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Subject: Brockton Branch Fair Lending Analysis

A Fair Lending analysis was done for the proposed Brockton branch location. The location was analyzed using both a 2-mile radius and a 3-mile radius. Census tracts by minority percentage, and by income level, within each radius, were examined. The location, 1280 Belmont Street, Brockton, is in a >25% and <=50% minority, middle income census tract.

The NContracts HMDA Redlining Analytics tool was used to complete this analysis. Census data is based on the data published by the FFIEC and the American Community Services (ACS) estimates published every year and is current as of July 15, 2021. A mapping tool was used to identify census tracts by minority percentage and income levels within a 2- and 3-mile radius of the proposed branch location. *The maps and data by census tract are included with this report. The additional census data includes tract population, percentage age (16-61), percentage employed, owner occupancy rates, median gross rent, and percentage minority by Asian, Black, and Hispanic populations.*

The assumption is that individuals, households, and small businesses will travel two to three miles to visit a brick-and-mortar branch location to establish a relationship. The analysis does not factor in digital banking services, such as online account opening, online banking, and mobile banking.

The analysis was completed for the census tracts in Brockton. The bordering towns within the 2- and 3- mile radius are Easton and West Bridgewater. Neither of these towns have minority or Low-to-Moderate Income (LMI) tracts that border Brockton.

The 2-mile radius includes five (5) census tracts that include both minority and income level census data. The minority percentage ranges between 7.26% to 55.71%. The income level tracts include one (1) upper income, three (3) middle income, and one (1) moderate income. One (1) census tract has a minority population over 50%, making it a majority minority census tract (MMCT). This tract also is moderate income level.

The 3-mile radius has eleven (11) census tracts that include both minority and income level census data. The minority percentage ranges between 7.26% to 86.49%. The income level ranges between low to upper, with the majority (6) being moderate income tracts. There is



also one low income, one upper income, and three middle income. Seven (7) of the 11 tracts have minority populations that exceed 50%, designating them as majority minority census tracts (MMCTs). These seven (7) tracts include one low-income level tract and the six (6) moderate income level tracts, designating them as Low-to-Moderate (LMI) census tracts also.

The proposed location will serve both Low-to-Moderate Income (LMI) and Majority Minority census tracts within a three (3) mile radius, bringing additional banking services to individuals, households, and small businesses in this area.