plan, you can avoid withdrawal penalties by transferring your assets into an IRA or another qualified plan. You can ask your employer to arrange for a "direct rollover" of your money into a new IRA account with us, or you can do it yourself with an IRA-to-IRA rollover.

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508-867-7442

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MORTGAGE & BUSINESS CENTER

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The consumer should consult a tax adviser for further information regarding the deductibility of interest and charges.



The Importance of Offering Value

We understand the importance of offering value to our customers. By offering competitive rates, a wide range of loan products, and experienced local lending professionals, you'll see why so many of your friends and neighbors have chosen NBSB to assist them with their financing needs.

Lending Solutions

- Residential Mortgages
- Residential Investment Mortgages
- Construction Loans
- Land Loans
- Home Equity Loans
- Auto Loans
- Personal Loans

Residential Mortgage Lending

First Time Home Buyer Program

- Streamlined Pre-Qualification Process
- Minimum 3% Down Payment
- Quick Loan Approval Process

Adjustable Rate Mortgages (ARM)

- Interest rate will adjust after a fixed period of time
- Competitive rates with various term options available

Construction Mortgages

- Monthly payments are interest-only during the construction period (First 12 months)
- Extended rate lock for up to 180 days available
- Finance the acquisition of land and cost of construction in one closing

(OVER)

Home Equity Loans

Home Equity Lines of Credit

- Access the available equity you have in your home to make home improvements, debt consolidation, or for any major expenses.
- As you repay your outstanding balance, the amount of available credit is replenished

Fixed Rate Equity Loan

- No Closing Costs
- Rate is fixed for the life of the loan

Consumer Lending

Auto Loan, Boat Loan, Recreational Vehicle/Motor Home

- NO Application fee
- Quick approval process
- Competitive rates
- All credit decisions made locally
- Pre-qualifications available

Mass Save® Heat Loan

- NO Application fee
- Quick approval process
- All credit decisions made locally
- Pre-qualifications available

Unsecured Personal Loan

- Borrow money for any purpose
- Competitive rates
- Low fixed monthly payments

Savings Secured Loans

Credit Builder Loan

- Build or rebuild your credit rating
- Fast approval with no credit report or income verification



EQUAL HOUSING
LENDER Member FDIC
Member DIF

NMLS ID #: 641656

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35 Summer Street, North Brookfield
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WARE BUSINESS CENTER

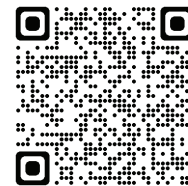
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North
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24 Hour Banking from Anywhere

At North Brookfield Savings Bank, we know that your banking needs don't stop at closing time. Whether you're at home, in your office, or halfway around the world, you can access your North Brookfield Savings Bank accounts 24 hours a day, 7 days a week.

Free Online Banking

Sign up today for Online Banking and easily manage your personal and business accounts.

Accounts: View balances, transactions, statement history and check images.

Transfers: Transfer funds between your NBSB accounts or set up scheduled transfers.

eStatements & eLoanBills: Enroll and view your statements online.

Loan Payments: Make loan payments to NBSB loan accounts.

Manage Alerts: Set customized account alerts to receive by email or text.

Debit Card: Activate or deactivate debit cards, submit travel notifications, and more!

FREE Bill Pay*

Bill Pay is an easy to use, secure environment with enhanced fraud monitoring.

Pay All of your Bills Securely in one place with one password, to anyone in the U.S.

Receive eBills: Set-up and receive eBills instead of paper bills for participating billers.

Flexible Payments Options: Schedule your future, recurring, one-time or rush payments.

Bill Pay History: View a complete bill payment history and bill payment status.

Set Reminders: Keep track of due dates by setting payment reminders for bills.

* Fee for rush delivery

NBSB Mobile Banking App

All of the outstanding features of our online banking services are available anytime, anywhere on our NBSB Mobile Banking App.

- Mobile Check Deposit¹
- Check Balances and Transactions
- Fingerprint ID or Face ID log in on eligible devices
- Transfer Funds
- Pay Bills
- Set and Manage budgets
- Debit Card Controls

(OVER)

Mobile Check Deposit¹

If you can't make it to the bank, no problem! With our convenient mobile check deposit feature, you can easily deposit your check directly from the NBSB Mobile Banking App by using your mobile device's camera. Follow the steps in the Mobile App to get started.

eStatements & eLoanBills

eStatements are electronic copies of your account statements that you can view, search, save and print online. Simply sign in to your Online Banking to view your statement.

Early Payday (Direct Deposit)

Automatically receive your direct deposit a day before you normally would.

Mobile Wallet*

Apple Pay®, Google Pay™ & Samsung Pay are safe and secure ways to utilize your NBSB debit card for quick and easy payments. Whether you are shopping for groceries, paying for lunch, or purchasing clothes you can use Mobile Wallet to pay at millions of store locations.

Debit and ATM Card

Get 24/7 access at ATMs and merchants, locally and around the world. Plus, your card is protected with fraud monitoring.

Get cash from your checking or savings accounts, deposit into your account at an NBSB ATM, check balances & transfer funds, and make purchases at merchant locations that accept MasterCard®.



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EQUAL HOUSING
LENDER Member FDIC
Member DIF

1. NBSB Deposit on the Go mobile check deposit is available to customers with an active checking, statement savings or money market account. Funds deposited through NBSB Deposit on the Go mobile check deposit will not be available for immediate withdrawal. Deposit limits and other restrictions may apply.

*Mobile wallet is free of charge. However, data rates may apply through your mobile service provider. Please check your plan for details. A mobile network or WIFI connection is required. Check with your service provider for details on specific fees and charges. Google Pay is a trademark of Google LLC. Android, Google Pay, and the Google Logo are trademarks of Google LLC. Samsung, Samsung Pay, Galaxy s (and other device names) and Samsung Knox are trademarks or registered trademarks of Samsung Electronics Co., Ltd. Other company and product names mentioned may be trademarks of their respective owners. Screen images are simulated; actual appearance may vary. Samsung Pay is available on select Samsung devices. Apple Pay is a trademark of Apple Inc., registered in the U.S. and other countries.



Account Services and Fees-Fee changes are in bold/italized.

Automatic overdraft account transfer service fee – per transfer	\$	5.00
Insufficient (NSF) / Uncollected (UCF) funds fee – per item paid or returned ¹	\$	30.00
Deposited item returned unpaid – per item	\$	7.16
Stop payment charge – per item or range of items	\$	30.00
Tax levy processing fee – per account	\$	100.00
Lost ATM or debit card replacement fee	\$	10.00
Foreign ATM/debit card withdrawals or transfers – each ²	\$	1.00
Foreign ATM/debit card balance inquiries – each ²	\$	0.25
Inactive account fee per month (after 1 year) ¹	\$	4.00
Dormant account fee per month (after 2 years) ¹	\$	4.00
Abandoned property fee (after 3 years)	\$	50.00
Early closeout fee (closed within 6 months of opening) ¹	\$	20.00
Excess withdrawal fee Money Market/Statement Savings	\$	10.00
Maintenance service charge³	\$	5.00
Checkbook orders – please contact a CSR		Varies
Online Bill Pay - Same Day Rush Delivery fee (electronic) ⁴	\$	9.95
Online Bill Pay - Next Day Rush Delivery fee (paper) ⁴	\$	12.95
Basic Business Checking - per check	\$	0.10

1. Insufficient/UCF Fees may be incurred on checks, ATM/debit card transactions, internet banking transactions including bill pay, in-branch or automatic withdrawals, or other electronic means. An item returned unpaid due to insufficient/uncollected funds may be presented one time with an Insufficient/UCF fee being assessed. Account holders with 18-65 accounts will be charged Insufficient/UCF fees of \$5 per item; inactive, dormant, and early closeout fees are waived.

2. Fees do not apply to Free Checking Plus, 18-65 Free Checking Plus, Teen Checking, or Business Free Checking Plus accounts.

3. Monthly Maintenance service charge for Now Accounts will be waived with direct deposit or minimum daily balance of \$500.

4. Per payment. Fees for the transaction are displayed on the screen before completing transaction. Rush Delivery transaction type and availability is based on merchant and merchant cut-off times.

Bank Checks and Money Orders

Bank checks/money orders - one free per day	\$	3.00
Bank check/money order stop payment – per item	\$	30.00

Safe Deposit Boxes

Safe deposit lost key	\$	25.00
Safe deposit late charge fee - 30 days or more past due	\$	20.00
Safe deposit box drilling	\$	250.00
Annual safe deposit box rental – please contact a CSR		Varies

Wire Transfer Fees

Outgoing domestic wire transfer	\$	25.00
Incoming domestic wire transfer	\$	10.00
Outgoing foreign wire transfer	\$	35.00
Incoming foreign wire transfer	\$	30.00

Research

Account research – hourly	\$	35.00
Statement copies – per statement	\$	5.00
Check copies – per check	\$	5.00

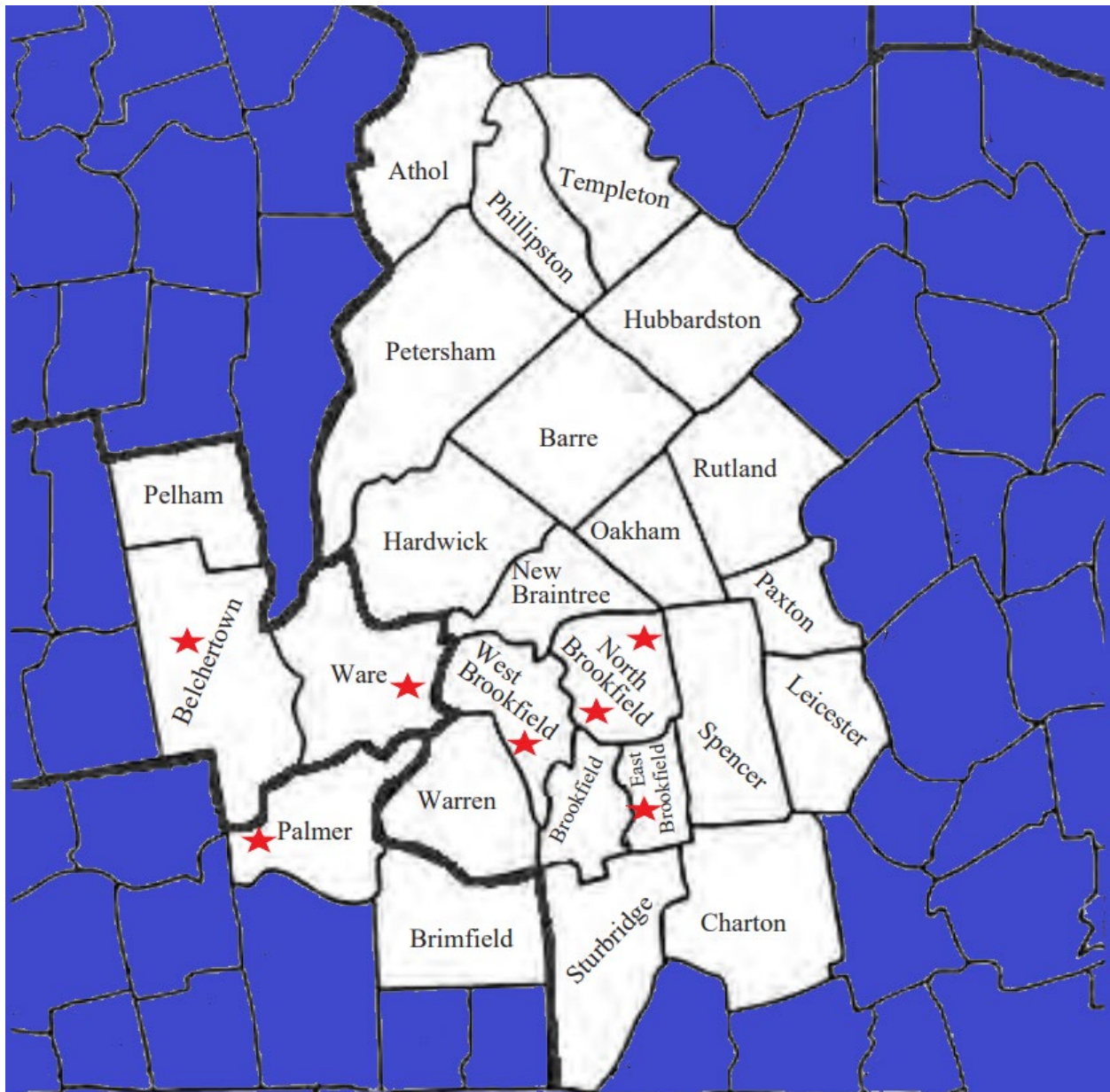
Miscellaneous

Domestic check collection fee - per item	\$	20.00
Foreign check collection fee – per item	\$	35.00
IRA outgoing transfer fee – per transfer	\$	50.00
SEP employer processor fee per account	\$	20.00
Foreign currency orders/exchanges	\$	20.00
Returned Mail fee per account per month	\$	5.00
Photocopies/faxes – each	\$	2.00

CRA PUBLIC FILE

Assessment Area Map and Census Tracts

North Brookfield Savings Bank's Assessment Area consists of twenty-five (25) towns within three (3) counties: Worcester, Hampden, and Hampshire. Within the assessment area there are seven (7) locations indicated in red.





City/Town	Census Tract(s)
Athol	7031.00 7032.00 7033.00
Barre	7221.00
Belchertown / Pelham	8202.05 8202.06 8202.07
Brimfield	8138.02
Brookfield	7601.00
Charlton	7561.01 7561.02
East Brookfield	7591.00
Hardwick / New Braintree	7231.00
Hubbardston	7061.00
Leicester	7351.00 7352.00
North Brookfield	7251.00
Oakham	7211.01
Palmer	8101.00 8102.00 8103.00
Paxton	7271.00
Petersham	7042.02
Phillipston	7042.01
Rutland	7211.03 7211.04
Spencer	7261.00 7262.00
Sturbridge	7581.01 7581.03 7581.04
Templeton	7051.01 7051.02
Ware	8201.01 8201.02
Warren	7611.00
West Brookfield	7241.00



CRA PUBLIC FILE

HMDA Disclosure Statement

North Brookfield Savings Bank's annual Home Mortgage Disclosure Act (HMDA) disclosure statements, the Loan Application Register, showing the annual applications for reportable home mortgage applications are available on the following Consumer Financial Protection Bureau (CFPB) website:

www.consumerfinance.gov/data-research/hmda/



CRA PUBLIC FILE

Loan-to-Deposit Ratios Calendar Year 2023

North Brookfield Savings Bank's loan-to-deposit ratio for each quarter of the prior calendar year are as follows:

Q1 2023	Q2 2023	Q3 2023	Q4 2023
76.45%	77.62%	76.79%	76.99%