

PUBLIC DISCLOSURE

January 22, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Amalgamated Bank
Certificate Number: 622

275 Seventh Avenue
New York, New York 10001

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

350 Fifth Avenue, Suite 1200
New York, New York 10118

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

INSTITUTION RATING

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

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	X
Low Satisfactory	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 Lending Test is rated Low Satisfactory.

- The bank’s lending levels reflect good responsiveness to assessment area credit needs.
- The bank made an adequate percentage of loans in its assessment areas.
- The geographic distribution of loans reflects good penetration throughout the assessment areas.
- The distribution of borrowers reflects, given the product lines offered by the bank, poor penetration among retail customers of different income levels.
- The bank makes limited use of innovative and flexible lending programs in order to serve assessment area credit needs.
- The bank is a leader in making community development loans.

The Investment Test is rated High Satisfactory.

- The bank has a significant level of qualified community development investments and grants.
- The bank exhibits good responsiveness to credit and community economic development needs.
- The bank rarely uses innovative or complex investments to support community development initiatives.

collateralized by 1,689 apartment affordable units located in an upper-income census tract in Prince George's County. A majority of the units are designated for low-income individuals and families.

- In 2016, Amalgamated invested \$1 million in the Partners for the Common Good (PCG). PCG is a Community Development Financial Institution (CDFI) that offers Community Development Notes that pay investors a below-market rate of interest. The assets from the Community Development Notes are placed as investments in community-based organizations that facilitate the provision of low-income housing, economic development, and critical community services in distressed urban and rural communities in the District of Columbia assessment area.

Outstanding Investments

- Between 1999 and 2007, Amalgamated made nine investments in the Access Capital Community Investment Fund. This organization invests in geographically specific debt securities located in portions of the U.S. designated by fund investors. The fund seeks to achieve its investment objective by investing primarily in debt securities designed to support underlying economic activities such as affordable housing, education, small business lending, and job creating activities. The fund's current book value is approximately \$13.0 million, of which approximately \$4.5 million is allocated to the District of Columbia assessment area.
- In 2010, Amalgamated invested \$4.0 million with the Solomon Hess Capital Management (SHCM). SHCM provides domestic banks with CRA eligible investments through the purchase of SBA 7(a), 504 and USDA small business loans. The firm provides targeted community investment opportunities by acquiring guaranteed portions of SBA 7(a) loans where the underlying small business is either located in a low- or moderate-income census tract, is located in a CDFI Qualified Investment census tract, or provides opportunities or services to low- and moderate-income individuals within the assessment area. The investment is secured by 15 loans, of which, 14 are located in a CDFI Fund Qualified Investment census tract and one business supports permanent job creation, retention, and/or improvement for individuals who are currently low- or moderate-income.

Grants and Donations

Amalgamated provided 23 grants and donations totaling \$183,526 to organizations that benefit the District of Columbia assessment area. The following are examples of qualified donations.

- Bread for the City – Amalgamated donated approximately \$12,856 to this nonprofit organization that provides low-income residents of the District of Columbia food, clothing, medical care, and legal and social services.
- Center for Community Change – Amalgamated donated approximately \$45,000 to this organization that provides essential services to low-income individuals.
- Martha's Table – In 2016 and 2018, Amalgamated donated a total of \$75,000 to this