



## **Community Reinvestment Act (CRA) Public File**

The information contained in this file is current as of April 1<sup>st</sup> of each year. To request a hard copy of this file, please contact us either in person or by phone at 781-729-2130. Please note we may charge a fee to cover the cost of copying and mailing (if applicable).

### **Public File Contents**

**Complaint/Comment Log**

**CRA Performance Evaluation**

**Branch Locations/Hours**

**Openings & Closings**

**Products & Services**

**Map of Assessment Area**

**HMDA Statement**

**Loan-to-Deposit Ratio**

**Community Reinvestment Act (CRA) Notice**

### **CRA Complaint/Inquiry Comment Log**

This log will be maintained in the Bank's electronic CRA Public File.

It will include comments, inquiries, and complaints from the current year and the two preceding years. Should the inquiry occur at a branch location, the Branch Manager should contact the CRA Officer and provide written details of the inquiry.

| <b>Date</b> | <b>Name</b> | <b>Nature of Inquiry*</b> | <b>Bank Employee</b> |
|-------------|-------------|---------------------------|----------------------|
|             |             |                           |                      |
|             |             |                           |                      |
|             |             |                           |                      |
|             |             |                           |                      |
|             |             |                           |                      |
|             |             |                           |                      |
|             |             |                           |                      |
|             |             |                           |                      |
|             |             |                           |                      |
|             |             |                           |                      |
|             |             |                           |                      |
|             |             |                           |                      |
|             |             |                           |                      |
|             |             |                           |                      |
|             |             |                           |                      |

\*Should a comment, inquiry, or complaint require additional space, separate documents should be attached.

# **PUBLIC DISCLOSURE**

January 29, 2024

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Winchester Savings Bank  
Certificate Number: 90308

661 Main Street  
Winchester, Massachusetts 01890

Division of Banks  
1000 Washington Street, 10<sup>th</sup> Floor  
Boston, Massachusetts 02118

Federal Deposit Insurance Corporation  
350 Fifth Avenue, Suite 1200  
New York, New York 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 Division of Banks or Federal Deposit Insurance Corporation concerning the safety and soundness of this financial institution.

## TABLE OF CONTENTS

|                                                              |    |
|--------------------------------------------------------------|----|
| INSTITUTION RATING .....                                     | 1  |
| DESCRIPTION OF INSTITUTION .....                             | 2  |
| DESCRIPTION OF ASSESSMENT AREAS.....                         | 3  |
| SCOPE OF EVALUATION .....                                    | 6  |
| CONCLUSIONS ON PERFORMANCE CRITERIA.....                     | 8  |
| DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW..... | 17 |
| APPENDICES .....                                             | 18 |
| DIVISION OF BANKS FAIR LENDING POLICIES AND PROCEDURES ..... | 18 |
| MINORITY APPLICATION FLOW .....                              | 18 |
| INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA .....           | 20 |
| GLOSSARY .....                                               | 21 |

## 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 area, 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 give the financial institution's size, financial condition, and assessment area needs.
- The bank made a majority of its home mortgage loans and small business loans in the assessment area.
- The geographic distribution of loans reflects poor dispersion throughout the assessment area.
- The distribution of borrowers reflects reasonable penetration among individuals of different income levels.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the lending test.

**The Community Development Test is rated Satisfactory.**

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

## DESCRIPTION OF INSTITUTION

### **Background**

Winchester Savings Bank (WSB) is a mutually owned financial institution headquartered in Winchester, Massachusetts (MA). The bank operates in Middlesex County and Essex County in Massachusetts. WSB received a Satisfactory rating from the Federal Deposit Insurance Corporation (FDIC) and the Massachusetts Division of Banks (Division) during its prior evaluation dated November 2, 2020. Examiners evaluated the bank's performance using Federal Financial Institutions Examination Council's (FFIEC) Intermediate Small Institution Examination Procedures.

### **Operations**

The bank operates five full-service branches in Middlesex County (4) and Essex County (1), Massachusetts. The bank's main office is located in a middle-income census tract at 661 Main Street in Winchester, MA. During the evaluation period, the bank opened one new location located in a moderate-income census tract in Danvers, MA. The bank's 375 Main Street, Woburn MA location is located in a moderate-income census tract. The bank's Horn Pond Plaza, Woburn, and Arlington locations are located in upper-income census tracts.

WSB is a full-service financial institution that offers a wide range of products and services to both retail and business customers. The bank's deposit products include checking, savings, time deposit, and retirement accounts. The bank's lending products include home mortgage, home equity loans and lines of credit, construction loans, consumer loans, commercial real estate, business term loans and business lines of credit. The bank offers other commercial banking products and services, which includes cash management services. The bank also offers alternative banking services for its consumer and business customers, which includes online banking and bill pay, mobile banking, mobile deposit, person-to-person payments, ATM, and debit card services.

### **Ability and Capacity**

WSB's assets totaled approximately \$769.3 million as of September 30, 2023, and included total loans of \$627.4 million and securities of \$73.7 million. Total deposits were \$585.9 million. Total assets increased 22.5 percent since the previous evaluation. WSB's loan portfolio reflects its residential lending focus and remains consistent with the previous evaluation. The following table illustrates the loan portfolio for WSB.

| <b>Loan Portfolio Distribution as of 9/30/2023</b>                                                    |                 |              |
|-------------------------------------------------------------------------------------------------------|-----------------|--------------|
| <b>Loan Category</b>                                                                                  | <b>\$(000s)</b> | <b>%</b>     |
| Construction, Land Development, and Other Land Loans                                                  | 71,935          | 11.4         |
| Secured by Farmland                                                                                   | 0               | 0.0          |
| Secured by 1-4 Family Residential Properties                                                          | 359,271         | 57.0         |
| Secured by Multifamily (5 or more) Residential Properties                                             | 114,312         | 18.1         |
| Secured by Nonfarm Nonresidential Properties                                                          | 78,798          | 12.5         |
| <b>Total Real Estate Loans</b>                                                                        | <b>624,316</b>  | <b>99.0</b>  |
| Commercial and Industrial Loans                                                                       | 5,325           | 0.8          |
| Agricultural Production and Other Loans to Farmers                                                    | 0               | 0.0          |
| Consumer Loans                                                                                        | 459             | 0.1          |
| Other Loans                                                                                           | 210             | 0.0          |
| <b>Total Loans</b>                                                                                    | <b>630,310</b>  | <b>100.0</b> |
| <i>Source: Reports of Condition and Income</i><br><i>Due to rounding, totals may not equal 100.0%</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 CRA requires each financial institution to define one or more assessment areas in which examiners will evaluate the institution's CRA performance. WSB designated a single assessment area in the Cambridge-Newton-Framingham, MA Metropolitan Division (15764). The following sections discuss demographic and economic information relevant to the assessment area.

### **Economic Demographic Data**

The current assessment area includes 141 census tracts throughout Middlesex and Essex Counties and consists of the following towns: Arlington, Lexington, Malden, Medford, Melrose, Reading, Stoneham, Wakefield, Winchester, Woburn, Beverly, Danvers, Lynn, Peabody, Salem, and Saugus.

The low-income census tracts are located in Malden, Beverly, Lynn, Peabody, and Salem. The moderate-income census tracts are located in Arlington, Malden, Medford, Melrose, Woburn, Beverly, Danvers, Lynn, Peabody, Salem, and Saugus. The census tract information reflects the following income designations according to the 2020 U.S. Census data:

- 14 low-income census tracts,
- 39 moderate-income census tracts,
- 51 middle-income census tracts,
- 35 upper-income census tracts, and
- 2 tracts with no income designation.

The number of census tracts in the assessment area increased since the prior evaluation due to the updated 2020 U.S. Census data and the addition of the municipalities of Malden, Wakefield,

Beverly, Danvers, Lynn, Peabody, Salem, and Saugus. According to the 2015 American Community Survey (ACS) Data, the prior assessment area has 125 census tracts with the following income designations:

- 16 low-income tracts,
- 31 moderate-income tracts,
- 55 middle-income tracts,
- 23 upper-income tracts, and
- 0 tracts with no income designation.

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

| Demographic Information of the Assessment Area                                                                                                                                  |         |               |                              |                  |                 |               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------------|------------------------------|------------------|-----------------|---------------|
| Demographic Characteristics                                                                                                                                                     | #       | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)                                                                                                                                                     | 141     | 9.9           | 27.7                         | 36.2             | 24.8            | 1.4           |
| Population by Geography                                                                                                                                                         | 675,781 | 8.4           | 27.2                         | 37.9             | 25.7            | 0.8           |
| Housing Units by Geography                                                                                                                                                      | 265,711 | 8.4           | 26.7                         | 39.1             | 24.9            | 1.0           |
| Owner-Occupied Units by Geography                                                                                                                                               | 154,383 | 3.8           | 22.5                         | 41.9             | 31.2            | 0.6           |
| Occupied Rental Units by Geography                                                                                                                                              | 100,773 | 15.5          | 32.7                         | 34.4             | 15.9            | 1.5           |
| Vacant Units by Geography                                                                                                                                                       | 10,555  | 8.8           | 30.4                         | 41.9             | 17.6            | 1.4           |
| Businesses by Geography                                                                                                                                                         | 69,286  | 8.0           | 27.6                         | 37.2             | 26.6            | 0.6           |
| Farms by Geography                                                                                                                                                              | 1,092   | 8.8           | 30.6                         | 36.6             | 23.7            | 0.3           |
| Family Distribution by Income Level                                                                                                                                             | 162,493 | 24.5          | 17.8                         | 20.4             | 37.2            | 0.0           |
| Household Distribution by Income Level                                                                                                                                          | 255,156 | 28.7          | 15.2                         | 17.7             | 38.4            | 0.0           |
| Median Family Income MSA - 15764<br>Cambridge-Newton-Framingham,<br>MA                                                                                                          |         | \$121,481     | Median Housing Value         |                  |                 | \$512,150     |
|                                                                                                                                                                                 |         |               | Median Gross Rent            |                  |                 | \$1,523       |
|                                                                                                                                                                                 |         |               | Families Below Poverty Level |                  |                 | 6.3%          |
| Source: 2020 ACS, 2022 D&B Data, and FFIEC Estimated Median Family Income;<br>(*) The NA category consists of geographies that have not been assigned an income classification. |         |               |                              |                  |                 |               |

The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units. In 2022, of the 265,711 total housing units, 58.1 percent, or 154,383 were owner occupied. Of the 154,383 owner-occupied units, 3.8 percent were located in low-income geographies, and 22.5 percent were located in moderate-income geographies. Therefore, home mortgage lending opportunities in low-income geographies in the bank's assessment area is limited. Additionally, the median housing cost of \$512,150 is well above the U.S. median housing cost of \$348,079.

Examiners also used the FFIEC updated median family income to analyze the bank's performance in home mortgage lending under the Borrower Profile criterion. The following table reflects the low-, moderate-, middle-, and upper-income categories in the assessment area.

| Median Family Income Ranges                                  |             |                         |                         |                |
|--------------------------------------------------------------|-------------|-------------------------|-------------------------|----------------|
| Median Family Incomes                                        | Low<br><50% | Moderate<br>50% to <80% | Middle<br>80% to <120%  | Upper<br>≥120% |
| Cambridge-Newton-Framingham, MA Median Family Income (15764) |             |                         |                         |                |
| 2020 (\$118,800)                                             | <\$59,400   | \$59,400 to <\$95,040   | \$95,040 to <\$142,560  | ≥\$142,560     |
| 2021 (\$120,200)                                             | <\$60,100   | \$60,100 to <\$96,160   | \$96,160 to <\$144,240  | ≥\$144,240     |
| 2022 (\$138,700)                                             | <\$69,350   | \$69,350 to <\$110,960  | \$110,960 to <\$166,440 | ≥\$166,440     |
| 2023 (\$146,200)                                             | <\$73,100   | \$73,100 to <\$116,960  | \$116,960 to <\$175,440 | ≥\$175,440     |
| Source: FFIEC                                                |             |                         |                         |                |

According to 2022 D&B data, 69,286 non-farm businesses operate in the bank's assessment area. The following reflects the gross annual revenues (GARs) for these businesses:

- 90.3 percent have revenues \$1.0 million or less,
- 3.6 percent have revenues more than \$1.0 million, and
- 6.1 percent have unknown revenues.

Service industries represent the largest portion of businesses (37.9 percent); followed by non-classifiable establishments (21.8 percent); finance, insurance, and real estate (11.0 percent); retail trade (9.7 percent); and construction (8.7 percent). The remaining 10.9 percent consists of multiple industries. In addition, 93.1 percent of area businesses operate from a single location and 63.5 percent of area businesses have four or fewer employees.

Data obtained from the Massachusetts Department of Economic Research indicates in December 2023, the unemployment rate was 3.5 percent statewide, 3.0 percent in Middlesex County, and 3.6 percent in Essex County.

### **Competition**

Financial services are highly competitive within the assessment area. According to the FDIC June 30, 2022, Deposit Market Share Report, 32 financial institutions operate 200 full-service branches in the assessment area. Of these institutions, WSB ranks 14<sup>th</sup> with a 1.8 percent deposit market share. The top three institutions based on deposit market share are Bank of America, N.A. (15.2 percent), Eastern Bank (11.3 percent), and Salem Five Bank (10.9 percent).

According to 2022 aggregate home mortgage data, there is a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders in the assessment area. In 2022, 457 lenders originated or purchased 27,520 home mortgage loans. WSB ranked 80<sup>th</sup> with 0.2 percent market share.

The analysis of small business loans in this evaluation does not include comparisons to aggregate data, as the bank is not required to report small business loans. However, examiners referenced the

data to determine the level of demand and competition in the area for small business lending. In 2022, 183 lenders reported 67,827 small business loans, indicating a high level of competition for small business lending. The top three small business lenders were American Express National Bank (29.3 percent), Bank of America, N.A. (12.4 percent), and JPMorgan Chase Bank N.A. (11.9 percent).

### **Community Contact**

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

Examiners contacted a representative from a local community development organization that provides affordable housing in the assessment area. During the interview, the contact discussed several challenges in providing affordable housing in their service area. The contact discussed the difficulty in accessibility and ability to develop housing. The contact discussed difficulties in zoning regulations, the availability of financing, and difficulties in construction which causes projects to be delayed. The contact also discussed the need for first time home buyer classes as potential borrowers lack the knowledge of available programs and grants. The contact also noted the need for institutions to provide these grants and programs, as a lack of availability of these products has made it difficult to fully serve potential borrowers.

### **Community Development and Credit Needs**

Examiners considered economic and demographic data, information gathered from the community contact, and discussions with bank management to determine the assessment area's primary credit and community development needs. Examiners determined that access to affordable housing is the primary community development need. Examiners also identified financial literacy opportunities to assist consumers in understanding the home buying process and how to pursue affordable housing programs and grants. Innovative and flexible home loan products represent the primary credit need of the assessment area.

## **SCOPE OF EVALUATION**

### **General Information**

This evaluation covers the period from the prior evaluation date of November 2, 2020, to the current evaluation date of January 29, 2024. The Division and FDIC used the FFIEC Interagency Intermediate-Small Institution Examination Procedures to evaluate the institution's performance. These procedures include two tests, the Lending Test and Community Development Test.

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

- LTD ratio
- Assessment Area Concentration
- Geographic Distribution
- Borrower Profile
- Response to CRA related complaints

The Community Development Test considers the following factors:

- The number and dollar amount of community development loans, qualified investments and donations, and community development services.
- The responsiveness of such activities to the community development needs of the assessment area.

Banks must achieve at least a Satisfactory rating under each test to receive an overall Satisfactory rating. This evaluation does not include any lending activity performed by affiliates.

### **Activities Reviewed**

Examiners determined that the bank's major product lines are home mortgages and small business loans. This conclusion considered the bank's business strategy and the number and dollar volume of loans originated during the evaluation period. The bank does not originate small farm loans; therefore, they were not included in the analysis of the bank's CRA Performance.

Examiners considered all home mortgage loans reported on the bank's 2020, 2021, and 2022 Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LAR). The bank reported 225 loans totaling \$139.7 million in 2020; 218 home mortgage loans totaling \$130.9 million in 2021; and 104 home mortgage loans totaling \$89.4 million in 2022. Examiners compared the bank's performance in 2020, 2021, and 2022 to aggregate home mortgage data. Examiners also compared the bank's performance in 2020 and 2021 to 2015 ACS demographic data and 2022 performance to the 2020 U.S. Census Data.

Although WSB is not required to collect small business loan data, the bank did collect small business loan data for 2021 and 2022. Therefore, examiners evaluated the full universe of small business loans originated in 2021 and 2022. In 2021, the bank originated 9 small business loans totaling \$1.9 million and in 2022, the bank originated 6 small business loans totaling \$1.1 million. Examiners compared the bank's performance to 2021 and 2022 D&B demographic data.

The bank's home mortgage loan originations received more weight when determining overall conclusions due to the bank's business strategy and the larger loan volume as compared to small business loan originations. Bank records indicated that the product mix and lending focus has remained consistent throughout the evaluation period.

For the Lending Test, examiners analyzed the number and dollar volume of loans. The evaluation presents the number and the dollar volume of loans, but examiners emphasized performance by number of loans as it is a better indicator of the number of individuals and business served.

For the Community Development Test, bank management provided data on community development loans, qualified investments, and community development services since the prior CRA evaluation dated November 2, 2020 through January 29, 2024.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### **LENDING TEST**

WSB demonstrated reasonable performance under the Lending Test. The Assessment Area Concentration and Borrower Profile performance primarily support this conclusion.

### **Loan-to-Deposit Ratio**

The LTD ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs. The bank's LTD ratio, calculated from Call Report data, averaged 91.1 percent over the past 12 calendar quarters from December 31, 2020, to September 30, 2023. The ratio ranged from a low of 82.8 percent on March 31, 2022, to a high of 107.1 percent on September 30, 2023. The following table represents the average LTD ratio for WSB compared to similarly situated institutions. Examiners selected similarly situated institutions based on asset size, geographic location, and lending focus. WSB's LTD ratio was higher than those comparable institutions.

| <b>LTD Ratio Comparison</b>                                           |                                                      |                                          |
|-----------------------------------------------------------------------|------------------------------------------------------|------------------------------------------|
| <b>Bank</b>                                                           | <b>Total Assets as of<br/>9/30/2023<br/>(\$000s)</b> | <b>Average Net<br/>LTD Ratio<br/>(%)</b> |
| <b>Winchester Savings Bank</b>                                        | <b>769,285</b>                                       | <b>91.1</b>                              |
| The Savings Bank                                                      | 768,661                                              | 77.2                                     |
| Winchester Co-Operative Bank                                          | 769,525                                              | 75.4                                     |
| <i>Source: Reports of Condition and Income 12/31/2020 – 9/30/2023</i> |                                                      |                                          |

### **Assessment Area Concentration**

WSB originated a majority of its home mortgage and small business loans by number within its assessment area. During the evaluation period, the bank originated 50.0 percent of its home mortgage loans and small business loans inside the assessment area. In 2022, rising interest rates and housing prices were contributing facts to the overall decrease in home mortgage loans. Please refer to the following table for totals by year and loan category.

| Lending Inside and Outside of the Assessment Area |                 |       |         |      |         |                                  |       |         |      |                |
|---------------------------------------------------|-----------------|-------|---------|------|---------|----------------------------------|-------|---------|------|----------------|
| Loan Category                                     | Number of Loans |       |         |      | Total # | Dollars Amount of Loans \$(000s) |       |         |      | Total \$(000s) |
|                                                   | Inside          |       | Outside |      |         | Inside                           |       | Outside |      |                |
|                                                   | #               | %     | #       | %    |         | \$                               | %     | \$      | %    |                |
| Home Mortgage                                     |                 |       |         |      |         |                                  |       |         |      |                |
| 2020                                              | 111             | 49.3  | 114     | 50.7 | 225     | 53,936                           | 38.6  | 85,714  | 61.4 | 139,650        |
| 2021                                              | 114             | 52.3  | 104     | 47.7 | 218     | 49,949                           | 38.2  | 80,945  | 61.8 | 130,894        |
| 2022                                              | 42              | 40.4  | 62      | 59.6 | 104     | 23,551                           | 26.4  | 65,822  | 73.6 | 89,373         |
| Subtotal                                          | 267             | 48.8  | 280     | 51.2 | 547     | 127,436                          | 35.4  | 232,481 | 64.6 | 359,917        |
| Small Business                                    |                 |       |         |      |         |                                  |       |         |      |                |
| 2021                                              | 9               | 100.0 | 0       | 0.0  | 9       | 1,910                            | 100.0 | 0       | 0.0  | 1,910          |
| 2022                                              | 5               | 83.3  | 1       | 16.7 | 6       | 880                              | 81.5  | 200     | 18.5 | 1,080          |
| Subtotal                                          | 14              | 93.3  | 1       | 6.7  | 15      | 2,790                            | 93.3  | 200     | 6.7  | 2,990          |
| Total                                             | 281             | 50.0  | 281     | 50.0 | 562     | 130,226                          | 35.9  | 232,681 | 64.1 | 362,907        |
| Source: HMDA Reported Data; CRA Reported Data     |                 |       |         |      |         |                                  |       |         |      |                |

### **Geographic Distribution**

The geographic distribution of loans reflects poor dispersion throughout the assessment area. The bank's poor performance of home mortgage lending supports this conclusion. Although more emphasis is placed on the number of loans, the dollar volume of loans made in low- and moderate-income census tracts is low. Examiners also noted that the bank changed its assessment area in 2023. The bank's assessment area for 2020 and 2021 consisted of zero low-income census tracts and four moderate-income census tracts. In 2022, the bank's assessment area still contained zero low-income census tracts and nine moderate-income census tracts. Nonetheless, examiners compared the bank's lending to the current assessment area and reviewed the bank's activities using the assessment area from the bank's prior evaluation. Examiner's review of the previous assessment area was necessary as lending activity took place before the bank's assessment area change.

### ***Home Mortgage***

The geographic dispersion of home mortgage loans reflects poor dispersion throughout the assessment area. In 2020, the bank's performance in low- and moderate-income census tracts was below the aggregate performance and the percentage of owner-occupied housing units. In 2021, the bank did not originate a loan in low-income census tracts. Although the bank increased its performance in moderate-income census tracts, its performance remained below the aggregate performance and percentage of owner-occupied housing units. In 2022, the bank's performance in low-income census tracts was again below the aggregate and demographic data. In moderate-income census tracts, the bank increased its percentage of loans in moderate-income census tracts, but was still below the aggregate and demographic data. 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                                                                                                                                                | 4.4                               | 4.4                          | 2          | 1.8          | 669           | 1.2          |
| 2021                                                                                                                                                | 4.4                               | 4.9                          | 0          | 0.0          | 0             | 0.0          |
| 2022                                                                                                                                                | 3.8                               | 5.2                          | 0          | 0.0          | 0             | 0.0          |
| Moderate                                                                                                                                            |                                   |                              |            |              |               |              |
| 2020                                                                                                                                                | 19.7                              | 19.2                         | 4          | 3.6          | 1,188         | 2.2          |
| 2021                                                                                                                                                | 19.7                              | 19.6                         | 5          | 4.4          | 1,019         | 2.0          |
| 2022                                                                                                                                                | 22.5                              | 24.8                         | 6          | 14.3         | 2,969         | 12.6         |
| Middle                                                                                                                                              |                                   |                              |            |              |               |              |
| 2020                                                                                                                                                | 52.2                              | 53.5                         | 44         | 39.6         | 14,270        | 26.5         |
| 2021                                                                                                                                                | 52.2                              | 51.6                         | 43         | 37.7         | 13,613        | 27.3         |
| 2022                                                                                                                                                | 41.9                              | 39.6                         | 12         | 28.6         | 6,173         | 26.2         |
| Upper                                                                                                                                               |                                   |                              |            |              |               |              |
| 2020                                                                                                                                                | 23.7                              | 22.9                         | 61         | 55.0         | 37,810        | 70.1         |
| 2021                                                                                                                                                | 23.7                              | 23.8                         | 66         | 57.9         | 35,317        | 70.7         |
| 2022                                                                                                                                                | 31.2                              | 29.6                         | 24         | 57.1         | 14,409        | 61.2         |
| Not Available                                                                                                                                       |                                   |                              |            |              |               |              |
| 2020                                                                                                                                                | 0.0                               | 0.0                          | 0          | 0.0          | 0             | 0.0          |
| 2021                                                                                                                                                | 0.0                               | 0.0                          | 0          | 0.0          | 0             | 0.0          |
| 2022                                                                                                                                                | 0.6                               | 0.8                          | 0          | 0.0          | 0             | 0.0          |
| <b>Total</b>                                                                                                                                        |                                   |                              |            |              |               |              |
| <b>2020</b>                                                                                                                                         | <b>100.0</b>                      | <b>100.0</b>                 | <b>111</b> | <b>100.0</b> | <b>53,936</b> | <b>100.0</b> |
| <b>2021</b>                                                                                                                                         | <b>100.0</b>                      | <b>100.0</b>                 | <b>114</b> | <b>100.0</b> | <b>49,949</b> | <b>100.0</b> |
| <b>2022</b>                                                                                                                                         | <b>100.0</b>                      | <b>100.0</b>                 | <b>42</b>  | <b>100.0</b> | <b>23,551</b> | <b>100.0</b> |
| Source: 2015 & 2020 ACS; Bank Data, 2020, 2021 & 2022 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0% |                                   |                              |            |              |               |              |

### ***Small Business***

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. In moderate-income census tracts in 2021, the bank originated 22.2 percent of its small business loans in moderate-income census tracts, which was above the percentage of small businesses in those areas. The bank's performance slightly decreased in 2022 and fell below that of the percentage of small businesses in moderate-income census tracts in the assessment area, but its

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

| <b>Geographic Distribution of Small Business Loans</b>                                                                                                     |                        |          |            |                 |            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|----------|------------|-----------------|------------|
| <b>Tract Income Level</b>                                                                                                                                  | <b>% of Businesses</b> | <b>#</b> | <b>%</b>   | <b>\$(000s)</b> | <b>%</b>   |
| Low                                                                                                                                                        |                        |          |            |                 |            |
| 2021                                                                                                                                                       | 9.1                    | --       | --         | --              | --         |
| 2022                                                                                                                                                       | 8                      | --       | --         | --              | --         |
| Moderate                                                                                                                                                   |                        |          |            |                 |            |
| 2021                                                                                                                                                       | 20.7                   | 2        | 22.2       | 280             | 14.7       |
| 2022                                                                                                                                                       | 27.6                   | 1        | 16.7       | 30              | 2.8        |
| Middle                                                                                                                                                     |                        |          |            |                 |            |
| 2021                                                                                                                                                       | 49.3                   | 2        | 22.2       | 260             | 13.6       |
| 2022                                                                                                                                                       | 37.2                   | 2        | 33.3       | 410             | 38         |
| Upper                                                                                                                                                      |                        |          |            |                 |            |
| 2021                                                                                                                                                       | 20.9                   | 5        | 55.6       | 1,370           | 71.7       |
| 2022                                                                                                                                                       | 26.6                   | 3        | 50         | 640             | 59.2       |
| Not Available                                                                                                                                              |                        |          |            |                 |            |
| 2021                                                                                                                                                       | --                     | --       | --         | --              | --         |
| 2022                                                                                                                                                       | 0.6                    | --       | --         | --              | --         |
| <b>Total</b>                                                                                                                                               |                        |          |            |                 |            |
| <b>2021</b>                                                                                                                                                | <b>100</b>             | <b>9</b> | <b>100</b> | <b>1,910</b>    | <b>100</b> |
| <b>2022</b>                                                                                                                                                | <b>100</b>             | <b>6</b> | <b>100</b> | <b>1,080</b>    | <b>100</b> |
| <i>Source: 2021 &amp; 2022 D&amp;B Data; 2021&amp; 2022 CRA Aggregate Data, "--" data not available.<br/> Due to rounding, totals may not equal 100.0%</i> |                        |          |            |                 |            |

## **Borrower Profile**

### ***Home Mortgage***

The borrower profile of home mortgage loans reflects reasonable penetration to borrowers of different income levels. In 2020, the bank made 9.0 percent of its home mortgage loans to low-income borrowers. In 2021, the bank's performance decreased to 5.3 percent which was slightly below the aggregate amount of 5.8 percent to low-income borrowers. In 2022, the bank increased its performance to 7.1 percent of loans to low-income borrowers, which is comparable to the aggregate at 7.8 percent.

In lending to moderate-income borrowers, the bank was below the aggregate in 2020, but increased its performance in 2021. In 2021, the bank increased to 21.2 percent of its loans to moderate-income borrowers, which was above the aggregate at 19.2 percent. In 2022, the bank's performance

decreased to 16.7 percent, which was below the aggregate at 19.6 percent. The following table illustrates the bank's lending to borrowers of different income levels in the assessment area.

| <b>Distribution of Home Mortgage Loans by Borrower Income Level</b>                                                                                 |                      |                                     |            |              |                 |              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------------------------------------|------------|--------------|-----------------|--------------|
| <b>Borrower Income Level</b>                                                                                                                        | <b>% of Families</b> | <b>Aggregate Performance % of #</b> | <b>#</b>   | <b>%</b>     | <b>\$(000s)</b> | <b>%</b>     |
| <b>Low</b>                                                                                                                                          |                      |                                     |            |              |                 |              |
| 2020                                                                                                                                                | 24.8                 | 5.1                                 | 10         | 9.0          | 1,714           | 3.2          |
| 2021                                                                                                                                                | 24.8                 | 5.8                                 | 6          | 5.3          | 874             | 1.8          |
| 2022                                                                                                                                                | 24.5                 | 7.8                                 | 3          | 7.1          | 692             | 2.9          |
| <b>Moderate</b>                                                                                                                                     |                      |                                     |            |              |                 |              |
| 2020                                                                                                                                                | 17.5                 | 20.0                                | 10         | 9.0          | 2,985           | 5.5          |
| 2021                                                                                                                                                | 17.5                 | 19.2                                | 24         | 21.1         | 5,492           | 11.0         |
| 2022                                                                                                                                                | 17.8                 | 19.6                                | 7          | 16.7         | 2,044           | 8.7          |
| <b>Middle</b>                                                                                                                                       |                      |                                     |            |              |                 |              |
| 2020                                                                                                                                                | 21.2                 | 24.3                                | 24         | 21.6         | 7,779           | 14.4         |
| 2021                                                                                                                                                | 21.2                 | 23.4                                | 28         | 24.6         | 10,904          | 21.8         |
| 2022                                                                                                                                                | 20.4                 | 23.4                                | 9          | 21.4         | 4,486           | 19.0         |
| <b>Upper</b>                                                                                                                                        |                      |                                     |            |              |                 |              |
| 2020                                                                                                                                                | 36.5                 | 39.1                                | 65         | 58.6         | 41,054          | 76.1         |
| 2021                                                                                                                                                | 36.5                 | 37.7                                | 55         | 48.2         | 32,508          | 65.1         |
| 2022                                                                                                                                                | 37.2                 | 35.7                                | 21         | 50.0         | 14,847          | 63.0         |
| <b>Not Available</b>                                                                                                                                |                      |                                     |            |              |                 |              |
| 2020                                                                                                                                                | 0.0                  | 11.5                                | 2          | 1.8          | 405             | 0.8          |
| 2021                                                                                                                                                | 0.0                  | 13.8                                | 1          | 0.9          | 170             | 0.3          |
| 2022                                                                                                                                                | 0.0                  | 13.5                                | 2          | 4.8          | 1,482           | 6.3          |
| <b>Total</b>                                                                                                                                        |                      |                                     |            |              |                 |              |
| <b>2020</b>                                                                                                                                         | <b>100.0</b>         | <b>100.0</b>                        | <b>111</b> | <b>100.0</b> | <b>53,936</b>   | <b>100.0</b> |
| <b>2021</b>                                                                                                                                         | <b>100.0</b>         | <b>100.0</b>                        | <b>114</b> | <b>100.0</b> | <b>49,949</b>   | <b>100.0</b> |
| <b>2022</b>                                                                                                                                         | <b>100.0</b>         | <b>100.0</b>                        | <b>42</b>  | <b>100.0</b> | <b>23,551</b>   | <b>100.0</b> |
| Source: 2015 & 2020 ACS; Bank Data, 2020, 2021 & 2022 HMDA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0% |                      |                                     |            |              |                 |              |

### ***Small Business***

The distribution of small business loans reflects reasonable penetration to businesses with GARs of \$1.0 million or less. The following table shows that the bank originated 55.5 percent of its small business loans to businesses with GARs of \$1.0 million or less in 2021. The bank's performance decreased in 2022 to 33.3 percent of its small business loans to those businesses. The bank's

performance in lending to businesses with GARs less than \$1.0 million is below the percentage of small businesses with similar revenues; however, the bank faces significant competition from many larger institutions in the assessment area. Considering the high level of competition for business lending in the assessment area, the bank's performance is considered reasonable. The following table illustrates the bank's penetration of small business lending by GAR level.

| Distribution of Small Business Loans by Gross Annual Revenue Category                                                                  |                 |          |            |              |            |
|----------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------|------------|--------------|------------|
| Business Revenue Level                                                                                                                 | % of Businesses | #        | %          | \$(000s)     | %          |
| <=\$1,000,000                                                                                                                          |                 |          |            |              |            |
| 2021                                                                                                                                   | 88.3            | 5        | 55.5       | 840          | 44         |
| 2022                                                                                                                                   | 89.3            | 2        | 33.3       | 260          | 24.1       |
| >\$1,000,000                                                                                                                           |                 |          |            |              |            |
| 2021                                                                                                                                   | 4.6             | 4        | 44.5       | 1,070        | 56         |
| 2022                                                                                                                                   | 4               | 4        | 66.7       | 820          | 75.9       |
| Revenue Not Available                                                                                                                  |                 |          |            |              |            |
| 2021                                                                                                                                   | 7.1             | --       | --         | --           | --         |
| 2022                                                                                                                                   | 6.7             | --       | --         | --           | --         |
| <b>Total</b>                                                                                                                           |                 |          |            |              |            |
| <b>2021</b>                                                                                                                            | <b>100</b>      | <b>9</b> | <b>100</b> | <b>1,910</b> | <b>100</b> |
| <b>2022</b>                                                                                                                            | <b>100</b>      | <b>6</b> | <b>100</b> | <b>1,080</b> | <b>100</b> |
| Source: 2021 & 2022 D&B Data; 2021 & 2022 CRA Aggregate Data, "--" data not available.<br>Due to rounding, totals may not equal 100.0% |                 |          |            |              |            |

### **Response to Complaints**

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

### **COMMUNITY DEVELOPMENT TEST**

WSB demonstrated adequate responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities.

#### **Community Development Loans**

The bank originated five community development loans totaling approximately \$8.0 million during the evaluation period. This level of activity represents 1.2 percent of average total assets and 1.6 percent of average total loans during the evaluation period. This level of lending represents an increase in the number and dollar volume of community development lending since the previous

evaluation when the bank originated four loans totaling \$3.6 million, representing 0.7 percent of average total assets and 0.6 percent of average total loans.

The bank's community development lending by dollar amount compared favorably to one similarly situated institution, but fell below another similarly situated institution. Nonetheless, the bank's higher level of community development lending compared to the prior evaluation demonstrates increased responsiveness to community development lending opportunities in the assessment area.

The following table illustrates the bank'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)     |
| 11/3/2020 – 12/31/2020        | 0                  | 0            | 0                  | 0        | 0                    | 0        | 0                       | 0        | 0        | 0            |
| 2021                          | 2                  | 2,000        | 0                  | 0        | 0                    | 0        | 0                       | 0        | 2        | 2,000        |
| 2022                          | 1                  | 513          | 0                  | 0        | 0                    | 0        | 0                       | 0        | 1        | 513          |
| 2023                          | 2                  | 5,452        | 0                  | 0        | 0                    | 0        | 0                       | 0        | 2        | 5,452        |
| YTD 2024                      | 0                  | 0            | 0                  | 0        | 0                    | 0        | 0                       | 0        | 0        | 0            |
| <b>Total</b>                  | <b>5</b>           | <b>7,965</b> | <b>0</b>           | <b>0</b> | <b>0</b>             | <b>0</b> | <b>0</b>                | <b>0</b> | <b>5</b> | <b>7,965</b> |
| <i>Source: Bank Data</i>      |                    |              |                    |          |                      |          |                         |          |          |              |

The following are notable examples of WSB's qualified community development lending activities:

- ***Affordable Housing Construction Loan*** - In 2023, the bank originated a \$4.9 million loan to fund the construction of a 26-unit mixed-use property (2 commercial units and 24 residential units) in a low-income census tract in Lynn, MA. Once completed, all 24 residential units will be leased to low-income individuals and will help meet the need for affordable housing in the bank's assessment area.
- ***Affordable Housing Refinance*** – In 2021, the bank refinanced a \$1.5 million loan secured by a 6-unit residential apartment building located in a moderate-income census tract in Chelsea, MA. All 6 units are rented to low-income individuals who qualify for housing choice vouchers under Section 8 of the Housing Act of 1937.

### **Qualified Investments**

WSB made 102 qualified investments totaling approximately \$20.7 million. This total includes 18 equity investments totaling \$20.6 million and 84 donations totaling approximately \$107,669. Of these investments, 18 equity investments and 1 donation benefitted the statewide or regional area. Examiners determined the bank met the needs of the assessment area; therefore, examiners considered those investment activities outside the assessment area. The bank's investments represent 3.1 percent of average total assets and 31.0 percent of average total securities. Investment activity increased by dollar amount since the prior evaluation where the bank made 111 qualified

investments for approximately \$3.0 million. WSB's investment activity exceeds that of similarly situated institutions.

The following table classifies by purpose qualified investments and donations in the combined assessment area.

| Activity Year                | Qualified Investments |              |                    |           |                      |          |                         |               |            |               |
|------------------------------|-----------------------|--------------|--------------------|-----------|----------------------|----------|-------------------------|---------------|------------|---------------|
|                              | Affordable Housing    |              | Community Services |           | Economic Development |          | Revitalize or Stabilize |               | Totals     |               |
|                              | #                     | \$(000s)     | #                  | \$(000s)  | #                    | \$(000s) | #                       | \$(000s)      | #          | \$(000s)      |
| Prior Period                 | 2                     | 764          | 0                  | 0         | 0                    | 0        | 2                       | 2,367         | 4          | 3,131         |
| 11/3/2020 – 12/31/2020       | 0                     | 0            | 0                  | 0         | 0                    | 0        | 0                       | 0             | 0          | 0             |
| 2021                         | 1                     | 500          | 0                  | 0         | 0                    | 0        | 8                       | 7,500         | 9          | 8,000         |
| 2022                         | 0                     | 0            | 0                  | 0         | 0                    | 0        | 3                       | 5,500         | 3          | 5,500         |
| 2023                         | 0                     | 0            | 0                  | 0         | 0                    | 0        | 2                       | 4,000         | 2          | 4,000         |
| YTD 2024                     | 0                     | 0            | 0                  | 0         | 0                    | 0        | 0                       | 0             | 0          | 0             |
| <b>Subtotal</b>              | <b>3</b>              | <b>1,264</b> | <b>0</b>           | <b>0</b>  | <b>0</b>             | <b>0</b> | <b>15</b>               | <b>19,367</b> | <b>18</b>  | <b>20,631</b> |
| Qualified Grants & Donations | 3                     | 9            | 81                 | 99        | 0                    | 0        | 0                       | 0             | 84         | 108           |
| <b>Total</b>                 | <b>6</b>              | <b>1,273</b> | <b>81</b>          | <b>99</b> | <b>0</b>             | <b>0</b> | <b>15</b>               | <b>19,367</b> | <b>102</b> | <b>20,739</b> |
| <i>Source: Bank Data</i>     |                       |              |                    |           |                      |          |                         |               |            |               |

### ***Equity Investments***

The following are notable examples of a qualified equity investments that benefitted the bank's assessment area or the greater statewide area.

- ***Federal Farm Credit Bank (FFCB)*** – During the evaluation period, WSB purchased 13 bonds totaling \$17.0 million benefitting the FFCB. The FFCB provides credit to farmers and ranchers nationwide, and makes loans to finance rural communication, energy, and water infrastructure improvements. The bank also retained one prior period FFCB bond investment with a book value of \$2.0 million.
- ***Massachusetts Economic Development and Finance Agency (MassDevelopment)*** – During the evaluation period, WSB retained two prior period MassDevelopment bond investments. Investment proceeds finance the purchase, construction, and rehabilitation of affordable housing throughout Massachusetts. The current book value of the two bond investments as of December 31, 2023 are \$382,066 and \$764,064.

### ***Qualified Donations***

The following are notable examples of qualified donations that benefit the bank's assessment area.

- ***Council of Social Concern (CSC)*** – WSB made several donations totaling \$12,697 to CSC during the evaluation period. CSC provides low cost daycare, parenting education classes, and operates a food pantry serving Woburn, Winchester, and other communities within and adjacent to the bank's assessment area.

- ***Housing Corporation of Arlington (HCA)*** – During the evaluation period, WSB made several donations totaling \$9,000 to this organization. HCA currently maintains 150 affordable housing units in Arlington, MA, and is developing additional units. HCA also administers a Homelessness Prevention Grant Program to help maintain housing for individuals that are temporarily unemployed or experiencing short-term financial difficulty.

### **Community Development Services**

During the evaluation period, bank staff provided 79 hours of qualified community development services to 7 organizations serving the assessment area and the broader statewide area. WSB's level of community development service activity is similar to the previous evaluation period when bank employees provided 47 instances of service to 11 organizations. WSB's performance is comparable to similarly situated financial institutions operating in MA. Additionally, two of the bank's five branches are in moderate-income areas, and deposit-taking ATMs are available at both locations. The following table illustrates the bank's community development service hours by year and purpose.

| <b>Community Development Services</b> |                           |                           |                             |                                |               |
|---------------------------------------|---------------------------|---------------------------|-----------------------------|--------------------------------|---------------|
| <b>Activity Year</b>                  | <b>Affordable Housing</b> | <b>Community Services</b> | <b>Economic Development</b> | <b>Revitalize or Stabilize</b> | <b>Totals</b> |
|                                       | <b>#</b>                  | <b>#</b>                  | <b>#</b>                    | <b>#</b>                       | <b>#</b>      |
| 11/3/2020 – 12/31/2020                | 0                         | 0                         | 0                           | 0                              | <b>0</b>      |
| 2021                                  | 0                         | 23                        | 0                           | 0                              | <b>23</b>     |
| 2022                                  | 0                         | 30                        | 0                           | 0                              | <b>30</b>     |
| 2023                                  | 0                         | 26                        | 0                           | 0                              | <b>26</b>     |
| YTD 2024                              | 0                         | 0                         | 0                           | 0                              | <b>0</b>      |
| <b>Total</b>                          | <b>0</b>                  | <b>79</b>                 | <b>0</b>                    | <b>0</b>                       | <b>79</b>     |
| <i>Source: Bank Data</i>              |                           |                           |                             |                                |               |

The following is a sample of community development services that benefit the assessment area.

- ***Community Services Network (CSN)*** - During the evaluation period, a mortgage loan officer taught a four-week first-time home buyer education program to CSN clients. CSN provides housing and financial-related counseling and educational services to low- and moderate-income individuals to promote independence and self-sufficiency.
- ***Shamrock Elementary School*** - During the evaluation period, two employees, a Vice President of branch administration and a relationship banker, taught financial literacy to students attending Shamrock Elementary School in Woburn, MA. The majority of students attending the school are low- and moderate-income and qualify for low- or reduced-price lunch.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Examiners did not identify any evidence of discriminatory or other illegal credit practices and, therefore, this consideration did not affect the bank's overall rating.

## APPENDICES

### DIVISION OF BANKS 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. Based on these procedures, no evidence of disparate treatment was noted.

### MINORITY APPLICATION FLOW

Division of Banks Examiners reviewed the bank's 2021 and 2022 HMDA LARs to determine if the application flow from different racial groups within the bank's assessment area reflects the assessment area demographics.

According to the 2020 U.S. Census data, the bank's assessment area contained a total population of 675,781 individuals, of which 34.2 percent are from minority groups. The assessment area's minority and ethnic population is 6.3 percent Black/African American, 11.3 percent Asian, 0.1 percent American Indian, 12.8 percent Hispanic or Latino, and 1.5 percent from other minority groups.

The following table exhibits the bank's minority application flow compared to aggregate lenders in the assessment area.

| MINORITY APPLICATION FLOW                                                                                        |            |              |                     |           |              |                     |
|------------------------------------------------------------------------------------------------------------------|------------|--------------|---------------------|-----------|--------------|---------------------|
| RACE                                                                                                             | Bank 2021  |              | 2021 Aggregate Data | Bank 2022 |              | 2022 Aggregate Data |
|                                                                                                                  | #          | %            | %                   | #         | %            | %                   |
| American Indian/ Alaska Native                                                                                   | 0          | 0.0          | 0.2                 | 0         | 0.0          | 0.3                 |
| Asian                                                                                                            | 2          | 1.3          | 9.5                 | 5         | 7.8          | 10.1                |
| Black/ African American                                                                                          | 2          | 1.3          | 3.0                 | 2         | 3.1          | 3.7                 |
| Hawaiian/Pacific Islander                                                                                        | 0          | 0.0          | 0.1                 | 0         | 0.0          | 0.2                 |
| 2 or more Minority                                                                                               | 0          | 0.0          | 0.1                 | 0         | 0.0          | 0.1                 |
| Joint Race (White/Minority)                                                                                      | 2          | 1.3          | 1.8                 | 1         | 1.6          | 2.1                 |
| <b>Total Racial Minority</b>                                                                                     | <b>6</b>   | <b>3.9</b>   | <b>14.7</b>         | <b>8</b>  | <b>12.5</b>  | <b>16.5</b>         |
| White                                                                                                            | 99         | 64.3         | 59.1                | 33        | 51.6         | 57.9                |
| Race Not Available                                                                                               | 49         | 31.8         | 26.2                | 23        | 35.9         | 25.6                |
| <b>Total</b>                                                                                                     | <b>154</b> | <b>100.0</b> | <b>100.0</b>        | <b>64</b> | <b>100.0</b> | <b>100.0</b>        |
| <b>ETHNICITY</b>                                                                                                 |            |              |                     |           |              |                     |
| Hispanic or Latino                                                                                               | 2          | 1.3          | 7.0                 | 2         | 3.1          | 8.3                 |
| Joint (Hisp/Lat /Not Hisp/Lat)                                                                                   | 0          | 0.0          | 1.3                 | 0         | 0.0          | 1.5                 |
| <b>Total Ethnic Minority</b>                                                                                     | <b>2</b>   | <b>1.3</b>   | <b>8.3</b>          | <b>2</b>  | <b>3.1</b>   | <b>9.8</b>          |
| Not Hispanic or Latino                                                                                           | 87         | 56.5         | 66.3                | 38        | 59.4         | 65.6                |
| Ethnicity Not Available                                                                                          | 65         | 42.2         | 25.4                | 24        | 37.5         | 24.6                |
| <b>Total</b>                                                                                                     | <b>154</b> | <b>100.0</b> | <b>100.0</b>        | <b>64</b> | <b>100.0</b> | <b>100.0</b>        |
| <i>Source: ACS Census 2015, 2020 U.S. Census, HMDA Aggregate Data 2021 and 2022, HMDA LAR Data 2021 and 2022</i> |            |              |                     |           |              |                     |

WSB received 154 HMDA reportable loan applications in 2021. Of these, the bank received 6, or 3.9 percent from racial minority applicants within the bank's assessment area, compared to the aggregate performance of 14.7 percent. The bank originated 4, or 66.7 percent of loans from racial minority applicants, compared to the aggregate origination rate of 64.9 percent. The bank received two, or 1.3 percent, from applicants of Hispanic or Latino origin within its assessment area, compared to the aggregate performance of 8.3 percent. The bank originated all applications from applicants of Hispanic or Latino origin, while the aggregate originated 60.1 percent.

In 2022, the bank received 64 HMDA reportable loan applications from within its assessment area. Of these, the bank received 8, or 12.5 percent, from racial minority groups, compared to the aggregate performance of 20.0 percent. Of these applications, the bank originated 6, or 75.0 percent, compared to the aggregate origination rate of 59.5 percent. The bank received two, or 3.1 percent, from applicants of Hispanic or Latino origin, compared to the aggregate performance of 9.8 percent. Neither of these applications were originated by the bank as both were withdrawn by the applicant or incomplete, while the aggregate originated 57.2 percent.

Considering the demographic data and housing composition of the assessment area, the bank's minority application flow is considered adequate.

## **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 the area's community development needs considering the amount and combination of these activities, along with their qualitative aspects.

## 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. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution 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 institution:
  - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution'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 institution's assessment area(s) or a broader statewide or regional area including the institution'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 institution'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.

# Locations & Hours

With a network of local branches and 24-Hour ATMs, as well as Telephone, Internet and Mobile Banking, Winchester Savings makes banking as simple and convenient as possible.

## CONTACT INFORMATION

(781) 729-2130 | (800) WSB-1871

24-Hour Telephone Banking: (800) 303-2434

[www.winchestersavings.com](http://www.winchestersavings.com)



## WINCHESTER

**MAIN OFFICE**  
(781) 729-2130  
661 Main Street

### MAIN OFFICE LOBBY HOURS

| DAY                | OPEN    | CLOSE    |
|--------------------|---------|----------|
| Monday - Wednesday | 8:00 am | 4:00 pm  |
| Thursday & Friday  | 8:00 am | 5:00 pm  |
| Saturday           | 9:00 am | 12:30 pm |

### MAIN OFFICE DRIVE-UP HOURS

|                 |         |          |
|-----------------|---------|----------|
| Monday - Friday | 8:00 am | 5:00 pm  |
| Saturday        | 9:00 am | 12:30 pm |



## ARLINGTON

(781) 646-4180  
188 Medford Street

### ALL OTHER LOCATIONS HOURS

| DAY             | OPEN    | CLOSE    |
|-----------------|---------|----------|
| Monday - Friday | 9:00 am | 5:00 pm  |
| Saturday        | 9:00 am | 12:30 pm |



## WOBURN

**WOBURN CENTER**  
(781) 938-7372  
375 Main Street



**HORN POND PLAZA**  
(781) 933-9400  
344 Cambridge Road



## DANVERS

(978) 560-3005  
44 Maple Street

(781) 729-2130 | [WINCHESTERSAVINGS.COM](http://WINCHESTERSAVINGS.COM)

WINCHESTER | WOBURN | ARLINGTON | DANVERS



STRENGTH | SERVICE | COMMUNITY

## **Changes to Winchester Savings Bank's branches**

This is a list of any branches opened or closed by the Bank during the current year and each of the prior two calendar years.

### **2025**

There have been no changes to Winchester Savings Bank branches in 2025.

### **2024**

- Our temporary Danvers branch location at 10 School St. in Danvers, MA 01923 was closed on February 10<sup>th</sup>.
- Our permanent Danvers branch located at 44 Maple St. in Danvers, MA 01923 was opened on February 12<sup>th</sup>.

### **2023**

- Our Hammond Square branch location at 573 Main St. in Woburn, MA 01801 was closed on August 25<sup>th</sup>.
- Our Woburn Center branch location at 375 Main St. in Woburn, MA 01801 was opened on August 28<sup>th</sup>.
- A temporary branch location at 10 School St. in Danvers, MA 01923 was opened on Monday, September 18<sup>th</sup>.



## **Products & Services Offered as of 9/30/25**

### **Personal Banking Products**

- Checking Accounts (Including 18/65 accounts and Free Checking)
- Savings & Money Market Accounts
- Club Accounts
- Certificates of Deposit
- Individual Retirement Accounts
- Residential Mortgage Loans (Including First-Time Homebuyer Products)
- Consumer Loans & Home Equity Lines of Credit
- Personal Overdraft Protection
- Credit Cards

### **Business Banking Products**

- Checking Accounts
- Savings & Money Market Accounts
- Small Business Administration Loan referrals
- Certificates of Deposit
- Merchant Services
- Business Overdraft Protection
- Business Loans & Lines of Credit
- Commercial Real Estate Loans
- Payroll Services
- Credit Cards

### **Convenience Services**

- ATMs (CIRRUS, Discover, MoneyPass, NYCE, PLUS, SUM)
- Automatic Transfers between Accounts
- CardValet Debit Card Controls
- Digital/Mobile Wallet (Apple Pay, Google Pay, Samsung Pay)
- Direct Deposit
- Drive-Up Banking (At our Main Office and Horn Pond locations)
- Foreign Currency Exchange
- Internet Banking & Bill Pay
- Medallion Signature Guarantees
- Mobile Banking & Mobile Deposit
- Night Depository
- Notary Public
- Online Deposit Account Opening
- Online Mortgage Applications
- Overdraft Privilege Service
- Safe Deposit Boxes (At our Main Office and Horn Pond locations)
- Savings Bond Redemption
- Self-Service Coin Machine (At our Main Office, Horn Pond, and Woburn Center locations)



## **Products & Services Offered as of 9/30/25**

- Spend & Save
- Telephone Banking
- Visa® Debit Card/Visa® Business Debit Card
- Wire Transfers (Domestic/Foreign)
- Zelle®

### **Cash Management Services**

- ACH Origination
- Remote Deposit Capture
- Wire Origination for Businesses
- Zero Balance Accounts
- Positive Pay
- Sweep Services
- Landlord/Tenant Accounts



STRENGTH. SERVICE. COMMUNITY.

## Schedule of Service Charges Effective September 23, 2025

### Account Fees

|                                      |           |
|--------------------------------------|-----------|
| Insufficient Funds Charge - Paid     | \$19.00   |
| Insufficient Funds Charge - Returned | \$19.00   |
| Uncollected Funds Fee                | \$19.00   |
| Returned Deposit Item Fee            | \$6.84    |
| Stop Payment                         | No Charge |
| Retirement Plan Fee, per plan        | \$16.00   |
| IRA Transfer Fee (Outgoing)          | \$25.00   |

### ATM/VISA® Check Card Service Charges

|                                                                         |                     |
|-------------------------------------------------------------------------|---------------------|
| Winchester Savings Bank ATM Withdrawal                                  | No Charge           |
| ATMs within Money Pass Network                                          | No Surcharge        |
| ATMs within SUM Network                                                 | No Surcharge        |
| Point of Sale (POS) Withdrawals                                         | No Charge           |
| Non-Winchester Savings Bank ATM Withdrawal                              | \$2.00              |
| VISA® Check Card Replacement Card                                       | \$10.00             |
| VISA® Check Card Rush Delivery                                          | \$40.00             |
| VISA®/Plus International Service Assessment (ISA)                       | 1.0% of transaction |
| Mastercard®/Cirrus ATM transaction Currency Conversion Assessment (CCA) | 0.2% of transaction |
| Mastercard®/Cirrus ATM transaction Cross Border Assessment (CBA)        | 0.9% of transaction |

### Overdraft Services

|                                                                                  |               |
|----------------------------------------------------------------------------------|---------------|
| Automatic Overdraft Protection Transfer Fee                                      | No Charge     |
| Overdraft Protection Line of Credit (interest is charged on outstanding balance) | No Annual Fee |

### Online Banking, Mobile Banking & Bill Pay

|                |           |
|----------------|-----------|
| Online Banking | No Charge |
| Mobile Banking | No Charge |
| Bill Pay       | No Charge |

### Negotiable Items

|                   |        |
|-------------------|--------|
| Money Order*      | \$2.00 |
| Treasurers Check* | \$5.00 |

\*One free per day

### Funds Transfers

|                         |         |
|-------------------------|---------|
| Domestic Wire, Incoming | \$10.00 |
| Domestic Wire, Outgoing | \$20.00 |
| Foreign Wire, Incoming  | \$10.00 |
| Foreign Wire, Outgoing  | \$40.00 |

## International

|                                                          |         |
|----------------------------------------------------------|---------|
| Check Sent for Collection (plus any pass-through charge) | \$20.00 |
| Foreign Currency Order Fee                               |         |
| Transactions Less than \$300.00 US                       | \$17.50 |
| Transactions \$300.00 US and Over                        | \$7.50  |

## Other

|                                                                                               |                                                 |
|-----------------------------------------------------------------------------------------------|-------------------------------------------------|
| Abandoned Property Fee                                                                        | \$50.00                                         |
| Account Research Fee (per hour)                                                               | \$20.00                                         |
| Check Printing Charges                                                                        | Varies                                          |
| Coin Counting                                                                                 | No Charge for Customers<br>5% for Non-Customers |
| Notary Public Fees                                                                            |                                                 |
| Winchester Savings Account Holders                                                            | No Charge                                       |
| Non-WSB Account Holders                                                                       | \$1.25 ea                                       |
| Safe Deposit Fees                                                                             |                                                 |
| Lost Key                                                                                      | \$20.00                                         |
| Box Drilling                                                                                  | \$225.00                                        |
| Late Payment                                                                                  | \$10.00                                         |
| (Contents of Safe Deposit Boxes are not insured by the FDIC, DIF, or Winchester Savings Bank) |                                                 |
| Legal Process Fees                                                                            | \$50.00                                         |

## Personal Accounts

|                           | Minimum Daily Balance Required to<br>Avoid Monthly Charges | Monthly Maintenance Service Charge |
|---------------------------|------------------------------------------------------------|------------------------------------|
| <b>CHECKING ACCOUNTS</b>  |                                                            |                                    |
| Completely Free Checking  | \$0.00                                                     | No Charge                          |
| 50+ Advantage Checking    | \$0.00                                                     | No Charge                          |
| Easy Interest Checking    | \$0.00                                                     | No Charge                          |
| Premier Interest Checking | \$1,500.00                                                 | \$10.00                            |
| <b>SAVINGS ACCOUNTS</b>   |                                                            |                                    |
| Statement Savings         | \$0.00                                                     | No Charge                          |
| Club Savings              | \$0.00                                                     | No Charge                          |
| High Yield Savings        | \$250.00                                                   | \$3.00                             |
| Money Market              | \$2,500.00                                                 | \$10.00                            |

### Notice to Depositors 65 years of age or older or 18 years of age or younger:

If you are 65 years of age or older or 18 years of age or younger and you have notified the Bank of your eligibility, you are entitled to a free 18/65 Checking Account and a free 18/65 Statement Savings Account. Each charge for Returned Items, Uncollected Funds, Insufficient Funds, and ATM or VISA® Check Card Overdrafts will be reduced from \$19 to \$5.

For more information, please refer to our current rate sheet and *Understanding Your Deposit Account* disclosure.



09/2025

## Business Account Schedule of Service Charges Effective September 23, 2025

### Account Fees

|                                      |           |
|--------------------------------------|-----------|
| Insufficient Funds Charge - Paid     | \$19.00   |
| Insufficient Funds Charge - Returned | \$19.00   |
| Uncollected Funds Fee                | \$19.00   |
| Returned Deposit Item Fee            | \$10.00   |
| Stop Payment                         | No Charge |

### ATM/Business VISA® Debit Card Service Charges

|                                                                         |                     |
|-------------------------------------------------------------------------|---------------------|
| Winchester Savings Bank ATM Withdrawal                                  | No Charge           |
| ATMs within Money Pass Network                                          | No Surcharge        |
| ATMs within SUM Network                                                 | No Surcharge        |
| Point of Sale (POS) Withdrawals                                         | No Charge           |
| Non-Winchester Savings Bank ATM Withdrawal                              | \$2.00              |
| ATM or VISA® Business Debit Card Overdraft                              | \$19.00             |
| VISA® Business Debit Card Replacement Card                              | \$10.00             |
| VISA® Business Debit Card Rush Delivery                                 | \$40.00             |
| VISA®/Plus International Service Assessment (ISA)                       | 1.0% of transaction |
| Mastercard®/Cirrus ATM transaction Currency Conversion Assessment (CCA) | 0.2% of transaction |
| Mastercard®/Cirrus ATM transaction Cross Border Assessment (CBA)        | 0.9% of transaction |

### Overdraft Services

|                                                                                  |               |
|----------------------------------------------------------------------------------|---------------|
| Automatic Overdraft Protection Transfer Fee                                      | No Charge     |
| Overdraft Protection Line of Credit (interest is charged on outstanding balance) | No Annual Fee |

### Online Banking, Mobile Banking & Bill Pay

|                |           |
|----------------|-----------|
| Online Banking | No Charge |
| Mobile Banking | No Charge |
| Bill Pay       | No Charge |

### Negotiable Items

|                   |        |
|-------------------|--------|
| Money Order*      | \$2.00 |
| Treasurers Check* | \$5.00 |
| *One free per day |        |

### Funds Transfers

|                         |         |
|-------------------------|---------|
| Domestic Wire, Incoming | \$10.00 |
| Domestic Wire, Outgoing | \$20.00 |
| Foreign Wire, Incoming  | \$10.00 |
| Foreign Wire, Outgoing  | \$40.00 |

### International

|                                                          |         |
|----------------------------------------------------------|---------|
| Check Sent for Collection (plus any pass-through charge) | \$20.00 |
| Foreign Currency Order Fee                               |         |
| Transactions less than \$300.00 US                       | \$17.50 |
| Transactions \$300.00 US and over                        | \$7.50  |

## Other

|                                                                                               |                                                 |
|-----------------------------------------------------------------------------------------------|-------------------------------------------------|
| Abandoned Property Fee                                                                        | \$50.00                                         |
| Account Research Fee per hour                                                                 | \$20.00                                         |
| Check Printing Charges                                                                        | Varies                                          |
| Coin Counting                                                                                 | No Charge for Customers<br>5% for Non-Customers |
| Night Deposit Bag Fees                                                                        |                                                 |
| Annual Per Bag Charge                                                                         | \$20.00                                         |
| Annual Maintenance Charge                                                                     | \$15.00                                         |
| Replacement Key                                                                               | \$10.00                                         |
| Notary Public Fees                                                                            |                                                 |
| Winchester Savings account holders                                                            | No Charge                                       |
| Non-WSB account holders                                                                       | \$1.25 ea                                       |
| Safe Deposit Fees                                                                             |                                                 |
| Lost Key                                                                                      | \$20.00                                         |
| Box Drilling                                                                                  | \$225.00                                        |
| Late Payment                                                                                  | \$10.00                                         |
| (Contents of Safe Deposit Boxes are not insured by the FDIC, DIF, or Winchester Savings Bank) |                                                 |
| Legal Process Fees                                                                            | \$50.00                                         |

## Business Accounts

|                                                                                                                                                                                                                                                                                                                                                                         | Minimum Daily Balance Required to<br>Avoid Monthly Charges | Monthly Maintenance Service Charge |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|------------------------------------|
| <b>CHECKING ACCOUNTS</b>                                                                                                                                                                                                                                                                                                                                                |                                                            |                                    |
| Completely Free Business Checking                                                                                                                                                                                                                                                                                                                                       | \$0.00                                                     | No Charge                          |
| Business Interest Checking                                                                                                                                                                                                                                                                                                                                              | \$1,500.00                                                 | \$10.00                            |
| Commercial Checking                                                                                                                                                                                                                                                                                                                                                     | \$0.00                                                     | \$15.00                            |
| Earnings Credit Rate (ECR) will determine your monthly Earnings Allowance. The ECR is established for your account at our sole discretion and is subject to change without prior notice. Additional Cash Management services are available and certain charges may apply. Current rate and service charge information is available from our Cash Management Department. | <b>Commercial Checking Fees</b>                            | <b>Amount</b>                      |
|                                                                                                                                                                                                                                                                                                                                                                         | Each Check Cleared                                         | \$0.15                             |
|                                                                                                                                                                                                                                                                                                                                                                         | Each Deposit                                               | \$0.15                             |
|                                                                                                                                                                                                                                                                                                                                                                         | Each Deposited Item                                        | \$0.15                             |
|                                                                                                                                                                                                                                                                                                                                                                         | Each ACH Transaction                                       | \$0.15                             |
| Earnings Allowance applied based on average collected balance and may offset fees.                                                                                                                                                                                                                                                                                      |                                                            |                                    |
| IOLTA Checking                                                                                                                                                                                                                                                                                                                                                          | \$0.00                                                     | No Charge                          |

## SAVINGS ACCOUNTS

|                            |             |         |
|----------------------------|-------------|---------|
| Business Money Market      | \$25,000.00 | \$15.00 |
| Business Statement Savings | \$1,000.00  | \$5.00  |
| High Yield Savings         | \$250.00    | \$3.00  |

For more information, please refer to our current rate sheet and *All About Your Business Deposit Account* disclosure.



09/2025

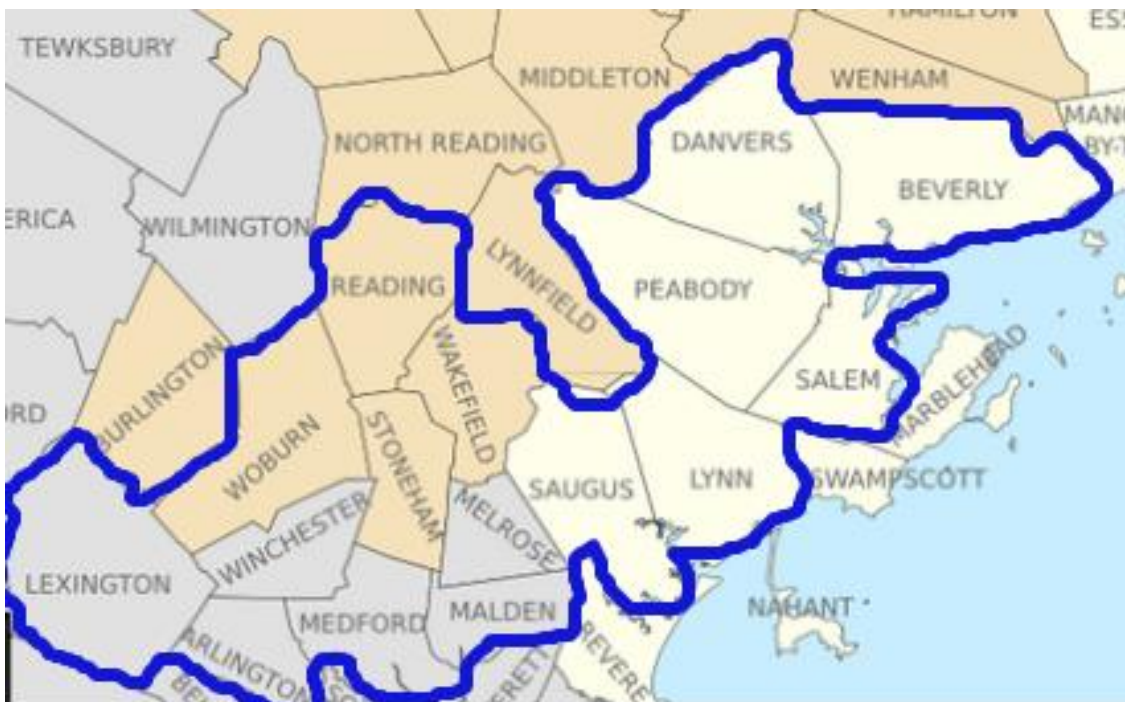


## Winchester Savings Bank – Assessment Area

**Effective July 11, 2023**

Our Community Re-Investment Act (CRA) Assessment Area includes the following cities/towns:

- Winchester
- Woburn
- Arlington
- Medford
- Lexington
- Reading
- Stoneham
- Melrose
- Wakefield
- Malden
- Peabody
- Danvers
- Saugus
- Lynn
- Beverly
- Salem



| County    | Town       | Tract Code | Tract Income Level | Distressed or Underserved Tract | Tract Median Family Income % | 2023 FFIEC Est. MSA/MD non-MSA/MD Median Family Income | 2023 Est. Tract Median Family Income | 2020 Tract Median Family Income | Tract Population | Tract Minority % | Minority Population | Owner Occupied Units | 1- to 4-Family Units |
|-----------|------------|------------|--------------------|---------------------------------|------------------------------|--------------------------------------------------------|--------------------------------------|---------------------------------|------------------|------------------|---------------------|----------------------|----------------------|
| Middlesex | Woburn     | 3331.00    | Middle             | No                              | 94.57                        | \$146,200                                              | \$138,261                            | \$114,896                       | 7687             | 21.97            | 1689                | 2257                 | 2404                 |
| Middlesex | Woburn     | 3332.00    | Middle             | No                              | 89.31                        | \$146,200                                              | \$130,571                            | \$108,500                       | 5228             | 20.45            | 1069                | 1228                 | 1815                 |
| Middlesex | Woburn     | 3333.00    | Moderate           | No                              | 72.3                         | \$146,200                                              | \$105,703                            | \$87,838                        | 4316             | 31.95            | 1379                | 787                  | 1407                 |
| Middlesex | Woburn     | 3334.00    | Middle             | No                              | 91.78                        | \$146,200                                              | \$134,182                            | \$111,503                       | 6524             | 26.89            | 1754                | 1515                 | 1809                 |
| Middlesex | Woburn     | 3335.01    | Middle             | No                              | 104.45                       | \$146,200                                              | \$152,706                            | \$126,888                       | 5093             | 21.83            | 1112                | 1398                 | 1616                 |
| Middlesex | Woburn     | 3335.02    | Middle             | No                              | 85.06                        | \$146,200                                              | \$124,358                            | \$103,333                       | 3429             | 29.43            | 1009                | 644                  | 1306                 |
| Middlesex | Woburn     | 3336.01    | Moderate           | No                              | 65.06                        | \$146,200                                              | \$95,118                             | \$79,038                        | 1550             | 41.74            | 647                 | 90                   | 157                  |
| Middlesex | Woburn     | 3336.02    | Moderate           | No                              | 78.16                        | \$146,200                                              | \$114,270                            | \$94,954                        | 7049             | 35.05            | 2471                | 1347                 | 2042                 |
| Middlesex | Reading    | 3341.00    | Middle             | No                              | 118.65                       | \$146,200                                              | \$173,466                            | \$144,142                       | 6999             | 12.43            | 870                 | 2154                 | 1966                 |
| Middlesex | Reading    | 3342.00    | Upper              | No                              | 131.43                       | \$146,200                                              | \$192,151                            | \$159,663                       | 4070             | 11.89            | 484                 | 1156                 | 1372                 |
| Middlesex | Reading    | 3343.00    | Upper              | No                              | 142.24                       | \$146,200                                              | \$207,955                            | \$172,796                       | 7768             | 10.05            | 781                 | 2452                 | 2557                 |
| Middlesex | Reading    | 3344.00    | Upper              | No                              | 138.27                       | \$146,200                                              | \$202,151                            | \$167,981                       | 6681             | 16.91            | 1130                | 2167                 | 2042                 |
| Middlesex | Wakefield  | 3351.00    | Middle             | No                              | 96.28                        | \$146,200                                              | \$140,761                            | \$116,964                       | 6259             | 11.68            | 731                 | 1935                 | 2312                 |
| Middlesex | Wakefield  | 3352.00    | Middle             | No                              | 102.63                       | \$146,200                                              | \$150,045                            | \$124,688                       | 6273             | 13.01            | 816                 | 1684                 | 2197                 |
| Middlesex | Wakefield  | 3353.01    | Middle             | No                              | 89.49                        | \$146,200                                              | \$130,834                            | \$108,714                       | 4124             | 17.58            | 725                 | 1090                 | 1618                 |
| Middlesex | Wakefield  | 3353.02    | Middle             | No                              | 110.87                       | \$146,200                                              | \$162,092                            | \$134,688                       | 5309             | 15.75            | 836                 | 1442                 | 1464                 |
| Middlesex | Wakefield  | 3354.00    | Upper              | No                              | 133.25                       | \$146,200                                              | \$194,812                            | \$161,875                       | 5125             | 14.81            | 759                 | 1663                 | 1767                 |
| Middlesex | Melrose    | 3361.00    | Middle             | No                              | 115.56                       | \$146,200                                              | \$168,949                            | \$140,385                       | 5758             | 16.59            | 955                 | 1605                 | 1996                 |
| Middlesex | Melrose    | 3362.01    | Upper              | No                              | 139.23                       | \$146,200                                              | \$203,554                            | \$169,142                       | 3062             | 11.82            | 362                 | 1025                 | 1094                 |
| Middlesex | Melrose    | 3362.02    | Upper              | No                              | 192.19                       | \$146,200                                              | \$280,982                            | \$233,482                       | 3416             | 14.23            | 486                 | 1021                 | 1060                 |
| Middlesex | Melrose    | 3363.00    | Upper              | No                              | 125.41                       | \$146,200                                              | \$183,349                            | \$152,358                       | 6985             | 16.78            | 1172                | 1905                 | 2349                 |
| Middlesex | Melrose    | 3364.02    | Middle             | No                              | 107.8                        | \$146,200                                              | \$157,604                            | \$130,963                       | 4764             | 22.19            | 1057                | 1170                 | 1277                 |
| Middlesex | Melrose    | 3364.03    | Unknown            | No                              | 0                            | \$146,200                                              | \$0                                  | \$0                             | 3254             | 39.61            | 1289                | 299                  | 376                  |
| Middlesex | Melrose    | 3364.04    | Moderate           | No                              | 71.74                        | \$146,200                                              | \$104,884                            | \$87,155                        | 2578             | 29.48            | 760                 | 488                  | 728                  |
| Middlesex | Stoneham   | 3371.01    | Upper              | No                              | 122.93                       | \$146,200                                              | \$179,724                            | \$149,345                       | 3220             | 16.65            | 536                 | 774                  | 1089                 |
| Middlesex | Stoneham   | 3371.02    | Middle             | No                              | 112.44                       | \$146,200                                              | \$164,387                            | \$136,600                       | 5414             | 16.97            | 919                 | 1710                 | 1669                 |
| Middlesex | Stoneham   | 3372.01    | Upper              | No                              | 135.08                       | \$146,200                                              | \$197,487                            | \$164,107                       | 3370             | 20.15            | 679                 | 886                  | 746                  |
| Middlesex | Stoneham   | 3372.02    | Middle             | No                              | 113.52                       | \$146,200                                              | \$165,966                            | \$137,917                       | 5110             | 14.72            | 752                 | 1593                 | 1749                 |
| Middlesex | Stoneham   | 3373.00    | Middle             | No                              | 98.86                        | \$146,200                                              | \$144,533                            | \$120,097                       | 6130             | 23.3             | 1428                | 1547                 | 1842                 |
| Middlesex | Winchester | 3381.00    | Upper              | No                              | 162.67                       | \$146,200                                              | \$237,824                            | \$197,614                       | 3204             | 32.74            | 1049                | 975                  | 1127                 |

|           |            |         |          |    |        |           |           |           |      |       |      |      |      |
|-----------|------------|---------|----------|----|--------|-----------|-----------|-----------|------|-------|------|------|------|
| Middlesex | Winchester | 3382.00 | Upper    | No | 127.41 | \$146,200 | \$186,273 | \$154,779 | 4271 | 40.34 | 1723 | 1124 | 1158 |
| Middlesex | Winchester | 3383.00 | Upper    | No | 205.79 | \$146,200 | \$300,865 | \$250,001 | 3469 | 17.67 | 613  | 826  | 924  |
| Middlesex | Winchester | 3384.00 | Upper    | No | 205.79 | \$146,200 | \$300,865 | \$250,001 | 6167 | 22.07 | 1361 | 2112 | 2165 |
| Middlesex | Winchester | 3385.00 | Upper    | No | 179.93 | \$146,200 | \$263,058 | \$218,587 | 5859 | 18.62 | 1091 | 1718 | 1868 |
| Middlesex | Medford    | 3391.01 | Upper    | No | 125.39 | \$146,200 | \$183,320 | \$152,333 | 3267 | 26.94 | 880  | 1087 | 698  |
| Middlesex | Medford    | 3391.02 | Upper    | No | 131.03 | \$146,200 | \$191,566 | \$159,178 | 3442 | 17.29 | 595  | 1059 | 1227 |
| Middlesex | Medford    | 3392.00 | Upper    | No | 145.22 | \$146,200 | \$212,312 | \$176,417 | 5700 | 14.14 | 806  | 1730 | 2232 |
| Middlesex | Medford    | 3393.00 | Moderate | No | 78.37  | \$146,200 | \$114,577 | \$95,208  | 2996 | 42.19 | 1264 | 583  | 927  |
| Middlesex | Medford    | 3394.00 | Upper    | No | 128.51 | \$146,200 | \$187,882 | \$156,125 | 3479 | 27.08 | 942  | 574  | 1204 |
| Middlesex | Medford    | 3395.00 | Middle   | No | 85.35  | \$146,200 | \$124,782 | \$103,693 | 5662 | 35.06 | 1985 | 650  | 1572 |
| Middlesex | Medford    | 3396.00 | Middle   | No | 114.39 | \$146,200 | \$167,238 | \$138,968 | 5454 | 30.95 | 1688 | 825  | 1933 |
| Middlesex | Medford    | 3397.00 | Moderate | No | 56.35  | \$146,200 | \$82,384  | \$68,459  | 3916 | 39.84 | 1560 | 873  | 1684 |
| Middlesex | Medford    | 3398.02 | Middle   | No | 84.05  | \$146,200 | \$122,881 | \$102,111 | 5485 | 49.3  | 2704 | 1020 | 1273 |
| Middlesex | Medford    | 3398.03 | Moderate | No | 77.99  | \$146,200 | \$114,021 | \$94,750  | 3383 | 49.72 | 1682 | 459  | 81   |
| Middlesex | Medford    | 3398.04 | Unknown  | No | 0      | \$146,200 | \$0       | \$0       | 2260 | 45.04 | 1018 | 553  | 1044 |
| Middlesex | Medford    | 3399.00 | Moderate | No | 75.81  | \$146,200 | \$110,834 | \$92,106  | 5327 | 37.58 | 2002 | 1105 | 1859 |
| Middlesex | Medford    | 3400.00 | Middle   | No | 89.09  | \$146,200 | \$130,250 | \$108,232 | 2590 | 37.88 | 981  | 569  | 846  |
| Middlesex | Medford    | 3401.00 | Middle   | No | 93.55  | \$146,200 | \$136,770 | \$113,654 | 6698 | 25.56 | 1712 | 2116 | 2443 |
| Middlesex | Malden     | 3411.01 | Upper    | No | 121.59 | \$146,200 | \$177,765 | \$147,717 | 3850 | 51.25 | 1973 | 897  | 1314 |
| Middlesex | Malden     | 3411.02 | Middle   | No | 81.07  | \$146,200 | \$118,524 | \$98,495  | 5180 | 52.82 | 2736 | 923  | 1055 |
| Middlesex | Malden     | 3412.00 | Moderate | No | 60.38  | \$146,200 | \$88,276  | \$73,352  | 6988 | 60.02 | 4194 | 1318 | 2034 |
| Middlesex | Malden     | 3413.01 | Middle   | No | 105.37 | \$146,200 | \$154,051 | \$128,008 | 4565 | 70.58 | 3222 | 117  | 193  |
| Middlesex | Malden     | 3413.02 | Middle   | No | 94.53  | \$146,200 | \$138,203 | \$114,848 | 2273 | 64.45 | 1465 | 213  | 535  |
| Middlesex | Malden     | 3414.00 | Moderate | No | 62.3   | \$146,200 | \$91,083  | \$75,694  | 6747 | 65.14 | 4395 | 1157 | 2014 |
| Middlesex | Malden     | 3415.00 | Moderate | No | 65.9   | \$146,200 | \$96,346  | \$80,066  | 5353 | 70.61 | 3780 | 727  | 1544 |
| Middlesex | Malden     | 3416.00 | Middle   | No | 88.35  | \$146,200 | \$129,168 | \$107,333 | 6985 | 53.04 | 3705 | 1160 | 1974 |
| Middlesex | Malden     | 3417.00 | Moderate | No | 70.21  | \$146,200 | \$102,647 | \$85,303  | 5607 | 49.97 | 2802 | 1127 | 1766 |
| Middlesex | Malden     | 3418.00 | Low      | No | 39.15  | \$146,200 | \$57,237  | \$47,560  | 7075 | 64.66 | 4575 | 741  | 1936 |
| Middlesex | Malden     | 3419.01 | Middle   | No | 83.86  | \$146,200 | \$122,603 | \$101,875 | 1515 | 57.03 | 864  | 298  | 380  |
| Middlesex | Malden     | 3419.03 | Middle   | No | 91.29  | \$146,200 | \$133,466 | \$110,909 | 6888 | 60.29 | 4153 | 639  | 725  |
| Middlesex | Malden     | 3419.04 | Low      | No | 36.35  | \$146,200 | \$53,144  | \$44,163  | 3237 | 58.33 | 1888 | 508  | 919  |
| Middlesex | Arlington  | 3561.00 | Upper    | No | 124.1  | \$146,200 | \$181,434 | \$150,769 | 3330 | 24.08 | 802  | 766  | 1410 |
| Middlesex | Arlington  | 3563.00 | Moderate | No | 77.81  | \$146,200 | \$113,758 | \$94,527  | 5332 | 32.65 | 1741 | 959  | 1753 |
| Middlesex | Arlington  | 3564.00 | Upper    | No | 135.34 | \$146,200 | \$197,867 | \$164,423 | 8136 | 20.88 | 1699 | 1981 | 2545 |

|           |           |         |          |    |        |           |           |           |      |       |      |      |      |
|-----------|-----------|---------|----------|----|--------|-----------|-----------|-----------|------|-------|------|------|------|
| Middlesex | Arlington | 3565.00 | Upper    | No | 121.93 | \$146,200 | \$178,262 | \$148,125 | 7067 | 23.9  | 1689 | 2126 | 2471 |
| Middlesex | Arlington | 3566.01 | Middle   | No | 111.92 | \$146,200 | \$163,627 | \$135,968 | 4783 | 29.02 | 1388 | 1122 | 1386 |
| Middlesex | Arlington | 3566.02 | Upper    | No | 143.12 | \$146,200 | \$209,241 | \$173,875 | 4284 | 22.34 | 957  | 1410 | 1513 |
| Middlesex | Arlington | 3567.01 | Upper    | No | 129.48 | \$146,200 | \$189,300 | \$157,300 | 6275 | 23.95 | 1503 | 1066 | 1716 |
| Middlesex | Arlington | 3567.03 | Upper    | No | 128.49 | \$146,200 | \$187,852 | \$156,103 | 3211 | 22.14 | 711  | 857  | 899  |
| Middlesex | Arlington | 3567.04 | Upper    | No | 142.07 | \$146,200 | \$207,706 | \$172,596 | 3890 | 25.84 | 1005 | 776  | 1163 |
| Middlesex | Lexington | 3581.00 | Upper    | No | 192.41 | \$146,200 | \$281,303 | \$233,750 | 5282 | 37.39 | 1975 | 1696 | 1937 |
| Middlesex | Lexington | 3583.00 | Upper    | No | 177.29 | \$146,200 | \$259,198 | \$215,385 | 6380 | 48.92 | 3121 | 1387 | 1468 |
| Middlesex | Lexington | 3584.00 | Upper    | No | 162.21 | \$146,200 | \$237,151 | \$197,059 | 5285 | 39.55 | 2090 | 1533 | 1665 |
| Middlesex | Lexington | 3585.00 | Upper    | No | 194.41 | \$146,200 | \$284,227 | \$236,181 | 5580 | 44.98 | 2510 | 1627 | 1696 |
| Middlesex | Lexington | 3586.00 | Upper    | No | 183.55 | \$146,200 | \$268,350 | \$222,984 | 6319 | 44.2  | 2793 | 1839 | 2088 |
| Middlesex | Lexington | 3587.00 | Upper    | No | 190.27 | \$146,200 | \$278,175 | \$231,154 | 5608 | 43.62 | 2446 | 1691 | 1961 |
| Essex     | Salem     | 2041.01 | Moderate | No | 64.02  | \$146,200 | \$93,597  | \$77,778  | 4664 | 30.21 | 1409 | 924  | 1650 |
| Essex     | Salem     | 2041.02 | Middle   | No | 83.9   | \$146,200 | \$122,662 | \$101,926 | 5708 | 26.07 | 1488 | 1270 | 1374 |
| Essex     | Salem     | 2042    | Low      | No | 48.97  | \$146,200 | \$71,594  | \$59,491  | 5236 | 31.46 | 1647 | 896  | 1740 |
| Essex     | Salem     | 2043    | Low      | No | 34.47  | \$146,200 | \$50,395  | \$41,875  | 4076 | 57.68 | 2351 | 501  | 1005 |
| Essex     | Salem     | 2044    | Middle   | No | 83.7   | \$146,200 | \$122,369 | \$101,688 | 3489 | 13.81 | 482  | 860  | 1277 |
| Essex     | Salem     | 2045    | Middle   | No | 86.63  | \$146,200 | \$126,653 | \$105,250 | 3537 | 21.88 | 774  | 738  | 955  |
| Essex     | Salem     | 2046    | Middle   | No | 89.62  | \$146,200 | \$131,024 | \$108,875 | 5369 | 22.97 | 1233 | 1478 | 2231 |
| Essex     | Salem     | 2047.01 | Moderate | No | 78.82  | \$146,200 | \$115,235 | \$95,760  | 6185 | 40.02 | 2475 | 1396 | 1559 |
| Essex     | Salem     | 2047.02 | Moderate | No | 68.57  | \$146,200 | \$100,249 | \$83,304  | 6208 | 34.49 | 2141 | 1445 | 1920 |
| Essex     | Lynn      | 2051    | Moderate | No | 77.67  | \$146,200 | \$113,554 | \$94,358  | 6128 | 45.86 | 2810 | 1474 | 1703 |
| Essex     | Lynn      | 2052    | Moderate | No | 60.33  | \$146,200 | \$88,202  | \$73,298  | 5925 | 60.19 | 3566 | 1213 | 1707 |
| Essex     | Lynn      | 2053    | Middle   | No | 105.21 | \$146,200 | \$153,817 | \$127,813 | 4807 | 32.76 | 1575 | 1217 | 1469 |
| Essex     | Lynn      | 2054    | Middle   | No | 97.56  | \$146,200 | \$142,633 | \$118,523 | 4874 | 22.01 | 1073 | 1395 | 1459 |
| Essex     | Lynn      | 2055    | Moderate | No | 53.93  | \$146,200 | \$78,846  | \$65,526  | 5500 | 74.71 | 4109 | 876  | 1330 |
| Essex     | Lynn      | 2056    | Moderate | No | 57.69  | \$146,200 | \$84,343  | \$70,089  | 4422 | 55.09 | 2436 | 741  | 952  |
| Essex     | Lynn      | 2057    | Moderate | No | 72.18  | \$146,200 | \$105,527 | \$87,697  | 5072 | 53.75 | 2726 | 1238 | 1707 |
| Essex     | Lynn      | 2058    | Moderate | No | 50.93  | \$146,200 | \$74,460  | \$61,875  | 3725 | 78.77 | 2934 | 409  | 914  |
| Essex     | Lynn      | 2059    | Moderate | No | 65.91  | \$146,200 | \$96,360  | \$80,076  | 4798 | 70.4  | 3378 | 799  | 1260 |
| Essex     | Lynn      | 2060    | Low      | No | 44.87  | \$146,200 | \$65,600  | \$54,516  | 3704 | 83.94 | 3109 | 175  | 578  |
| Essex     | Lynn      | 2061    | Low      | No | 34.98  | \$146,200 | \$51,141  | \$42,500  | 4199 | 85.71 | 3599 | 222  | 758  |
| Essex     | Lynn      | 2062    | Moderate | No | 56.31  | \$146,200 | \$82,325  | \$68,410  | 5879 | 86.26 | 5071 | 681  | 1448 |
| Essex     | Lynn      | 2063    | Moderate | No | 76.73  | \$146,200 | \$112,179 | \$93,224  | 4214 | 81.56 | 3437 | 697  | 1678 |

|       |         |         |          |    |        |           |           |           |      |       |      |      |      |
|-------|---------|---------|----------|----|--------|-----------|-----------|-----------|------|-------|------|------|------|
| Essex | Lynn    | 2064    | Moderate | No | 63.74  | \$146,200 | \$93,188  | \$77,434  | 6060 | 65.81 | 3988 | 1062 | 1825 |
| Essex | Lynn    | 2065    | Low      | No | 36.29  | \$146,200 | \$53,056  | \$44,089  | 3747 | 81.35 | 3048 | 468  | 1063 |
| Essex | Lynn    | 2066    | Moderate | No | 58.9   | \$146,200 | \$86,112  | \$71,563  | 5116 | 58.76 | 3006 | 680  | 1259 |
| Essex | Lynn    | 2067    | Moderate | No | 50.26  | \$146,200 | \$73,480  | \$61,062  | 4564 | 60.41 | 2757 | 631  | 953  |
| Essex | Lynn    | 2068    | Low      | No | 25.46  | \$146,200 | \$37,223  | \$30,935  | 4425 | 76.32 | 3377 | 293  | 642  |
| Essex | Lynn    | 2069    | Low      | No | 37.92  | \$146,200 | \$55,439  | \$46,066  | 4995 | 64.64 | 3229 | 352  | 266  |
| Essex | Lynn    | 2070    | Low      | No | 33.67  | \$146,200 | \$49,226  | \$40,909  | 2289 | 74.4  | 1703 | 139  | 303  |
| Essex | Lynn    | 2071    | Low      | No | 46.93  | \$146,200 | \$68,612  | \$57,014  | 3807 | 88.86 | 3383 | 364  | 1034 |
| Essex | Lynn    | 2072    | Low      | No | 33.53  | \$146,200 | \$49,021  | \$40,734  | 3003 | 80.02 | 2403 | 298  | 537  |
| Essex | Saugus  | 2081.01 | Middle   | No | 85.48  | \$146,200 | \$124,972 | \$103,851 | 5402 | 29.58 | 1598 | 1437 | 2027 |
| Essex | Saugus  | 2081.02 | Middle   | No | 88.34  | \$146,200 | \$129,153 | \$107,326 | 3542 | 30.55 | 1082 | 871  | 1192 |
| Essex | Saugus  | 2082    | Middle   | No | 90.32  | \$146,200 | \$132,048 | \$109,732 | 5530 | 21.59 | 1194 | 1691 | 1907 |
| Essex | Saugus  | 2083.01 | Moderate | No | 66.85  | \$146,200 | \$97,735  | \$81,221  | 2678 | 20.61 | 552  | 760  | 1023 |
| Essex | Saugus  | 2083.02 | Moderate | No | 76.13  | \$146,200 | \$111,302 | \$92,484  | 4985 | 21.89 | 1091 | 1431 | 1462 |
| Essex | Saugus  | 2084.01 | Middle   | No | 87.08  | \$146,200 | \$127,311 | \$105,795 | 2968 | 21.56 | 640  | 992  | 844  |
| Essex | Saugus  | 2084.02 | Middle   | No | 101.01 | \$146,200 | \$147,677 | \$122,708 | 3514 | 27.8  | 977  | 735  | 872  |
| Essex | Peabody | 2101    | Middle   | No | 104.2  | \$146,200 | \$152,340 | \$126,587 | 6880 | 10.84 | 746  | 2383 | 2468 |
| Essex | Peabody | 2102    | Middle   | No | 99.9   | \$146,200 | \$146,054 | \$121,371 | 5308 | 10.19 | 541  | 1785 | 1946 |
| Essex | Peabody | 2103.01 | Middle   | No | 87.92  | \$146,200 | \$128,539 | \$106,811 | 5176 | 10.72 | 555  | 1418 | 623  |
| Essex | Peabody | 2103.02 | Middle   | No | 83.3   | \$146,200 | \$121,785 | \$101,205 | 4918 | 24.66 | 1213 | 1090 | 1175 |
| Essex | Peabody | 2104.01 | Moderate | No | 61.37  | \$146,200 | \$89,723  | \$74,563  | 3235 | 34.22 | 1107 | 468  | 854  |
| Essex | Peabody | 2104.02 | Middle   | No | 91.57  | \$146,200 | \$133,875 | \$111,250 | 4133 | 18.22 | 753  | 1188 | 1373 |
| Essex | Peabody | 2105    | Middle   | No | 95.62  | \$146,200 | \$139,796 | \$116,172 | 6946 | 15.92 | 1106 | 2301 | 2513 |
| Essex | Peabody | 2106    | Moderate | No | 74.04  | \$146,200 | \$108,246 | \$89,948  | 4424 | 25.95 | 1148 | 961  | 1427 |
| Essex | Peabody | 2107    | Low      | No | 46.19  | \$146,200 | \$67,530  | \$56,120  | 4446 | 44.06 | 1959 | 778  | 1321 |
| Essex | Peabody | 2108    | Moderate | No | 66.88  | \$146,200 | \$97,779  | \$81,250  | 4951 | 45.28 | 2242 | 945  | 1509 |
| Essex | Peabody | 2109    | Middle   | No | 82.56  | \$146,200 | \$120,703 | \$100,300 | 4064 | 23.89 | 971  | 1068 | 1502 |
| Essex | Danvers | 2111    | Moderate | No | 79.55  | \$146,200 | \$116,302 | \$96,648  | 4033 | 13.17 | 531  | 1006 | 1121 |
| Essex | Danvers | 2112.01 | Middle   | No | 102.77 | \$146,200 | \$150,250 | \$124,853 | 2605 | 11.63 | 303  | 664  | 899  |
| Essex | Danvers | 2112.02 | Moderate | No | 73.23  | \$146,200 | \$107,062 | \$88,967  | 3830 | 11.1  | 425  | 878  | 992  |
| Essex | Danvers | 2113    | Upper    | No | 122.72 | \$146,200 | \$179,417 | \$149,083 | 6916 | 9.79  | 677  | 1991 | 2105 |
| Essex | Danvers | 2114.01 | Moderate | No | 79.48  | \$146,200 | \$116,200 | \$96,563  | 4261 | 19.71 | 840  | 754  | 711  |
| Essex | Danvers | 2114.02 | Middle   | No | 106.89 | \$146,200 | \$156,273 | \$129,857 | 6442 | 12.34 | 795  | 2206 | 2437 |
| Essex | Beverly | 2171.01 | Middle   | No | 115.43 | \$146,200 | \$168,759 | \$140,227 | 4797 | 15.84 | 760  | 1191 | 1406 |

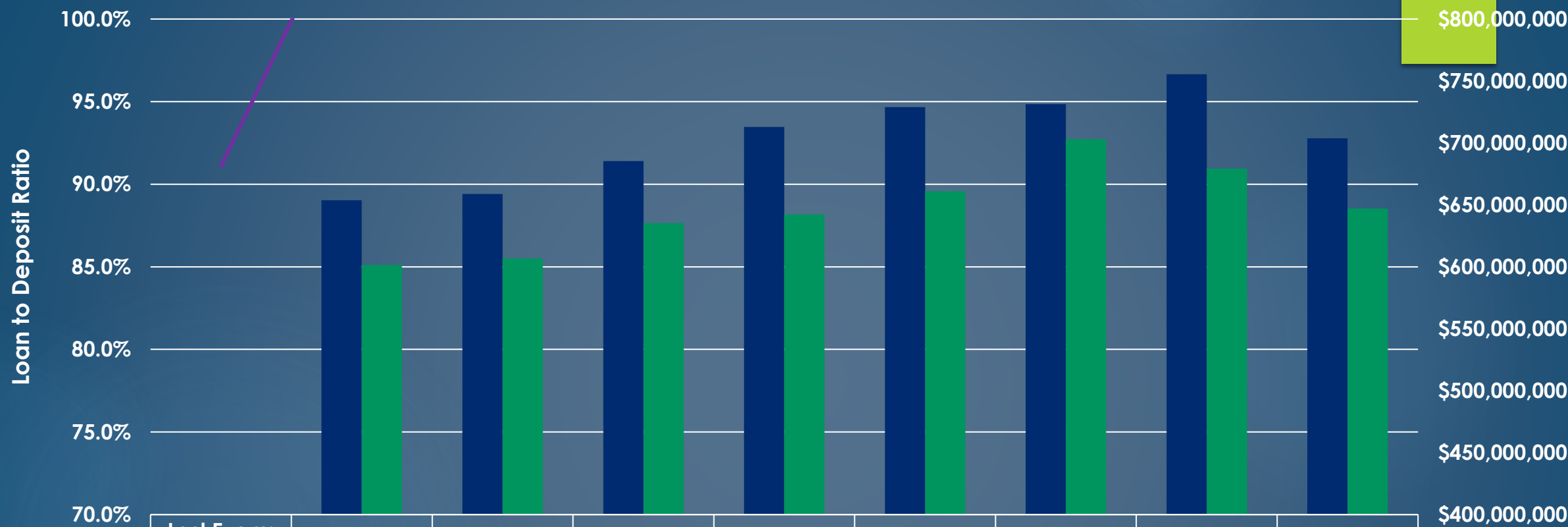
|       |         |         |          |    |        |           |           |           |      |       |      |      |      |
|-------|---------|---------|----------|----|--------|-----------|-----------|-----------|------|-------|------|------|------|
| Essex | Beverly | 2171.02 | Moderate | No | 76.92  | \$146,200 | \$112,457 | \$93,452  | 3029 | 17.89 | 542  | 537  | 739  |
| Essex | Beverly | 2172.01 | Middle   | No | 97.4   | \$146,200 | \$142,399 | \$118,333 | 4237 | 14.09 | 597  | 1201 | 1258 |
| Essex | Beverly | 2172.02 | Middle   | No | 108.86 | \$146,200 | \$159,153 | \$132,250 | 3586 | 10.21 | 366  | 1254 | 1430 |
| Essex | Beverly | 2173    | Moderate | No | 76.26  | \$146,200 | \$111,492 | \$92,652  | 5281 | 30.28 | 1599 | 824  | 1490 |
| Essex | Beverly | 2174.01 | Low      | No | 45.8   | \$146,200 | \$66,960  | \$55,648  | 2423 | 21.75 | 527  | 184  | 748  |
| Essex | Beverly | 2174.02 | Moderate | No | 54.59  | \$146,200 | \$79,811  | \$66,328  | 3409 | 16.93 | 577  | 845  | 776  |
| Essex | Beverly | 2175    | Middle   | No | 109.04 | \$146,200 | \$159,416 | \$132,471 | 6420 | 12.02 | 772  | 1677 | 2436 |
| Essex | Beverly | 2176.01 | Upper    | No | 134.1  | \$146,200 | \$196,054 | \$162,917 | 4732 | 8.88  | 420  | 1180 | 1263 |
| Essex | Beverly | 2176.02 | Upper    | No | 176.46 | \$146,200 | \$257,985 | \$214,375 | 4756 | 8.39  | 399  | 1106 | 1234 |

## **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. HMDA data for many other financial institutions are also available online. For more information, visit the Consumer Financial Protection Bureau's Web site ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)).

Rev. 1/1/2018

# Loan-to-Deposit Ratio



|           |       |               |               |               |               |               |               |               |               |
|-----------|-------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Loans     |       | \$653,631,800 | \$658,744,800 | \$685,402,300 | \$712,860,000 | \$728,933,400 | \$731,328,000 | \$755,371,200 | \$703,753,071 |
| Deposits  |       | \$601,501,800 | \$606,819,200 | \$635,392,600 | \$642,278,800 | \$660,991,400 | \$703,081,400 | \$679,181,300 | \$647,035,214 |
| LTD Ratio | 91.1% | 108.7%        | 108.6%        | 107.9%        | 111.0%        | 110.3%        | 104.0%        | 111.2%        | 108.8%        |

## COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) and the Massachusetts Commissioner of Banks (Commissioner) evaluate our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC and the Commissioner also take this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA. You may review today the public section of our most recent CRA evaluation, prepared by the FDIC and/or the Division of Banks, and a list of services we provide. You may also have access to the following additional information, which we will make available to within five calendar days after you make a request to us: (1) a map showing the assessment area, which is the area in which the FDIC evaluates our CRA performance in this community; (2) information about our branches in this assessment area; (3) a list of services we provide at those locations; (4) data on our lending performance in this assessment area; and (5) copies of all written comments received by us that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

At least 30 days before the beginning of each calendar quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination for the next two quarters. This list is available from the Regional Director, FDIC 350 Fifth Avenue, Suite 1200, New York, NY 10118, or the Massachusetts Division of Banks, One Federal Street, Suite 710, Boston, MA 02110-2012. You may send written comments about our performance in helping to meet community credit needs to Michael Goldberg, CRA Compliance Officer, Winchester Savings Bank, 661 Main Street, Winchester, MA 01890, FDIC Regional Director and the Massachusetts Division of Banks. You may also submit comments electronically through the FDIC's website at [www.fdic.gov/regulations/cra](http://www.fdic.gov/regulations/cra). Your letter, together with any response by us, will be considered by the FDIC and the Commissioner in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director and the Commissioner of Banks. You may also request from the FDIC Regional Director and the Commissioner of Banks an announcement of our applications covered by the CRA filed with the FDIC and the Commissioner of Banks.

You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Massachusetts Division of Banks and the Federal Deposit Insurance Corporation, online at [www.winchestersavings.com](http://www.winchestersavings.com) or you may request a copy at any of our branch locations, or contact us by phone at 781-729-2130.