



COMMUNITY REINVESTMENT ACT POLICY 2024

VOTED BY THE COMPLIANCE COMMITTEE: December 3, 2024

VOTED BY THE BOARD OF DIRECTORS: December 17, 2024

COMMUNITY REINVESTMENT ACT STATEMENT OF CHARLES RIVER BANK

Charles River Bank was chartered in 1915 to serve the various savings and credit needs of individuals, businesses and organizations in our community and primarily to promote thrift and home ownership. This commitment to thrift and home ownership remains with us today, as is apparent by our corporate mission statement: “To foster financial success for individuals, families, small businesses and the communities we serve”.

The Bank’s main office is located on 70 Main Street, Medway. In March of 2009 we opened a branch at 2 South Maple Street, Bellingham and in April 2010, we opened a branch at 1 Hastings Street, Mendon MA. The Bank also maintains a limited service branch located at the Medway High School.

This statement has been prepared for our depositors, loan customers and members of the community, pursuant to the Community Reinvestment Act of 1977. There are four parts to this statement and each serves a separate purpose. Part I is entitled "Delineation of Community" which makes reference to a map and a description of the approximate area that we regard as our basic lending community known as our assessment area. Our lending community includes all types of neighborhoods and districts, and persons of all income levels and races. Designation of our community does not mean that we don’t make loans outside of our assessment area, we sometimes do. The concept of our basic lending community is subject to change over time, as patterns of development change and populations shift. We will regularly adjust our delineation of community to reflect these changes.

Part II of this statement consists of a list of the general services that we offer. The first section of Part II lists the types of credit that we offer and an explanation of how the availability of certain types of credit can vary. Due to limitations of space, this listing cannot contain all of the terms and conditions which affect our ability to grant credit. A loan officer will be pleased to provide you with detailed information, upon request. The second section lists the types of deposit accounts and related services that we offer. The final section of Part II details the Bank’s hours of operation. For a detailed explanation of these accounts and services, please contact one of our customer service representatives.

Part III of the statement is an important notice about the operation of the Community Reinvestment Act.

Part IV contains the Community Reinvestment Act Policy of the Charles River Bank.

The Bank's Board of Directors' hope that the information contained in this statement is useful to you. If you have any questions, do not hesitate to contact me directly or to speak with one of our officers.

Sincerely yours,

Derek Plourde
President and Chief Executive Officer

PART I

CHARLES RIVER BANK DELINEATION OF COMMUNITY CRA AREA MAP

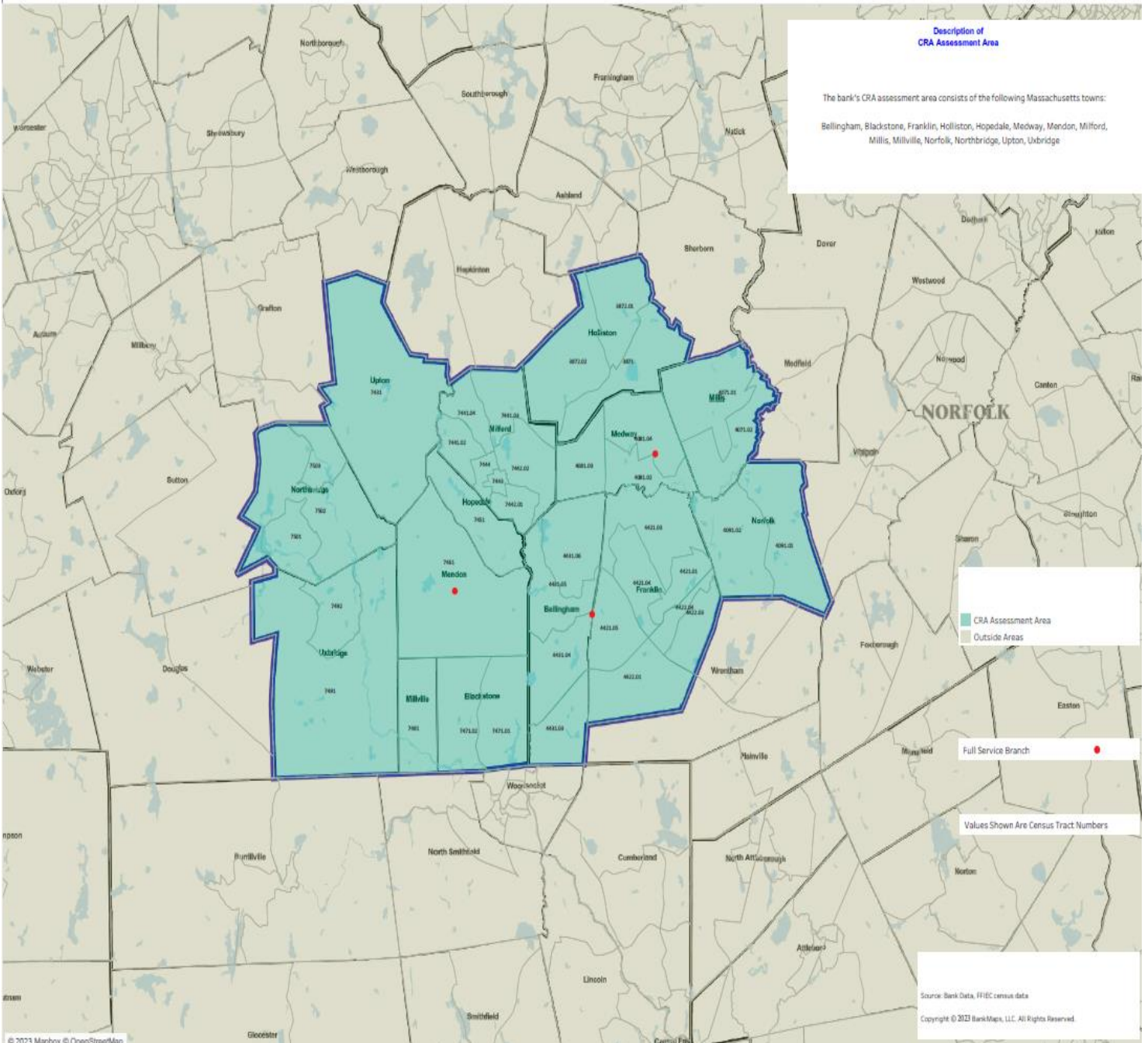
Charles River Bank is a community bank; it was established to support this and surrounding communities. We aggressively seek good loans from within our area and we approve all sound loans that come to us from within our market.

Our delineated community is comprised of the following towns: Medway, Millis, Franklin, Milford, Holliston, Norfolk, Bellingham, Mendon, Uxbridge, Blackstone, Millville, Hopedale, Northbridge, and Upton. This designation of community does not preclude our making loans to other areas, but rather delineates where our emphasis and marketing efforts are directed. The map found on the following page graphically depicts our community and the outlined area represents our assessment area. The map also includes the different census tracts within each town, indicated by their assigned census tract number. The census tracts are as follows:

MEDWAY	4081.02	BELLINGHAM	4431.03	FRANKLIN	4421.01
	4081.03		4431.04		4421.03
			4431.05		4421.04
					4421.05
	4081.04		4431.06		4422.01
					4422.03
MILLIS	4071.01	MILFORD	7441.02		4422.04
	4071.02		7441.03		
			7441.04	NORFOLK	4091.01
			7442.01		4091.02
			7442.02		
			7443.00		
			7444.00		
HOLLISTON	3871.00	MENDON	7461.00	MILLVILLE	7481.00
	3872.01				
	3872.02			NORTHBRIDGE	7501.00
					7502.00
HOPEDALE	7451.00	UXBRIDGE	7491.00		7503.00
			7492.00		
BLACKSTONE	7471.01			UPTON	7431.00
	7471.02				

Charles River Bank CRA ASSESSMENT MAP

CRA Assessment Area - 2023
Charles River Bank



PART II
SECTION I
BASIC LISTING OF TYPES OF CREDIT OFFERED BY
CHARLES RIVER BANK

Charles River Bank offers a variety of loan products tailored to meet the financial needs of all of the residents in the assessment area. The Bank product offering includes:

Owner Occupied Residential Mortgage Loans

We are pleased to provide Owner Occupied Residential Mortgage Loans on new or existing single unit and 2 - 4 unit residences. Applicants can select from a fixed rate conventional mortgage loan. Also available are various adjustable rate mortgages with a maximum term of 30 years and a no closing cost product.

Generally, mortgage loans may require a maximum Loan-to-Value (LTV) of 80%. For those borrowers with a smaller down payment, the Bank will provide up to 97% LTV financing with our portfolio mortgages. Minimum credit scores, borrower contribution and debt-to-income ratios must conform to FNMA guidelines. A LTV greater than 80% requires Private Mortgage Insurance (PMI).

Construction Mortgages

The Bank also offers Construction Mortgages to finance the construction of residences. This type of mortgage loan becomes a permanent mortgage loan upon completion of the construction of the property.

Non-Owner Occupied 1-4 Family Residential Mortgage Loans

Non-Owner Occupied Residential Mortgage Loans are also offered by the Bank with a maximum LTV of 80% of fair market value.

Home Equity Line of Credit

Also available is a Home Equity Line of Credit (*HELOC*) up to a maximum combined loan to value (CLTV) of up to 80% if Charles River Bank holds the first mortgage or 75% if we do not hold the first mortgage.. A Home Equity Line of Credit is an open-end account with a variable rate of interest. The HELOC may range from a minimum line of credit of \$10,000 to a maximum line of credit of \$250,000.00. Borrowers should seek the advice of a tax consultant to determine eligibility of deductibility of interest paid on these loans.

Home Equity Loan

Charles River Bank offers a Home Equity Loan, with a maximum term of 20 years up to a maximum combined loan-to-value of 80% or 75% if we do not hold the first mortgage. The bank offers a fixed or variable rate Home Equity Loan fixed principal and interest payment, minimum loan amount of \$10,000 and maximum loan amount of \$250,000.00.

Savings or Term Deposit Account Secured Loan

Customers may use their Passbook Savings or Term Deposit Account to secure a loan with the Bank. The Bank will lend up to 95% of the balance on deposit and the monthly minimum payment is interest only.

Automobile Loans

The Bank offers financing on both new and used automobiles (up to 5 years old). The maximum term for new automobiles is 72 months and the maximum term for used automobiles is 60 dependent on the age of automobile.

MassSave Loans

The bank offers MassSave loans for the installation of qualified energy-efficient improvements to owner occupied and investment properties. These are zero percent interest rate loans with a maximum of \$25,000 unsecured or up to \$50,000 with a UCC filing

Land Loans

Financing of land is for interim financing therefore the maximum term of the loan is 3 years. The maximum LTV on a Land Loan on a buildable lot shall not exceed 70% and on raw land, the maximum LTV will not exceed 65%.

Commercial Real Estate Loans

The Bank offers a variety of commercial real estate loans for those borrowers investing in owner and non-owner occupied real estate.

Overdraft Line Of Credit

The Bank offers an Overdraft Line of Credit product to non-business customers linked to a customer's checking account. The maximum line is generally \$1,500.00 but may be increased on an individual basis using standard underwriting procedures.

Basic Banking Program

The Bank participates in the Massachusetts Bankers Association "Basic Banking Program", providing affordable products.

FNMA Home Ready Program

Charles River Bank is an approved lender under the FNMA Home Ready program that provides funding at market or below market rates to low and moderate-income residents of Massachusetts. Programs are available to first time homebuyers of one to four family residences, as well as refinance opportunities. FNMA's mission is to provide affordable housing programs to those residents whose income falls into specific income limits established by county. A borrower may put as little as 0% percent down with credit score and debt-to-income ratio floors and caps. Eligibility criteria are adjusted in accordance to the loan-to-value, loan purpose and type of collateral. Private Mortgage Insurance is obtained through a Private Mortgage Insurance company at reduced premiums. Credit counseling is required for all first time homebuyers and those who are purchasing a two to four owner-occupied dwelling.

Equity Builder Program

The bank offers borrowers with at or below 80% of the area median income up to \$29,000 to be used for down-payment, closing-cost, and home-buyer counseling cost assistance.

FHLB HOW (Housing Our Workforce) Loan Program

HOW offers matching grants to households earning more than 80% and up to 120% of the area median income to help them with down payment assistance. Borrowers can receive up to \$25,000.00.

Small Business Administration (SBA) Lender

Charles River Bank is an approved SBA lender. The Bank provides financing to qualified small business owners with annual revenues under \$1 million dollars.

PART II

SECTION II FINANCIAL/OTHER SERVICES OFFERED

A. Deposit Accounts

1. Savings
2. Statement Savings
3. Charles River Fund
4. Holiday Clubs
5. Certificates of Deposit
6. IRA Accounts
7. NOW Accounts
8. Money Market Accounts
9. Checking Accounts
10. Commercial Checking Accounts
11. Deposit to Deposit Overdraft Protection

B. Other Services

1. Treasurer's Checks
2. Money Orders
3. Certified Checks
4. Safe Deposit Box Rentals
5. Direct Deposit
6. Wire Transfers
7. Savings Bonds
8. ATM Services (NYCE/Cirrus)
9. Notary Public Service
10. Credit Cards
11. Telephone Banking, *PhoneBank*
12. Mobile Banking
13. Mobile Check Deposit
14. Bank to Bank Transfers
15. Person to Person Transfers
16. Internet Banking with Bill Payer
17. Debit MasterCard®
18. Overdraft Privilege Program
19. Merchant Credit Card Processing
20. Remote Deposit Capture
21. Manage My Money (Personal Financial Management & Budgeting)
22. Non-Deposit Investment Products

BANKING HOURS

The Bank maintains three full service branches at 70 Main Street, Medway, MA, 2 South Maple Street, Bellingham MA and 1 Hastings Street, Mendon, MA 01756. The branch hours for all branches are as follows:

Lobby and Drive-Up

Monday, Tuesday, Wednesday	8:30 AM – 4:00 PM
Thursday	8:30 AM – 6:00 PM Drive-up only, Lobby closes at 4:00PM
Friday	8:30 AM – 4:00 PM
Saturday	9:00 AM – 1:00 PM

Medway High School Branch

Open When School is in Session:

Monday through Friday Wednesdays 10:30am – 12noon.

24 Hour services offered by the Bank include ATM's located at the main office which includes one drive-up and one walk-up. The Bellingham office offers a drive-up ATM. The Bank is a member of the SUM and MoneyPass networks providing our customers access to surcharge free ATM's. 24 Hour telephone banking and Internet Banking with bill payer service is also offered by the Bank. The Bank also offers online and mobile banking.

PART III

COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal and State Community Reinvestment Act (CRA), the Federal Reserve Bank (FRB) and the Massachusetts Division of Banks (Division) evaluate our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FRB and Division 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, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FRB and the Division, and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the FRB publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional and Community Officer, Federal Reserve Bank of Boston, 600 Atlantic Ave, Boston MA 02210. The Division also publishes a quarterly list of scheduled CRA examinations. This list is available from the Commissioner of Banks, 1000 Washington Street, 10th Floor, Boston MA 02118-6400. You may send written comments about our performance in helping to meet community credit needs to Derek Plourde, President and Chief Executive Officer of Charles River Bank, P.O. Box 740, Medway, MA 02053, Regional and Community Officer, Federal Reserve Bank of Boston, 600 Atlantic Ave, Boston, MA 02210 and/or the Commissioner of Banks, One South Station, Boston, MA 02110. Your letter, together with any response by us, will be considered by the FRB and Division in evaluating our CRA performance and may be made public.

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

PART IV

CHARLES RIVER BANK **BOARD OF DIRECTORS**

COMMUNITY REINVESTMENT ACT POLICY STATEMENT

The Board of Directors of the Charles River Bank, understanding its obligations under the law, but more importantly recognizing the need for adequate community reinvestment, has adopted the following:

It is the policy of the Charles River Bank that this bank is committed to the goals of the Community Reinvestment Act.

The Officers and Directors of the bank will continue to undertake an ongoing process of determining the credit and banking needs of the communities we serve. The results of that investigation will be relayed to the full Board for action as needed.

The Board has appointed the Compliance Committee to coordinate the Bank's efforts to comply with Community Reinvestment Act, and report to the Board periodically on the results of these efforts.

The Community Reinvestment Act Statement will be reviewed at least annually, more frequently if necessary, by the full Board of Directors.