



**CIT Bank, N.A.
Community Reinvestment Act Plan
For the 4 Years Ending December 2019
Revised Submission as of May 5, 2016**

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I. Executive Summary

The Board of Directors of CIT Bank, N.A. ("CITBNA" or "Bank") is implementing this Community Reinvestment Act ("CRA") Plan for the four years ending December 31, 2019. The CRA Plan ("Plan") sets forth the Bank's commitments and targets for lending, investment, and community development ("CD") services in its southern California assessment areas ("AAs")¹, and an action plan for achieving those goals.

In addition, the Plan details the CITBNA CRA governance structure, describes reporting that will be used to monitor the achievement of Plan goals, and explains the Bank's plans to develop products and services that serve community needs.

The Plan presented here describes the Bank's activities and goals that will be evaluated under the large institution CRA examination procedures and is not intended to suggest that the Bank has chosen to be examined under the strategic plan option cited in 12 CFR 25.27.

To effectively execute the Plan, the Bank is taking steps to elevate and strengthen support for CRA initiatives throughout the Bank. We have enhanced and expanded our management-level CRA Committee to include broader business unit involvement and established that the CRA Committee will report to both the Bank's Executive Management Committee and the Bank's Board of Directors or a Board Committee.

This Plan was developed with significant input from the community through outreach meetings with over 25 community-based organizations, a written survey from 49 community organizations, independent research and open to the public, Community Days. These outreach activities were specifically responsible for over 17 specific commitments included in the Plan ranging from expansion of the cultural diversity of our Board of Directors to extensive ongoing outreach to the community regarding ongoing lending and training.

In response to community input, the Bank also appointed a Community Advisory Board ("CAB") comprised of representatives of community-based organizations operating in our assessment areas. The CAB will meet at least quarterly and Bank staff will have ongoing communications with community development organizations to obtain regular feedback on our CRA initiatives and to help inform our product offerings and marketing.

Product development and management will be a key responsibility of the CRA Committee which will take a comprehensive approach including idea generation, approval and implementation to make sure our products serve low- and moderate-income ("LMI") customers. We will refine our investment strategies to more directly support CRA goals

¹ The Bank's Assessment Area includes the following MSAs / MDs: (1) Los Angeles-Long Beach-Glendale, CA MD (2) Oxnard-Thousand Oaks-Ventura, CA MSA (3) Riverside-San Bernardino-Ontario CA MSA (4) San Diego-Carlsbad, CA MSA (5) Anaheim-Santa Ana-Irvine, CA MD. This Plan may be amended if the Assessment Areas change within the period of time the Plan covers.

and establish CRA-qualified investment goals for the Bank's assessment areas. We will enhance our community development grants program to strategically support the nonprofit partners in the Bank's community development initiatives.

Finally, we are developing new CRA performance reports for executive management and the Board, and expanding CRA and community development training and resources.

In this Plan, the words "CITBNA," "the Bank," "we," "our" and "us" refer to CIT Bank, N.A, a wholly owned subsidiary of CIT Group Inc. CITBNA is a regional bank headquartered in Pasadena, California. The Bank has approximately \$43 billion in assets. Through its Internet bank, BankOnCIT.com and the 70 Retail Banking Centers of its OneWest Bank division located in southern California, CITBNA offers a suite of banking products designed to help customers achieve a range of financial goals. In addition, CITBNA offers a full suite of financing and banking solutions across a range of industries to businesses and individuals nationwide. CITBNA seeks to build client relationships with a high level of personal service and customized products through retail branch-based bankers, private bankers, wholesale banking teams, product specialists and investment advisors to facilitate clients' use, where appropriate, of multiple services and products offered by the Bank

II. CRA Mission Statement

In developing this Plan, the Bank's Board of Directors adopted the following mission statement regarding CRA activities:

CIT Bank is fully committed to meeting the credit needs of the communities in our assessment area, including the needs of low- and moderate-income neighborhoods and consumers, consistent with safe and sound operations.

It is our goal to invest and provide banking services to the betterment of the constituents in our assessment area with a focus on the underserved. In this process we will seek public input from the communities in our assessment area along with community groups providing services therein.

We will develop a CRA Plan and develop specific targets to accomplish the Plan consistent with the Bank's risk and return thresholds.

We will provide management and Board oversight along with reporting to assess their achievement and modify our strategies as appropriate to meet this mission and our Plan.

III. Public Input

This Plan was revised and enhanced with considerable input of community groups. Beginning in September 2014, CIT and OneWest jointly hosted our first Community Day and shared a draft CRA plan with attendees. Following this meeting, CITBNA employees met with community groups and received feedback on that Plan. The Bank reissued draft CRA Plans in October 2014 and February 2015 based on ongoing feedback received from community groups.

As a condition of the merger approval, the OCC asked the Bank to seek additional public input to revise and finalize the CRA plan. To meet this condition the Bank continued to seek community input through: (1) research (2) additional community outreach (3) a written survey (4) Community Advisory Board input and (5) feedback received at our October 2015 Community Day that was open to the public.

Included in all these outreach activities were community groups that were neutral, supported or opposed the merger. We held over 28 meetings, received 49 written survey responses and had over 50 groups represented at the 2015 Community Day event. The groups represented all assessment areas of the Bank's footprint and all community services were represented with no concentration of any single community service.

Based on the community feedback received, the Bank has amended the Plan since the initial draft to include the following activities:

- Establish a Community Advisory Board
- Strive for Bank Board diversity including representatives from the Latino, Asian American and African American communities
- Conduct annual community meetings open to all participants
- Hold focus groups to allow community groups to dive deeper into product offerings and provide additional feedback
- Evaluate programs we can offer for affordable mortgage loan products
- Evaluate programs we can offer for small balance multifamily loan products
- Develop education and training programs to provide education to nonprofit partners on product suites
- Increase marketing to minority newspapers and other minority marketing channels
- Ensure marketing covers full suite of product offerings
- For loans originated by CITBNA, develop a first look policy to prefer nonprofits in the sale of distressed loans and REO properties
- Explore Participation in the California State Loan Guaranty Program
- Develop declined loan referral programs (mortgage and small business)

- Support technical assistance programs and refer small business loan denials to these programs.
- Increase proportion of multiyear grants
- Make ATMs surcharge free for EBT cards
- Lower the opening balance on the personal checking account
- Ensure personal checking account remains competitive against peers and accessible to LMI individuals

IV. Discussion of CRA Lending, Investment and Services

It is the goal of the Bank to provide lending, investments and services that reflect the needs of our local communities. To assess community needs, the Bank conducted research, performed outreach to community groups, sought feedback from the CAB, conducted a written survey and held a Community Day that included a survey with written and verbal input. The conclusions of these assessments are that the following are particular needs in the local community:

- Affordable housing
- Single family and multifamily lending
- Small business lending
- Economic development
- Financial education
- Ongoing outreach to the community on evolving needs

The Bank used the feedback to develop this 4 year plan which targets \$5B in new lending and investing activities as shown below:

CRA Lending and Investing in the Assessment Area	Target Volumes				
	Year 1	Year 2	Year 3	Year 4	Total
CRA Lending	\$ 797	\$ 1,114	\$ 1,312	\$ 1,408	\$ 4,630
Investing	\$ 100	\$ 100	\$ 100	\$ 100	\$ 400
Total	\$ 897	\$ 1,214	\$ 1,412	\$ 1,508	\$ 5,030

The actual target for new CRA qualified investments is 8% of Tier 1 capital over the life of this Plan, which is estimated to be \$400M and shown here as a dollar amount for illustrative purposes only. The following sections of this plan outline in more detail our commitment to investing, lending, and services over the life of this plan.

A. CRA Lending

Through its community outreach efforts, the Bank has identified affordable housing as a primary need in the southern California community. To meet our goals and continue to meet the need of our community, we are exploring and evaluating new lending products, specifically for affordable housing. In addition, we will expand our marketing efforts to LMI communities. CRA Lending activities we are looking to expand include:

- The volume of single family residential mortgage loans and the proportion of these loans to LMI borrowers and in LMI census tracts;
- The volume of small loans to businesses located in LMI census tracts and businesses with \$1 million or less in revenues;
- The volume of multifamily loans in LMI census tracts and
- The number, amount, and variety of community development loans in its assessment area.

CITBNA has established goals for overall residential mortgage lending volume including penetration to LMI borrowers and in LMI areas, small business loans including businesses located in LMI census tracts and businesses with annual revenues of no more than \$1 million, multifamily loans in LMI areas and loans for affordable housing and community development and to community development organizations that serve clients with loan products that are not offered directly by CITBNA. In addition, the Bank will pursue innovative and flexible lending products such as leases originated by the Bank and its affiliates, however, we recognize that these will not count towards our CRA Reportable Lending target. Over time the Bank may adjust the mix of products offered and/or develop additional products to meet the needs of the community.

Plan goals will be updated annually as performance is measured against its criteria of success. Annual updates will take market conditions and updated feedback into consideration when establishing updates to the annual plan goals. The Bank will measure its performance at least quarterly to determine whether it is on track to meet its goals or whether it must change its strategies in order to meet its goals over time. The Plan will also be updated as a result of changes to the Bank's assessment areas, merger activity, acquisitions, or other matters, such as varying economic and market conditions within the Bank's assessment areas that may affect the Bank's performance context. All lending programs will be subject to approval by the Bank's established processes and will conform to appropriate safety and soundness considerations.

1. CRA Lending Commitment

- Target \$4.6 billion over 4 years in CRA-Reportable Lending²
- Meet or exceed peer benchmark targets for LMI tracts and borrowers
- Achieve SBA Preferred Lender designation

² CRA-Reportable Lending is defined as lending within the Assessment Area that is reported to the Federal Financial Institutions Examination Council ("FFIEC") that includes Home Mortgage, Small Loans to Businesses, Multifamily and Community Development Lending

- Develop a small business loan and technical assistance referral program so that businesses unable to qualify for small business loans from the Bank can be referred seamlessly to local CDFIs and other nonprofit providers that may be able to make the loan and/or provide technical assistance in order to help borrowers better prepare themselves to qualify for conventional financing
- Maintain single point of contact to work with nonprofit groups representing homeowners seeking to secure loan modifications
- Maintain single point of contact structure for delinquent accounts for forward and reverse residential mortgage loans³
- For loans originated by CITBNA (including originations by predecessor OneWest, however excluding loans acquired by OneWest), CITBNA will develop a policy to prefer nonprofits in the sale of distressed loans and REO properties

2. CRA Lending Targets

It is the Bank's goal to achieve the additional CRA Lending Targets identified below. Certain targets listed below are for products that have not had an opportunity to mature, for example SBA 7(a) lending which is a product launched by OneWest in 2014 and Direct Capital Corporation, a small business lending platform acquired by CIT in 2014. In the event we are not able to grow these businesses, we will grow other products at a faster pace to achieve the overall CRA Lending Commitments identified above.

CRA Reportable Lending Volume

The lending volumes listed below reflect loans in the Bank's Assessment Area.

Lending in the Assessment Area	Target Volumes					In / Out Ratio
	Year 1	Year 2	Year 3	Year 4	Total	
Single Family Loans	\$ 330	\$ 476	\$ 592	\$ 651	\$ 2,049	50%
Small Loans to Business:						
SBA	\$ 112	\$ 165	\$ 181	\$ 200	\$ 657	82%
Other Small loans	\$ 70	\$ 77	\$ 85	\$ 93	\$ 324	8%
Sub total	\$ 181	\$ 241	\$ 266	\$ 293	\$ 981	16%
Multi Family Loans	\$ 150	\$ 200	\$ 200	\$ 200	\$ 750	100%
Community Development Loans	\$ 136	\$ 196	\$ 254	\$ 263	\$ 850	100%
Total	\$ 797	\$ 1,114	\$ 1,312	\$ 1,408	\$ 4,630	40%

In/Out Ratio

The Bank has set an in/out ratio for all CRA-Reportable loans at 40% (based on dollar volume). This ratio reflects the fact the CITBNA has a national small business lending franchise.

³ The single point of contact includes a team of Bank associates in order to provide a significant range of working hours for each loan with a borrower facing financial hardship.

LMI Penetration Targets

CITBNA has set annual LMI targets for origination benchmarked to peer market share⁴.

Loan Category	Target	Year 1	Year 2	Year 3	Year 4
Loans to small businesses	Percentage of Bank’s loans to small businesses by count located in LMI census tracts in AA compared against the level of peer performance.	≥90%	≥90%	≥100%	≥100%
Loans to small businesses	Percentage of Bank’s loans to small businesses by count in AA with annual revenues of \$1MM or less compared against the level of peer performance.	≥90%	≥90%	≥100%	≥100%
Residential loans ⁵	Percentage of Bank’s residential loans by count located in LMI census tracts in AA compared against the level of peer performance.	≥90%	≥90%	≥100%	≥100%
Residential loans ⁴	Percentage of Bank’s residential loans by count whose LMI borrowers compare against the level of peer performance.	≥90%	≥90%	≥100%	≥100%
Multifamily loans	Percentage of Bank’s multifamily loans by count located in LMI census tracts in AA compared against the level of peer performance.	≥95%	≥97%	≥100%	≥100%

3. CRA Lending Actions

- Single Family Residential Loans
 - It is the intention of the Bank to achieve the majority of the SFR lending target primarily through direct and correspondent originations, and secondarily through closed loan purchases, to the extent that the direct and correspondent channels are not generating the targets or are not otherwise feasible.

² CRA-Reportable Lending is defined as lending within the Assessment Area that is reported to the Federal Financial Institutions Examination Council (“FFIEC”) that includes Home Mortgage, Small Loans to Businesses, Multifamily and Community Development Lending

⁴ Targets are based on the most recent Peer Market Share Data made available by the Federal Financial Institutions Examination Council. Due to the reporting cycle, the targets are based on prior year performance.

* denotes annual amount originated by original commitment.

⁵ Residential loans include originations and purchases of 1-4 single family mortgages and home refinance loans.

- The Bank will focus on developing partnerships with local community-based organizations, to increase the number and amount of SFR mortgage loans originated in LMI geographies or to LMI persons
- The Bank will evaluate affordable SFR loan programs including but not limited to:
 - Fannie Mae Home Ready
 - FHLB – San Francisco’s WISH and IDEA programs
 - FHA Loans
- The Bank will hold focus groups with community groups focused on affordable housing to discuss additional affordable mortgage loan products
- Establish referral programs to nonprofit partners for borrowers who do not qualify for a mortgage loan
- Develop training and educational materials to educate community partners on the Bank’s mortgage loan product suite.
- Design a marketing program to build awareness of all mortgage products offered by the Bank
- Support credit counseling and first time homebuyer education initiatives
- Multifamily Loans
 - It is the intention of the Bank to achieve the majority of the multifamily lending target primarily through direct originations, and secondarily through closed loan purchases, to the extent that the direct channels are not generating the targets or are not otherwise feasible.
 - Continue to offer 3-5 year term, floating rate loans for multifamily properties in transition (i.e., that are not fully stabilized properties) subject to ongoing feasibility and safety and soundness evaluation
 - Evaluate new multifamily products that meet affordable housing needs including a small balance multifamily loan product that includes a streamlined, efficient origination process
 - Establish referral programs to nonprofits for credits the Bank is unable to approve
- Small Business Loans
 - Develop a suite of lending and deposit products targeted to small business
 - Achieve the SBA Preferred Lender Designation
 - Explore products such as the Cal State Guaranty Fund
 - The Bank will hold focus groups with community groups focused on small business lending and technical assistance to discuss additional small business lending needs
 - Develop a small business loan and technical assistance referral program to local CDFIs and other nonprofit partners
 - Develop training and educational materials to educate community partners on the Bank’s small business product suite.
 - Design a marketing program to build awareness of all small business products offered by the Bank
- Community Development Loans

- Hire a community development loan officer
- Create a training program for the Bank's commercial loan officers and credit risk management to augment the knowledge and skills of its lenders and underwriters to allow the Bank to more effectively underwrite community development loans
- Expand partnerships with CDFIs or qualified nonprofit organizations

4. Lending Considerations

The Bank has adopted policies to ensure lending practices are neither abusive nor predatory and that all credit decisions must be made without regard to race, color, religion, national origin, sex, marital status, disability, sexual orientation, or any other basis prohibited by law, and without arbitrary refusal to consider applications on the basis of the age or location of the dwelling in home-secured transactions.

The Bank will evaluate each borrower's ability to repay their loan according to the terms of the loan. The Bank does not offer loan terms that make it difficult for borrowers to meet their payment obligations or which may heighten the borrower's need to sell or refinance the property when amortization begins, such as unreasonable balloon payments, negative amortization, call provisions, deeply discounted starting interest rates, increases in interest rates on default, etc. The Bank does not originate high cost or high rate loans, as the terms are defined under applicable federal or state law. Loan officers are not incented to direct a borrower into any one product over another and are not given pricing discretion.

All new products will be subject to the new product approval process by the Bank. Considerations will include whether the Bank can recruit qualified subject matter experts including loan officers and credit approval officers. The Bank will also consider new products eligibility under its risk profile and Risk Appetite Statement.

The Bank has carefully reviewed its mortgage servicing practices for conformance with applicable legal requirements and mortgage servicing rules that went into effect in January 2014, and require that a loan modification request reach a decision point before a foreclosure referral is made. The Bank's processes are also consistent with the dual tracking restriction in the servicing rules. The Bank complies with all HUD mortgagee letters for applicable servicing including reverse mortgage provisions for surviving spouses.

B. CRA Investments

The CRA Investment Test evaluates the Bank's record of helping to meet credit needs through qualified investments that benefit the Bank's assessment areas or a broader statewide or regional area that includes one or more of the Bank's assessment areas. Qualified investments must benefit LMI persons or geographies and have a primary purpose of community or economic development of LMI areas, distressed areas, or designated disaster areas; affordable housing for LMI persons; or essential services for LMI persons or geographies. Qualified investments include, but are not limited to, investments that promote community development, affordable housing, revitalization and stabilization, or

economic development. Qualified investments may be in the form of grants of cash or cash equivalents; deposits; purchases of certain securities or bonds; investments in tax credits for qualified community development projects, such as Low-Income Housing Tax Credits ("LIHTC") or New Markets Tax Credits; or certain in-kind donations of property or goods. Qualified community development investments provide a means of supporting local communities through lawful investments, deposits, membership shares, or grants that serve a primary purpose of community development.

1. CRA Investment Commitment

- New CRA Qualified Investments will total 8% of Tier 1 Capital by the end of this Plan⁶ (currently estimated to be \$400M)
- While Qualified Investments of the Bank in our Assessment Area prior to initiation of this plan may amortize, mature or payoff, during the term of this plan, it is not the intention of the Bank to actively market them for sale
- \$5 million in annual donations (in addition to the qualified investments noted above) to established nonprofit organizations with demonstrated capacity/impact which would meet the definition of qualified investments pursuant to 12(T)(4) of the interagency questions and answers on community reinvestment)

2. CRA Investment Targets

It is the Bank's intention to meet the CRA Investment Targets outlined below; however, the Bank recognizes that investment opportunity or qualified partners may not be available to achieve these goals. In the event that the opportunities do not exist, funds will be reallocated to available investment opportunities to meet the CRA Investment Commitments outlined above.

Investment Target

The Bank will broaden its CRA investment portfolio. In doing so, the Bank will strive to 1) take a leadership position in origination of qualified investments, 2) grow the use of innovativeness and complexity in their qualified investments and 3) ensure excellent responsiveness to community development and credit needs, while maintaining the Bank's risk and economic return tolerances.

⁶ Tier 1 Capital for CRA Investment measurement purposes, assumes a 9% Tier 1 Leverage Ratio.

Donation Target

The Bank will continue to work with nonprofit organizations that provide basic services that provide community benefits. Based on a community needs assessment, the Bank has prioritized its grant making to the following service categories:

- Affordable housing
- Technical assistance programs for small business owners
- Workforce development
- Financial literacy & education
- Health and human services to LMI individuals
- Programs for at risk youth

The Bank recognizes the need for capacity building and multiyear donations to provide leverage to nonprofit organizations to focus on providing services. The Bank will make unrestricted and multi-year grants on a select basis.

3. CRA Investment Actions

In striving to achieve the Investment Targets, the Bank will focus on a variety of investment types including the following , generally in the order listed:

- Equity investments or grants to CDFIs
- Low Income Housing Tax Credits
- CRA-focused Mutual Funds
- CRA qualified municipal bonds
- New Market Tax Credits
- Investments in minority or women-owned financial institutions or in Low Income Credit Unions
- CRA-targeted Mortgage Backed Securities

4. Investment Considerations

Organizations receiving grants will be required to go through an approval process that ensures funds are used for specific initiatives identified by the Bank. The Bank will ensure that the funds have a demonstrable impact to the community in which the organization serves. Additional reporting by grant recipients may be required to ensure grants are meeting the intended purposes of the grants.

C. CRA Services

1. CRA Services Commitment

- 15% of total branches/ATMs out of the total population of branches/ATMs to be located in LMI tracts
- ATMs will be a member of MoneyPass providing participants surcharge free access to the Bank's ATMs (Note: EBT Cards are members of MoneyPass)
- Maintain a competitive Personal Checking account
- Annual CRA volunteer service target of 2,100 hours

2. CRA Services Targets

- Host at least 3 annual companywide community service days that enable employees to volunteer during work hours
- Place employees with locally based community development entities that offer programs and services benefiting LMI communities. Service activities may include, but are not exclusive to, serving on a loan committee, board membership or providing foreclosure counseling.

3. CRA Services Action Plan

- To ensure the Bank's services are meeting the needs of the community, including LMI individuals, the Bank will develop reporting to measure and monitor the effectiveness of its product and service offerings
- Evaluate additional partnerships to add full-service ATMs and expand customer access points in LMI tracts within footprint
- Monitor MoneyPass to ensure EBT Cards continue to have surcharge free access to the CITBNA ATM network
- Sponsor activities that provide credit counseling, budget management, homebuyer education, and basic financial education targeting LMI communities
- Partner with community groups to expand education around mobile banking services
- Join the Alliance for Economic Inclusion and partner with nonprofit providers to educate customers on credit and deposit products
- Market credit products through Branches, Online Banking and ATMs

4. Services Considerations

The Bank will carefully consider any adverse impact that might result from closing, relocating, or consolidating a bank branch or full-service ATM and will ensure that any closure, consolidation or relocation is conducted in compliance with the OCC's Comptroller's Licensing Manual, with Section 42 of the FDIA, consistent with the Community Reinvestment Act (CRA) Compliance Policy, any applicable CRA provisions and as directed by the CRA Committee.

V. Other Community Benefit Targets

In addition to the CRA Lending, Investment and Services commitments and targets discussed above, the Bank maintains the following additional targets:

- The Bank will maintain the CAB who will support the Bank in developing and refining our community programs and annual community benefits plan
- On an annual basis, the Bank will host a community day with community leaders in the Bank's assessment areas to share information on its annual community activities and solicit input from the community on emerging and continuing areas of need
- The Bank will maintain representatives from the Latino, Asian American and Pacific Islander, and African-American community on its board of directors
- The Bank will spend at least \$36 million with women-, minority- and service disabled veteran-owned businesses ("WMDVBE") over the next four years
- Maintain membership in the Southern California Minority Supplier Development Council
- Actively recruit minorities, disabled, veterans as well as unemployed individuals through outreach in targeted job fairs and job boards

VI. CRA Governance

Governance begins with the CITBNA Board of Directors and is carried out through the Bank's management level committees and employees. An overview of each group and its responsibilities is listed below:

CIT Bank, N.A. Board of Directors:

The CITBNA Board is responsible for establishing an environment supportive of CRA and evidencing the Bank is meeting the credit needs in its assessment area, which includes approving the Commitments outlined in this Plan and ensuring the Bank meets these Commitments and the timetables outlined therein.

Regulatory Compliance:

The Regulatory Compliance Committee will approve the CRA Plan (directly or as a part of the full Board of Directors approval). Additionally, not less than quarterly, the Regulatory Compliance Committee shall review written progress reports from management as to CITBNA's satisfaction of the goals and timetables set forth in this Plan and direct management to undertake any measures the Committee determines to be necessary or advisable to achieve full compliance with such obligations.

Executive Management Committee:

The Executive Management Committee will ensure implementation of appropriate governance, framework, controls and processes for the CRA program and related activities, will review the CRA plan, will receive and review regular updates (at least quarterly) on CRA performance and approve any changes to the Bank's delineated AA.

Enterprise Risk Committee

The Enterprise Risk Committee will review and approve the CRA plan.

CRA Committee:

The Bank will maintain a management level CRA Committee that is primarily responsible for assuring the Bank meets the needs of our community and achievement of this Plan. The CRA Committee will establish annual specific product and service targets underneath the Commitments outlined in the Plan and will measure results against both the Targets and the Commitments outlined in the Plan and make adjustments to the detailed targets over time as necessary.

The CRA Committee will also evaluate targets and may recommend changes on an annual basis based upon input received from the community, varying economic and market conditions, changes to the Bank's assessment areas, merger activity, acquisitions, or other matters that may affect the Bank's performance context.

The CRA Committee will provide periodic updates to the Bank's Board and Management Committee as called for in this Plan.

The CRA Committee's Members include:

- Chief Executive Officer (Committee Chair)
- CRA Officer
- Head of the Retail Bank
- Chief Investment Officer
- Head of Mortgage Originations
- Chief Risk Officer
- Head of Regulatory Relations
- Head of SBA Lending

CRA Community Advisory Board:

A key source for assessing the needs of our community will be ongoing input from our CAB. The CAB will be led by the Bank's CEO and be comprised of approximately 6 external community leaders.

The CAB will meet quarterly and will be updated on the results of our community activities and achievement of this Plan. The Bank will seek input from the CAB about ongoing needs

of the community and will utilize this information in modifying specific targets under the CRA Plan.

CRA Product Development and Management:

The Bank will approach CRA related product development and management from a comprehensive perspective, including idea generation, regular product review, new product approval and new product implementation. Product development and management will be a key component of each CRA Committee meeting and a primary responsibility of the CRA team.

Idea Generation

Idea generation will come from our ongoing outreach to the community including but not limited to input from the CAB, regular meetings by the CRA Committee and senior management, with community groups, feedback from our annual Community Day, focus groups and industry round tables and review of competitor offerings by the CRA team.

Product Management

To manage our products and evaluate how effectively they meet community needs, the following business units will provide an annual summary of their products to the CRA Committee highlighting product features and demonstrating how the product set meets the credit needs of the assessment area.

- Retail Deposit Banking
- Business Deposit Banking
- Small Business Lending
- Commercial Real Estate (multifamily lending)
- Mortgage Lending

Annual assessments may include peer product comparison, metrics that demonstrate product sales are diverse across income brackets, product gap analyses and new product or service proposals.

Approval and Implementation

Based upon the idea generation and product reviews described above, the CRA Committee will prioritize new products and product enhancements with the relevant business unit, assigning direct responsibility to a senior officer within that unit to shepherd the change through approval and implementation. The CRA Committee will get regular updates on status from the Business Unit leader at the CRA Committee meetings.

Product Development Committee

All new products are approved by the Bank's Product Development Committee. To assure CRA related product approvals are given the appropriate attention and evaluation, at least 2

members of the CRA Committee must be voting members of the Bank's Product Development Committee.

CRA Department

The Bank will maintain a CRA department that in its judgment is of sufficient staff and expertise to be able to achieve this Plan. The CRA department will play a vital role in the successful implementation of the CRA Plan. The department will be responsible for:

- Reviewing and implementing the Bank's CRA Plan goals and propose changes based upon input received from the community, varying economic and market conditions, changes to the Bank's assessment areas, merger activity, acquisitions, or other matters that may affect the Bank's performance context.
- Ensuring compliance with the technical CRA requirements, including the appropriateness of the Bank's CRA assessment area delineations and the maintenance and availability of the Bank's CRA Public File and Public Notice.
- Assuring appropriate reporting to the CRA Committee at least quarterly and the Board at least semi-annually on CRA performance, the effectiveness of the Bank's CRA program, and the Bank's progress in achieving this plan.
- Completing a self-assessment in advance of regulatory performance evaluations.
- Establishing and maintaining a CRA training program for appropriate employees of the Bank and the Board.
- Working with the Bank's business units to identifying qualified lending, investment and service opportunities to meet the Bank's goals and assisting in due diligence as required.
- Tracking and maintaining documentation of the Bank's CRA activity.
- Developing and maintaining a CRA performance context for the Bank and its assessment areas.
- Planning, organizing, and attending community development activities on behalf of the Bank or by the Bank.
- Maintaining and developing knowledge of CRA and community development by participating in conferences, webinars, and training.
- Serving as a liaison between the community and the Bank by initiating and maintaining regular communications with local government, community development organizations, and other community-based entities.

Internal Audit

The Bank's Internal Audit unit will conduct periodic reviews of the CRA activities including, but not limited to, 1) CRA Lending, Investment and Services activities, 2) management and Board CRA reporting, 3) adherence with established CRA policies and procedures, 4) HMDA reporting, and 5) adherence with the key components of this Plan.

VII. CRA Reporting

CRA reporting will be designed in manner to provide clear evidence on how the Bank’s activities are helping meet the needs of our AA. This will include tracking results to the Commitments and Targets outlined in this Plan.

The table below notes the frequency of CRA reporting to various audiences. Reporting at a minimum will include the following:

	Board of Directors	Regulatory Compliance Committee	Executive Management Committee	Community Advisory Board	CRA Committee	OCC	Public
Lending Commitments	Semi-Annually	Quarterly	Quarterly	Quarterly	Quarterly	Post Board Meeting	Before CRA Exam
Lending Targets		Quarterly	Quarterly	Quarterly	Quarterly		
Investment Commitments	Semi-Annually	Quarterly	Quarterly	Quarterly	Quarterly	Post Board Meeting	Before CRA Exam
Investments Targets		Quarterly	Quarterly	Quarterly	Quarterly		
Service Commitments	Semi-Annually	Quarterly	Quarterly	Quarterly	Quarterly	Post Board Meeting	Before CRA Exam
Services Targets		Quarterly	Quarterly	Quarterly	Quarterly		
CRA Action Plan Activities		Quarterly	Quarterly	Quarterly	Quarterly		Annual Community Day

Lending:

The CRA Officer will monitor the Bank’s qualified CRA lending quarterly and report on the status of the Bank’s investment performance relative to its Commitments and Targets to the CRA Committee. Reports will also include recent activities that align with the Lending Action Plan including a review of new products launched or being evaluated in that period. As described above, under product development, on an annual basis, the CRA Committee will seek input and analysis from the Business Units to demonstrate how their products and services are effectively meeting the credit needs of the community including the credit needs of LMI people.

Investments:

The CRA Officer will monitor the Bank’s qualified investments quarterly and report on the status of the Bank’s investment performance relative to its Commitments and Targets to the CRA Committee. Reports will also include recent activities that align with the Investment Action Plan including a review of new investments made in the period. The CRA Committee

will share these results with the CAB, Audit Committee and Board of Directors as outlined above. Performance will be monitored for each of the Bank's assessment areas to ensure adequate coverage. Management will determine the nature and scope of qualified investments made within the respective assessment areas with guidance provided by the CRA Officer. The CRA Officer will work with the Bank's Chief Investment Officer to seek out appropriate securities based on qualified investment opportunities.

Services:

The CRA Officer will monitor the Bank's CRA Services quarterly and report on the status of the Bank's performance relative to its Commitments and Targets to the CRA Committee. Reports will also include recent activities that align with the Services Action Plan. The CRA Committee will share these results with the CAB, Audit Committee and Board of Directors as outlined above. Performance will be monitored for each of the Bank's assessment areas to ensure adequate coverage.

Service reporting at a minimum will include reports that measure CITBNA's alternative banking systems (e.g. ATMs, mobile banking) are available to provide, and effective in providing, needed retail banking services in LMI geographies or to LMI individuals. Such reports will include:

- Number of LMI customer accounts opened by channel (Branch, Online, Call Center)
- Usage of mobile banking services by LMI customers⁷
- Usage of full-service ATMs by LMI customers

⁷ CITBNA does not track income levels for deposit customers, as such, CITBNA will rely upon census tract information based on the customers home address to determine whether the customer is an LMI customer