



## **PUBLIC DISCLOSURE**

August 22, 2022

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

RBC Bank (Georgia), National Association  
Charter Number: 23416

8081 Arco Corporate Drive  
Raleigh, NC 27617

Office of the Comptroller of the Currency

350 South Grand Avenue  
Los Angeles, CA 90071

NOTE: 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, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

## Table of Contents

Overall CRA Rating .....	3
Description of Institution .....	4
Scope of the Evaluation .....	6
Discriminatory or Other Illegal Credit Practices Review .....	6
State Rating.....	8
State of Georgia .....	8
Appendix A: Scope of Examination .....	A-1
Appendix B: Summary of MMSA and State Ratings .....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated Satisfactory.

The following table indicates the performance level of RBC Bank (Georgia) N.A. (RBC Bank, bank, or institution) with respect to the Lending, Investment, and Service Tests:

Performance Levels	RBC Bank (Georgia) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the bank’s geographic distribution and borrower income distribution of home mortgage loans. Both the bank’s geographic distribution and borrower income distribution are excellent. The bank’s community development (CD) lending had a negative impact on the Lending Test rating.
- The Investment Test rating is based on the bank’s CD qualified investments and financial donations. The bank’s overall level of qualified CD investments is adequate and responsive to community needs.
- The Service Test rating is based primarily based on the bank’s level of CD services. CD services are adequate and responsive to community needs. The bank does not operate any branch offices and offers online banking services.

### Lending in Assessment Area

An adequate percentage of the bank’s loans are inside the assessment area (AA).

The bank originated and purchased 11.8 percent of its total home mortgage loans inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Table D - Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Home Mortgage										
2019	110	10.2	967	89.8	1,077	18,867	5.0	359,781	95.0	378,648
2020	60	5.9	960	94.1	1,020	12,848	3.2	386,010	96.8	398,858
2021	252	17.2	1,215	82.8	1,467	61,092	9.7	566,463	90.3	627,555
<b>Subtotal</b>	<b>422</b>	<b>11.8</b>	<b>3,142</b>	<b>88.2</b>	<b>3,564</b>	<b>92,807</b>	<b>6.6</b>	<b>1,311,782</b>	<b>93.4</b>	<b>1,405,061</b>
<b>Total</b>	<b>422</b>	<b>11.8</b>	<b>3,142</b>	<b>88.2</b>	<b>3,564</b>	<b>92,807</b>	<b>6.6</b>	<b>1,311,782</b>	<b>93.4</b>	<b>1,405,061</b>
<i>Source: Bank Data</i>										
<i>Due to rounding, totals may not equal 100.0%</i>										

For the combined three-year evaluation period, RBC Bank originated and purchased the majority of its home mortgage loans outside its AA (88.2 percent). The bank’s business strategy of providing banking services and mortgage loans to Royal Bank of Canada’s (RBC Canada) Canadian customers living and vacationing in the United States reduces the percentage of lending inside the AA.

## Description of Institution

RBC Bank (Georgia) N.A. is a wholly owned subsidiary of RBC USA Holdco Corporation (USA Holdco), which is a wholly owned subsidiary of RBC Canada and headquartered in Toronto, Canada. As of December 31, 2021, RBC Bank reported total assets of \$5.6 billion and tier 1 capital of \$521.3 million. The bank is a single state institution headquartered in Atlanta, GA. RBC Bank does not have any branch offices or bank owned automated teller machines (ATMs). The majority of the bank’s employees are located in Raleigh, NC.

RBC Bank’s strategic objective is to be a leader in serving the cross-border lifestyle needs of Canadians in the United States. To accomplish this, RBC Bank offers unique lending and banking cross border solutions to attract clients. RBC Bank utilizes online banking, telephone banking, and PNC-owned ATMs to serve its customers in the United States. Lending products include mortgage loans, home equity lines of credit (LOC), credit cards, and personal LOCs. Some of the aforementioned products are only available to existing RBC Canada customers. Clients with RBC Bank accounts can easily transfer funds from RBC Canada accounts and convert funds to United States currency. A limited number of lending and deposit account products are available to individuals without an existing account at RBC Canada.

As of December 31, 2021, the bank’s loan portfolio consisted primarily of first lien single family mortgage loans, which represents 86.7 percent of average gross loans. Credit card loans and home equity LOCs represent 6.8 percent and 5.8 percent of average gross loans, respectively. Net loans represent 34.5 percent of average assets.

RBC Bank offers an affordable housing product (AHP) designed specifically for low- and moderate-income borrowers in the AA. This product allows relaxed credit standards, non-traditional credit references and higher loan-to-value ratios of 97.0 percent and 100.0 percent, without requiring private

mortgage insurance. Customers who qualify for this loan product are also eligible for a deposit account at RBC Bank. Additionally, residents of the bank's AA are eligible for the bank's mortgage loan products.

There were no financial or legal impediments that affected RBC Bank's ability to meet the credit needs in its AA. The last CRA performance, dated June 17, 2019, resulted in a "Satisfactory" rating.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

This performance evaluation assesses the bank's CRA performance under the large retail bank Lending, Investment, and Service Tests. The evaluation period is January 1, 2019, to December 31, 2021.

In evaluating the bank's lending performance, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA). The bank does not originate loans to small businesses or farm loans.

With an evaluation period end date of December 31, 2021, qualifying activities performed in response to the significant impact of the Coronavirus Disease 2019 (COVID-19) Pandemic across the United States, are addressed in this evaluation.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

The bank's overall rating is based solely on performance in the State of Georgia, which consists of one AA, the Atlanta-Sandy Springs-Alpharetta, GA Metropolitan Statistical Area (MSA) (Atlanta MSA). The Lending Test received more weight than the Investment and Service Test in the overall rating.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c), respectively, in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and

regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by, or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Georgia

**CRA rating for the State of Georgia <sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Low Satisfactory

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending activity reflects adequate responsiveness to credit needs in the AA.
- The bank exhibits excellent geographic distribution of home mortgage loans in the AA.
- The bank exhibits excellent distribution of home mortgage loans among individuals of different income levels.
- The bank has few if any CD loans, which had a negative impact on the overall Lending Test.
- The bank makes extensive use of innovative and/or flexible products, which had a positive impact on the overall Lending Test.
- The bank provides an adequate level of investments.
- The bank provides an adequate level of CD services.

### Description of Institution's Operations in Georgia

RBC Bank has one AA in the state of Georgia consisting of the entire Atlanta MSA. The AA consists of 29 counties which are listed in Appendix A.

The bank faces significant competition for deposits and loans in the Atlanta MSA. According to June 30, 2021, deposit market share data, 108 other depository institutions operated 1,137 branches in the AA. RBC Bank maintained \$5.1 billion in deposits and ranked 49<sup>th</sup> in deposits with a market share of 1.8 percent. The top three banks by deposit market share are Wells Fargo, N.A. with 26.2 percent, Truist with 20.4 percent, and Bank of America, N.A. with 16.4 percent.

The Atlanta MSA poses challenges to home mortgage lenders in the AA, including RBC Bank. The Atlanta MSA is a high-cost housing area, particularly for low-income individuals. According to data from Realtor.com, the average housing list price increased from \$250,351 in 2019 to \$330,435 in 2021 reflecting a 32.0 percent increase. One simplistic method used to determine housing affordability assumes

---

<sup>1</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.



a maximum monthly principal and interest payment of no more than 30.0 percent of the applicant’s income. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not accounting for down payment, homeowners’ insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$42,850 per year (or less than 50.0 percent of the 2021 FFIEC adjusted median family income in the AA) could afford a \$199,554 mortgage with a payment of \$1,071 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an average estimated payment of \$1,774 based on the average list price of homes in the 27 counties in the Atlanta MSA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Atlanta MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	951	10.6	26.5	30.6	31.4	0.8
Population by Geography	5,535,837	7.4	26.2	34.3	31.8	0.3
Housing Units by Geography	2,202,308	8.3	26.9	33.0	31.7	0.1
Owner-Occupied Units by Geography	1,248,212	3.2	20.8	37.3	38.7	0.0
Occupied Rental Units by Geography	716,104	14.7	35.4	27.1	22.5	0.3
Vacant Units by Geography	237,992	15.8	33.1	28.6	22.4	0.1
Businesses by Geography	1,024,063	6.2	23.8	31.2	38.5	0.4
Farms by Geography	17,526	4.1	23.0	39.5	33.3	0.1
Family Distribution by Income Level	1,331,952	23.1	16.8	18.2	41.9	0.0
Household Distribution by Income Level	1,964,316	23.9	16.5	17.5	42.1	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$67,322	Median Housing Value			\$184,540
			Median Gross Rent			\$996
			Families Below Poverty Level			12.0%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

### Employment and Economic Factors

As of December 2021, the unemployment rate in the Atlanta MSA was 2.8 percent according to the U.S. Bureau of Labor Statistics. During the review period, the Atlanta MSA unemployment rates ranged from a low of 3.0 percent in November 2019 to a high of 12.3 percent in April 2020. The high unemployment rate reflects the impacts of the COVID-19 Pandemic. Unemployment rates in the Atlanta MSA were slightly lower than unemployment rates in the state of Georgia which was 3.3 percent as of December 2021.

According to November 2021 Moody’s Financial Analytics, the economy of the Atlanta MSA was strengthening and trending close to pre-pandemic levels. This growth was primarily fueled by job gains in logistics and professional/business services. The area’s unemployment rates were below pre-pandemic

levels. The Atlanta areas is a national and regional headquarters location for large corporations in industries such as technology, healthcare, aviation, and consumer goods. There is also a high level of local and federal government employment opportunities, as Atlanta is the capital of Georgia. The five largest Atlanta area employers are Delta Air Lines, Emory University & Healthcare, The Home Depot, Northside Hospital, and Piedmont Healthcare.

According to November 2021 Moody’s Financial Analytics, single-family housing permits had declined. While building activity slightly cooled the market, migration into the area has caused housing prices to surge past previous highs.

### Community Contacts

As part of the CRA evaluation, the OCC reviewed information from ten community contacts conducted during the evaluation period within the Atlanta MSA AA to determine local economic conditions and community needs. Two of these organizations, which focused on affordable housing, indicated that there is a shortage of affordable housing for homeowners and renters. In addition, the community contacts acknowledged a need for financial education to improve credit profiles of borrowers.

## **Scope of Evaluation in Georgia**

For the state of Georgia, the OCC completed full-scope review procedures for Atlanta MSA.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA**

### **LENDING TEST**

The bank’s performance under the Lending Test in Georgia is rated Low Satisfactory.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review the bank’s performance in the Atlanta MSA was adequate.

### **Lending Activity**

Lending levels reflect adequate responsiveness to AA credit needs considering the number and dollar amount of home mortgage loans relative to the bank’s lending capacity, based on deposits, competition, and market presence.

Number of Loans*					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Atlanta MSA	422	0	0	1	423

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Atlanta MSA	\$92,807	0	0	\$1,500	\$94,307

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Lending in the Atlanta MSA is adequate. As of June 30, 2021, there were 108 depository institutions in the AA. RBC Bank ranked 49<sup>th</sup> in deposits, or the 54<sup>th</sup> percentile, with a 1.8 percent market share. Based upon internal bank data, the bank maintains approximately \$25.4 million in deposits for customers with addresses in the Atlanta MSA.

Based on 2020 HMDA market share data, RBC Bank ranked 295<sup>th</sup> out of 918 lending institutions, or the 68<sup>th</sup> percentile, with a market share of 0.20 percent demonstrating adequate responsiveness to credit needs. The top five home mortgage lenders, Quicken Loans, Wells Fargo N.A., Truist Bank, PennyMac Loan Services LLC, and Ameris Bank, had a combined market share of 23.6 percent. Market share for the top five lenders ranged from 2.9 percent to 8.4 percent.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits an excellent geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to Table O in the state of Georgia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

RBC Bank's geographic distribution of home mortgages during the review period reflected excellent distribution. The percentage of home mortgages in low- and moderate-income census tracts significantly exceeded both percentage of owner-occupied housing units and aggregate lending in the AA.

#### ***Lending Gap Analysis***

The OCC reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. The OCC did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an excellent distribution of loans among individuals of different income levels, given the product lines offered by the institution.

#### ***Home Mortgage Loans***

Refer to Table P in the state of Georgia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

RBC Bank's borrower distribution of home mortgage loans reflected excellent distribution. The percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families, but significantly exceeded aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers significantly exceeded both the percentage of moderate-income families and aggregate lending in the AA.

The assessment of performance considered the high cost of home ownership would not be affordable for low-income borrowers earning no more than 50.0 percent of the assessment area median family income. The high cost of housing in the Atlanta MSA may have impacted the bank's opportunities to originate loans to low-income borrowers.

### **Community Development Lending**

The institution has made few CD loans and this low volume of CD lending had a negative impact on the bank's performance under the Lending Test.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made one CD loan during the review period totaling \$1.5 million or 0.3 percent of tier 1 capital. The bank's CD loan participation provided financing for the construction of a 75-unit affordable housing complex for seniors in the AA.

As of the examination date, the bank had two outstanding CD LOCs totaling \$600,000 which were originated in 2017 and 2018. The funds from these two LOCs continue to support a local Community Development Financial Institution's (CDFI) \$17 million internal fund. The CDFI uses the fund to acquire, rehabilitate, and build new affordable homes. Although the LOCs were originated outside of the current review period, the loans demonstrate the bank's responsiveness to the affordable housing needs of the Atlanta MSA.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs, which had a positive impact on the bank's performance under the Lending Test.

The bank offers an Affordable Housing Product (AHP) in the AA targeted toward low-income and moderate-income borrowers. This product features relaxed credit standards, non-traditional credit references, and higher loan-to-value ratios of 97.0 percent and 100.0 percent, without requiring private mortgage insurance. During the review period, the bank initiated a special promotion to waive certain closing costs, including bank fees, title fees, appraisal fees, and recording fees. In connection with its AHP, RBC Bank participates in a financial literacy program with a local affordable housing organization in DeKalb County and with the DeKalb County Commission. During the review period, the bank originated 71 AHP loans totaling \$13.3 million.

In connection with its AHP, RBC Bank participates with other organizations offering down payment and closing cost assistance to first time home buyers. One of these down payment assistance programs is the Affordable Housing Set-Aside Program available through the Atlanta Housing Authority and the Federal Home Loan Bank of Atlanta. During the review period, eight of the bank’s AHP borrowers received approximately \$77,000 in down payment assistance through these programs.

RBC Bank continues to partner with a local CDFI in connection with a home ownership initiative. The program is a lease-to-own program allowing individuals to rent their future home while providing them the tools and partnerships to repair credit and qualify for a loan to purchase the home. RBC Bank provides financing for the CDFI to purchase the homes, which are then rented to eligible low-and moderate-income families for eventual purchase. The bank originated 31 loans totaling \$4.4 million with this program.

Between March 2020 and November 2021, the bank offered a six-month rehabilitation plan for borrowers, including low- and moderate-income borrowers impacted by the COVID-19 Pandemic. The plan permitted borrowers to defer up to a maximum of six-months of payments provided the loan was delinquent. The amortization of the loan was adjusted to amortize all deferred payments for the remaining life of the loan at the end of the deferral period. Under the plan, the bank deferred 59 loans totaling \$8.8 million.

## INVESTMENT TEST

The bank’s performance under the Investment Test in Georgia is rated Low Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review the bank’s performance in the Atlanta MSA was adequate.

The institution has made an adequate level of qualified CD investments and grants, although rarely made in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Atlanta MSA	6	8,095	3	9,728	9	100	17,823	100	0	0

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Qualified investments consist solely of affordable housing mortgage-backed securities and donations to community organizations within the AA. The bank has shown adequate responsiveness to investment opportunities within the AA, as affordable housing and financial literacy are community needs.

Qualified investments represented 3.6 percent of the bank's tier 1 capital and 7.3 percent of allocated tier 1 capital to the Atlanta MSA AA. During the current evaluation period, RBC Bank purchased three mortgage-backed securities totaling \$9.7 million. These three mortgage-backed securities pools consisted of 38 home mortgage loans to low- and moderate-income borrowers in the AA.

RBC Bank made \$773 thousand in qualified donations to three community organizations within the AA. These organizations provide affordable housing or financial services to low- and moderate-income individuals throughout the Atlanta MSA. The qualified donations include:

- One \$100 thousand donation to provide financial education to low- and moderate-income individuals,
- One \$50 thousand donation to support a community development organization that provides a tenancy to home ownership program, and
- One \$50 thousand donation to provide credit counseling sessions to low- and moderate-income individuals.

As of December 31, 2021, the outstanding balance on prior period investments totaled \$8.1 million and continue to benefit the bank's AA. These prior investments consisted of six mortgage-back securities to low-income and moderate-income borrowers in the AA.

## **SERVICE TEST**

The bank's performance under the Service Test in Georgia is Low Satisfactory.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full scope review the bank's performance in the Atlanta MSA was adequate.

### **Retail Banking Services**

Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the institution's AA. The bank does not rely on a branch network to offer its products and services but uses alternative delivery systems to provide financial services to its customers.

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. The bank did not open or close any branch offices during the evaluation period.

Services, and including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. The bank does not own ATMs. However, deposit customers may use any PNC Bank ATM, or any ATM in the All Point network, free of charge.

RBC Bank operates as a virtual bank and does not have any retail branches. While the bank's main office is located in an upper-income census tract in the Atlanta MSA, this office is not open to the public. All products and services offered by the bank are accessible online or by telephone. The bank's website exclusively focuses on Canadian clients with U.S. banking needs, including mortgage loans and credit cards.

## **Community Development Services**

The institution provides an adequate level of services.

During the review period, four bank employees contributed a total of 316 hours to four community development organizations. These CD services involved financial literacy training and provision of technical expertise as board members with four affordable housing community organizations.

The following are examples of the CD services provided:

- An employee served on the Advisory Board and Loan Committee of a CD organization that works to provide affordable housing throughout the AA.
- An employee taught homebuyer and financial education workshops targeted at low- and moderate-income individuals in partnership with two CD organizations in the AA.
- Financial education and literacy classes reached approximately 396 low- and moderate-income individuals and totaled approximately 294 hours.

## Appendix A: Scope of Examination

---

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	01/01/2019 – 12/31/2021	
<b>Bank Products Reviewed:</b>	Home mortgage loans, community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	None	None
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State</b>		
Georgia		
Atlanta-Sandy Springs-Alpharetta GA, MSA	Full Scope	Counties of Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Jasper, Lamar, Meriwether, Morgan, Newton, Paulding, Pickens, Pike, Rockdale, Spauling, Walton



## Appendix B: Summary of MMSA and State Ratings

---

RATINGS: RBC Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
MMSA or State:				
Georgia	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**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, other secured consumer loans, and other unsecured consumer loans.

**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, which 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).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, 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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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 state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to

determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties 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 percent 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 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**MMSA (state):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**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 qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** 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 or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders’ equity, perpetual preferred shareholders’ equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Appendix D: Tables of Performance Data

---

### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2019-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Atlanta GA MSA	422	92,807	100.0	373,834	3.2	9.2	2.7	20.8	47.6	16.8	37.3	25.4	35.5	38.7	17.5	45.0	0.0	0.2	0.0		
<b>Total</b>	<b>422</b>	<b>92,807</b>	<b>100.0</b>	<b>373,834</b>	<b>3.2</b>	<b>9.2</b>	<b>2.7</b>	<b>20.8</b>	<b>47.6</b>	<b>16.8</b>	<b>37.3</b>	<b>25.4</b>	<b>35.5</b>	<b>38.7</b>	<b>17.5</b>	<b>45.0</b>	<b>0.0</b>	<b>0.2</b>	<b>0.0</b>		

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "2021 Aggregate" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2019-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Atlanta GA MSA	422	92,807	100.0	373,834	23.1	8.8	5.8	16.8	25.1	15.5	18.2	12.1	19.0	41.9	17.5	39.4	0.0	36.5	20.3		
<b>Total</b>	<b>422</b>	<b>92,807</b>	<b>100.0</b>	<b>373,834</b>	<b>23.1</b>	<b>8.8</b>	<b>5.8</b>	<b>16.8</b>	<b>25.1</b>	<b>15.5</b>	<b>18.2</b>	<b>12.1</b>	<b>19.0</b>	<b>41.9</b>	<b>17.5</b>	<b>39.4</b>	<b>0.0</b>	<b>36.5</b>	<b>20.3</b>		

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "2021 Aggregate" data not available.  
Due to rounding, totals may not equal 100.0%*