

PUBLIC DISCLOSURE

September 12, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank Hapoalim B.M.
Certificate Number: 33686

1120 Avenue of the Americas
New York, New York 10036

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**. An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment areas, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Bank Hapoalim B.M.'s (Bank Hapoalim) satisfactory performance under the Community Development Test supports the overall rating. In addition, examiners did not identify any evidence of discriminatory or other illegal credit practices.

The following points summarize the bank's performance.

Community Development Test

- The institution has an adequate level of community development loans, community development services, or qualified investments, particularly investments that are not routinely provided by private investors.
- The institution rarely uses innovative or complex qualified investments, community development loans, or community development services.
- The institution exhibits adequate responsiveness to credit and community development needs in its assessment area.

- During the evaluation period, the bank invested in the Solomon Hess SBA Loan Fund. The fund’s mission is to promote economic development in low- and moderate-income areas and create jobs for low- and moderate-income individuals in the bank’s assessment area. The current book value of this investment is \$5.2 million.
- During the evaluation period, the bank made several donations totaling \$13,560 to support a non-profit organization located in New York County that provides community services targeted to elderly low- and moderate-income individuals. The organization provides meals and medical wellness-related services primarily to elderly low- and moderate-income individuals within the assessment area.

Community Development Services

During the evaluation period, Bank Hapoalim provided 45 instances of financial expertise or technical assistance to community development-related organizations in the assessment area. The following table illustrates the bank’s community development services during the evaluation period by year and community development purpose.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2015	0	13	0	0	13
2016	0	17	0	0	17
2017	0	8	0	0	8
YTD 2018	0	7	0	0	7
Total	0	45	0	0	45
<i>Source: Bank Records</i>					

Below are notable examples of the bank’s community development services:

- A bank officer provided financial education to participants in ‘Non-Traditional Employment for Women’ (NEW), an organization that prepares low-income minority women in New York City for careers in the construction, maintenance, and trade fields.
- The bank participated in the Cristo Rey internship program with Cristo Rey High School in Harlem, New York County, and sponsored internship opportunities for two seniors offering financial expertise and education for the summer session.

Investment, Loan, and Service Initiatives

Bank Hapoalim rarely uses innovative or complex qualified investments, community development loans, or community development services. While Bank Hapoalim’s community development loans, qualified investments, and community development services were responsive to the community development needs of its assessment area, examiners did not consider these activities to be innovative or complex.