



Community Reinvestment Act Public File

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CRA Related Complaints

No CRA related complaints have been received.

PUBLIC DISCLOSURE

December 9, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Hyperion Bank
Certificate Number: 58371

199 W Girard Ave
Philadelphia, Pennsylvania 19123

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
New York Regional Office

350 Fifth Avenue, Suite 1200
New York, NY 10118

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 RATING

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

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment areas, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-deposit (LTD) ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs.
- A majority of loans are in the institution's assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects, given the demographics of the assessment areas, poor penetration among businesses of different sizes. Borrower distribution of residential mortgage loans was not analyzed, since borrower income was not available for a majority of the institution's loans.
- The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory.

- The institution's community development performance demonstrates adequate responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas.

DESCRIPTION OF INSTITUTION

Background

Hyperion Bank (Hyperion) is a state-chartered commercial bank headquartered in Philadelphia, Pennsylvania (PA). The institution is wholly owned by Hyperion Bancshares, Inc., a one-bank holding company also headquartered in Philadelphia, PA. Hyperion has two subsidiaries: HB Realty, LLC, which holds the bank's foreclosed other real estate owned properties; and HB Subsidiaries, LLC, the minority owner of Hyperion Mortgage, LLC, which is a joint venture for consumer mortgage banking activities.

Hyperion received a "Satisfactory" rating at its previous Federal Deposit Insurance Corporation (FDIC) Performance Evaluation, dated November 8, 2022, based on Interagency Small Institution Examination Procedures.

Operations

Hyperion operates two full-service branch offices, with one in Philadelphia, PA and another in Atlanta, Georgia (GA). The bank did not open or close any branches or engage in any merger or acquisition activity since the previous evaluation. Hyperion remains focused on providing credit to real estate investors for the purpose of acquisition, rehabilitation, and/or refinance of residential one-to-four family and multifamily properties for rental or resale. The bank also offers Small Business Administration (SBA) financing, commercial real estate loans and lines of credit, and residential construction loans. Deposit products include consumer and business checking, savings, and money market accounts; certificates of deposit; and Interest on Lawyers' Trust Accounts (IOLTAs). Additionally, Hyperion provides online, mobile, and telephone banking; online bill pay; and money transfer services through Zelle.

Ability and Capacity

Bank assets totaled \$519.5 million as of September 30, 2025, which included total loans of \$444.7 million and total securities of \$17.3 million. Deposits totaled \$353.6 million. Since the prior evaluation, total assets, loans, and deposits increased by 71.1 percent, 72.6 percent, and 49.2 percent, respectively. The increase in total assets, loans, and deposits since the prior evaluation is due to strategic business growth.

Hyperion's loan portfolio composition remained consistent since the previous evaluation. Loans secured by 1-4 family residential properties continue to comprise the largest percentage of the portfolio at 45.2 percent. The following table illustrates the loan portfolio composition as of September 30, 2025.

Loan Portfolio Distribution as of 09/30/2025		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	139,431	31.4
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	201,189	45.2
Secured by Multifamily (5 or more) Residential Properties	4,631	1.0
Secured by Nonfarm Nonresidential Properties	57,663	13.0
Total Real Estate Loans	402,914	90.6
Commercial and Industrial Loans	42,331	9.5
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	104	0.0
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	310	0.1
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	(987)	(0.2)
Total Loans	\$444,672	100%
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet assessment area credit needs.

DESCRIPTION OF ASSESSMENT AREAS

The Community Reinvestment Act (CRA) requires each financial institution to define one or more assessment areas within which its supervisory agency will evaluate its CRA performance. Hyperion designates two assessment areas, one in PA and one in GA. The PA assessment area consists of Philadelphia County, which is part of the Philadelphia, PA Metropolitan Division (MD) #37964 and the broader Philadelphia-Camden-Wilmington, PA-New Jersey (NJ)-Delaware (DE)-Maryland (MD) Metropolitan Statistical Area (MSA) #37980. This assessment area is referred to as the State of PA assessment area within this performance evaluation.

The bank previously delineated the GA assessment area to include contiguous census tracts in DeKalb and Fulton Counties; however, the bank expanded the assessment area since the previous evaluation. The GA assessment area now consists of DeKalb, Fulton, Gwinnett, and Cobb Counties in their entirety. DeKalb, Fulton, and Gwinnett Counties are part of the Atlanta-Sandy Springs-Roswell, GA MD #12054. Cobb County is part of the Marietta, GA MD #31924. Both MDs are part of the broader Atlanta-Sandy Springs-Roswell, GA MSA #12060. This assessment area is referred to as the State of GA assessment area within this performance evaluation.

Assessment area delineations are based on available census data. Specifically, the 2015 ACS Census data was used at the previous evaluation to delineate the bank's assessment area. In 2022, the FFIEC released updates to the MSAs and MDs, states, counties, census tracts, and income-level indicators based on information collected during the 2020 U.S. Census. As a result of the 2020 U.S. Census, the number of census tracts increased, and income classifications changed, which slightly impacted the bank's assessment areas. The Office of Management and Budget also made boundary changes to MSAs, effective January 1, 2024, which impacted the GA assessment area by changing the name and composition of MSA #12060. A detailed description of each full-scope assessment area, including demographic and economic data, is contained within the comments for the individual rated areas.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation, dated November 8, 2022, to the current evaluation, dated December 9, 2025. Examiners used the FFIEC Interagency Intermediate Small Institution Examination Procedures to evaluate the bank's CRA performance. These procedures include the Lending Test and the Community Development Test. Refer to the Appendices for a complete description of these tests.

Examiners performed full-scope reviews for both the State of PA and State of GA assessment areas. Examiners refer to these as the two rated areas within this evaluation. For each rated area, the bank's performance is based on performance at the respective MSA-level.

The PA assessment area contributed more weight to overall ratings and conclusions given that most loans and deposits were in PA compared to GA. Examiners did not consider affiliate lending during this CRA evaluation.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	Loans		Deposits		Branches	
	\$(000s)	%	\$(000s)	%	#	%
Philadelphia MSA	108,547	84.9	205,404	56.8	1	50.0
Atlanta MSA	19,308	15.1	156,093	43.2	1	50.0
Total	127,855	100.0	361,497	100	2	100.0
<i>Source: Bank Data; FDIC Summary of Deposits (06/30/2025)</i>						

Activities Reviewed

The bank originated a high volume of other real estate-secured commercial and construction loans during the evaluation period; however, these loans primarily include temporary construction financing and are not included in the Lending Test analysis. Examiners determined Hyperion's major CRA product lines are residential mortgage and small business loans. This conclusion considered the bank's business strategy, as well as the number and dollar volume of loans originated during the evaluation period. Hyperion's record of originating residential mortgage loans contributed more weight to overall conclusions, given the larger volume of originations compared to small business loans during the evaluation period. The bank did not originate any small farm loans during the evaluation period; therefore, small farm loans were not considered in the analysis. No other loan types, such as consumer loans, represent a major product line.

Hyperion is subject to Home Mortgage Disclosure Act (HMDA) reporting requirements. Examiners reviewed home mortgage loans reported on the bank's 2022, 2023, and 2024 HMDA loan application registers. Hyperion originated 97 loans totaling \$71.1 million in 2022, 58 loans totaling \$37.3 million in 2023, and 51 loans totaling \$26.9 million in 2024. Residential mortgage loans include purchase money mortgage, refinance, and home improvement loans, for both owner-occupied and non-owner-occupied properties. Most of Hyperion's residential mortgage loans are secured by non-owner-occupied properties. The bank does not market or solicit a traditional owner-occupied home mortgage loan product. Examiners compared the bank's home mortgage lending to the 2020 U.S. Census data, as well as the 2022, 2023, and 2024 aggregate HMDA data.

Based on asset size, Hyperion is not required to collect or report its small business loans pursuant to CRA; however, the bank chose to collect sufficient data for analysis. The bank originated or purchased 27 small business loans totaling \$10.7 million in 2022, 22 small business loans totaling \$7.8 million in 2023, and 60 small business loans totaling \$20.0 million in 2024. Examiners compared Hyperion's small business lending data to Dun & Bradstreet (D&B) demographic data for each year.

Although this evaluation presents both the number and dollar volume of loans, examiners emphasized performance by number of loans because the number of loans is a better indicator of the individuals or businesses served.

For the Community Development Test, bank management provided data on community development loans, qualified investments, and community development services since the prior evaluation dated November 8, 2022. Tables present the bank’s community development activities for each year in the evaluation period.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Hyperion’s overall Lending Test performance is rated “Satisfactory.” The bank’s overall satisfactory performance in the Assessment Area Concentration and LTD ratio criteria, along with satisfactory performance in the State of PA primarily supports this conclusion. Performance in the two rated areas was inconsistent, as overall lending volumes in the State of GA were low.

This section presents the institution’s overall performance under the Lending Test. Separate presentations for the individual rated areas are included in the subsequent sections.

Loan-to-Deposit Ratio

The LTD ratio is more than reasonable given the institution’s size, financial condition, and assessment area credit needs. Hyperion’s LTD ratio, calculated from Call Report data, averaged 109.6 percent over the past 12 calendar quarters from December 31, 2022, to September 30, 2025. The LTD ratio fluctuated during the evaluation period, ranging from a low of 98.4 percent as of June 30, 2024, to a high of 124.8 percent as of September 30, 2025. In addition, the bank’s September 30, 2025 LTD ratio of 124.8 percent exceeded that of its Uniform Bank Performance Report (UBPR) peer group of 78.8 percent.

The following table compares the bank’s LTD ratio to similarly situated institutions, which examiners selected based on lending focus, geographic location, and asset size.

Loan-to-Deposit (LTD) Ratio Comparison		
Bank	Total Assets as of 09/30/2025 (\$000s)	Average Net LTD Ratio (%)
Hyperion Bank	519,508	109.6
Port Richmond Savings Bank	96,449	141.9
United Savings Bank	447,562	49.3
<i>Source: Reports of Condition and Income 12/31/2022 - 09/30/2025</i>		

Assessment Area Concentration

As shown in the following table, a majority of overall loans are in the institution’s assessment areas. However, a majority of small business loans by number and dollar volume are outside the assessment areas. The bank purchased 29 small business loans totaling \$8.3 million in 2024, all of which were outside the assessment areas.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000)				Total \$(000)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2022	82	84.5	15	15.5	97	59,581	83.8	11,528	16.2	71,109
2023	48	82.8	10	17.2	58	30,671	82.3	6,614	17.7	37,285
2024	39	76.5	12	23.5	51	20,909	77.9	5,942	22.1	26,851
Subtotal	169	82.0	37	18.0	206	111,161	82.2	24,084	17.8	135,245
Small Business										
2022	19	70.4	8	29.6	27	6,122	57.1	4,600	42.9	10,722
2023	12	54.5	10	45.5	22	3,946	50.6	3,854	49.4	7,800
2024	18	30.0	42	70.0	60	6,626	33.2	13,349	66.8	19,975
Subtotal	49	45.0	60	55.0	109	16,694	43.4	21,803	56.6	38,497
Total	218	69.2	97	30.8	315	127,855	73.6	45,887	26.4	173,742
Source: Imported Bank Data Due to rounding, totals may not equal 100.0%.										

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. Examiners focused on the number of loans made within low- and moderate-income census tracts. Hyperion's performance in PA contributed the most weight in forming the overall ratings and conclusions, as a majority of Hyperion's deposits and loans are located within this assessment area. The bank's record of originating residential mortgage loans contributed more weight to overall conclusions due to the larger volume when compared to small business lending during the evaluation period. While performance for both product lines was poor in the State of GA, excellent performance in residential mortgage lending in the State of PA supports overall reasonable performance.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment areas, poor penetration among businesses of different revenue sizes. The overall low volume of small business loans in both rated areas reflects poor performance in meeting the credit needs of the area's small businesses. The distribution of borrowers was not analyzed for residential mortgage loans, as borrower income was not reported for a majority of Hyperion's loans.

Response to Complaints

The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test Rating.

COMMUNITY DEVELOPMENT TEST

The institution's community development performance demonstrates adequate responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas. Overall performance was consistent within each rated area.

Community Development Loans

Hyperion made 24 community development loans totaling \$19.6 million during the evaluation period. By dollar volume, this level of activity represents 4.6 percent of average total assets and 5.4 percent of average total loans as of September 30, 2025.

In addition to the community development loans originated within the assessment areas, the institution made two community development loans totaling approximately \$1.1 million in the broader statewide or regional area, as discussed below.

- In 2023, the bank originated a \$121,000 loan to reimburse the borrower for recent renovations to an investment property in Lancaster, PA. The loan supports affordable housing, as the subject property rents below the HUD fair market value.
- In 2025, the bank contributed \$6.0 million toward a loan participation to finance construction of an apartment complex in Hamilton, NJ, where 32 of 198 apartment units were specifically designated as affordable housing. Of the bank's share of the participation, \$969,697 in financing supports affordable housing.

The following table shows Hyperion's community development loan activity by purpose and rated area.

Community Development Lending by Rated Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Pennsylvania	17	11,679	1	394	0	0	0	0	18	12,073
Georgia	0	0	1	433	3	6,009	0	0	4	6,442
Regional Activities	2	1,091	0	0	0	0	0	0	2	1,091
Total	19	12,770	2	827	3	6,009	0	0	24	19,606
<i>Source: Bank Data</i>										

Refer to the discussions of community development loans within the rated areas for additional details and examples.

Qualified Investments

Hyperion made eight investments and donations totaling approximately \$758,000 during the evaluation period. This level of activity represents 0.2 percent of average total assets and 4.2 percent of average total securities as of September 30, 2025. The following table shows the bank's qualified investment and donation totals by purpose and rated area.

Qualified Investments by Assessment Area										
Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Pennsylvania	3	3	2	5	0	0	0	0	5	8
Georgia	0	0	2	500	0	0	0	0	2	500
Nationwide Activities	0	0	1	250	0	0	0	0	1	250
Total	3	3	5	755	0	0	0	0	8	758
<i>Source: Bank Data</i>										

Of the totals depicted in the table, Hyperion made seven investments and donations totaling \$508,000 that directly benefitted the assessment areas. The bank also opened a \$250,000 certificate of deposit in a minority-owned CDFI based outside of the assessment areas. The bank's investment supported the CDFI's mission to offer affordable financial services for all.

Community Development Services

During the evaluation period, Hyperion directors and employees provided six instances of community development services throughout the assessment areas. The following table shows Hyperion's community development services during the evaluation period by purpose and rated area.

Community Development Services by Rated Area					
Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Pennsylvania	3	1	0	0	4
Georgia	0	2	0	0	2
Total	3	3	0	0	6
<i>Source: Bank Data</i>					

Hyperion also provided the following community development services and programs during the evaluation period:

- **IOLTA Accounts**: Hyperion participates in the PA and GA IOLTA programs established by the Supreme Court of each state. The purpose of the IOLTA is to provide funding for civil legal services for people who cannot afford them. This fund is supported by interest that accrues on aggregated escrow and trust accounts (for comingled client deposits) maintained

by participating attorneys. The interest paid on the accounts is sent to the PA and GA Bar Foundations and distributed to non-profit agencies that provide legal services for the poor and disadvantaged.

- EverFi School Financial Literacy: Hyperion also offers the EverFi Venture financial education program targeted to students. These school-led courses give students the tools they need to successfully manage their financial future. In 2025, the bank sponsored the program in 19 schools, 15 of which serve primarily low- and moderate-income students.

Refer to the discussions of community development services within the rated areas for additional details and examples.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

PENNSYLVANIA – Full-Scope Review

CRA RATING FOR PENNSYLVANIA: SATISFACTORY

The Lending Test is rated: SATISFACTORY

The Community Development Test is rated: SATISFACTORY

DESCRIPTION OF INSTITUTION’S OPERATIONS IN PENNSYLVANIA

Hyperion designates one assessment area within PA, which is comprised of Philadelphia County in its entirety. Philadelphia County is in the Philadelphia, PA MD #37964, which is part of the broader Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA #37980. The bank’s branch is located in an upper-income census tract in Philadelphia and has a non-deposit taking ATM on premises.

Economic and Demographic Data

There are 408 census tracts within Philadelphia County. These tracts reflected the following income designations according to 2020 U.S. Census data:

- 48 low-income,
- 121 moderate-income,
- 88 middle-income,
- 122 upper-income, and
- 29 with no income designation.

The Department of Housing and Urban Development (HUD) designates Renewal Communities and Empowerment Zones, which are defined as distressed urban communities. Of the 408 census tracts in the assessment area, 78 are also in the Philadelphia, PA Renewal Community and the Philadelphia, PA/Camden, NJ Empowerment Zone. Additionally, the bank’s branch is in the Philadelphia, PA/Camden, NJ Empowerment Zone.

The following table shows the demographic information for the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	408	11.8	29.7	21.6	29.9	7.1
Population by Geography	1,603,797	12.7	33.0	25.1	26.9	2.3
Housing Units by Geography	689,121	12.5	31.7	24.8	29.2	1.8
Owner-Occupied Units by Geography	323,784	10.3	29.8	28.8	29.9	1.3
Occupied Rental Units by Geography	289,341	13.9	32.0	22.0	29.9	2.2
Vacant Units by Geography	75,996	16.4	38.9	18.0	23.8	2.8
Businesses by Geography	242,618	10.3	30.4	23.0	33.7	2.6
Farms by Geography	407	8.4	23.3	17.7	48.2	2.5
Family Distribution by Income Level	330,898	30.1	17.2	16.8	35.9	0.0
Household Distribution by Income Level	613,125	30.7	15.0	15.5	38.7	0.0
Median Family Income MD - 37964 Philadelphia, PA MD		\$68,458	Median Housing Value			\$ 210,668
			Median Gross Rent			\$1,125
			Families Below Poverty Level			18.5%
Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

There are 689,121 total housing units in the assessment area. Of these, 47.0 percent are owner-occupied housing units, 42.0 percent are occupied rental units, and 11.0 percent are vacant. The Geographic Distribution criterion compares residential mortgage lending to the distribution of owner-occupied housing units. As shown above, 10.3 percent of the total owner-occupied housing units are located in low-income census tracts and 29.8 percent are located within moderate-income census tracts. Additionally, 12.5 percent of the total housing units are located in low-income census tracts and 31.7 percent are located within moderate-income census tracts. This data reflects the opportunities lenders have to originate owner-occupied and non-owner-occupied residential mortgage loans within these income geographies.

The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by gross annual revenue (GAR) level. According to 2024 D&B data, there were 242,618 non-farm businesses operating within the assessment area. The Gross Annual Revenue (GAR) distributions for these businesses are as follows:

- 94.4 percent of businesses have GARs of \$1.0 million or less,
- 1.2 percent of businesses have GARs greater than \$1.0 million, and
- 4.4 percent of businesses have no reported revenues.

The Geographic Distribution criterion for small business lending compares small business lending to the distribution of businesses within the assessment area. As shown in the table above, 10.3 percent of businesses are located in low-income census tracts and 30.4 percent are located in

moderate-income census tracts. These percentages reflect opportunities to originate loans to business operating in low- and moderate-income geographies.

Non-classifiable establishments represent the largest share of businesses (27.2 percent), followed by other services (except public administration) (9.7 percent); professional, scientific, and technical services (8.2 percent); and retail trade (7.3 percent). Within the assessment area, 65.4 percent of businesses have four or fewer employees and 96.1 percent operate from a single location. This information reflects the potential demand for, and the opportunity to originate, small business loans in the assessment area.

According to Moody's Analytics, the top five employers in Philadelphia are University of Pennsylvania Health System, Thomas Jefferson University and Jefferson Health, Children's Hospital of Philadelphia, Temple University Health System, and Comcast Corporation.

The following table summarizes the average annual unemployment rate from the Bureau of Labor Statistics at the county, statewide, and national level during the evaluation period. As noted, the Philadelphia County unemployment rate has been consistently higher than state and national averages.

Unemployment Rates				
Area	2022	2023	2024	YTD 2025
	%	%	%	%
Philadelphia County	4.9	4.3	4.5	5.2
Pennsylvania Statewide	4.1	3.7	3.6	3.9
National Average	3.6	3.6	4.0	4.2
<i>Source: Bureau of Labor Statistics</i>				

Competition

The State of PA assessment area is a highly competitive market for financial services. The most recent FDIC Summary of Deposits Market Share Report is as of June 30, 2025, and shows there were 37 institutions operating a total of 253 branch offices across Philadelphia County. Of these, Hyperion ranked 16th with a 0.3 percent deposit market share. The top three institutions by deposit market share were Bank of America, National Association (NA) (21.8 percent); Wells Fargo Bank, NA (19.7 percent); and PNC Bank, NA (17.3 percent).

There is a high level of competition for home mortgage loans among banks, credit unions, and non-depository lenders in the assessment area. Based on 2024 peer mortgage data, 501 lenders originated or purchased 27,288 home mortgage loans in the assessment area. Of these lenders, Hyperion ranked 116th by number of originations and purchases, capturing 0.1 percent of the total market share. The top three mortgage lenders in the assessment area included Police and Fire Federal Credit Union (6.2 percent); CrossCountry Mortgage, LLC (4.7 percent); and Pennymac Loan Services, LLC (4.3 percent).

Hyperion is not required to collect or report its small business loan data due to its asset size. Therefore, the analysis of small business loans under the Lending Test does not include aggregate data comparisons. The aggregate data, however, reflects the level of demand for small business loans and is therefore included for performance context. Aggregate data for 2024 shows that 127 institutions originated or purchased 33,962 small business loans in the assessment area, indicating a high level of competition for this product. The top three small business lenders in the assessment area included American Express National Bank (27.9 percent); JPMorgan Chase Bank, NA (18.1 percent); and Bank of America, NA (6.1 percent).

Community Contacts

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs and shows the level of opportunity in the institution's assessment area.

Examiners reviewed a recent community contact with a local neighborhood advisory committee specializing in foreclosure assistance in Philadelphia County. The contact identified a need for affordable housing and first-time homebuyer programs in the lower income neighborhoods of Philadelphia. The contact expressed concern over the increased gentrification of low-income neighborhoods in Philadelphia. While the housing stock is increasing, it is pricing out individuals that currently live in the area.

Examiners also reviewed a recent community contact with a CDFI that serves the city of Philadelphia. The organization provides access to capital, technical assistance, and business support services to small businesses in the region who may not qualify for loans under industry standard underwriting practices. In addition to receiving government grants, the organization relies on financial institutions to provide loans and equity equivalent debt for funding. According to the contact, there is ample opportunity for financial institutions to provide credit and technical assistance to small businesses in the assessment area.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that affordable housing represents the primary credit and community development need of the assessment area. Financing for small businesses represents another primary credit need.

SCOPE OF EVALUATION - PENNSYLVANIA

Examiners used full-scope examination procedures to evaluate Hyperion's performance in the State of PA assessment area. Please refer to the overall Scope of Evaluation section for information on products and timeframe reviewed.

CONCLUSIONS ON PERFORMANCE CRITERIA IN PENNSYLVANIA

LENDING TEST

Hyperion's Lending Test performance in the State of PA is rated "Satisfactory." The bank's performance under the Geographic Distribution criterion supports this rating. Examiners placed the most weight on lending performance within this assessment area when concluding overall ratings.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The bank's excellent performance of residential mortgage lending and poor performance of small business lending supports this conclusion. Examiners focused on loan volume and the number of loans in low- and moderate-income census tracts.

Residential Mortgage Loans

The geographic distribution of residential mortgage loans reflects excellent dispersion throughout the assessment area. The table below compares the bank's lending performance to the percentage of owner-occupied housing units across all census tract income designations. The bank's level of lending in low-income census tracts exceeded aggregate and demographic data each year of the review period. The bank's level of lending in moderate-income census tracts exceeded or aligned with both benchmarks throughout the review period.

Given that a majority of Hyperion's residential mortgage loans are non-owner-occupied, the percentage of total housing units by geography provides a more meaningful comparison. By this metric, 12.5 percent of the total housing units are located in low-income census tracts and 31.7 percent are located within moderate-income census tracts. Hyperion's lending in low- and moderate-income census tracts exceeded or aligned with the percentage of total housing units each year of the review period. As shown below, a majority of Hyperion's residential mortgage loans for all years were within low- and moderate-income census tracts.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2022	10.3	8.3	16	21.1	11,419	20.6
2023	10.3	9.0	13	28.3	3,847	12.9
2024	10.3	9.7	8	21.1	2,815	14.8
Moderate						
2022	29.8	28.5	28	36.8	19,707	35.5
2023	29.8	30.9	14	30.4	9,189	30.8
2024	29.8	30.6	14	36.8	7,052	37.0
Middle						
2022	28.8	26.8	6	7.9	3,593	6.5
2023	28.8	26.2	8	17.4	2,533	8.5
2024	28.8	25.8	9	23.7	4,020	21.1
Upper						
2022	29.9	35.0	14	18.4	13,712	24.7
2023	29.9	32.5	7	15.2	11,900	39.9
2024	29.9	31.8	6	15.8	4,685	24.6
NA						
2022	1.3	1.5	12	15.8	7,053	12.7
2023	1.3	1.4	4	8.7	2,344	7.9
2024	1.3	2.1	1	2.6	475	2.5
Total						
2022	100.0	100.0	76	100.0	55,484	100.0
2023	100.0	100.0	46	100.0	29,813	100.0
2024	100.0	100.0	38	100.0	19,047	100.0
Source: 2020 Census; Imported Bank Data; 2024, 2023, 2022 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%.						

Small Business Loans

The geographic distribution of small business loans reflects poor dispersion throughout the assessment area. The overall lending volume is poor, with 18 small business loan originations within the assessment area during a three-year period. The bank originated only six small business loans in low- and moderate-income census tracts during the review period. Due to the low volume of loans originated in the assessment area, examiners could not conduct meaningful geographic distribution analysis. The following table details the distribution of small business loans during the review period.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2022	9.9	0	0.0	0	0.0
2023	10.0	0	0.0	0	0.0
2024	10.3	2	28.6	570	32.0
Moderate					
2022	28.9	1	20.0	250	20.6
2023	29.5	1	16.7	100	8.3
2024	30.4	2	28.6	615	34.5
Middle					
2022	22.1	0	0.0	0	0.0
2023	22.3	3	50.0	535	44.2
2024	23.0	1	14.3	126	7.1
Upper					
2022	36.2	4	80.0	962	79.4
2023	35.4	2	33.3	575	47.5
2024	33.7	2	28.6	470	26.4
NA					
2022	2.9	0	0.0	0	0.0
2023	2.8	0	0.0	0	0.0
2024	2.6	0	0.0	0	0.0
Total					
2022	100.0	5	100.0	1,212	100.0
2023	100.0	6	100.0	1,210	100.0
2024	100.0	7	100.0	1,781	100.0
Source: 2024, 2023, 2022 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%.					

Borrower Profile

The distribution of borrowers reflects poor penetration among businesses of different sizes. Examiners focused on loan volume and the number of loans to businesses with GAR of \$1.0 million or less. Overall, the low volume of small business lending reflects the bank not meeting the credit needs of small businesses in the assessment area. As noted previously, examiners did not analyze borrower distribution for residential mortgage lending.

Small Business Loans

The distribution of borrowers reflects poor penetration among businesses of different sizes. While the bank originated most of its small business loans to businesses with GAR of \$1.0 million or less

during the review period, the overall lending volume is poor. Due to the low volume of loans originated in the assessment area, examiners could not conduct meaningful borrower distribution analysis. The following table details the distribution of small business loans during the review period.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000					
2022	93.9	5	100.0	1,212	100.0
2023	94.4	4	66.7	785	64.9
2024	94.4	7	100.0	1,781	100.0
> \$1,000,000					
2022	1.8	0	0.0	0	0.0
2023	1.7	1	16.7	325	26.9
2024	1.2	0	0.0	0	0.0
Revenue Not Available					
2022	4.3	0	0.0	0	0.0
2023	4.0	1	16.7	100	8.3
2024	4.4	0	0.0	0	0.0
Total					
2022	100.0	5	100.0	1,212	100.0
2023	100.0	6	100.0	1,210	100.0
2024	100.0	7	100.0	1,781	100.0
<i>Source: 2024, 2023, 2022 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%.</i>					

COMMUNITY DEVELOPMENT TEST

The Community Development Test rating for the State of PA is “Satisfactory.” The bank’s community development performance demonstrates adequate responsiveness to community development needs in the PA assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s assessment area.

Community Development Loans

During the evaluation period, Hyperion made 18 community development loans totaling \$12.1 million benefitting the PA assessment area. The bank’s community development loans in this assessment area primarily supported affordable housing for low- and moderate-income families.

The following table shows Hyperion’s community development lending activity by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022	0	0	0	0	0	0	0	0	0	0
2023	3	3,567	0	0	0	0	0	0	3	3,567
2024	5	2,603	1	394	0	0	0	0	6	2,997
YTD 2025	9	5,509	0	0	0	0	0	0	9	5,509
Total	17	11,679	1	394	0	0	0	0	18	12,073
<i>Source: Bank Data</i>										

Below are notable examples of the community development loans benefitting this assessment area.

- In 2023, Hyperion originated a \$2.9 million loan to finance construction of a 19-unit residential complex where a majority of units have rental rates below fair market rent.
- In 2024, Hyperion originated a \$360,000 refinance for a multifamily property containing 14 apartments. All units have rental rates below fair market rent.
- In 2025, Hyperion originated two loans totaling \$1.2 million for the construction of a mixed-use complex containing 13 residential units, most of which have rental rates below fair market rent.

Qualified Investments

During the evaluation period, Hyperion made five donations totaling \$8,000 benefiting this assessment area. The donations supported two affordable housing and community services organizations based in Philadelphia. The following table illustrates the bank’s qualified donations by year and purpose.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	0	0	0	0	0	0	0	0
2022	0	0	0	0	0	0	0	0	0	0
2023	0	0	0	0	0	0	0	0	0	0
2024	0	0	0	0	0	0	0	0	0	0
YTD 2025	0	0	0	0	0	0	0	0	0	0
Subtotal	0	0	0	0	0	0	0	0	0	0
Qualified Grants & Donations	3	3	2	5	0	0	0	0	5	8
Total	3	3	2	5	0	0	0	0	5	8
<i>Source: Bank Data</i>										

Community Development Services

During the evaluation period, two bank directors provided four instances of community development services benefitting this assessment area. Specifically, the bank's President served on the Board of an organization that focuses on affordable housing and social services for low- and moderate-income individuals in Philadelphia. Another director served on the Board of an organization that advocates for the rights and opportunities of underserved public school students in Pennsylvania. The following table illustrates the bank's community development services during the evaluation period by year and purpose.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2022	0	0	0	0	0
2023	1	1	0	0	2
2024	1	0	0	0	1
YTD 2025	1	0	0	0	1
Total	3	1	0	0	4
<i>Source: Bank Data</i>					

GEORGIA – Full-Scope Review

CRA RATING FOR GEORGIA: NEEDS TO IMPROVE

The Lending Test is rated: NEEDS TO IMPROVE

The Community Development Test is rated: SATISFACTORY

DESCRIPTION OF INSTITUTION’S OPERATIONS IN GEORGIA

Hyperion designates one assessment area in GA, which is comprised of DeKalb, Fulton, Gwinnett, and Cobb Counties. DeKalb, Fulton, and Gwinnett Counties are part of the Atlanta-Sandy Springs-Roswell, GA MD #12054. Cobb County is part of the Marietta, GA MD #31924. Both MDs are part of the broader Atlanta-Sandy Springs-Roswell, GA MSA #12060. The bank operates one branch in an upper-income census tract in Fulton County.

Economic and Demographic Data

There are 936 census tracts within the GA assessment area. These tracts reflected the following income designations according to U.S. Census data:

- 81 low-income,
- 188 moderate-income,
- 250 middle-income,
- 372 upper-income, and
- 45 with no income designation.

The Department of Housing and Urban Development designates Renewal Communities, which are defined as distressed urban communities. Of the 936 census tracts in the assessment area, 63 are also in the Atlanta, GA Renewal Community.

The following table shows the demographic information for the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	936	8.7	20.1	26.7	39.7	4.8
Population by Geography	3,554,303	7.7	20.9	28.4	39.7	3.3
Housing Units by Geography	1,409,550	8.6	20.8	27.4	39.7	3.6
Owner-Occupied Units by Geography	769,570	3.8	15.3	30.0	49.1	1.8
Occupied Rental Units by Geography	524,650	14.2	28.0	24.8	27.1	5.9
Vacant Units by Geography	115,330	14.9	24.6	21.3	33.7	5.5
Businesses by Geography	564,301	6.7	19.5	25.9	43.6	4.3
Farms by Geography	2,229	3.9	12.4	23.8	56.4	3.5
Family Distribution by Income Level	809,475	21.1	15.9	18.1	44.9	0.0
Household Distribution by Income Level	1,294,220	23.3	15.7	17.4	43.6	0.0
Median Family Income MD - 12054 Atlanta-Sandy Springs-Roswell, GA MD Median Family Income MD - 31924 Marietta, GA MD		\$81,951 \$91,140	Median Housing Value		\$ 281,863	
			Median Gross Rent		\$1,272	
			Families Below Poverty Level		8.5%	
Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

There are 1,409,550 total housing units in the assessment area. Of these, 54.6 percent are owner-occupied housing units, 37.2 percent are occupied rental units, and 8.2 percent are vacant. The Geographic Distribution criterion compares residential mortgage lending to the distribution of owner-occupied housing units. As shown above, 3.8 percent of the total owner-occupied housing units are located in low-income census tracts and 15.3 percent are located within moderate-income census tracts. Additionally, 8.6 percent of the total housing units are located in low-income census tracts and 20.8 percent are located within moderate-income census tracts. This data reflects the opportunities lenders have to originate owner-occupied and non-owner-occupied residential mortgage loans within these income geographies.

According to 2024 D&B data, there were 564,301 non-farm businesses operating within the assessment area. The Gross Annual Revenue (GAR) distributions for these businesses are as follows:

- 93.1 percent of businesses have GARs of \$1.0 million or less,
- 1.5 percent of businesses have GARs greater than \$1.0 million, and
- 5.4 percent of businesses have no reported revenues

There are 564,301 non-farm businesses operating within the assessment area. As shown in the table above, 6.7 percent of businesses are located in low-income census tracts and 19.5 percent are

located in moderate-income census tracts. These percentages reflect opportunities to originate loans to business operating in low- and moderate-income geographies.

Non-classifiable establishments represent the largest share of businesses (20.8 percent), followed by professional, scientific, and technical services (14.2 percent); other services (except public administration) (8.5 percent); and administrative and support and waste management and remediation services (7.8 percent). Within the assessment area, 72.2 percent of businesses have four or fewer employees and 95.3 percent operate from a single location. This information reflects the potential demand for, and the opportunity to originate, small business loans in the assessment area.

According to Moody's Analytics, the top five employers in the Atlanta-Sandy Springs-Roswell, GA MSA are Delta Air Lines, Inc.; Emory University and Emory Healthcare; Piedmont Healthcare; Northside Hospital; and Publix Super Markets, Inc.

The following table summarizes the average annual unemployment rate from the Bureau of Labor Statistics at the county, statewide, and national level during the evaluation period.

Unemployment Rates				
Area	2022	2023	2024	YTD 2025
	%	%	%	%
Fulton County	3.2	3.4	3.7	3.6
DeKalb County	3.3	3.5	3.7	3.6
Gwinnett County	2.8	3.0	3.2	3.3
Cobb County	2.8	3.1	3.2	3.2
Georgia Statewide	3.2	3.3	3.5	3.5
National Average	3.6	3.6	4.0	4.2
<i>Source: Bureau of Labor Statistics</i>				

Competition

The State of GA assessment area is a highly competitive market for financial services. The FDIC Summary of Deposits Market Share Report as of June 30, 2025 shows there were 67 institutions operating 668 branches across this assessment area. Of these, Hyperion ranked 44th with a 0.1 percent deposit market share. The top three institutions by deposit market share were Truist Bank (26.6 percent); Bank of America, NA (21.9 percent); and Wells Fargo Bank, NA (15.7 percent).

There is a significant level of competition for home mortgage loans among banks, credit unions, and non-depository lenders in the assessment area. Based on 2024 peer mortgage data, 767 lenders originated or purchased 87,981 home mortgage loans in the assessment area. Of these lenders, Hyperion ranked 595th by number of originations and purchases, capturing less than 0.01 percent of the total market share. The top three mortgage lenders in the assessment area included Rocket Mortgage, LLC (6.3 percent); United Wholesale Mortgage, LLC (5.8 percent); and Pennymac Loan Services, LLC (4.9 percent).

There is also a significant level of competition for small business loans among the various banks serving the State of GA assessment area. Examiners reviewed aggregate small business data, reported at the county level, for performance context. Aggregate data for 2024 shows that 210 lenders originated or purchased 154,453 small business loans in the assessment area. The top three small business lenders in DeKalb, Fulton, Gwinnett, and Cobb Counties were American Express National Bank (37.3 percent); JPMorgan Chase Bank, NA (20.8 percent); and Bank of America, NA (8.4 percent).

Community Contacts

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs and shows the level of opportunity in the institution's assessment area.

Examiners contacted a local affiliate of a nationwide organization that focuses on construction of affordable housing for low- and moderate-income families. The contact emphasized that there is a strong need for affordable housing in the GA assessment area, noting that the organization has hundreds of families on their wait list. The contact stated that high home prices are making homeownership unattainable for low- and moderate-income families. According to the contact, new construction in the assessment area is primarily for larger homes above the \$400,000 to \$500,000 price point; builders are not economically incentivized to develop affordable housing. The contact also identified financial literacy as a major community development need in the assessment area and thought that local financial institutions could play a more substantive role in offering financial education programs about budgeting, credit, and homeownership.

Examiners also reviewed a recent community contact with an economic development organization in the assessment area. The contact indicated that affordable housing and small business lending are primary credit needs. The contact stated that elevated mortgage interest rates and home prices have disincentivized developers from building affordable housing. In addition, the contact indicated that small business lending has become more challenging, specifically with restructured criteria for obtaining financing through the SBA. The contact stated that in addition to these challenges, financial literacy education specific to obtaining and preserving credit represents a need in the assessment area.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that affordable housing, small business lending, and financial education programs are primary needs of the assessment area.

SCOPE OF EVALUATION – GEORGIA

Examiners used full-scope examination procedures to evaluate Hyperion’s performance in the State of GA assessment area. Please refer to the overall Scope of Evaluation section for information on products and timeframe reviewed.

CONCLUSIONS ON PERFORMANCE CRITERIA IN GEORGIA

LENDING TEST

Hyperion’s Lending Test performance in the State of GA is rated “Needs to Improve.” The bank’s loan volume in the assessment area was low throughout the review period, which contributed to poor dispersion and penetration. As a result, lending levels reflect poor responsiveness to assessment area credit needs.

Geographic Distribution

The geographic distribution of loans reflects poor dispersion throughout the assessment area. Examiners focused on the number of loans in low- and moderate-income census tracts. The overall volume of both residential mortgage and small business lending is low which did not allow for meaningful geographic distribution analysis.

Residential Mortgage Loans

The geographic distribution of residential mortgage loans reflects very poor dispersion throughout the assessment area. The overall lending volume is poor, with nine residential mortgage loan originations within the assessment area during a three-year period. The bank originated only three residential mortgage loans in moderate-income census tracts during the review period, with none in low-income census tracts. Due to the negligible volume of loans originated in the assessment area, examiners could not conduct meaningful geographic distribution analysis. The table below compares the bank’s lending performance to the percentage of owner-occupied housing units across all census tract income designations.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low						
2022	3.8	4.6	0	0.0	0	0.0
2023	3.8	5.4	0	0.0	0	0.0
2024	3.8	4.9	0	0.0	0	0.0
Moderate						
2022	16.8	17.5	3	50.0	731	17.8
2023	16.8	19.6	0	0.0	0	0.0
2024	15.3	17.7	0	0.0	0	0.0
Middle						
2022	28.3	28.8	1	16.7	260	6.4
2023	28.3	28.2	1	50.0	293	34.2
2024	30.0	31.0	0	0.0	0	0.0
Upper						
2022	49.3	46.6	2	33.3	3,106	75.8
2023	49.3	44.3	1	50.0	565	65.9
2024	49.1	44.0	1	100.0	1,862	100.0
NA						
2022	1.8	2.5	0	0.0	0	0.0
2023	1.8	2.6	0	0.0	0	0.0
2024	1.8	2.5	0	0.0	0	0.0
Total						
2022	100.0	100.0	6	100.0	4,097	100.0
2023	100.0	100.0	2	100.0	858	100.0
2024	100.0	100.0	1	100.0	1,862	100.0
Source: 2020 Census; Imported Bank Data; 2024, 2023, 2022 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%.						

Small Business Loans

The geographic distribution of small business loans reflects poor dispersion throughout the assessment area. The overall lending volume is poor, with 31 small business originations within the assessment area during a three-year period. The bank originated eight loans in low- and moderate-income census tracts during the review period. Although the percentages appear reasonable when compared to demographic data, the overall volume of loans reflects poor performance in meeting the credit needs of businesses located in these areas. Due to the low volume of loans originated in the assessment area, examiners could not conduct meaningful geographic distribution analysis. The following table details the distribution of small business loans during the review period.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2022	6.4	0	0.0	0	0.0
2023	6.1	0	0.0	0	0.0
2024	6.7	2	18.2	1,250	25.8
Moderate					
2022	22.0	3	21.4	1,095	22.3
2023	21.5	1	16.7	517	18.9
2024	19.5	2	18.2	487	10.1
Middle					
2022	24.5	2	14.3	538	11.0
2023	24.7	2	33.3	1,319	48.2
2024	25.9	1	9.1	250	5.2
Upper					
2022	43.4	8	57.1	2,627	53.5
2023	44.1	2	33.3	600	21.9
2024	43.6	6	54.6	2,858	59.0
NA					
2022	3.7	1	7.1	650	13.2
2023	3.6	1	16.7	300	11.0
2024	4.3	0	0.0	0	0.0
Total					
2022	100.0	14	100.0	4,910	100.0
2023	100.0	6	100.0	2,736	100.0
2024	100.0	11	100.0	4,845	100.0
Source: 2024, 2023, 2022 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%.					

Borrower Profile

The distribution of borrowers reflects poor penetration among businesses of different sizes. Examiners focused on loan volume and the number of loans to businesses with GAR of \$1.0 million or less. Overall, the low volume of small business lending reflects the bank not meeting the credit needs of small businesses in the assessment area. As noted previously, examiners did not analyze borrower distribution for residential mortgage lending.

Small Business Loans

The distribution of borrowers reflects poor penetration among businesses of different sizes. While the bank originated most of its small business loans to businesses with GAR of \$1.0 million or less during

the review period, the overall lending volume is poor. Due to the low volume of loans originated in the assessment area, examiners could not conduct meaningful borrower distribution analysis. The following table details the distribution of small business loans during the review period.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000					
2022	94.6	12	85.7	3,835	78.1
2023	94.1	4	66.7	1,936	70.8
2024	93.1	6	54.6	2,418	49.9
> \$1,000,000					
2022	1.7	2	14.3	1,075	21.9
2023	1.9	2	33.3	800	29.2
2024	1.5	5	45.5	2,427	50.1
Revenue Not Available					
2022	3.8	0	0.0	0	0.0
2023	4.1	0	0.0	0	0.0
2024	5.4	0	0.0	0	0.0
Total					
2022	100.0	14	100.0	4,910	100.0
2023	100.0	6	100.0	2,736	100.0
2024	100.0	11	100.0	4,845	100.0
<i>Source: 2024, 2023, 2022 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%.</i>					

COMMUNITY DEVELOPMENT TEST

The Community Development Test rating for the State of GA is “Satisfactory.” The bank’s community development performance demonstrates adequate responsiveness to community development needs in the GA assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s assessment area.

Community Development Loans

During the evaluation period, Hyperion made four community development loans totaling \$6.4 million benefitting the GA assessment area. The following table shows Hyperion’s community development lending activity by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022	0	0	1	433	0	0	0	0	1	433
2023	0	0	0	0	1	1,509	0	0	1	1,509
2024	0	0	0	0	0	0	0	0	0	0
YTD 2025	0	0	0	0	2	4,500	0	0	2	4,500
Total	0	0	1	433	3	6,009	0	0	4	6,442
<i>Source: Bank Data</i>										

Below are notable examples of the community development loans benefitting this assessment area.

- In 2023, the bank originated a \$1.5 million SBA loan to finance a restaurant. The loan supported economic development in Fulton County by creating 40 jobs for low- and moderate-income individuals.
- In 2025, the bank originated a \$4.0 million loan to finance essential improvements required to maintain operations of a hotel franchise and retain 11 low- and moderate-income jobs. The loan supports economic development in Cobb County through low- and moderate-income job retention.

Qualified Investments

During the evaluation period, Hyperion made two qualified investments totaling \$500,000 benefitting this assessment area. The bank opened and subsequently renewed a \$250,000 certificate of deposit in a low-income credit union. The bank's investment contributed to the institution's capital raise to open their first branch in the Atlanta market.

Community Development Services

During the evaluation period, bank staff provided two instances of community development services in the GA assessment area. One employee taught financial literacy at a social services organization that assists individuals experiencing homelessness. Another employee provided financial education at a local middle school which primarily serves low- and moderate-income students. The following table illustrates the bank's community development services during the evaluation period by year and purpose.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2022	0	0	0	0	0
2023	0	0	0	0	0
2024	0	1	0	0	1
YTD 2025	0	1	0	0	1
Total	0	2	0	0	2
<i>Source: Bank Data</i>					

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Community Development Test	Rating
PENNSYLVANIA	Satisfactory	Satisfactory	Satisfactory
GEORGIA	Needs to Improve	Satisfactory	Needs to Improve

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 bank 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.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income 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 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.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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.

Qualified Investment: A 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.

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

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating 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.

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.

**HYPERION BANK
COMMUNITY REINVESTMENT ACT
AND
HOME MORTGAGE DISCLOSURE ACT
PUBLIC FILE**

BRANCH LISTING

Main Office:

199 West Girard Avenue

Philadelphia, PA 19123

Phone: 215-789-4200 Fax: 215-423-2529

Hours: Monday through Friday – 9:00 am to 5:00 pm

Census Tract: 0144.00

Branch Office:

3525 Piedmont Rd. Building 5, Suite 215

Atlanta, GA 30305

Hours: Monday through Friday – 9:00 am to 5:00 pm

Census Tract: 0100.03

**HYPERION BANK
COMMUNITY REINVESTMENT ACT
AND
HOME MORTGAGE DISCLOSURE ACT
PUBLIC FILE**

BRANCH OPENINGS

2025

No branch openings for calendar year 2025

2024

No branch openings for calendar year 2024

2023

No branch openings for calendar year 2023

2022

No branch openings for calendar year 2022

2021

No branch openings for calendar year 2021

2020

No branch openings for calendar year 2020

2019

3525 Piedmont Rd., Suite 5-215 Atlanta, GA 30305

2018

No branch openings for calendar year 2018

2017

No branch openings for calendar year 2017

Hyperion Bank Main Office:

199 West Girard Avenue

Philadelphia, PA 19123

Phone: 215-789-4200 Fax: 215-423-2529

Hours: Monday through Friday – 9:00 am to 5:00 pm

MSA/MD Code: 37964 State Code: 42 County Code: 101 Tract Code: 0144.00

**HYPERION BANK
COMMUNITY REINVESTMENT ACT
AND
HOME MORTGAGE DISCLOSURE ACT
PUBLIC FILE**

BRANCH CLOSINGS

2025

No branch openings for calendar year 2025

2024

No branch openings for calendar year 2024

2023

No branch openings for calendar year 2023

2022

No branch closings for calendar year 2022

2021

No branch closings for calendar year 2021

2020

No branch closings for calendar year 2020

2019

No branch closings for calendar year 2019

2018

No branch closings for calendar year 2018

Hyperion Bank Main Office:

199 West Girard Avenue

Philadelphia, PA 19123

Phone: 215-789-4200 Fax: 215-423-2529

Hours: Monday through Friday – 9:00 am to 5:00 pm

MSA/MD Code: 37964 State Code: 42 County Code: 101 Tract Code: 0144.00

**HYPERION BANK
COMMUNITY REINVESTMENT ACT
AND
HOME MORTGAGE DISCLOSURE ACT
PUBLIC FILE**

2017

No branch closings for calendar year 2017

Hyperion Bank Main Office:

199 West Girard Avenue

Philadelphia, PA 19123

Phone: 215-789-4200 Fax: 215-423-2529

Hours: Monday through Friday – 9:00 am to 5:00 pm

MSA/MD Code: 37964 State Code: 42 County Code: 101 Tract Code: 0144.00

HYPERION BANK

List of Services

Main Office

Hyperion Bank – Main Office

199 W. Girard Avenue

Philadelphia, PA 19123

Phone 215-789-4200

Fax 215-423-2529

Banking Office Hours: Monday - Friday 9:00 AM - 5:00 PM

ATM at location

Branches

Hyperion Bank – Atlanta Office

3525 Piedmont Avenue, Suite 5-215

Atlanta, GA 30305

Phone 404-381-2110

Banking Office Hours: Monday - Friday 9:00 AM - 5:00 PM

No ATM at location

The below loan and deposit products are available at both offices (See Fee Schedule for fees)

- **Loan Products**
 - **Consumer Loans**
 - **Home Mortgage Loans**
 - **MasterCard and Visa Credit Cards**
 - **Business Loans**
 - **Small Business Administration (SBA) Loans**
 - **Business Loans & Lines of Credit**
 - **Commercial Real Estate Loans**
 - **Construction Loans**
 - **Standby Letters of Credit**
 - **Business Credit Cards**

- **Deposit Products**
 - **Consumer Deposit Products**
 - **Free Personal Checking Account**
 - **Free Statement Savings Account**
 - **Consumer Money Market Account**
 - **Certificates of Deposit**
 - **Free Children's Savings Account**
 - **Individual Retirement Accounts (IRAs)**
 - **Business Deposit Products**
 - **Business Checking**
 - **Business Interest Checking**
 - **Business Analysis Checking**
 - **Business Money Market Account**
 - **Interest on Lawyer Trust (IOLTA) Checking Account**

Services

Consumer

Online Banking

Bill Pay & Presentment

Cashier's (Bank) Checks

Consumer Credit Cards - Mastercard® and Visa®

Debit Cards

Direct Deposit

eStatements

Money Management

Free Coin Counting for Hyperion Bank customers

Free Mobile Deposits

Night Deposit Drop

Mobile Apps.

Mobile Web and Text Message Banking

Notary Services

Safe Deposit Boxes

Telephone Banking (English & Spanish)

24-Hour ATM

Business

Merchant & Payroll Services

ACH/Wire Transfers

Notary Services



SCHEDULE OF FEES

Effective September 9, 2024

Account Research	\$30.00/hour and \$2.00 per copy
Auto-Overdraft Protection transfer from another Hyperion Bank Deposit Account*	\$5.00 per occurrence
Cashier's (Bank) Check	\$7.00 each
Coin Counting Machine (Philadelphia location only)	5% for non-customers. Free for Hyperion Bank Customers
Expedited Bill Payment – Electronic	\$9.95 each
Expedited Bill Payment – Overnight Check	\$30.00 each
Escheatment Processing	\$75.00 per account
Foreign Currency Order	\$5.00 under \$300.00 \$15.00 over \$300.00
International Check Processing	\$25.00 each for checks under \$300.00 \$75.00 each for checks over \$300.00
International Returned Deposit Item	\$45.00 each
Legal Levies & Garnishments	\$125.00 each
Night Deposit Keys (>2)	\$2.00/key
Night Deposit Sealed Bags	\$30.00/100 bags
Notary Public	FREE for Hyperion Bank Customers
Overdraft/Return Item/NSF/Uncollected Funds*	\$35.00 each
*Overdraft/Return Items/NSF/Uncollected Funds may be created by checks or by other electronic means.	
Paper Statement	\$3.00 each
Returned Deposit Item*	\$15.00 each
Replacement of ATM/Debit Card	\$5.00 each
Statement Reconciliation	\$30.00/hour; minimum ½ hour
Stop Payment	\$30.00 each
Zelle Money Transfer	FREE

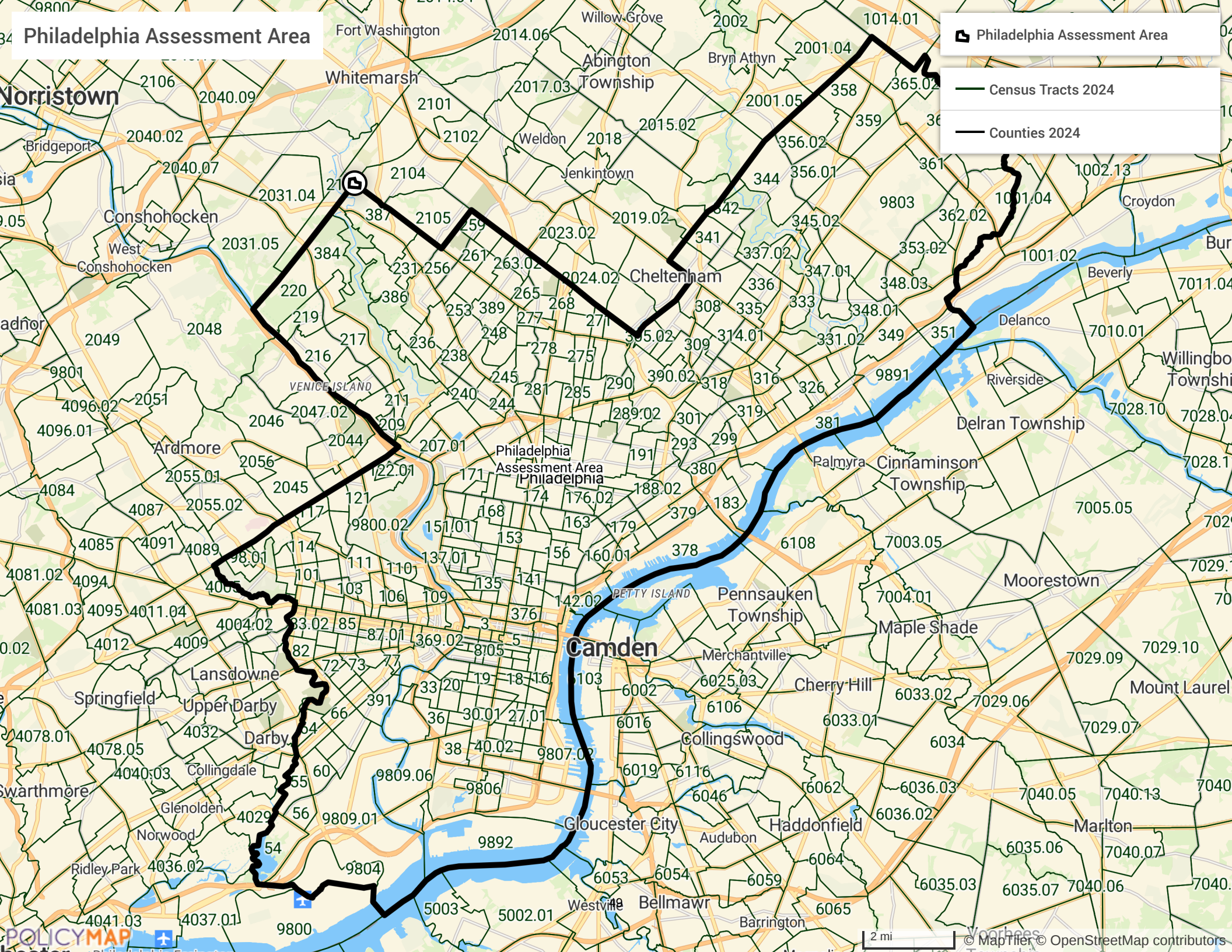
Safe Deposit Box Rentals

10"x10"	\$135.00/year
5"x10"	\$85.00/year
3"x10"	\$55.00/year
3"x5"	\$28.00/year
Drilling of Box	Market Cost
Replacing Lock and New Keys	Market Cost

Wire Transfers

Outgoing	\$25.00 (Domestic) \$50.00 (International)
Incoming	Free (Domestic) \$25.00 (International)

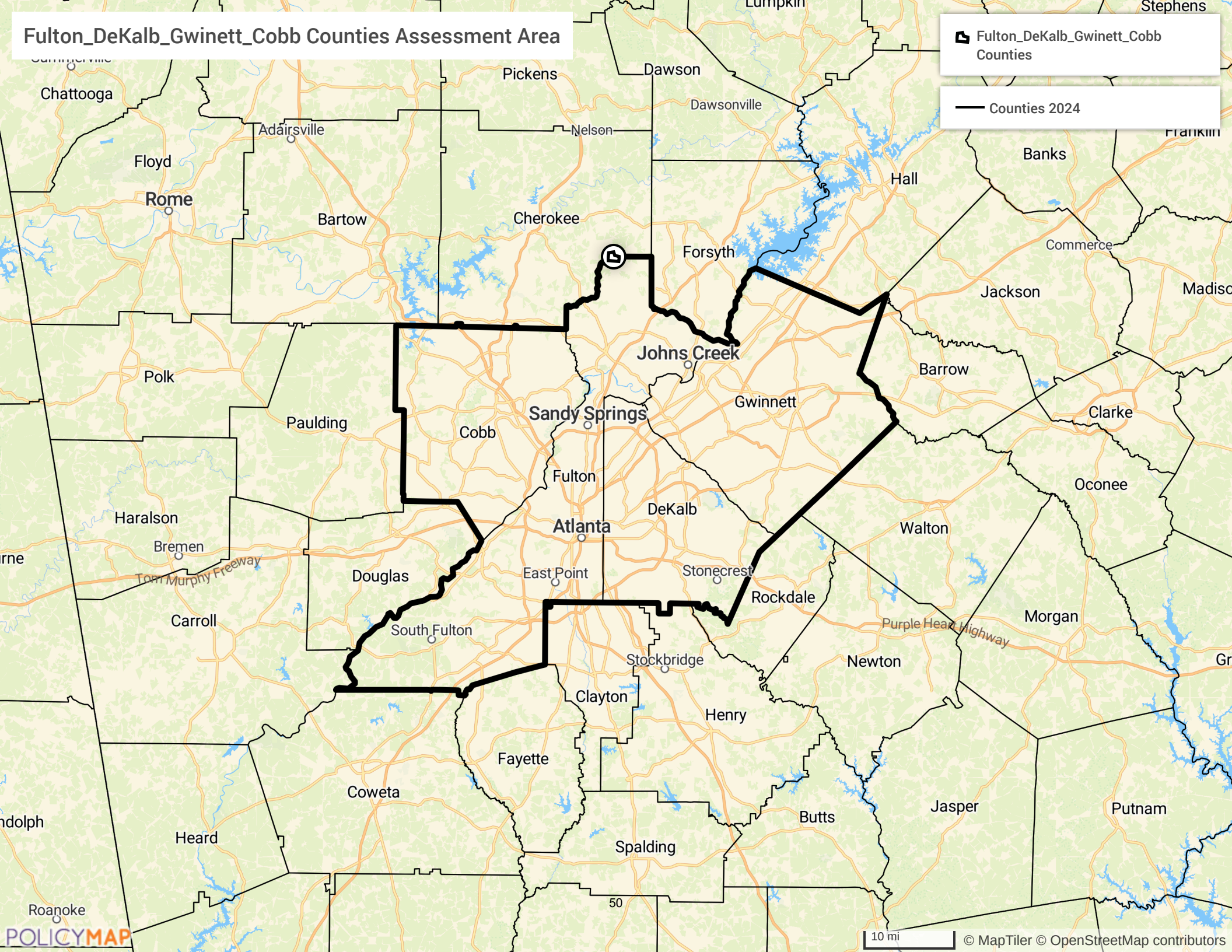
Philadelphia Assessment Area



Fulton_DeKalb_Gwinett_Cobb Counties Assessment Area

 Fulton_DeKalb_Gwinett_Cobb
Counties

— Counties 2024





Home Mortgage Disclosure Act Notice

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's Web site (www.consumerfinance.gov/hmda). HMDA data for many other financial institutions are also available at this Web site.



Bankwide

Quarter	LTD Ratio
Q1 2025	108.25%
Q2 2025	114.42%
Q3 2025	124.83%
Q4 2025	97.21%
Average	111.18%

Philadelphia

Quarter	LTD Ratio
Q1 2025	156.49%
Q2 2025	157.28%
Q3 2025	159.10%
Q4 2025	124.73%
Average	149.40%

Atlanta

Quarter	LTD Ratio
Q1 2025	51.11%
Q2 2025	58.01%
Q3 2025	75.92%
Q4 2025	57.61%
Average	60.66%