



To: Joe Cachuela, Director of Risk and Compliance
Julie Heapes, Director of Facilities Design and Security

From: Marla Snyder, Compliance Officer

Date: June 10, 2022

Subject: Pembroke Branch Closure Fair Lending and CRA Analysis

A Fair Lending analysis was done to ensure that there was no adverse impact on minority communities or low-to-moderate income individuals because of the branch closure at 75 Washington Street, Pembroke, MA, 02359, Plymouth County.

Pembroke has eleven (11) census tracts and one (1) zip codes. The 75 Washington Street, Pembroke branch is in the 02359-zip code. This zip code is included in each of the eleven (11) census tracts.

The eleven (11) census tracts have minority populations as a percentage of total population that range between a high of 11.31% to a low of 1.39%. Minority populations represent Black, Hispanic, and Asian individuals. The average median income is \$90,699 for each of the census tracts. Owner occupancy for each of these tracts ranges from 67.67% - 93.44%. These figures demonstrate that the closure of the Pembroke branch will have no impact on minority communities.

The 75 Washington Street, Pembroke branch is not in a Low-to-Moderate Income (LMI) census tract, is not in a Majority Minority Census Tract (MMCT) and is not in a Distressed/Underserved area.

The Hanover location, with a Face2Face ATM and office appointments, is 0.6 miles from the Pembroke Branch location. The East Bridgewater Branch (Carriage Crossing), a full-service branch with a Drive Up and Face2Face ATM, is located 3 miles from the Pembroke Branch location. The Norwell Branch, a full-service branch with a Drive Up and Face2Face ATM, is located 4 miles from the Pembroke Branch location. These locations offer multiple options for clients to receive their banking services.

A table with the details by census tract is included with this memo.