

Charter Number: 24440



**ICBC**

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**Community Reinvestment Act (CRA) Public File**

**May 1, 2024**

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CRA Public Notice	-	1 page
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CRA Disclosure Statement	-	47 pages
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HMDA Disclosure Statement	<p>The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's Web site (<a href="http://www.consumerfinance.gov/hmda">www.consumerfinance.gov/hmda</a>). HMDA data for many other financial institutions are also available at this Web site.</p>	

## COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Comptroller of the Currency (OCC) evaluates our record of helping to meet the credit needs of this community, consistent with safe and sound operations. The OCC also takes 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. You may review today the public section of our most recent CRA evaluation, prepared by the OCC, and a list of services provided at this branch. You may also have access to the following additional information, which we will make available to you at this branch within five calendar days after you make a request to us: (1) A map showing the assessment area containing this branch, which is the area in which the OCC evaluates our CRA performance in this community; (2) information about our branches in this assessment area; (3) a list of services we provide at those locations; (4) data on our lending performance in this assessment area; and (5) copies of all written comments received by us that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

At least 30 days before the beginning of each quarter, the OCC publishes a nationwide list of the banks and savings associations that are scheduled for CRA examination in that quarter. This list is available from the OCC at 7 Times Square, 10th Floor, New York, NY 10036. These schedules are also posted on their website at <http://www.occ.treas.gov>

You may send written comments about our performance in helping to meet community credit needs to our CRA Officer and to the OCC at:

Ms. Michelle Yong  
Consumer Compliance and CRA Officer  
Industrial and Commercial Bank of China (USA) NA  
1185 Avenue of the Americas, 16th Floor  
New York, NY 10036

Deputy Comptroller  
Northeastern District  
Office of the Comptroller of the Currency  
7 Times Square, 10th Floor  
New York, NY 10036

Your comments, together with any response by us, will be considered by the OCC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the OCC. You may also request from the OCC an announcement of our applications covered by the CRA filed with the OCC.



## **PUBLIC DISCLOSURE**

January 8, 2024

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

Industrial and Commercial Bank of China (USA), N.A.  
Charter Number: 24440

1185 Avenue of the Americas, 16th Floor  
New York, NY 10036

Office of the Comptroller of the Currency  
International Banking Supervision  
7 Times Square, 10th Floor Mailroom  
New York, NY 10036

**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.

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated Outstanding.

The following table indicates the performance level of Industrial and Commercial Bank of China (USA), National Association (ICBC USA) with respect to the **Large Bank CRA** Lending, Investment, and Service Tests for 2020:

Performance Levels	ICBC USA Large Bank CRA Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory		X	X
Low Satisfactory			
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 Outstanding performance in both California and New York.
- The Investment Test rating is based on Outstanding performance in California and Low Satisfactory performance in New York.
- The Service Test rating is based on Low Satisfactory performance in California and Outstanding performance in New York.

Conclusions with respect to the **Strategic Plan** performance for 2021-2022:

Performance Levels*	ICBC USA Strategic Plan CRA Performance Tests		
	Lending Test	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\*All tests are weighted equally in arriving at an overall rating

The bank exceeded its plan goals for a satisfactory rating and substantially achieved its plan goals for an outstanding rating.

- Community Development (CD) lending performance is Satisfactory. ICBC USA exceeded its Strategic Plan goals for an outstanding rating for the 2021-2022 evaluation period in the state of New York. In the state of California, the bank failed to substantially meet its Strategic Plan goals for a satisfactory rating in two of its three assessment areas (AAs). In the Los Angeles AA, the bank exceeded its plan goals for an outstanding rating for the 2021-2022 evaluation period; however, in the Oakland and San Francisco AAs, the bank did not meet its plan goals for a satisfactory rating for the 2021-2022 evaluation period.
- CD investment performance is Outstanding. ICBC USA exceeded its Strategic Plan goals for an outstanding rating for the 2021-2022 evaluation period in the state of California and met its plan goals for a satisfactory rating in the state of New York.
- CD service performance is Outstanding. ICBC USA exceeded its Strategic Plan goals for an outstanding rating for the 2021-2022 evaluation period in the state of California and met its plan goals for a satisfactory rating in the state of New York.

### Lending in Assessment Area

An adequate percentage of the bank's loans are in its AAs.

The bank originated and purchased 57.2 percent of its total reportable loans inside the AAs during 2020. 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. This performance was a neutral factor in the overall analysis of the geographic distribution of lending by income level of the geographies.

<b>Lending Inside and Outside of the Assessment Area (2020)</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	125	56.8	95	43.2	220	\$118,843	55.4	\$95,796	44.6	\$214,639
Small Business	2	100.0	0	0.0	2	\$1,450	100.0	\$0	0.0	\$1,450
<b>Total</b>	<b>127</b>	<b>57.2</b>	<b>95</b>	<b>42.8</b>	<b>222</b>	<b>\$120,293</b>	<b>55.7</b>	<b>\$95,796</b>	<b>44.3</b>	<b>\$216,089</b>

\*Lending in Assessment Area factor is applicable to the Large Bank procedures only

### Description of Institution

Industrial and Commercial Bank of China (USA), National Association is an interstate bank headquartered in New York, New York. ICBC USA is considered an ethnic bank as it's located in primarily Asian-American neighborhoods and attracts largely the Chinese community due to the familiarity of the bank's parent. ICBC USA is a majority-owned subsidiary of Industrial and Commercial Bank of China, Limited (ICBC Ltd), headquartered in Beijing, China. ICBC Ltd is the largest wholesale and retail bank in China. As of December 31, 2022, ICBC USA had total assets of \$2.9 billion, total loans of \$2.6 billion, and tier one capital of \$430.6 million.



ICBC USA provides retail and commercial banking and trade finance services, offering a range of products to meet both consumer and commercial banking needs. Within lending, the bank focuses on commercial loans and commercial mortgages, which account for 78.1 percent of total loans. In addition to the main office, the bank operates three branches in New York City, five branches in the greater Los Angeles area, and five branches in the greater San Francisco/Oakland area. The bank owns and operates 11 deposit-taking ATMs (three in New York, five in Los Angeles, and three in San Francisco/Oakland). There were no branches opened or closed during the evaluation period.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities. The bank received a Satisfactory rating in its previous CRA evaluation dated November 16, 2020.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under both the Large Bank CRA procedures and the bank's approved Strategic Plan. Since the last CRA performance evaluation, the bank entered into a CRA Strategic Plan that was approved by the OCC in December 2020. The plan is effective January 1, 2021, and covers 2021 through 2025. Since the bank was not operating under its Strategic Plan until 2021, the OCC evaluated the bank's 2020 performance under the CRA Large Bank procedures, and the 2021 and 2022 performance was evaluated against the bank's approved Strategic Plan goals.

#### Large Bank evaluation

In evaluating the bank's lending performance under the CRA Large Bank procedures during 2020, the OCC reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA). In 2020, the volume of small loans to businesses reported under the CRA was insufficient to conduct a meaningful analysis and the bank made no reportable farm loans.

Lending activity responsiveness was assessed by comparing the bank's deposit market rank percentage in each AA to the home mortgage market rank percentage in 2020. Specifically, the bank's market rank (deposit or lending) was divided by the total number of depository institutions or lenders, respectively to determine the bank's "percentile." This approach takes into consideration the differences between the number of insured depository institutions and the number of home mortgage lenders within the AA.

In assessing retail lending performance, more weight was placed on the geographic distribution of mortgage loans than the borrower distribution of loans. Within the bank's reported home mortgage data there is a very high percentage of loans with borrower income information not available. This is attributed to the bank's asset-based adjustable-rate mortgage product which does not consider the income of the borrower for underwriting.

The analysis of CD loans considered both the number and dollar volume of lending with emphasis placed on loans that were particularly complex or responsive to AA needs. CD lending had either a positive, neutral, or negative impact on the rating, which is described within the narrative comments. To provide perspective, the dollar volume of CD lending was compared to the tier 1 capital amount allocated to the AA based on the area's pro rata share of bank deposits. The level of CD lending was

considered for one year only under the Large Bank procedures versus the entire three-year evaluation period.

The Investment Test considers the bank's qualified CD investments, as well as grants and donations that were made during the evaluation period. Prior period investments that remain outstanding and continue to benefit the bank's AAs were also considered at the year-end 2020 book values. The level of qualified investments in comparison to allocated tier 1 capital, based on the pro rata share of AA deposits, received the most weight in determining the rating. Consistent with CD lending, the level of CD investments was considered for one year only under the Large Bank procedures versus the entire three-year evaluation period. Examiners also considered the complexity or innovativeness of the investments, the responsiveness of the investments to community development needs, and the bank's demonstrated leadership as applicable.

Service Test performance considers both retail services and CD services. For retail services, the geographic distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies was given the most weight. Consistent with other CD activities, the level of CD services was considered for one year only under the Large Bank procedures versus the entire three-year evaluation period.

Qualifying activities performed by ICBC USA in response to the coronavirus pandemic, also known as COVID-19, are also considered in this evaluation.

#### Strategic Plan evaluation

In evaluating the bank's performance under its Strategic Plan, the OCC reviewed the bank's CD loans, CD investments and CD services for the period of 2021 through 2022.

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

For the Large Bank CRA evaluation (2020), all bank AAs were evaluated as full-scope and there were no limited-scope AAs. For purposes of the Large Bank CRA evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA) are combined and evaluated as a single AA. Further, all bank AAs are included within the bank's Strategic Plan goals (2021-2022).

#### **Ratings**

Per the CRA Large Bank procedures, the Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating. The bank's overall rating under the Large Bank CRA performance (2020), is a blend of the state ratings. The state of California received slightly greater weight than the state of New York based on the bank's level of deposits and branches. The evaluation of lending was based on home mortgage lending. As noted earlier, the bank originated an insufficient volume of small loans to businesses to conduct a meaningful analysis. The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

For the Strategic Plan evaluation covering 2021 and 2022, the bank's overall rating is based on the performance as agreed upon in the strategic planning application process. Per the Strategic Plan, all three tests carried equal weight in arriving at an overall rating. Further, all areas were equally weighted in determining conclusions regardless of the level of deposits or branches.

In determining the overall institution rating, examiners placed greater weight on the bank's Strategic Plan performance given that it represents the majority of the evaluation period.

### Strategic Plan Information

ICBC USA's Strategic Plan is effective January 1, 2021, and covers calendar years 2021-2025. The plan sets forth measurable goals over the five-year period for which the OCC will assess the bank's record of helping to meet the credit needs of its communities. The plan includes goals that constitute "satisfactory" and "outstanding" performance for CD lending, investments, and services. The bank set cumulative targets for the plan period which are spread out across the five-year period as annual benchmarks. The plan also establishes annual minimum target amounts which set forth an expectation that an acceptable level of activity is conducted every year of the plan. Once the minimum thresholds are met, the plan allows the bank to carry over excess amounts to a prior or following year to satisfy that year's benchmark, which allows for flexibility in responding to AA needs and opportunities and also considers market conditions and internal factors. The target goals for CD lending and investments are based upon percentages of allocated tier 1 capital for the AA and take into consideration a projected increase in tier 1 capital over the plan period. The target hours for community services are based on the number of employees within the AA.

<b>Strategic Plan Goals 2021-2025</b>												
<b>AA</b>	<b>2021</b>		<b>2022</b>		<b>2023</b>		<b>2024</b>		<b>2025</b>		<b>Cumulative</b>	
	<b>SAT</b>	<b>OUT</b>	<b>SAT</b>	<b>OUT</b>	<b>SAT</b>	<b>OUT</b>	<b>SAT</b>	<b>OUT</b>	<b>SAT</b>	<b>OUT</b>	<b>SAT</b>	<b>OUT</b>
<b>CD Lending (\$000s)</b>												
Los Angeles	\$4,300	\$5,375	\$4,472	\$5,590	\$4,649	\$5,811	\$4,832	\$6,040	\$5,020	\$6,274	\$23,272	\$29,090
Oakland	\$800	\$1,000	\$832	\$1,040	\$865	\$1,081	\$899	\$1,124	\$934	\$1,167	\$4,330	\$5,412
San Francisco	\$4,650	\$5,812	\$4,836	\$6,045	\$5,028	\$6,284	\$5,225	\$6,531	\$5,428	\$6,785	\$25,167	\$31,458
New York	\$5,280	\$6,600	\$5,491	\$6,864	\$5,709	\$7,136	\$5,933	\$7,416	\$6,163	\$7,704	\$28,576	\$35,720
<b>CD Investments (\$000s)</b>												
Los Angeles	\$200	\$300	\$300	\$400	\$400	\$500	\$500	\$600	\$600	\$800	\$2,000	\$2,600
Oakland	\$100	\$200	\$200	\$300	\$300	\$400	\$400	\$500	\$500	\$600	\$1,500	\$2,000
San Francisco	\$200	\$300	\$300	\$400	\$400	\$500	\$500	\$600	\$600	\$600	\$2,000	\$2,600
New York	\$200	\$300	\$300	\$400	\$400	\$500	\$500	\$600	\$600	\$800	\$2,000	\$2,600
<b>CD Services (hours)</b>												
Los Angeles	66	99	73	109	80	120	88	132	97	145	403	605
Oakland	14	21	15	24	17	26	19	28	20	31	85	103
San Francisco	54	81	59	90	65	99	72	108	79	119	330	497
New York	92	138	101	152	111	167	122	184	135	203	562	844

In assessing the bank's performance against its Strategic Plan goals, examiners utilized the following criteria outline in the approved Strategic Plan.

The bank's CD lending, investment, and service performance were assigned points based on the following parameters.

<b>Performance Rating</b>	<b>Minimum % of Satisfactory Goals</b>		<b>Points</b>
Substantial Noncompliance	<	75%	0
Needs to Improve	< =	85%	5
Low Satisfactory	< =	95%	10
High Satisfactory	< =	125%	15
Outstanding	>	125%	20

The bank's CD lending, investment, and service performance or points, across all its AAs were then averaged to determine overall ratings based on the following composite rating scale.

<b>Minimum Average Points</b>	<b>Rating/Result</b>
< = 8	Evaluate performance under Large Bank procedures
< = 15	Satisfactory
< = 20	Outstanding

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

Pursuant to 12 C.F.R. §25.28(c) in determining a national bank's 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 AA 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 Consumer Financial Protection Bureau, 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 California

**CRA rating for the State of California:** Outstanding

#### **LARGE BANK CRA (2020):**

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

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

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AAs credit needs.
- An excellent geographic distribution of loans.
- A poor distribution of loans among individuals of different income levels.
- A relatively high level of CD loans that had a positive impact on the rating.
- An excellent level of CD investments.
- Reasonably accessible service delivery systems.
- A relatively high level of CD services.

#### **STRATEGIC PLAN (2021-2022):**

- The bank exceeded its plan goals for an outstanding rating for CD lending in the Los Angeles AA and failed to meet its plan goals for a satisfactory rating for CD lending in the Oakland and San Francisco AAs.
- The bank exceeded its plan goals for an outstanding rating for CD qualified investments.
- The bank exceeded its plan goals for an outstanding rating for CD services.

### Description of Institution's Operations in California

ICBC USA delineated three AAs in the state of California. They included the Los Angeles-Long Beach-Glendale MD (Los Angeles MD), the Oakland-Berkley-Livermore MD (Oakland MD) and the San Francisco-San Mateo-Redwood City MD (San Francisco MD). Examiners combined bank-delineated AAs located in the same MSA into one AA for purposes of the Large Bank CRA evaluation. Refer to appendix A for a complete list of counties reviewed.

As of year-end 2022, ICBC USA had 10 branch locations and eight deposit-taking ATMs within these AAs. In 2020, the bank made \$86.1 million or 72.4 percent of its total dollar volume of home mortgage loans in these AAs.

The state of California represented the bank’s largest rated area in terms of deposits. Based on June 30, 2020, Federal Deposit Insurance Corporation (FDIC) summary of deposit information, ICBC USA had \$1.15 billion in deposits in the state of California, which represented 56.7 percent of the bank’s total deposits. The bank ranked 42<sup>nd</sup> in deposit market share with 0.1 percent out of 120 depository institutions. The top three competitors had 54.4 percent of the market share and included Bank of America, NA with 339 branches and 28.4 percent market share, Wells Fargo Bank, NA with 355 branches and 15.5 percent market share, and JP Morgan Chase Bank, NA with 390 branches and 10.5 percent market share.

Based on June 30, 2022, FDIC summary of deposit information, ICBC USA had just under \$1.18 billion in deposits in the state of California, which represented 52.5 percent of the bank’s total deposits. The bank ranked 42<sup>nd</sup> in deposit market share with 0.1 percent out of 116 depository institutions. The top three competitors had 53 percent of the market share and included Bank of America, NA with 316 branches and 26.7 percent market share, Wells Fargo Bank, NA with 320 branches and 13.2 percent market share, and JP Morgan Chase Bank, NA with 362 branches and 13.1 percent market share.

### Los Angeles-Long Beach-Glendale MD

The following table provides a summary of the demographics, including housing and business information for the Los Angeles MD AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Los Angeles MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,346	9.4	28.7	24.9	34.8	2.2
Population by Geography	10,038,388	8.6	29.3	26.3	35.1	0.8
Housing Units by Geography	3,476,718	7.8	26.3	24.8	40.6	0.5
Owner-Occupied Units by Geography	1,499,879	2.4	17.2	26.6	53.7	0.1
Occupied Rental Units by Geography	1,763,190	12.2	34.2	23.6	29.2	0.9
Vacant Units by Geography	213,649	8.7	25.4	22.8	42.2	1.0
Businesses by Geography	941,441	4.6	18.9	21.2	52.8	2.4
Farms by Geography	8,629	2.7	17.6	24.9	53.6	1.1
Family Distribution by Income Level	2,186,485	24.5	16.3	16.7	42.4	0.0
Household Distribution by Income Level	3,263,069	25.9	15.4	15.8	43.0	0.0
Median Family Income MSA – 31084 Los Angeles-Long Beach-Glendale, CA		\$62,703	Median Housing Value			\$495,540
			Median Gross Rent			\$1,292
			Families Below Poverty Level			14.3%
<i>Source: 2015 ACS Census and 2020 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>						

The Los Angeles MD AA consisted of Los Angeles County. As of year-end 2022, ICBC USA operated five branches and five deposit-taking ATMs in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2020, ICBC USA had \$527.8 million in deposits in the AA which represented 26 percent of total bank deposits. ICBC USA had 0.1 percent deposit market share which ranked 46<sup>th</sup> among all institutions. Competition was extensive with 98 total FDIC insured financial institutions operating 1,698 offices in the AA. The top three competitors were Bank of America, NA with 239 branches and 16.4 percent market share, JP Morgan Chase Bank, NA with 287 branches and 13.8 percent market share, and Wells Fargo Bank, NA with 243 branches and 12.9 percent market share.

According to the FDIC's Summary of Deposits as of June 30, 2022, ICBC USA had \$520.4 million in deposits in the AA which represented 23.2 percent of total bank deposits. ICBC USA had 0.1 percent deposit market share which ranked 45<sup>th</sup> among all institutions. Competition was extensive with 95 total FDIC insured financial institutions operating 1,571 offices in the AA. The top three competitors were Bank of America, NA with 222 branches and 17.3 percent market share, JP Morgan Chase Bank, NA with 265 branches and 16.7 percent market share, and Wells Fargo Bank, NA with 218 branches and 12.9 percent market share.

Based on information from the November 2022 Moody's Analytics report, the Los Angeles MD's economy has cooled but is nonetheless nearing a full employment recovery. The area economy is driven by tourism, logistics, and medical centers. Los Angeles benefits from a strong healthcare base and a growing tech presence that provide well-paying jobs. Other strengths of the area include global links through entertainment, tourism, and fashion and the presence of the deep San Pedro harbor which enables Los Angeles to handle megaships that other ports cannot. Conversely, the area is prone to natural disasters including earthquakes, drought, and wildfires. In addition, high costs hinder net migration gains. While the pandemic exodus has eased, the loss of residents is still greater than pre-COVID. The top employers in the area include Cedars-Sinai Medical Center, Los Angeles International Airport, University of California (Los Angeles), VXi Global Solutions, and the Walt Disney Co. On the housing front, rising borrowing costs have hampered demand, and home sales have fallen to near-historic lows. However, affordability continues to be an issue in Los Angeles despite some housing price contraction.

According to the U.S. Bureau of Labor Statistics, the 2022 annual unemployment rate in the Los Angeles MD was 4.9 percent, compared to 12.3 percent in 2020 and 8.9 percent in 2021. Unemployment peaked at 19 percent in May 2020 due the business shutdowns caused by the COVID-19 pandemic. The Los Angeles MD unemployment rate was higher than the 4.2 percent unemployment rate for the state of California in 2022.

Based on information in the above table, low-income families earned less than \$31,352 and moderate-income families earned less than \$50,162. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$784 for low-income borrowers and \$1,254 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$2,660. Most low-income and moderate-income borrowers would be unable to afford a mortgage loan in this AA.



Examiners relied on information provided from two community contacts conducted during the evaluation period to understand area needs and opportunities. The contacts represented organizations focused on neighborhood housing and economic development.

Per one contact, Los Angeles has a large minority population who may not speak English and work primarily low paying jobs. It is difficult for them to obtain credit for housing and consumer goods. Los Angeles County has a very limited housing stock, which has highly increased in value, and more people are having a difficult time being able to afford housing. Individuals with little or no credit histories face difficulties building and obtaining credit and qualifying for housing, even for affordable housing programs. The contact identified needs for credit counseling, small consumer loans, and affordable housing loans, and noted opportunities for local financial institutions to provide credit building loans that could help low- and moderate-income individuals gain credit.

The contact from an economic development organization stated that it is difficult to obtain small business loans for minority and women owned entrepreneurs mainly located in low- and moderate-income communities. This is due to the businesses being young and lacking the two to three years of business activity that banks often require. They have seen an increase in requests for start-ups with the majority of requests being for online retailing versus traditional brick and mortar retail. The contact identified a need for small business loans to support start-up businesses in the area since many banks and Community Development Financial Institutions (CDFIs) do not offer this type of financing.

## San Francisco-Oakland MSA

The following table provides a summary of the demographics, including housing and business information for the San Francisco-Oakland MSA AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: San Francisco-Oakland 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)	716	12.6	20.7	30.4	34.4	2.0
Population by Geography	3,174,477	11.6	21.8	33.1	32.8	0.6
Housing Units by Geography	1,246,372	11.9	20.4	32.2	34.6	0.8
Owner-Occupied Units by Geography	576,764	4.7	15.9	35.2	44.0	0.2
Occupied Rental Units by Geography	595,141	18.2	24.9	29.7	25.9	1.3
Vacant Units by Geography	74,467	18.0	18.8	29.6	32.0	1.6
Businesses by Geography	310,031	13.4	16.8	27.7	40.9	1.1
Farms by Geography	3,520	9.3	16.0	32.5	41.8	0.4
Family Distribution by Income Level	709,163	25.1	15.8	18.0	41.2	0.0
Household Distribution by Income Level	1,171,905	27.0	14.6	15.9	42.5	0.0
Median Family Income MSA - 36084 Oakland-Berkeley-Livermore, CA		\$93,822	Median Housing Value			\$686,064
Median Family Income MSA - 41884 San Francisco-San Mateo-Redwood City, CA		\$103,742	Median Gross Rent			\$1,523
			Families Below Poverty Level			7.4%

*Source: 2015 ACS Census and 2020 D&B Data*

*Due to rounding, totals may not equal 100.0*

*(\*) The NA category consists of geographies that have not been assigned an income classification.*

The San Francisco-Oakland MSA AA consisted of a portion of the Oakland-Berkeley-Livermore MD (Alameda County) and the entire San Francisco-San Mateo-Redwood City MD (San Francisco and San Mateo counties). As of year-end 2022, ICBC USA operated five branches and three deposit-taking ATMs in the AA.

According to the FDIC's Summary of Deposits as of June 30, 2020, ICBC USA had \$624 million in deposits in the AA which represented 30.7 percent of total bank deposits. ICBC USA had 0.1 percent deposit market share which ranked 28<sup>th</sup> among all institutions. Competition was extensive with 59 total FDIC insured financial institutions operating 711 offices in the AA. The top three competitors were Bank of America, NA with 100 branches and 42.7 percent market share, Wells Fargo Bank, NA with 112 branches and 18.6 percent market share, and First Republic Bank with 24 branches and 9.4 percent market share.

According to the FDIC's Summary of Deposits as of June 30, 2022, ICBC USA had \$656.7 million in deposits in the AA which represented 29.3 percent of total bank deposits. ICBC USA had 0.1 percent deposit market share which ranked 25<sup>th</sup> among all institutions. Competition was extensive with 60 total FDIC insured financial institutions operating 668 offices in the AA. The top three competitors were Bank of America, NA with 94 branches and 38.4 percent market share, First Republic Bank with 24 branches and 13.9 percent market share, and Wells Fargo Bank, NA with 102 branches and 13.6 percent market share.

### **Oakland MD**

Based on information from the November 2022 Moody's Analytics report, Oakland's economy is making headway, but job growth has slowed. While leisure/hospitality and healthcare industries led gains, the public sector has struggled to find momentum and overall employment remains below its pre-pandemic level. Area economic drivers include high tech, medical centers, and the federal government. The top employers in the area include University of California, Western Digital, Chevron Corp., Grifols, and Lawrence Livermore National Laboratory. The tech industry is a vital source of high paying jobs in Oakland as the area benefits from its proximity to Silicon Valley. Oakland is attractive for tech firms fleeing higher-cost Silicon Valley with its more affordable industrial and office space. Area strengths include the presence of world-class universities and laboratories, and ample infrastructure for transportation and distribution facilities. Weaknesses of the area include deteriorating migration trends and high costs compared with other emerging tech hubs. On the housing front, the area is facing one of the sharpest housing corrections in the nation. While housing prices have contracted somewhat, they remain elevated. This coupled with rising interest rates and slow income growth continue to push homeownership out of reach for many area residents.

### **San Francisco MD**

Based on information from the November 2022 Moody's Analytics report, San Francisco's economy continues to recover but job growth has slowed. Total employment is further from its pre-pandemic peak than all other large California economies. The area economy is driven by high tech, financial services, and medical centers. The top five employers in the area are University of California (San Francisco), Salesforce Inc, Wells Fargo, Kaiser Permanente, and United Airlines. San Francisco benefits from a

highly educated and skilled workforce and in turn very high incomes. The Bay Area is the tech capital of the world and benefits from a robust cluster of internet and other tech-service companies. While tech giants including Meta, Twitter, and Salesforce have recently announced layoffs, the cuts were not unexpected given the inherent volatility of the tech industry along with the rapid expansion of firms in the initial aftermath of the pandemic. In addition, tech firms are facing difficulty raising capital and investment funding due to rising interest rates and overall economic uncertainties. Area weaknesses include high costs, including housing, office rents, and energy, and land constraints and regulations that limit construction. Housing affordability is a major issue in San Francisco. While housing prices have contracted somewhat, they remain elevated. This coupled with rising interest rates and slow income growth continue to push homeownership out of reach for many area residents.

According to the U.S. Bureau of Labor Statistics, the 2022 annual unemployment rate in San Francisco-Redwood City-South San Francisco MD was 2.5 percent, compared to 7.5 percent in 2020 and 4.9 percent in 2021. The 2022 annual unemployment rate in the Oakland-Hayward-Berkeley MD was 3.4 percent, compared to 9 percent in 2020 and 6.2 percent in 2021. Unemployment in both MDs peaked in April 2020 at 12.6 and 15 percent respectively due to the business shutdowns caused by the COVID-19 pandemic. The areas unemployment rates compared favorably to the 4.2 unemployment rate for the state of California in 2022.

Based on information in the above table, low-income families earned less than \$46,911-\$51,871 and moderate-income families earned less than \$75,058-\$82,994, depending on the MD. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. Depending on the MD, this calculated to a maximum monthly mortgage payment between \$1,173 and \$1,297 for low-income borrowers and between \$1,876 and \$2,075 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$3,683. Most low-income and moderate-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners relied on information provided from a community contact conducted during the evaluation period with a representative from a local community development organization. The contact indicated that with COVID-19 many industries have been negatively affected, particularly small retail and hospitality. People are struggling to stay in their homes despite federal aid and mortgage forbearance programs. Despite the pandemic, housing prices and rents are increasing. When properties go into foreclosure investors are coming in and buying properties. This had led to further gentrification and pushing low- and moderate-income people out of the area. The contact indicated that banks can help by not funding this type of development, funding Community Land Trusts to buy at-risk properties, and creating first-time home buyer programs.

Examiners also considered comments provided by seven community organizations as part of an interagency CRA listening session conducted in November 2021. The participants in the session represented organizations focused on community development including affordable housing, financial literacy, and economic development. During the CRA listening session, the participants indicated that the inequities that existed prior to the pandemic have been exacerbated. Low- and moderate-income families are relying more and more on food pantries, and there are extreme concerns from the community about housing insecurity. Bay Area rents are very high, and many families could not access or did not qualify for housing assistance. The participants also mentioned there are many low- and moderate-income individual owned small businesses in the area. The participants identified a need for

flexible loan underwriting for small businesses with no prior credit history. The participants added that more emphasis is needed to help homeowners preserve their homes along with assistance programs for first-time homebuyers.

## Scope of Evaluation in California

Examiners selected all AAs in the state of California for full-scope review. The San Francisco MSA received slightly more weight in arriving at conclusions as it had more deposits in the state of California than the Los Angeles MD. In arriving at Lending Test conclusions, examiners only analyzed home mortgage loans as small business and small farm lending was negligible and did not provide for a meaningful analysis.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

### LARGE BANK CRA (2020)

#### LENDING TEST

The bank's performance under the Lending Test in California is rated Outstanding.

#### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Los Angeles MD and San Francisco-Oakland MSA AAs was excellent.

#### Lending Activity

<b>Number of Loans*</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Los Angeles MD	57	2	0	2	61	55.5	45.8
San Francisco-Oakland MSA	48	0	0	1	49	44.5	54.2
Total	105	2	0	3	110	100.0	100.0

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

<b>Dollar Volume of Loans* (\$000)</b>							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Los Angeles MD	\$47,505	\$1,450	\$0	\$2,250	\$51,205	55.6	45.8
San Francisco-Oakland MSA	\$38,820	\$0	\$0	\$2,000	\$40,820	44.4	54.2
Total	\$86,325	\$1,450	\$0	\$4,250	\$92,025	100.0	100.0

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

#### Los Angeles MD

Lending levels reflected excellent responsiveness to AA credit needs when considering the bank's business model and limited presence in the market.

As of June 30, 2020, ICBC USA ranked 46<sup>th</sup> out of 98 depository institutions (top 46.9 percent) with a deposit market share of 0.1 percent.

For home mortgage loans, the bank's 2020 market share of 0.01 percent ranked 377<sup>th</sup> out of 869 lenders (top 43.4 percent). The top three lenders were Quicken Loans, LLC with 8.8 percent market share, United Wholesale Mortgage, LLC with 8.4 percent market share, and Wells Fargo Bank, NA with 4.6 percent market share.

### **San Francisco-Oakland MSA**

Lending levels reflected excellent responsiveness to AA credit needs when considering the bank's business model and limited presence in the market.

As of June 30, 2020, ICBC USA ranked 28<sup>th</sup> out of 59 depository institutions (top 47.5 percent) with a deposit market share of 0.1 percent.

For home mortgage loans, the bank's 2020 market share of 0.03 percent ranked 228<sup>th</sup> out of 725 lenders (top 31.4 percent). The top three lenders were Quicken Loans, LLC with 11.9 percent market share, Wells Fargo Bank, NA with 7.2 percent market share, and United Wholesale Mortgage, LLC with 6.1 percent market share.

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

The bank exhibited an excellent geographic distribution of loans in its AAs. Examiners generally placed more emphasis on the bank's performance in moderate-income geographies as these areas had a higher percentage of owner-occupied housing units.

### **Los Angeles MD**

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

Refer to Table O in the state of California 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.

The geographic distribution of home mortgage loans was good. The percentage of home mortgage loans originated or purchased in low-income geographies was below both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

### **San Francisco-Oakland MSA**

***Home Mortgage Loans***

Refer to Table O in the state of California 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.

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in low-income geographies was near the percentage of owner-occupied housing units located in those geographies and approximated the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

***Lending Gap Analysis***

The OCC reviewed summary reports and maps and analyzed home mortgage activity to identify any gaps in the geographic distribution of the bank's loans in the AAs. In performing this analysis, examiners considered the low volume of reportable lending activity by ICBC USA in the AA. Examiners also considered competition and demographic information. The OCC did not identify any unexplained conspicuous gaps in any of the areas reviewed.

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

The bank exhibited a poor distribution of loans among individuals of different income levels.

**Los Angeles MD*****Home Mortgage Loans***

Refer to Table P in the state of California 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.

The distribution of home mortgage loans among individuals of different income levels was poor.

The bank did not originate or purchase any home mortgage loans to low- and moderate-income borrowers in 2020. Examiners considered housing costs in relation to the median family incomes in the AAs, which limited the affordability for low-income and moderate-income borrowers. The area's high poverty rate of 14.3 percent also inhibits homeownership. Further, examiners considered the very high percentage of home mortgage loans made by the bank in 2020 to borrowers with income information not available in the AA (89.5 percent).

**San Francisco-Oakland MSA*****Home Mortgage Loans***

Refer to Table P in the state of California 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.

The distribution of home mortgage loans among individuals of different income levels was poor.

The bank did not originate or purchase any home mortgage loans to low- and moderate-income borrowers in 2020. Examiners considered housing costs in relation to the median family incomes in the AAs, which limited the affordability for low-income and moderate-income borrowers. Further, examiners considered the very high percentage of home mortgage loans made by the bank in 2020 to borrowers with income information not available in the AA (87.5 percent).

### **Community Development Lending**

The institution has made a relatively high level of CD loans.

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.

#### **Los Angeles MD**

The bank is a leader in making CD loans which had a positive impact on performance. ICBC USA made two CD loans totaling \$2.2 million in 2020, which represented 2.2 percent of allocated tier 1 capital. All loans supported affordable housing, which is a significant need in the AA.

CD loans included:

- A \$2 million line of credit to a nonprofit affordable housing organization headquartered in the Los Angeles MD. Specifically, the organization lends to developers to provide construction and permanent financing for dwellings occupied by low- and moderate-income individuals throughout the state of California.
- A \$500,000 commercial mortgage loan secured by a six-unit apartment building containing three housing units affordable to low- and moderate-income individuals in Los Angeles based on the Housing and Urban Development (HUD) affordable housing calculation. The qualified amount for CD is \$250,000.

#### **San Francisco-Oakland MSA**

The bank made a relatively high level of CD loans which had a positive impact on performance. ICBC USA made one CD loan totaling \$2 million in 2020, which represented 1.7 percent of allocated tier 1 capital. The CD loan addressed affordable housing, a significant need in the AA, by refinancing an existing mortgage on a multifamily property consisting of 45 units with below market rents considered affordable to low- and moderate-income individuals based on the HUD affordable housing calculation.

### **Product Innovation and Flexibility**

The institution made no use of innovative or flexible lending practices in order to serve AA credit needs.

Refer to Tables O through P in the state of California section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The bank's performance under the Investment Test in California is rated Outstanding.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Los Angeles MD AA was good and, in the San Francisco-Oakland MSA AA was excellent.

Qualified Investments (2020)										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Los Angeles MD	2	\$503	10	\$1,173	12	63.2	\$1,676	40.6	0	0.0
San Francisco-Oakland MSA	0	\$0	7	\$2,450	7	36.8	\$2,450	59.4	0	0.0
Total	2	\$503	17	\$3,623	19	100.0	\$4,126	100.0	0	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.

### Los Angeles MD

The bank had a significant level of qualified CD investments and grants, particularly those that are not routinely provided by private investors, although rarely in a leadership position. The institution did not use innovative or complex investments to support CD initiatives.

In 2020, ICBC USA had two prior period mortgage-backed securities (MBS) on the books totaling \$503,196 and purchased one new MBS investment totaling \$1.2 million. The MBS are secured by underlying mortgages to primarily low- and moderate-income borrowers in Los Angeles. ICBC USA also made nine grants and donations, totaling \$5,357, in 2020 to community service organizations that provided essential services to low- and moderate-income individuals. CD investments represented 1.6 percent of allocated tier 1 capital in 2020.

Examples of grants and donations in the AA include:

- A \$1,250 donation to a nonprofit organization that provides community services including legal consultation for new immigrants, family counseling, and low cost medical and dental services to underserved populations.
- A \$1,000 donation to an organization providing childcare and distance learning programs to low-income students and families during the COVID-19 pandemic.

### San Francisco-Oakland MSA

The bank had an excellent level of qualified CD investments and grants, particularly those that are not routinely provided by private investors, although rarely in a leadership position. The institution made no use of innovative or complex investments to support CD initiatives.



In 2020, ICBC USA made one MBS investment totaling \$1.1 million that is secured by underlying mortgages to primarily low- and moderate-income borrowers in Oakland. The bank also placed funds at a San Francisco based CDFI bank totaling \$1.3 million using the Certificate of Deposit Account Registry Service (CDARS). In addition, the bank made five grants and donations, totaling \$8,750, to community service organizations that provided essential services to low- and moderate-income individuals. CD investments represented 2 percent of allocated tier 1 capital for 2020.

Examples of grants and donations in the AA include:

- A \$2,500 donation to a nonprofit organization that serves at-risk youth in San Francisco’s Chinatown area. The organization provides programs including behavioral health, community/school-based outreach, leadership development, and workforce development.
- A \$1,750 donation to a community center that provides care for children from primarily low- and moderate-income families.

**SERVICE TEST**

The bank’s performance under the Service Test in California is rated Low Satisfactory.

**Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank’s performance in the Los Angeles MD and San Francisco-Oakland MSA AAs was adequate.

**Retail Banking Services**

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Los Angeles MD	44.2	5	50.0	0.0	40.0	0.0	60.0	8.6	29.3	26.3	35.1
San Francisco-Oakland MSA	55.8	5	50.0	60.0	0.0	40.0	0.0	11.6	21.8	33.1	32.8

**Los Angeles MD**

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution’s AA.

Although the bank has no branches in low-income geographies, the distribution of branches in moderate-income geographies exceeded the percentage of the population living within those geographies.

ICBC USA had several Alternative Delivery Systems (ADS) including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. ICBC USA had five deposit-taking ATMs in the AA, one in each of the bank’s branches. ADS had a neutral impact on the Service Test rating.

**San Francisco-Oakland MSA**

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution’s AA.

Although the bank has no branches in moderate-income geographies, the distribution of branches in low-income geographies exceeded the percentage of the population living within those geographies.

ICBC USA had several ADS including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. ICBC USA had three deposit-taking ATMs in the AA, all of which were located inside the bank’s branches in low-income geographies. ADS had a neutral impact on the Service Test rating.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Los Angeles MD	0	0	0	0	0	0
San Francisco-Oakland MSA	0	0	0	0	0	0

**Los Angeles MD**

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies or individuals. Services are comparable among locations regardless of income level of the geography, and all branches have reasonable weekday hours (10:00 a.m.- 4:00 p.m.).

**San Francisco-Oakland MSA**

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconveniences the AAs, particularly low- and moderate-income geographies or individuals. Services are comparable among locations regardless of income level of the geography, and all branches have reasonable weekday hours (10:00 a.m.- 4:00 p.m.).

## **Community Development Services**

### **Los Angeles MD**

The institution provided a relatively high level of CD services.

In 2020, six ICBC USA employees participated in two qualified CD service activities totaling 60 hours within the Los Angeles MD AA. Specifically, the activities related to youth financial literacy as part of a distance learning program during COVID-19 that covered banking basics.

### **San Francisco-Oakland MSA**

The institution provided a relatively high level of CD services.

In 2020, eleven ICBC USA employees participated in four qualified CD service activities totaling 69 hours within the San Francisco-Oakland MSA AA. Specifically, the activities related to youth financial literacy and fundraising.

Examples of CD service activities include:

- Six bank employees provided financial literacy presentations to at-risk youth through an organization serving a diverse population of low-income minority youth.
- An employee served as a member of the fundraising committees for two area organizations that provide programs and services to low- and moderate-income youth and families.

## **CRA STRATEGIC PLAN (2021-2022)**

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE IN CALIFORNIA:**

- CD lending performance was overall satisfactory. ICBC USA exceeded its plan goals for an outstanding rating in the Los Angeles AA. Within the Oakland and San Francisco AAs, the bank did not meet its plan goals for a satisfactory rating for the 2021-2022 period. Examiners considered that on a combined basis, the bank made \$40.2 million in CD loans in the state of California, far exceeding its combined plan goals of \$24.9 million for an Outstanding rating across its AAs in California.
- CD investment performance was excellent. ICBC USA exceeded its plan goals for an outstanding rating in all AAs in the state of California for the 2021-2022 period. The bank had \$7.4 million in qualified investments outstanding (along with donations and grants made) as of year-end 2021 and \$8.4 million outstanding as of year-end 2022, thus exceeding its combined plan goals of \$7.2 million for an Outstanding rating across its AAs in California.
- CD service performance was excellent. ICBC USA exceeded its plan goals for an outstanding rating in all AAs in the state of California for the 2021-2022 period. Bank employees provided 530 service hours in the state of California, exceeding its combined plan goals of 424 hours for an outstanding rating across its AAs in California.

**DISCUSSION OF PERFORMANCE IN LOS ANGELES:**

The bank exceeded its plan goals for a satisfactory rating and substantially achieved its plan goals for an outstanding rating for CD loans, investments, and services within the Los Angeles AA.

- The bank originated six CD loans totaling \$18.9 million in 2021 and six CD loans totaling \$13.9 million in 2022, which substantially exceeded its CD lending plan goals for an outstanding rating for 2021 (\$5.4 million) and 2022 (\$5.6 million). CD loans supported affordable housing, a significant need in the AA.
- For 2021-2022, the bank substantially exceeded its CD investment plan goals for an outstanding rating. The bank had \$2.9 million in CD investments outstanding in both 2021 and 2022 and made \$7,550 in qualifying donations and grants over the evaluation period. Investments primarily supported affordable housing needs, followed by community services for low- and moderate-income individuals. The bank’s targeted total qualified investments goals are cumulative, and while the plan provides for minimum annual plan benchmarks, the bank measures against the cumulative plan performance goals of \$2 million for satisfactory performance and \$2.6 million for outstanding performance which the bank exceeded in both 2021 and 2022.
- Bank employees participated in various CD service activities totaling 120 hours in 2021 and 147 hours in 2022, which substantially exceeded its plan goals for an outstanding rating for 2021 (99) and 2022 (109). CD services included financial education and fundraising assistance to area nonprofits.

<b>STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE</b>					
<b>Los Angeles AA</b>					
	<b>Plan Targets</b>			<b>Actual Performance (2021-2022)</b>	<b>Rating</b>
	<b>Outstanding</b>	<b>Satisfactory</b>	<b>Minimum</b>		
<b>CD Lending (\$ 000's)</b>					
2021	\$5,375	\$4,300	\$2,150	\$18,880	
2022	\$5,590	\$4,472	\$2,236	\$13,900	
<b>Total</b>	<b>\$10,965</b>	<b>\$8,772</b>	<b>\$4,386</b>	<b>\$32,780</b>	<b>Outstanding</b>
<b>CD Investments* (\$ 000's)</b>					
2021	\$300	\$200	\$200	\$2,954	
2022	\$400	\$300	\$300	\$2,937	
<b>Cumulative</b>	<b>\$2,600</b>	<b>\$2,000</b>	<b>\$2,000</b>		<b>Outstanding</b>
<b>CD Services (Hours)</b>					
2021	99	66	66	120	
2022	109	73	73	147	
<b>Total</b>	<b>208</b>	<b>139</b>	<b>139</b>	<b>267</b>	<b>Outstanding</b>

\*Investments include new investments, outstanding investments at book value, and any grants/donations made within the year. CD investment goals are measured on a cumulative basis for the entire Strategic Plan period.

Examples of CD activities in the AA include:

- A refinance of an \$11.5 million commercial mortgage secured by five apartment buildings in Los Angeles, containing a total of 59 units. The apartments are under a Housing Assistance Payment contract with HUD and are 100 percent occupied by tenants under Section 8 housing.
- A new \$2.1 million commercial mortgage secured by a 15-unit co-living style property providing affordable housing. The property which has separate one bedroom/bathroom suites with common living areas is subject to the city of Los Angeles rent control policy.
- A renewal and increase to \$6.5 million of an existing line of credit to a community organization headquartered in Los Angeles that supports affordable housing development in California.
- A \$1.3 million MBS purchased in 2021 for which the underlying mortgages were made to low- and moderate-income borrowers in Los Angeles.
- Three prior period MBS investments with an outstanding book value of \$1.7 million as of year-end 2022.
- Two donations totaling \$2,750 to an area nonprofit that provides essential community services to the Chinese community including new immigrants and the underserved.
- Numerous bank employees participated in fundraising events for a community health center that serves low-income patients providing 64 service hours over 2021 and 2022. The employees’ involvement included arranging, planning, and coordinating the events and advising on fundraising strategies.

**DISCUSSION OF PERFORMANCE IN OAKLAND:**

The bank exceeded its plan goals for a satisfactory rating and substantially achieved its plan goals for an outstanding rating for CD investments and services within the Oakland AA. The bank failed to substantially meet its plan goals for a satisfactory rating for CD loans.

- The bank failed to substantially meet its CD lending plan goals for a satisfactory rating in the Oakland AA. The bank originated no CD loans in the AA for 2021-2022, falling short of its plan targets for 2021 (\$800,000) and 2022 (\$832,000).
- For 2021-2022, the bank substantially exceeded its CD investment plan goals for an outstanding rating. The bank had \$2.4 million in CD investments outstanding in both 2021 and 2022 which supported affordable housing needs. The bank made no grants or donations over the evaluation period. The bank’s targeted total qualified investments goals are cumulative and while the plan provides for minimum annual plan benchmarks, the bank measures against the cumulative plan performance goals of \$1.5 million for satisfactory performance and \$2 million for outstanding performance which the bank exceeded in both 2021 and 2022.
- Bank employees participated in various CD service activities totaling 56 hours in 2021 and 24 hours in 2022, achieving its plan goals for an outstanding rating for 2021 (21) and 2022 (24). CD services included financial education and general community services.

<b>STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE</b>
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<b>Oakland AA</b>					
	<b>Plan Targets</b>			<b>Actual Performance</b>	<b>Rating</b>
	<b>Outstanding</b>	<b>Satisfactory</b>	<b>Minimum</b>		
<b>CD Lending (\$000's)</b>					
2021	\$1,000	\$800	\$400	\$0	
2022	\$1,040	\$832	\$416	\$0	
<b>Total</b>	<b>\$2,040</b>	<b>\$1,632</b>	<b>\$816</b>	<b>\$0</b>	<b>Substantial Noncompliance</b>
<b>CD Investments* (\$000's)</b>					
2021	\$200	\$100	\$100	\$2,416	
2022	\$300	\$200	\$200	\$2,416	
<b>Cumulative</b>	<b>\$2,000</b>	<b>\$1,500</b>	<b>\$1,500</b>		<b>Outstanding</b>
<b>CD Services (Hours)</b>					
2021	21	14	14	56	
2022	24	15	15	24	
<b>Total</b>	<b>45</b>	<b>29</b>	<b>29</b>	<b>80</b>	<b>Outstanding</b>

\*Investments include new investments, outstanding investments at book value, and any grants/donations made within the year. CD investment goals are measured on a cumulative basis for the entire Strategic Plan period.

Examples of CD activities in the AA include:

- A \$1.3 million MBS purchased in 2021 for which the underlying mortgages were made to low- and moderate-income borrowers in Oakland.
- A prior period MBS investment purchased in 2020 with an outstanding book value of \$1.1 million as of year-end 2022.
- Bank staff provided assistance totaling 30 service hours in 2021 to an area nonprofit that serves low-income families, seniors, and those with disabilities. Specifically, bank staff provided financial education covering common scam prevention and volunteered with food pantry sorting, packing, and distributing.

#### **DISCUSSION OF PERFORMANCE IN SAN FRANCISCO:**

The bank exceeded its plan goals for a satisfactory rating and substantially achieved its plan goals for outstanding ratings for CD investments and services within the San Francisco AA. The bank failed to substantially meet its plan goals for a satisfactory rating for CD loans.

- The bank failed to substantially meet its CD lending plan goals for a satisfactory rating in the San Francisco AA. The bank originated no CD loans in 2021 and originated two CD loans totaling \$7.4 million in 2022. The bank fell short of its target CD lending goal for a satisfactory rating in 2021 (\$4.7 million) and exceeded its plan goal for an outstanding rating in 2022 (\$6 million). On a combined basis, the bank fell short of its \$9.5 million combined plan goal for a satisfactory rating for 2021-2022.
- For 2021-2022, the bank substantially exceeded its CD investment plan goals for an outstanding rating. The bank had \$2 million in CD investments outstanding in 2021 and \$3 million in CD investments outstanding in 2022. Investments supported affordable housing and economic development. The bank also made \$9,500 in qualifying donations and grants over the evaluation

period which supported community services for low- and moderate-income individuals. The bank’s targeted total qualified investments goals are cumulative and while the plan provides for minimum annual plan benchmarks, the bank measures against the cumulative plan performance goals of \$2 million for satisfactory performance and \$2.6 million for outstanding performance which the bank exceeded in both 2021 and 2022.

- Bank employees participated in various CD service activities totaling 83 hours in 2021 and 100 hours in 2022, substantially exceeding the Strategic Plan goals for an outstanding rating for 2021 (81) and 2022 (90).

<b>STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE</b>					
<b>San Francisco AA</b>					
	<b>Plan Targets</b>			<b>Actual Performance</b>	<b>Rating</b>
	<b>Outstanding</b>	<b>Satisfactory</b>	<b>Minimum</b>		
<b>CD Lending (\$ 000's)</b>					
2021	\$5,812	\$4,650	\$2,325	\$0	
2022	\$6,045	\$4,836	\$2,418	\$7,390	
<b>Total</b>	<b>\$11,857</b>	<b>\$9,486</b>	<b>\$4,743</b>	<b>\$7,390</b>	<b>Needs to Improve</b>
<b>CD Investments (\$ 000's)</b>					
2021	\$300	\$200	\$200	\$2,004	
2022	\$400	\$300	\$300	\$3,015	
Prior Period	<b>\$2,600</b>	<b>\$2,000</b>	<b>\$2,000</b>		<b>Outstanding</b>
<b>CD Services (Hours)</b>					
<b>2021</b>	81	54	54	83	
<b>2022</b>	90	59	59	100	
<b>Total</b>	<b>171</b>	<b>113</b>	<b>113</b>	<b>183</b>	<b>Outstanding</b>

\*Investments include new investments, outstanding investments at book value, and any grants/donations made within the year. CD investment goals are measured on a cumulative basis for the entire Strategic Plan period.

Examples of CD activities in the AA include:

- A \$6 million loan to a nonprofit CDFI that supported working capital for their programs providing affordable housing in San Francisco.
- A \$2 million certificate of deposit with a San Francisco based CDFI bank to support the bank’s efforts in providing business checking, business lending, and personal banking services to underserved groups in the San Francisco Bay area.
- A \$1 million MBS purchased in 2022 for which the underlying mortgages were made to low- and moderate-income borrowers in San Francisco.
- Two donations totaling \$3,500 to a nonprofit organization that serves low-income, at-risk youth in San Francisco’s Chinatown area. The organization provides supportive programs including behavioral health, education, and workforce development.
- Six bank employees participated in a local affordable housing expo providing a total of 42 financial education service hours to first time homebuyers attending the free event.

## State Rating

### State of New York

**CRA rating for the State of New York:** Outstanding

#### **LARGE BANK CRA (2020):**

**The Lending Test is rated:** Outstanding

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

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected good responsiveness to AA credit needs.
- An excellent geographic distribution of loans.
- An adequate distribution of loans among individuals of different income levels.
- An excellent level of CD loans that had a positive impact on performance.
- An adequate level of CD investments.
- Readily accessible service delivery systems
- A relatively high level of CD services.

#### **STRATEGIC PLAN (2021-2022):**

- The bank exceeded its plan goals for an outstanding rating for CD lending.
- The bank achieved its plan goals for a satisfactory rating for CD qualified investments.
- The bank achieved its plan goals for a satisfactory rating for CD services.

### **Description of Institution's Operations in New York**

ICBC USA delineated one AA in the state of New York which included the New York-Jersey City-White Plains, NY MD (New York MD) (Refer to appendix A for a complete list of counties reviewed).

As of year-end 2022, ICBC USA had three branch locations and three deposit-taking ATMs in the state of New York. In 2020, the bank made \$32.8 million or 16 percent of its total dollar volume of home mortgage loans in this AA.

The state of New York represented the bank's second largest rated area in terms of deposits. Based on June 30, 2020, FDIC summary of deposit information, ICBC USA had \$880 million in deposits in the state of New York, which represented 43.3 percent of the bank's total deposits. The bank ranked 48<sup>th</sup> in



deposit market share with 0.1 percent out of 111 depository institutions. The top three competitors had 61.2 percent of the market share and included JP Morgan Chase Bank, NA with 291 branches and 41.1 percent market share, The Bank of New York Mellon with two branches and 10.5 percent market share, and Goldman Sachs Bank USA with one branch and 9.6 percent market share.

Based on June 30, 2022, FDIC summary of deposit information, ICBC USA had \$1.1 billion in deposits in the state of New York, which represented 47.5 percent of the bank's total deposits. The bank ranked 44<sup>th</sup> in deposit market share with 0.1 percent out of 106 depository institutions. The top three competitors had 62.5 percent of the market share and included JP Morgan Chase Bank, NA with 248 branches and 39.4 percent market share, Goldman Sachs Bank USA with one branch and 13.6 percent market share, and The Bank of New York Mellon with two branches and 9.5 percent market share.

## New York-Jersey City-White Plains MD

Table A – Demographic Information of the Assessment Area						
Assessment Area: New York MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,718	8.4	26.9	32.2	29.1	3.3
Population by Geography	6,525,905	11.2	30.7	28.4	29.5	0.3
Housing Units by Geography	2,723,760	9.8	27.3	26.3	36.2	0.3
Owner-Occupied Units by Geography	785,357	2.8	17.3	33.9	45.7	0.2
Occupied Rental Units by Geography	1,677,492	13.6	32.5	23.3	30.2	0.4
Vacant Units by Geography	260,911	6.7	24.2	22.1	46.6	0.4
Businesses by Geography	734,204	6.5	20.5	20.7	49.3	3.1
Farms by Geography	2,884	4.2	16.7	22.1	55.1	1.9
Family Distribution by Income Level	1,423,260	30.4	16.1	15.8	37.8	0.0
Household Distribution by Income Level	2,462,849	30.0	14.3	15.4	40.4	0.0
Median Family Income MSA – 35614 New York-Jersey City-White Plains, NY- NJ		\$67,560	Median Housing Value			\$593,392
			Median Gross Rent			\$1,417
			Families Below Poverty Level			15.7%

Source: 2015 ACS Census and 2020 D&B Data  
Due to rounding, totals may not equal 100.0  
(\* ) The NA category consists of geographies that have not been assigned an income classification.

The New York MD AA consisted of three of 10 counties that comprise the MD including: Kings, New York, and Queens counties. As of year-end 2022, ICBC USA operated three branches and three deposit-taking ATMs in the AA. The bank's main office is also located in the AA, but the location does not provide walk-in services to the general public.

Based on the information from November 2022 Moody's Analytics report, the New York MD's economy is recovering although growth has slowed. Despite the slower pace, gains are widespread supported by consumer industries and construction. New York is a major tourist destination and consumer industries have been bolstered by tourists and weekend visitors returning to Manhattan. New

York is also the financial capital of the world and benefits from high per capita income and limited exposure to manufacturing. The top employers in the area include Montefiore Health System, Mount Sinai Health System, JP Morgan Chase & Co., Bank of America, and New York-Presbyterian Healthcare System. Area weaknesses include high costs, including taxes, housing, office rents, and energy, and a rapidly aging infrastructure. The area also suffers from troubled fiscal health made worse by population losses, although international immigration remains strong. The financial sector has been hurt by rapidly rising interest rates that have sharply reduced transactions and led to a bear market. Big banks are reporting weak earnings, and at least one large bank has already announced significant layoffs. On the commercial real estate front, office vacancies are significantly higher than pre-pandemic levels due to the prevalence of remote work arrangements. With office usage dwindling, companies are offloading real estate which is hampering commercial construction and sales prices. The residential housing market is not faring much better. While the housing market has slowed overall, a heavy reliance on condos has helped soften the blow of a broader single-family price correction. Apartment rent growth has also slowed and is far below its early-year pace.

According to the U.S. Bureau of Labor Statistics, the 2022 annual unemployment rate in the New York MD was 4.7 percent, compared to 10.8 percent in 2020 and 8.3 percent in 2021. Unemployment peaked in May 2020 (18.7 percent) due the business shutdowns caused by the COVID-19 pandemic. The area unemployment rate was higher than the 4.3 percent unemployment rate for New York State in 2022.

Based on information in the above table, low-income families earned less than \$33,780 and moderate-income families earned less than \$54,048. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$845 for low-income borrowers and \$1,351 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$3,185. Most low-income and moderate-income borrowers would be unable to afford a mortgage loan in this AA.

Examiners relied on information provided from a community contact conducted during the evaluation period to understand area needs and opportunities. The contact, who represented an organization focused on economic development, indicated that needs for small business assistance programs and small business financing increased drastically after the pandemic. The organization's small business workshops for new and existing business owners, and small business loans for start-ups and business expansion have been well received in the community. The contact indicated there is an opportunity for banks to invest in CDFIs, which can in turn be used to fund micro-loans. Other identified needs included food assistance, supportive health services, and affordable housing.

### **Scope of Evaluation in New York**

Examiners selected the only AA in the state of New York for full-scope review. In arriving at conclusions, examiners only analyzed home mortgage loans as the bank made no small business/small farm loans in 2020 in the AA.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK**

### **LARGE BANK CRA (2020)**

## LENDING TEST

The bank's performance under the Lending Test in New York MD is rated Outstanding.

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

Based on a full-scope review, the bank's performance in the New York MD was excellent.

### Lending Activity

Lending levels reflected good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
New York MD	20	0	\$0	3	23	100.0	100.0

\*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	%State* Loans	%State Deposits
New York MD	\$32,774	\$0	\$0	\$11,500	\$44,274	100.0	100.0

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

### New York MD

As of June 2020, ICBC USA ranked 48<sup>th</sup> out of 111 depository institutions (top 43.2 percent) with a deposit market share of 0.1 percent.

For home mortgage loans, the bank's 2020 market share of 0.03 percent ranked 178<sup>th</sup> out of 380 lenders (top 46.8 percent). The top three lenders were Wells Fargo Bank, NA with 12.1 percent market share, JP Morgan Chase Bank, NA with 11.8 percent market share, and Citi Bank, NA with 6.7 percent market share.

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

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

#### *Home Mortgage Loans*

Refer to Table O in the state of New York 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.

The geographic distribution of home mortgage loans was excellent. The percentage of home mortgage loans originated or purchased in both low- and moderate-income geographies exceeded the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

#### *Lending Gap Analysis*

The OCC reviewed summary reports and maps and analyzed home mortgage activity to identify any gaps in the geographic distribution of the bank's loans in the AA. In performing this analysis, examiners considered the low volume of reportable lending activity by ICBC USA in the AA. Examiners also considered competition and demographic information. The OCC did not identify any unexplained conspicuous gaps in the area reviewed.

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

The bank exhibited an adequate distribution of loans among individuals of different income levels.

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

Refer to Table P in the state of New York 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.

The distribution of home mortgage loans among individuals of different income levels was adequate. The bank made no home mortgage loans to low-income borrowers during 2020. The proportion of the bank's home mortgage loans to moderate-income borrowers was significantly below the percentage of moderate-income families but exceeded the aggregate industry distribution of loans.

Examiners considered housing costs in relation to the median family incomes in the AA, which limited the affordability for both low-income and moderate-income borrowers. The area's high poverty rate of 15.7 percent also inhibits homeownership. Further, examiners considered the very high percentage of home mortgage loans made by the bank in 2020 to borrowers with income information not available in the AA (75 percent).

### **Community Development Lending**

The institution is a leader in making CD loans, which had a positive impact on the rating.

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.

#### **New York MD**

The level of CD lending was excellent. ICBC USA made three CD loans totaling \$11.5 million in 2020, which represented 6.8 percent of allocated tier 1 capital. CD loans were responsive to identified community needs for economic development and affordable housing.

By dollar volume, 43.5 percent of CD loans funded revitalization and stabilization efforts, 30.4 percent funded economic development activities, and 26.1 percent funded community services.

Examples of CD loans in the AA include:

- A \$3.5 million term loan to an economic development corporation which allowed the corporation to provide financial assistance to business owners who were impacted by the COVID-19 pandemic.
- A refinancing of a \$5 million commercial mortgage on a mixed-use property, comprised of 27 residential units and two commercial units, located in a moderate-income tract in Manhattan. The subject property benefits from a tax exemption program in New York given to real estate developers for building new multi-family residential housing on land that is vacant or underutilized.

**Product Innovation and Flexibility**

The institution made no use of innovative or flexible lending practices in order to serve AA credit needs.

Refer to Tables O through P in the state of New York section of appendix D for the facts and data that support these conclusions.

**INVESTMENT TEST**

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

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

Based on a full-scope review, the bank’s performance in the New York MD was adequate.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
New York MD	0	\$0	6	\$1,238	6	100.0	\$1,238	100.0	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.

**New York MD**

The institution had an adequate level of qualified CD investments and grants, particularly those that are not routinely provided by private investors, although rarely in a leadership position. The institution did not use innovative or complex investments to support CD initiatives.

In 2020, ICBC USA made five donations totaling \$37,512 to community service organizations that provided essential services to low- and moderate-income individuals. The bank also placed funds at a New York City based CDFI bank totaling \$1.2 million using CDARS. Qualified investments represented 0.7 percent of allocated tier 1 capital.

Examples of grants and donations in the AA include:

- A \$26,080 COVID-19 related donation to a medical center that supported the hospital as they provided access to healthcare services to the affected communities, particularly low- and moderate-income communities.
- A \$5,000 donation to a nonprofit organization that builds and preserves affordable housing for low-income individuals in Chinatown and the Lower East Side of Manhattan and also provides after school programs for new immigrant students.

**SERVICE TEST**

The bank’s performance under the Service Test in New York is rated Outstanding.

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

Based on a full-scope review, the bank’s performance in the New York MD was excellent.

**Retail Banking Services**

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
New York MD	100.0	3	100.0	33.3	66.7	0.0	0.0	11.2	30.7	28.4	29.5

The bank’s distribution of branches in both low- and moderate- income geographies exceeded the percentage of the population living within those geographies.

ICBC USA had several ADS including ATMs, telephone banking, online banking, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers. ICBC USA had three deposit-taking ATMs in the AA, one in each of the bank’s branches . ADS had a neutral impact on the Service Test rating.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
New York MD	0	0	0	0	0	0

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies or individuals. Services are comparable among locations regardless of income level of the geography, and all branches have reasonable weekday hours (9:00 a.m.- 4:00 p.m.).

### **Community Development Services**

The institution provided a relatively high level of CD services.

In 2020, ICBC USA employees provided participated in three activities providing 80 hours of qualified service activities.

Examples of CD activities include:

- Three bank employees created a financial literacy video on the basics of banking for local high school students in Long Island City. The video covered topics including basic banking accounts and the difference between debit cards and credit cards.
- A bank employee served as a member of the board for a community-based organization that works to oversee and fund the maintenance, improvement, and promotion of a low-income commercial district in New York City. The employee provided technical assistance on financial matters and strategies to address issues that local small businesses face specifically in response to the COVID-19 pandemic.

### **CRA STRATEGIC PLAN (2021-2022)**

The bank exceeded its plans goals for a satisfactory rating and substantially achieved its plan goals for an outstanding rating within the state of New York.

- CD lending performance was excellent. ICBC USA exceeded its plan goals for an outstanding rating in the New York MD AA for the 2021-2022 period.
- CD investment performance was good. ICBC USA exceeded its plan goals for a satisfactory rating in the New York MD AA for the 2021-2022 period.
- CD service performance was good. ICBC USA exceeded its plan goals for a satisfactory rating in the New York MD AA for the 2021-2022 period.

### **DISCUSSION OF PERFORMANCE IN NEW YORK MD:**

- The bank originated one CD loan totaling \$35 million in 2021 and four CD loans totaling \$87.1 million in 2022, which substantially exceeded its plan goals for an outstanding rating for 2021 (\$6.6 million) and 2022 (\$6.9 million). CD loans supported affordable housing, a significant need in the AA, and to a lesser extent community services to low- and moderate-income individuals.
- For 2021-2022, the bank exceeded its CD investment plan goals for a satisfactory rating. The bank had \$2 million in CD investments outstanding in both 2021 and 2022 and made \$19,000 in grants

and donations over the evaluation period. The bank's one investment supported economic development and the grants and donations supported affordable housing and community services to low- and moderate-income individuals. The bank's targeted total qualified investments goals are cumulative, and while the plan provides for minimum annual plan benchmarks, the bank measures against the cumulative plan performance goals of \$2 million for satisfactory performance which the bank met in both 2021 and 2022.

- Bank employees participated in various CD service activities totaling 96 hours in 2021 and 115 hours in 2022, exceeding its plan goals for a satisfactory rating for 2021 (92) and 2022 (101). CD services included financial education, board membership, and general community services.

<b>STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE</b>					
<b>New York MD</b>					
	<b>Plan Targets</b>			<b>Actual Performance 2021-2022</b>	<b>Rating</b>
	<b>Outstanding</b>	<b>Satisfactory</b>	<b>Minimum</b>		
<b>CD Lending (\$ 000's)</b>					
<b>2021</b>	\$6,600	\$5,280	\$2,640	\$35,000	
<b>2022</b>	\$6,864	\$5,491	\$2,746	\$87,138	
<b>Total</b>	<b>\$13,464</b>	<b>\$10,771</b>	<b>\$5,386</b>	<b>\$122,138</b>	<b>Outstanding</b>
<b>CD Investments (\$ 000's)</b>					
<b>2021</b>	\$300	\$200	\$200	\$2,009	
<b>2022</b>	\$400	\$300	\$300	\$2,015	
<b>Total</b>	<b>\$2,600</b>	<b>\$2,000</b>			<b>High Satisfactory</b>
<b>CD Services (Hour)</b>					
<b>2021</b>	138	92	92	96	
<b>2022</b>	152	101	101	115	
<b>Total</b>	<b>290</b>	<b>193</b>	<b>193</b>	<b>211</b>	<b>High Satisfactory</b>

Examples of CD activities in the AA include:

- A \$35 million commercial mortgage secured by a former hotel property that is operated by a nonprofit that provides transitional housing for formerly incarcerated individuals along with individual and group counseling, case management, education and employment assistance, and substance abuse and mental health treatment.
- A refinance of a \$43 million commercial mortgage secured by a mixed-use property containing 11 commercial and 83 rent stabilized, affordable housing units located in Queens.
- A \$2 million certificate of deposit with a New York City based CDFI bank which supported the CDFI's efforts in providing affordable small business loans, innovative and responsible personal loans, and asset building services in low- and moderate-income communities in New York City.
- Two donations totaling \$10,000 to an area nonprofit organization that supports affordable housing development and preservation for low-income people in Chinatown and the Lower East Side and also provides after school programs to disadvantaged youth.



- A bank employee served on the board of a community-based Business Improvement District (BID) in New York City. The BID focuses on overseeing and funding the maintenance, improvement, and promotion of the Chinatown commercial district.
- Numerous bank employees participated in financial education workshops through an area nonprofit community organization serving low-income Asian Americans. The attendees of the workshops were primarily Chinese immigrants who have been in the country 0-5 years and primarily speak Mandarin.

## Appendix A: Scope of Examination

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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>	(01/01/2020 to 12/31/2022)	
<b>Bank Products Reviewed:</b>	Home mortgage, Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
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>		
<b>California</b>		
Los Angeles MD AA	Full-scope	Los Angeles County
San Francisco/Oakland MSA AA	Full-scope	San Francisco, San Mateo, Alameda counties
<b>New York</b>		
New York MD AA	Full-scope	Kings, New York, Queens counties

## Appendix B: Summary of MMSA and State Ratings

RATINGS ICBC USA Large Bank CRA (2020)				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
	Outstanding	High Satisfactory	High Satisfactory	Outstanding
MMSA or State:				
California	Outstanding	Outstanding	Low Satisfactory	Outstanding
New York	Outstanding	Low Satisfactory	Outstanding	Outstanding

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

Ratings ICBC USA Strategic Plan (2021-2021)	
State or Multistate Metropolitan Area Name	State or Multistate Metropolitan Area Rating
California	Outstanding
New York	Outstanding

## 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 (MD):** 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

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### 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.



- 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**CALIFORNIA**

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																		<b>2020</b>
	<b>Total Home Mortgage Loans</b>			<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
<b>Assessment Area</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Los Angeles	57	\$47,370	54.3	2.4	1.8	2.2	17.2	17.5	14.9	26.6	17.5	25.3	53.7	63.2	57.5	0.1	0.0	0.1
San Francisco-Oakland	48	\$38,699	45.7	4.7	4.2	4.3	15.9	27.1	15.4	35.2	33.3	35.2	44.0	31.3	44.7	0.2	4.2	0.3
<b>Total</b>	<b>105</b>	<b>\$86,069</b>	<b>100.0</b>	<b>3.1</b>	<b>2.9</b>	<b>2.8</b>	<b>16.8</b>	<b>21.9</b>	<b>15.0</b>	<b>29.0</b>	<b>24.8</b>	<b>28.2</b>	<b>51.0</b>	<b>48.6</b>	<b>53.8</b>	<b>0.1</b>	<b>1.9</b>	<b>0.2</b>

Source: 2015 ACS Census; 01/01/2020 - 12/31/2020 Bank Data, 2020 HMDA aggregate data.  
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>2020</b>
	<b>Total Home Mortgage Loans</b>			<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>		
<b>Assessment Area</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
Los Angeles	47	\$47,370	54.3	24.5	0.0	2.1	16.3	0.0	5.8	16.7	0.0	15.3	42.4	10.5	60.3	0.0	89.5	16.5
San Francisco-Oakland	58	\$38,699	45.7	25.1	0.0	3.5	15.8	0.0	11.1	18.0	2.1	20.1	41.2	10.4	56.2	0.0	87.5	9.0
<b>Total</b>	<b>105</b>	<b>\$86,069</b>	<b>100.0</b>	<b>24.7</b>	<b>0.0</b>	<b>2.5</b>	<b>16.2</b>	<b>0.0</b>	<b>7.3</b>	<b>17.0</b>	<b>1.0</b>	<b>16.7</b>	<b>42.1</b>	<b>10.5</b>	<b>59.1</b>	<b>0.0</b>	<b>88.6</b>	<b>14.3</b>

Source: 2015 ACS Census; 01/01/2020 - 12/31/2020 Bank Data, 2020 HMDA aggregate data.  
Due to rounding, totals may not equal 100.0

**NEW YORK**

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																		<b>2020</b>	
<b>Assessment Area</b>	<b>Total Home Mortgage Loans</b>			<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
New York	20	\$32,774	100.0	2.8	5.0	3.9	17.3	35.0	17.5	33.9	10.0	31.2	45.7	50.0	47.2	0.2	0.0	0.3	
<b>Total</b>	<b>20</b>	<b>\$32,774</b>	<b>100.0</b>	<b>2.8</b>	<b>5.0</b>	<b>3.9</b>	<b>17.3</b>	<b>35.0</b>	<b>17.5</b>	<b>33.9</b>	<b>10.0</b>	<b>31.2</b>	<b>45.7</b>	<b>50.0</b>	<b>47.2</b>	<b>0.2</b>	<b>0.0</b>	<b>0.3</b>	

*Source: 2015 ACS Census; 01/01/2020 - 12/31/2020 Bank Data, 2020 HMDA aggregate data.  
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>2020</b>	
<b>Assessment Area</b>	<b>Total Home Mortgage Loans</b>			<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
New York	20	\$32,774	100.0	30.4	0.0	1.2	16.1	5.0	4.9	15.8	5.0	15.0	37.8	15.0	61.8	0.0	75.0	17.0	
<b>Total</b>	<b>20</b>	<b>\$32,774</b>	<b>100.0</b>	<b>30.4</b>	<b>0.0</b>	<b>1.2</b>	<b>16.1</b>	<b>5.0</b>	<b>4.9</b>	<b>15.8</b>	<b>5.0</b>	<b>15.0</b>	<b>37.8</b>	<b>15.0</b>	<b>61.8</b>	<b>0.0</b>	<b>75.0</b>	<b>17.0</b>	

*Source: 2015 ACS Census; 01/01/2020 - 12/31/2020 Bank Data, 2020 HMDA aggregate data.  
Due to rounding, totals may not equal 100.0*

Loans by County

Respondent ID: 0000024440

Small Business Loans - Originations

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

State: CALIFORNIA (06)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>SAN FRANCISCO COUNTY (075), CA</b>										
<b>MSA 41884</b>										
<b>Inside AA 0004</b>										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	0	0	1	900	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	900	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	1	900	0	0	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
STATE TOTAL	0	0	0	0	1	900	0	0	0	0

Loans by County

Respondent ID: 0000024440

Small Business Loans - Originations

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

State: NEW YORK (36)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
<b>KINGS COUNTY (047), NY</b>										
<b>MSA 35614</b>										
<b>Inside AA 0002</b>										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	1	499	1	499	0	0
Median Family Income 50-60%	0	0	0	0	1	950	1	950	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	2	1,449	2	1,449	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	2	1,449	2	1,449	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
STATE TOTAL	0	0	0	0	2	1,449	2	1,449	0	0
TOTAL ACROSS ALL STATES										
TOTAL INSIDE AA	0	0	0	0	3	2,349	2	1,449	0	0
TOTAL OUTSIDE AA	0	0	0	0	0	0	0	0	0	0
TOTAL INSIDE & OUTSIDE	0	0	0	0	3	2,349	2	1,449	0	0

**2021 Institution Disclosure Statement - Table 3**  
**Assessment Area/Non-Assessment Area Activity**  
**Small Business Loans**  
**Institution: IND & COMM BNK OF CHINA (USA)**

**Respondent ID: 0000024440**  
**Agency: OCC - 1**

ASSESSMENT AREA LOANS	Originations		Originations to Businesses with <= \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
NY - KINGS COUNTY (047) - MSA 35614	2	1,449	2	1,449	0	0
CA - SAN FRANCISCO COUNTY (075) - MSA 41884	1	900	0	0	0	0

**2021 Institution Disclosure Statement - Table 5**  
**Community Development/Consortium-Third Party Activity**  
**Institution: IND & COMM BNK OF CHINA (USA)**

PAGE: 1 OF 1

**Respondent ID: 0000024440**

**Agency: OCC - 1**

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**Memo Item: Loans by Affiliates**

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	<b>Num of Loans</b>	<b>Amount (000s)</b>	<b>Num of Loans</b>	<b>Amount (000s)</b>
Community Development Loans				
Originated	7	53,880	0	0
Purchased	0	0	0	0
Total	7	53,880	0	0
Consortium/Third Party Loans (optional)				

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

\* denotes no loans made in specified tracts

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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**ASSESSMENT AREA - 0001**

**LOS ANGELES COUNTY (037), CA**

**MSA: 31084**

**Median Family Income 20-30%**

2247.00\* 2421.00\* 2426.00\* 5716.00\* 9104.03\* 9105.01\*

**Median Family Income 30-40%**

1174.07\* 1201.03\* 1201.07\* 1283.03\* 1904.02\* 1908.01\* 1917.10\* 2060.10\* 2060.50\* 2071.03\* 2087.20\*  
2089.02\* 2089.04\* 2091.02\* 2091.03\* 2091.04\* 2094.01\* 2094.02\* 2094.03\* 2098.20\* 2122.03\* 2122.04\*  
2123.03\* 2219.00\* 2240.10\* 2240.20\* 2244.20\* 2246.00\* 2283.20\* 2286.00\* 2289.00\* 2312.10\* 2317.10\*  
2318.00\* 2349.01\* 2377.20\* 2383.10\* 2397.01\* 2404.01\* 2431.00\* 6001.00\* 9001.02\*

**Median Family Income 40-50%**

1047.01\* 1174.05\* 1174.08\* 1175.20\* 1193.40\* 1200.30\* 1201.06\* 1224.10\* 1233.04\* 1275.20\* 1278.06\*  
1282.10\* 1340.01\* 1838.20\* 1864.01\* 1905.20\* 1909.01\* 1909.02\* 1912.01\* 1912.03\* 1916.10\* 1916.20\*  
1917.20\* 1925.20\* 1926.10\* 1977.00\* 1991.20\* 1997.00\* 1999.00\* 2031.00\* 2033.00\* 2037.20\* 2042.00\*  
2043.00\* 2044.10\* 2044.20\* 2049.10\* 2051.20\* 2060.32\* 2062.00\* 2071.02\* 2083.01\* 2084.01\* 2085.02\*  
2088.01\* 2089.03\* 2095.10\* 2095.20\* 2098.10\* 2100.10\* 2112.01\* 2113.10\* 2113.20\* 2121.02\* 2123.04\*  
2123.05\* 2124.20\* 2132.01\* 2134.02\* 2193.00\* 2199.01\* 2211.10\* 2213.03\* 2213.04\* 2214.01\* 2216.02\*  
2218.10\* 2218.20\* 2226.00\* 2242.00\* 2243.10\* 2243.20\* 2244.10\* 2264.20\* 2267.00\* 2270.20\* 2281.00\*  
2282.10\* 2282.20\* 2283.10\* 2284.10\* 2284.20\* 2285.00\* 2287.10\* 2287.20\* 2288.00\* 2292.00\* 2293.00\*  
2294.10\* 2294.20\* 2311.00\* 2312.20\* 2313.00\* 2317.20\* 2319.00\* 2326.00\* 2327.00\* 2349.02\* 2362.02\*  
2362.03\* 2362.04\* 2371.01\* 2375.00\* 2377.10\* 2383.20\* 2392.01\* 2393.10\* 2395.02\* 2396.02\* 2397.02\*  
2398.01\* 2400.10\* 2402.00\* 2405.00\* 2411.20\* 2414.00\* 2427.00\* 2948.10\* 2948.20\* 2948.30\* 2962.10\*  
2962.20\* 4328.02\* 4333.02\* 4334.02\* 4335.01\* 5018.03\* 5305.00\* 5309.02\* 5326.06\* 5328.00\* 5329.00\*  
5330.01\* 5331.03\* 5331.04\* 5331.05\* 5342.02\* 5344.04\* 5354.00\* 5356.06\* 5402.01\* 5402.02\* 5406.00\*  
5416.03\* 5416.04\* 5706.03\* 5725.00\* 5728.00\* 5730.02\* 5733.00\* 5751.02\* 5754.01\* 5754.02\* 5758.01\*  
5758.03\* 5759.02\* 5762.00\* 5764.01\* 5764.03\* 5769.01\* 6002.02\* 6003.04\* 6006.02\* 6011.00\* 6015.01\*  
6025.05\* 6028.01\* 9006.07\* 9007.03\* 9008.06\* 9104.02\* 9105.02\* 9106.02\*

**Median Family Income 50-60%**

1021.05\* 1041.05\* 1044.04\* 1064.07\* 1066.48\* 1175.10\* 1175.30\* 1193.42\* 1200.20\* 1201.04\* 1201.05\*



**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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1201.08*	1218.01*	1221.22*	1232.03*	1232.04*	1232.05*	1232.06*	1234.10*	1241.03*	1241.05*	1242.04*
1271.03*	1272.20*	1274.00*	1276.03*	1276.04*	1277.12*	1279.10*	1281.02*	1283.02*	1343.05*	1345.21*
1345.22*	1836.10*	1838.10*	1853.20*	1892.01*	1904.01*	1905.10*	1910.00*	1911.10*	1911.20*	1913.02*
1914.10*	1914.20*	1918.10*	1926.20*	1990.00*	1994.00*	1998.00*	2011.20*	2015.03*	2035.00*	2036.00*
2037.10*	2041.10*	2048.10*	2049.20*	2051.10*	2071.01*	2080.00*	2083.02*	2088.02*	2092.00*	2093.00*
2112.02*	2114.10*	2114.20*	2117.03*	2118.04*	2121.01*	2122.02*	2123.06*	2125.01*	2126.20*	2129.00*
2133.10*	2133.20*	2134.01*	2181.20*	2184.00*	2189.00*	2198.00*	2211.20*	2212.10*	2212.20*	2213.02*
2215.00*	2216.01*	2217.10*	2221.00*	2222.00*	2225.00*	2260.02*	2264.10*	2270.10*	2314.00*	2321.10*
2321.20*	2322.00*	2324.00*	2325.00*	2328.00*	2345.02*	2361.00*	2371.02*	2382.00*	2392.02*	2393.20*
2393.30*	2395.01*	2396.01*	2398.02*	2403.00*	2404.02*	2406.00*	2408.00*	2409.00*	2410.01*	2411.10*
2412.02*	2413.00*	2420.00*	2422.00*	2423.00*	2755.00*	2911.10*	2920.00*	2932.02*	2947.01*	2949.00*
2966.00*	3022.01*	3022.02*	3025.03*	3025.04*	3202.01*	4023.03*	4023.04*	4025.01*	4027.02*	4028.01*
4042.01*	4326.01*	4327.00*	4328.01*	4333.06*	4334.03*	4335.04*	4336.02*	4338.01*	4339.01*	4620.02*
4823.04*	5301.01*	5304.00*	5313.01*	5315.03*	5315.04*	5316.02*	5316.04*	5317.01*	5317.02*	5326.03*
5326.04*	5326.05*	5327.00*	5330.02*	5331.06*	5331.07*	5332.01*	5332.03*	5333.00*	5334.03*	5335.01*
5336.01*	5336.02*	5337.01*	5337.02*	5337.03*	5338.03*	5338.06*	5339.02*	5341.02*	5342.01*	5343.01*
5344.05*	5344.06*	5348.03*	5350.02*	5351.01*	5352.00*	5353.00*	5355.01*	5355.03*	5356.04*	5357.02*
5361.04*	5402.03*	5405.02*	5416.06*	5421.06*	5426.01*	5511.02*	5538.02*	5541.04*	5544.03*	5703.03*
5703.04*	5729.00*	5730.04*	5732.01*	5752.01*	5752.02*	5753.00*	5758.02*	5763.01*	5763.02*	5765.02*
5768.01*	5769.03*	6002.01*	6003.03*	6013.03*	6015.02*	6017.00*	6018.01*	6018.02*	6019.00*	6020.03*
6025.04*	6025.06*	6029.00*	7001.02*	9001.03*	9005.05*	9006.02*	9007.04*	9105.04*	9106.01*	9107.11*
9800.08*	9800.15*									

**Median Family Income 60-70%**

1012.10*	1047.03*	1047.04*	1064.08*	1132.33*	1154.03*	1172.01*	1193.20*	1193.41*	1204.00*	1211.01*
1212.22*	1224.20*	1230.10*	1231.04*	1233.03*	1234.20*	1241.02*	1241.04*	1242.03*	1253.20*	1255.02*
1276.05*	1278.03*	1278.04*	1278.05*	1286.01*	1310.10*	1323.00*	1345.20*	1347.10*	1349.03*	1393.03*
1395.04*	1835.20*	1853.10*	1863.01*	1872.00*	1903.01*	1912.04*	1913.01*	1915.00*	1927.00*	1957.10*
1958.02*	1958.04*	1974.20*	1992.01*	2013.01*	2014.01*	2015.01*	2015.04*	2032.00*	2039.00*	2041.20*
2046.00*	2047.00*	2048.20*	2084.02*	2086.10*	2086.20*	2111.20*	2111.22*	2118.02*	2118.03*	2119.10*

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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2119.21*	2119.22*	2124.10*	2126.10*	2131.00*	2132.02*	2182.10*	2183.00*	2187.02*	2199.02*	2214.02*
2220.02*	2260.01*	2291.00*	2316.00*	2323.00*	2346.00*	2347.00*	2352.02*	2372.01*	2373.00*	2374.01*
2374.02*	2376.00*	2400.20*	2407.00*	2410.02*	2430.00*	2696.01*	2774.00*	2911.20*	2912.20*	2944.10*
2945.10*	2946.10*	2946.20*	2965.00*	2969.01*	2971.10*	3012.04*	3015.02*	3016.01*	3017.02*	3020.03*
3021.02*	3021.03*	3024.01*	3025.05*	3203.00*	4024.06*	4025.02*	4028.03*	4028.04*	4045.04*	4047.02*
4047.03*	4048.01*	4081.38*	4087.24*	4088.00*	4322.01*	4324.02*	4331.02*	4332.00*	4333.04*	4333.05*
4340.01*	4340.03*	4620.01*	4803.04*	4817.11*	4817.14*	4823.01*	4823.03*	4825.02*	4825.03*	5015.04*
5023.02*	5028.02*	5308.01*	5311.01*	5313.02*	5315.02*	5318.00*	5319.02*	5320.01*	5321.01*	5323.02*
5324.00*	5325.00*	5334.02*	5335.03*	5336.03*	5338.04*	5338.05*	5339.01*	5340.01*	5341.01*	5342.03*
5343.02*	5344.03*	5348.02*	5348.04*	5349.00*	5350.01*	5351.02*	5356.05*	5356.07*	5358.03*	5404.00*
5407.00*	5410.01*	5414.00*	5415.00*	5416.05*	5420.00*	5421.03*	5422.00*	5425.01*	5425.02*	5432.02*
5511.01*	5522.00*	5537.01*	5537.02*	5539.02*	5541.01*	5541.05*	5542.04*	5544.04*	5551.02*	5552.11*
5552.12*	5703.01*	5704.03*	5717.04*	5732.02*	5734.02*	5751.01*	5751.03*	5759.01*	5764.02*	5765.03*
6003.02*	6009.02*	6009.12*	6010.01*	6012.02*	6012.11*	6012.12*	6014.01*	6016.00*	6020.02*	6020.04*
6021.03*	6021.04*	6025.07*	6030.01*	6031.02*	6033.01*	9005.01*	9005.06*	9005.07*	9006.05*	9006.06*
9006.09*	9007.01*	9008.04*	9106.03*	9203.36*	9203.37*					

**Median Family Income 70-80%**

1042.01*	1042.03*	1042.04*	1043.10*	1043.20*	1044.03*	1045.00*	1048.21*	1061.14*	1134.21*	1153.02*
1171.02*	1193.10*	1200.10*	1212.21*	1221.21*	1231.03*	1235.10*	1235.20*	1236.02*	1253.10*	1271.02*
1271.04*	1272.10*	1273.00*	1279.20*	1282.20*	1317.01*	1327.00*	1341.01*	1393.02*	1832.20*	1836.20*
1837.01*	1852.03*	1862.01*	1864.03*	1864.04*	1899.04*	1901.00*	1918.20*	1924.20*	1925.10*	1953.00*
1956.00*	1957.20*	1973.00*	1976.00*	1991.10*	1992.02*	2011.10*	2012.00*	2038.00*	2111.21*	2117.04*
2181.10*	2186.00*	2187.01*	2188.00*	2190.10*	2190.20*	2200.00*	2315.00*	2345.01*	2372.02*	2378.00*
2379.00*	2380.00*	2412.01*	2696.02*	2699.07*	2723.02*	2751.02*	2912.10*	2933.04*	2941.20*	2943.02*
2944.21*	2945.20*	3018.01*	3020.02*	3020.04*	3023.01*	3023.02*	3107.03*	4023.01*	4026.00*	4029.03*
4030.00*	4043.01*	4045.01*	4047.01*	4051.02*	4062.00*	4076.01*	4082.11*	4315.01*	4322.02*	4324.01*
4333.07*	4335.03*	4336.01*	4339.02*	4340.04*	4619.02*	4622.01*	4803.03*	4809.02*	4809.03*	4810.01*
4811.02*	4814.01*	4814.02*	4816.06*	4817.12*	4817.13*	4822.02*	4824.01*	5004.02*	5005.00*	5006.00*
5018.04*	5030.00*	5301.02*	5302.04*	5307.00*	5308.02*	5309.01*	5310.00*	5311.02*	5312.01*	5312.02*

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

5319.01\* 5320.02\* 5322.00\* 5323.04\* 5332.02\* 5334.01\* 5335.02\* 5345.01\* 5345.02\* 5355.02\* 5356.03\*  
5358.02\* 5360.00\* 5361.03\* 5400.00\* 5401.02\* 5403.00\* 5405.01\* 5409.01\* 5411.00\* 5413.00\* 5418.01\*  
5421.05\* 5424.01\* 5426.02\* 5427.00\* 5429.00\* 5535.02\* 5535.04\* 5538.01\* 5543.01\* 5543.02\* 5702.03\*  
5704.04\* 5706.01\* 5717.01\* 5765.01\* 5769.04\* 6004.00\* 6010.02\* 6013.02\* 6021.05\* 6022.00\* 6024.03\*  
6030.05\* 6037.04\* 6039.00\* 6040.01\* 6040.02\* 6041.00\* 9001.04\* 9002.01\* 9003.00\* 9008.03\* 9010.10\*  
9104.04\* 9106.05\* 9107.07\* 9107.14\* 9200.37\* 9200.38\*

**Median Family Income 80-90%**

1011.10\* 1012.20\* 1041.08\* 1046.10\* 1046.20\* 1048.22\* 1064.05\* 1066.04\* 1070.10\* 1095.00\* 1132.34\*  
1133.21\* 1192.02\* 1210.10\* 1212.10\* 1218.02\* 1219.00\* 1221.20\* 1239.01\* 1249.02\* 1281.01\* 1325.02\*  
1340.02\* 1831.03\* 1871.01\* 1871.02\* 1907.00\* 1908.02\* 1919.01\* 1959.01\* 1959.03\* 1972.00\* 1975.00\*  
2014.02\* 2087.10\* 2127.01\* 2128.00\* 2151.01\* 2182.20\* 2185.00\* 2220.01\* 2352.01\* 2381.00\* 2722.01\*  
2733.00\* 2911.30\* 2933.07\* 2971.20\* 3018.02\* 3025.06\* 3106.01\* 3118.01\* 3118.02\* 4024.02\* 4027.06\*  
4029.02\* 4037.22\* 4046.00\* 4048.02\* 4048.03\* 4049.03\* 4051.01\* 4052.01\* 4053.01\* 4071.01\* 4071.02\*  
4072.00\* 4075.01\* 4077.01\* 4080.06\* 4081.39\* 4081.40\* 4081.41\* 4082.02\* 4087.23\* 4329.02\* 4331.01\*  
4334.01\* 4337.00\* 4615.02\* 4616.00\* 4619.01\* 4621.00\* 4623.01\* 4810.02\* 4811.01\* 4811.03\* 4813.00\*  
4822.01\* 4824.02\* 5009.00\* 5010.01\* 5014.00\* 5025.00\* 5029.02\* 5031.04\* 5031.06\* 5300.04\* 5302.03\*  
5303.01\* 5303.02\* 5306.01\* 5316.03\* 5340.02\* 5347.00\* 5357.01\* 5358.04\* 5359.01\* 5361.02\* 5362.00\*  
5408.00\* 5409.02\* 5417.00\* 5418.02\* 5428.00\* 5432.01\* 5439.05\* 5440.01\* 5509.01\* 5509.02\* 5513.00\*  
5535.03\* 5536.01\* 5540.02\* 5544.05\* 5546.00\* 5702.02\* 5702.04\* 5706.02\* 5717.03\* 5727.00\* 5731.00\*  
5768.02\* 6014.02\* 6021.06\* 6024.02\* 6024.04\* 6025.08\* 6025.09\* 6028.02\* 6030.04\* 6030.06\* 6031.01\*  
6033.02\* 6038.01\* 6038.02\* 6506.04\* 7017.02\* 9006.08\* 9007.05\* 9008.05\* 9011.01\* 9100.01\* 9101.01\*  
9102.05\* 9105.05\* 9106.06\* 9107.06\* 9107.13\* 9107.15\* 9107.16\*

**Median Family Income 90-100%**

1014.00\* 1021.07\* 1044.01\* 1048.10\* 1064.03\* 1096.03\* 1114.00\* 1132.35\* 1154.04\* 1203.00\* 1210.20\*  
1222.00\* 1230.20\* 1238.00\* 1243.00\* 1249.03\* 1276.06\* 1310.20\* 1313.00\* 1317.02\* 1318.00\* 1319.00\*  
1321.02\* 1325.01\* 1347.20\* 1349.04\* 1394.01\* 1395.03\* 1832.21\* 1834.01\* 1834.02\* 1835.10\* 1837.02\*  
1851.00\* 1863.02\* 1895.00\* 1899.02\* 2016.01\* 2017.00\* 2085.01\* 2117.01\* 2125.02\* 2171.00\* 2172.00\*  
2197.00\* 2340.00\* 2343.00\* 2348.00\* 2384.00\* 2675.01\* 2699.04\* 2702.00\* 2718.02\* 2752.00\* 2772.00\*  
2932.01\* 2941.10\* 3010.00\* 3012.06\* 3016.02\* 3019.00\* 3021.04\* 4006.02\* 4011.02\* 4017.03\* 4020.01\*

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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4021.01*	4022.00*	4024.03*	4024.05*	4029.04*	4041.00*	4044.01*	4049.02*	4050.01*	4050.02*	4052.02*
4057.02*	4061.02*	4067.01*	4069.01*	4073.02*	4075.02*	4076.02*	4078.02*	4080.04*	4082.12*	4085.01*
4086.30*	4087.04*	4087.05*	4301.01*	4301.02*	4310.01*	4312.00*	4325.00*	4326.02*	4329.01*	4338.02*
4610.00*	4808.04*	4809.01*	4812.01*	4812.02*	4815.00*	4816.03*	4816.04*	4816.05*	4821.01*	4825.21*
5015.03*	5020.03*	5020.04*	5020.05*	5021.00*	5027.00*	5031.03*	5035.01*	5306.02*	5323.03*	5401.01*
5410.02*	5424.02*	5435.01*	5502.01*	5502.02*	5503.00*	5515.01*	5517.00*	5518.00*	5519.00*	5524.00*
5526.01*	5526.02*	5528.00*	5529.00*	5533.00*	5534.00*	5536.02*	5539.01*	5540.01*	5548.01*	5549.00*
5551.04*	5704.02*	5705.02*	5723.01*	5730.03*	5770.00*	6009.11*	6026.00*	6034.00*	6503.00*	6700.03*
7018.01*	7018.02*	9005.04*	9005.08*	9010.11*	9012.10*	9100.02*	9107.09*	9107.12*	9200.23*	9200.35*

**Median Family Income 100-110%**

1032.00*	1061.11*	1061.13*	1065.20*	1094.00*	1134.22*	1152.01*	1152.02*	1154.01*	1190.02*	1192.01*
1194.00*	1220.00*	1236.01*	1242.01*	1251.00*	1331.00*	1348.00*	1372.01*	1831.04*	1833.00*	1852.02*
1881.00*	1891.01*	1899.03*	1899.05*	1902.02*	1924.10*	1958.03*	1993.00*	2013.02*	2115.00*	2167.00*
2675.02*	2699.03*	2712.00*	2718.01*	2722.02*	2732.00*	2761.00*	2933.01*	2933.02*	2942.00*	2943.01*
2969.02*	2972.01*	3105.01*	3107.02*	3112.00*	3201.00*	3202.02*	4011.01*	4021.02*	4027.03*	4038.02*
4039.01*	4039.02*	4040.00*	4042.02*	4043.02*	4057.01*	4058.00*	4067.02*	4070.01*	4070.02*	4073.01*
4077.02*	4078.01*	4081.36*	4081.37*	4083.01*	4086.23*	4300.02*	4309.01*	4311.00*	4314.00*	4315.02*
4318.00*	4319.00*	4323.00*	4800.11*	4803.02*	4808.02*	4821.02*	4827.02*	5004.03*	5007.00*	5008.00*
5022.00*	5023.01*	5024.01*	5024.02*	5026.02*	5032.02*	5033.02*	5300.06*	5359.02*	5412.00*	5421.04*
5430.00*	5431.00*	5433.05*	5435.02*	5437.01*	5508.00*	5512.01*	5512.02*	5514.01*	5514.02*	5520.01*
5520.02*	5521.00*	5527.00*	5531.00*	5542.03*	5547.00*	5548.02*	5550.01*	5550.02*	5551.03*	5705.01*
5715.02*	5723.02*	5724.00*	5771.00*	5990.00*	6005.01*	6005.02*	6008.01*	6099.00*	6500.04*	6506.05*
6701.00*	7002.00*	9010.08*	9010.09*	9011.02*	9012.09*	9102.01*	9102.08*	9107.05*	9110.01*	9200.31*
9200.33*	9301.01*	9302.00*								

**Median Family Income 110-120%**

1041.03*	1041.24*	1060.10*	1060.20*	1061.12*	1070.20*	1091.00*	1096.01*	1096.04*	1112.02*	1112.05*
1113.01*	1190.01*	1198.00*	1199.00*	1211.02*	1237.00*	1254.01*	1255.01*	1277.11*	1288.02*	1312.00*
1314.00*	1316.00*	1330.00*	1341.03*	1341.04*	1343.04*	1343.06*	1351.14*	1412.01*	1814.00*	1816.00*
1831.01*	1955.00*	2016.02*	2149.01*	2151.02*	2653.05*	2697.00*	2698.00*	2699.05*	2717.02*	2751.01*

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

2753.11\* 2756.03\* 3102.01\* 4009.00\* 4015.00\* 4016.02\* 4017.04\* 4027.05\* 4033.05\* 4036.00\* 4044.02\*  
4052.03\* 4061.01\* 4066.02\* 4068.00\* 4081.33\* 4081.35\* 4084.01\* 4086.31\* 4087.22\* 4307.23\* 4308.01\*  
4310.02\* 4321.02\* 4609.00\* 4622.02\* 4628.00\* 4801.02\* 4804.00\* 4819.02\* 4825.22\* 4827.01\* 4828.00\*  
5004.04\* 5013.00\* 5018.02\* 5026.01\* 5031.05\* 5035.02\* 5040.01\* 5041.01\* 5300.05\* 5302.02\* 5435.03\*  
5437.02\* 5438.01\* 5501.00\* 5504.00\* 5506.01\* 5515.02\* 5532.00\* 5542.01\* 5544.06\* 5726.00\* 5734.01\*  
5742.02\* 5750.02\* 6035.00\* 6500.03\* 6509.01\* 6700.02\* 7028.03\* 9200.29\* 9200.34\* 9200.41\* 9200.42\*  
9201.06\*

**Median Family Income >= 120%**

1011.22\* 1013.00\* 1021.03\* 1021.04\* 1031.01\* 1031.02\* 1033.00\* 1034.00\* 1064.06\* 1065.10\* 1066.03\*  
1066.41\* 1066.42\* 1066.43\* 1066.45\* 1066.46\* 1066.49\* 1081.01\* 1081.02\* 1081.03\* 1081.04\* 1082.01\*  
1082.02\* 1092.00\* 1093.00\* 1097.00\* 1098.00\* 1111.00\* 1112.01\* 1112.04\* 1112.06\* 1113.02\* 1131.01\*  
1131.02\* 1132.11\* 1132.12\* 1132.13\* 1132.31\* 1132.32\* 1132.37\* 1133.01\* 1133.03\* 1133.22\* 1134.01\*  
1151.01\* 1151.04\* 1153.01\* 1171.01\* 1172.02\* 1173.01\* 1173.02\* 1173.03\* 1174.04\* 1197.00\* 1216.00\*  
1233.01\* 1239.02\* 1240.00\* 1244.00\* 1245.00\* 1246.00\* 1247.00\* 1252.00\* 1254.02\* 1256.00\* 1284.00\*  
1285.00\* 1286.02\* 1287.02\* 1288.01\* 1289.10\* 1311.00\* 1320.01\* 1320.02\* 1321.01\* 1329.00\* 1342.01\*  
1343.02\* 1343.03\* 1344.21\* 1344.22\* 1344.23\* 1344.24\* 1349.01\* 1349.05\* 1351.02\* 1351.11\* 1351.13\*  
1352.01\* 1352.02\* 1352.03\* 1370.00\* 1371.03\* 1371.04\* 1373.01\* 1373.02\* 1374.01\* 1374.02\* 1375.01\*  
1375.02\* 1375.04\* 1380.00\* 1390.01\* 1392.00\* 1393.01\* 1394.02\* 1395.02\* 1396.00\* 1397.01\* 1397.02\*  
1397.03\* 1398.01\* 1398.02\* 1411.01\* 1411.02\* 1412.02\* 1413.02\* 1413.03\* 1413.04\* 1414.00\* 1415.00\*  
1416.00\* 1417.00\* 1431.00\* 1432.00\* 1433.00\* 1434.00\* 1435.00\* 1436.02\* 1436.03\* 1436.04\* 1437.00\*  
1438.00\* 1439.01\* 1439.02\* 1810.00\* 1813.00\* 1815.00\* 1832.22\* 1852.04\* 1861.00\* 1862.02\* 1862.03\*  
1873.00\* 1882.01\* 1882.02\* 1883.00\* 1891.02\* 1892.02\* 1893.00\* 1894.00\* 1896.00\* 1897.01\* 1897.02\*  
1898.00\* 1919.02\* 1920.01\* 1920.02\* 1923.00\* 1941.01\* 1941.02\* 1942.00\* 1943.00\* 1944.01\* 1944.02\*  
1945.00\* 1951.00\* 1952.01\* 1952.02\* 1954.00\* 1959.02\* 1974.10\* 2060.20\* 2060.31\* 2073.01\* 2075.01\*  
2079.00\* 2110.00\* 2127.02\* 2140.00\* 2141.00\* 2144.00\* 2145.01\* 2145.02\* 2145.03\* 2146.00\* 2147.00\*  
2148.00\* 2149.02\* 2161.00\* 2162.00\* 2163.00\* 2164.01\* 2164.02\* 2168.00\* 2169.00\* 2170.01\* 2170.02\*  
2195.00\* 2342.00\* 2351.00\* 2360.00\* 2364.00\* 2611.01\* 2611.02\* 2612.00\* 2621.00\* 2622.00\* 2623.01\*  
2623.02\* 2623.03\* 2624.00\* 2625.01\* 2626.01\* 2626.04\* 2627.04\* 2627.06\* 2628.02\* 2640.00\* 2641.02\*  
2641.03\* 2643.01\* 2643.02\* 2651.00\* 2652.01\* 2652.02\* 2654.10\* 2654.20\* 2655.10\* 2655.20\* 2656.01\*

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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2656.02\* 2657.00\* 2671.00\* 2672.00\* 2674.02\* 2674.03\* 2674.04\* 2676.00\* 2677.00\* 2678.00\* 2679.01\*  
2679.02\* 2690.00\* 2691.00\* 2693.00\* 2695.00\* 2699.06\* 2701.00\* 2703.00\* 2711.00\* 2713.00\* 2714.00\*  
2715.00\* 2716.00\* 2717.01\* 2719.01\* 2719.02\* 2721.00\* 2723.01\* 2731.00\* 2734.02\* 2735.02\* 2736.00\*  
2737.00\* 2738.00\* 2739.02\* 2741.00\* 2742.02\* 2753.02\* 2754.00\* 2756.02\* 2760.00\* 2764.00\* 2765.00\*  
2766.01\* 2766.03\* 2766.04\* 2770.00\* 2771.00\* 2780.01\* 2781.02\* 2913.00\* 2933.06\* 2951.03\* 2963.00\*  
2964.01\* 2964.02\* 2970.00\* 2972.02\* 2973.00\* 2974.00\* 2975.00\* 2976.01\* 2976.02\* 3001.00\* 3002.00\*  
3003.01\* 3004.00\* 3005.01\* 3005.02\* 3006.00\* 3007.01\* 3007.02\* 3008.00\* 3009.01\* 3009.02\* 3011.00\*  
3012.03\* 3012.05\* 3013.00\* 3014.00\* 3015.01\* 3017.01\* 3101.00\* 3102.02\* 3103.00\* 3104.00\* 3106.02\*  
3107.01\* 3108.00\* 3109.00\* 3110.00\* 3111.00\* 3113.00\* 3114.00\* 3115.00\* 3116.00\* 3117.00\* 4002.04\*  
4002.05\* 4002.06\* 4002.07\* 4003.02\* 4003.04\* 4004.02\* 4004.03\* 4004.04\* 4005.01\* 4006.03\* 4006.04\*  
4008.00\* 4010.01\* 4010.02\* 4012.01\* 4012.02\* 4012.03\* 4013.03\* 4013.04\* 4013.11\* 4013.12\* 4016.01\*  
4016.03\* 4017.01\* 4018.00\* 4019.02\* 4020.02\* 4033.03\* 4033.04\* 4033.12\* 4033.16\* 4033.17\* 4033.18\*  
4033.19\* 4033.20\* 4033.21\* 4033.22\* 4033.23\* 4033.24\* 4033.25\* 4034.01\* 4034.02\* 4034.03\* 4034.04\*  
4034.05\* 4034.06\* 4034.07\* 4034.08\* 4035.00\* 4037.02\* 4037.03\* 4037.21\* 4038.01\* 4045.03\* 4049.01\*  
4053.02\* 4054.00\* 4055.00\* 4056.00\* 4059.00\* 4060.00\* 4063.00\* 4064.02\* 4064.11\* 4064.12\* 4065.00\*  
4066.01\* 4069.02\* 4074.00\* 4079.00\* 4080.03\* 4080.05\* 4081.34\* 4083.02\* 4083.03\* 4084.02\* 4085.03\*  
4085.04\* 4085.05\* 4086.24\* 4086.25\* 4086.26\* 4086.27\* 4086.28\* 4086.29\* 4087.03\* 4087.06\* 4300.03\*  
4302.00\* 4303.01\* 4303.02\* 4304.00\* 4305.01\* 4305.02\* 4306.00\* 4307.01\* 4307.21\* 4307.24\* 4308.02\*  
4308.03\* 4309.02\* 4313.00\* 4316.00\* 4317.00\* 4320.00\* 4321.01\* 4600.00\* 4601.00\* 4602.00\* 4603.01\*  
4603.02\* 4604.01\* 4605.01\* 4605.02\* 4606.00\* 4607.00\* 4608.00\* 4611.00\* 4612.00\* 4613.00\* 4614.00\*  
4615.01\* 4617.00\* 4623.02\* 4624.00\* 4625.00\* 4626.00\* 4627.00\* 4629.00\* 4630.00\* 4631.01\* 4631.02\*  
4632.00\* 4633.00\* 4634.00\* 4635.00\* 4636.01\* 4636.02\* 4637.00\* 4638.00\* 4639.00\* 4640.00\* 4641.00\*  
4642.00\* 4800.02\* 4800.12\* 4801.01\* 4802.01\* 4802.02\* 4805.00\* 4806.00\* 4807.02\* 4807.03\* 4807.04\*  
4808.03\* 4818.00\* 4819.01\* 4820.01\* 4820.02\* 4826.00\* 5001.00\* 5002.01\* 5002.02\* 5003.00\* 5010.02\*  
5012.00\* 5015.01\* 5016.00\* 5017.00\* 5019.00\* 5028.01\* 5029.01\* 5032.01\* 5033.01\* 5034.01\* 5034.02\*  
5036.01\* 5036.02\* 5037.01\* 5037.02\* 5037.03\* 5038.01\* 5038.02\* 5039.01\* 5039.02\* 5040.02\* 5300.03\*  
5321.02\* 5433.04\* 5433.06\* 5433.21\* 5433.22\* 5434.00\* 5436.01\* 5436.02\* 5436.03\* 5436.04\* 5437.03\*  
5438.02\* 5439.03\* 5440.02\* 5500.00\* 5505.00\* 5506.02\* 5507.00\* 5510.00\* 5523.01\* 5523.02\* 5530.00\*  
5541.03\* 5545.11\* 5545.12\* 5545.13\* 5545.14\* 5545.15\* 5545.16\* 5545.17\* 5545.18\* 5545.19\* 5545.21\*

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

5545.22\* 5552.02\* 5700.01\* 5700.02\* 5700.03\* 5701.00\* 5707.01\* 5707.02\* 5708.00\* 5709.01\* 5709.02\*  
5710.00\* 5711.01\* 5711.02\* 5712.00\* 5713.00\* 5714.00\* 5715.03\* 5715.04\* 5718.00\* 5719.00\* 5720.01\*  
5720.02\* 5721.00\* 5722.01\* 5722.02\* 5734.03\* 5736.01\* 5737.00\* 5738.00\* 5739.02\* 5740.00\* 5741.00\*  
5742.01\* 5743.00\* 5744.00\* 5745.00\* 5746.02\* 5748.00\* 5749.01\* 5749.02\* 5750.01\* 5760.01\* 5766.01\*  
5766.02\* 5767.00\* 5772.00\* 5773.00\* 5774.00\* 5775.01\* 5775.04\* 5776.02\* 5776.03\* 5776.04\* 5991.00\*  
6006.01\* 6007.02\* 6007.03\* 6007.04\* 6008.02\* 6013.01\* 6023.01\* 6023.02\* 6027.00\* 6032.00\* 6036.00\*  
6037.02\* 6037.03\* 6200.01\* 6200.02\* 6201.01\* 6201.02\* 6202.01\* 6203.01\* 6203.03\* 6203.05\* 6204.00\*  
6205.01\* 6205.21\* 6205.22\* 6206.01\* 6206.02\* 6207.01\* 6207.02\* 6208.00\* 6209.01\* 6209.04\* 6210.01\*  
6210.02\* 6210.04\* 6211.02\* 6211.04\* 6212.01\* 6212.04\* 6213.01\* 6213.24\* 6213.26\* 6214.00\* 6500.01\*  
6501.01\* 6501.02\* 6502.00\* 6504.01\* 6505.01\* 6505.02\* 6506.02\* 6506.03\* 6507.01\* 6507.02\* 6508.00\*  
6509.02\* 6510.01\* 6510.02\* 6511.01\* 6511.02\* 6512.01\* 6512.21\* 6512.22\* 6513.02\* 6513.04\* 6514.01\*  
6514.02\* 6700.01\* 6702.01\* 6702.02\* 6703.24\* 6703.26\* 6703.28\* 6704.03\* 6704.05\* 6704.06\* 6704.07\*  
6704.11\* 6704.13\* 6704.16\* 6705.00\* 6706.02\* 6707.01\* 6707.02\* 7001.01\* 7003.00\* 7004.00\* 7005.01\*  
7005.02\* 7006.00\* 7007.00\* 7008.01\* 7008.02\* 7009.01\* 7009.02\* 7010.00\* 7012.01\* 7012.02\* 7013.02\*  
7013.04\* 7014.02\* 7015.01\* 7015.02\* 7016.01\* 7016.02\* 7017.01\* 7019.02\* 7020.02\* 7021.02\* 7022.01\*  
7022.02\* 7023.00\* 7024.00\* 7025.01\* 7025.02\* 7026.00\* 7027.00\* 7028.01\* 7028.02\* 7029.01\* 7030.01\*  
7030.02\* 7031.00\* 7032.00\* 8001.01\* 8001.02\* 8002.02\* 8002.03\* 8002.04\* 8003.24\* 8003.25\* 8003.26\*  
8003.27\* 8003.28\* 8003.29\* 8003.30\* 8003.31\* 8003.32\* 8004.06\* 8004.08\* 8004.10\* 8005.04\* 8005.06\*  
9009.00\* 9010.04\* 9010.07\* 9012.05\* 9012.13\* 9102.02\* 9102.06\* 9102.07\* 9102.09\* 9102.10\* 9103.01\*  
9103.02\* 9104.01\* 9108.04\* 9108.05\* 9108.07\* 9108.08\* 9108.09\* 9108.10\* 9108.11\* 9108.12\* 9108.13\*  
9200.12\* 9200.13\* 9200.15\* 9200.16\* 9200.17\* 9200.18\* 9200.20\* 9200.26\* 9200.28\* 9200.30\* 9200.32\*  
9200.36\* 9200.39\* 9200.40\* 9200.43\* 9200.44\* 9200.45\* 9201.02\* 9201.04\* 9201.07\* 9201.08\* 9201.09\*  
9201.10\* 9201.11\* 9201.12\* 9201.14\* 9201.15\* 9201.16\* 9201.18\* 9201.19\* 9203.03\* 9203.12\* 9203.13\*  
9203.14\* 9203.22\* 9203.26\* 9203.28\* 9203.29\* 9203.30\* 9203.31\* 9203.32\* 9203.34\* 9203.38\* 9203.39\*  
9303.01\* 9800.19\* 9800.24\*

**Median Family Income Not Known**

1151.03\* 1902.01\* 2063.00\* 2073.02\* 2074.00\* 2075.02\* 2077.10\* 2201.00\* 2227.00\* 2653.01\* 2653.03\*  
2653.04\* 2673.00\* 3200.00\* 4019.01\* 4024.04\* 4032.00\* 5041.02\* 5516.00\* 5746.01\* 5747.00\* 5755.00\*  
7011.00\* 9010.03\* 9200.11\* 9202.00\* 9800.01\* 9800.02\* 9800.03\* 9800.04\* 9800.05\* 9800.06\* 9800.07\*

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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9800.09\* 9800.10\* 9800.13\* 9800.14\* 9800.18\* 9800.20\* 9800.21\* 9800.22\* 9800.23\* 9800.25\* 9800.26\*  
9800.28\* 9800.30\* 9800.31\* 9800.33\* 9901.00\* 9902.00\* 9903.00\*

**ASSESSMENT AREA - 0002**

**KINGS COUNTY (047), NY**

**MSA: 35614**

**Median Family Income 10-20%**

0910.00\*

**Median Family Income 20-30%**

0029.01\* 0085.00\* 0185.01\* 0285.02\* 0352.00\* 0535.00\* 0808.00\* 0908.00\* 1110.00\*

**Median Family Income 30-40%**

0023.00\* 0100.00\* 0120.00\* 0255.00\* 0259.02\* 0299.00\* 0307.00\* 0326.00\* 0342.00\* 0357.00\* 0382.00\*  
0397.00\* 0427.00\* 0489.00\* 0511.00\* 0525.00\* 0533.00\* 0539.00\* 0545.00\* 0572.00\* 0906.00\* 0912.00\*  
0982.00\* 1034.00\* 1106.00\* 1120.00\* 1134.00\* 1156.00\* 1214.00\*

**Median Family Income 40-50%**

0076.00\* 0082.00\* 0094.00\* 0096.00\* 0098.00\* 0106.00\* 0108.00\* 0112.00\* 0118.00\* 0212.00\* 0220.00\*  
0222.00\* 0228.00\* 0230.00\* 0233.00\* 0234.00\* 0236.00\* 0240.00\* 0281.00\* 0303.00\* 0309.00\* 0330.00\*  
0340.00\* 0349.00\* 0351.00\* 0359.00\* 0373.00\* 0381.00\* 0387.00\* 0391.00\* 0395.00\* 0403.00\* 0409.00\*  
0431.00\* 0478.00\* 0505.00\* 0507.00 0508.01\* 0509.00\* 0527.00\* 0529.00\* 0531.00\* 0537.00\* 0538.00\*  
0547.00\* 0874.01\* 0890.00\* 0900.00\* 0918.00\* 0944.02\* 1144.00\* 1146.00\* 1190.00\* 1198.00\* 1210.00\*  
1237.00\*

**Median Family Income 50-60%**

0002.00\* 0022.00\* 0068.00\* 0071.00\* 0072.00\* 0074.00\* 0078.00\* 0084.00\* 0090.00\* 0092.00\* 0101.00\*  
0102.00\* 0104.00\* 0110.00\* 0114.00\* 0116.00\* 0122.00\* 0192.00\* 0213.00\* 0216.00\* 0218.00\* 0224.00\*  
0232.00\* 0238.00\* 0242.00\* 0251.00\* 0259.01\* 0277.00\* 0283.00\* 0287.00\* 0293.00\* 0305.00\* 0345.00\*  
0350.00\* 0361.00\* 0362.00\* 0363.00\* 0365.02\* 0369.00\* 0374.02\* 0392.00\* 0405.00\* 0411.00\* 0417.00\*  
0419.00\* 0421.00\* 0423.00\* 0429.00\* 0433.00\* 0435.00\* 0437.00\* 0439.00\* 0445.00\* 0453.00\* 0482.00\*  
0490.00\* 0491.00 0493.00\* 0523.00\* 0534.00\* 0610.04\* 0792.00\* 0804.00\* 0818.00\* 0884.00\* 0892.00\*  
0896.00\* 0898.00\* 0916.00\* 1058.01\* 1058.04\* 1116.00\* 1122.00\* 1128.00\* 1152.00\* 1160.00\* 1166.00\*  
1170.00\* 1176.02\* 1186.00\* 1188.00\* 1196.00\* 1200.00\* 1208.00\*



**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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**Median Family Income 60-70%**

0070.00\* 0126.00\* 0127.00\* 0142.00\* 0182.00\* 0190.00\* 0210.00\* 0226.00\* 0229.00\* 0235.00\* 0249.00\*  
0254.00\* 0257.00\* 0258.00\* 0271.00\* 0286.00\* 0288.00\* 0289.00\* 0292.00\* 0304.00\* 0311.00\* 0321.00\*  
0325.00\* 0343.00\* 0347.00\* 0353.00\* 0356.01\* 0360.01\* 0360.02\* 0365.01\* 0366.00\* 0375.00\* 0379.00\*  
0399.00\* 0412.00\* 0414.02\* 0416.00\* 0425.00\* 0430.00\* 0447.00\* 0449.00\* 0456.00\* 0460.00\* 0468.00\*  
0480.00\* 0486.00\* 0492.00\* 0508.03\* 0510.01\* 0513.00\* 0516.01\* 0516.02\* 0520.00\* 0552.00\* 0578.00\*  
0580.00\* 0786.00\* 0788.00\* 0796.02\* 0806.00\* 0816.00\* 0820.00\* 0822.00\* 0824.00\* 0870.00\* 0878.00\*  
0920.00\* 0924.00\* 0938.00\* 1098.00\* 1118.00\* 1130.00\* 1142.02\* 1162.00\* 1164.00\* 1168.00\* 1176.01\*  
1178.00\* 1182.02\* 1192.00\* 1194.00\*

**Median Family Income 70-80%**

0080.00\* 0088.00\* 0128.01\* 0138.00\* 0196.00\* 0208.00\* 0211.00\* 0221.00\* 0244.00\* 0246.00\* 0247.00\*  
0248.00\* 0252.00\* 0260.00\* 0261.00\* 0263.00\* 0264.00\* 0265.00\* 0272.00\* 0273.00\* 0276.00\* 0291.00\*  
0296.00\* 0297.00\* 0298.00\* 0308.00\* 0315.00\* 0317.02\* 0319.00\* 0329.00\* 0331.00\* 0333.00\* 0337.00\*  
0339.00\* 0341.00\* 0355.00\* 0371.00\* 0385.00\* 0386.00\* 0389.00\* 0390.00\* 0393.00\* 0400.00\* 0401.00\*  
0406.00\* 0410.00\* 0413.00\* 0415.00\* 0418.00\* 0424.00\* 0432.00\* 0434.00\* 0438.00\* 0441.00\* 0443.00\*  
0462.01\* 0464.00\* 0474.00\* 0476.00\* 0484.00\* 0506.00\* 0508.04\* 0510.02\* 0512.00\* 0514.00\* 0530.00\*  
0550.00\* 0554.00\* 0556.00\* 0582.00\* 0594.01\* 0606.00\* 0790.00\* 0794.00\* 0802.00\* 0810.00\* 0830.00\*  
0854.00\* 0860.00\* 0862.00\* 0872.00\* 0882.00\* 0886.00\* 0888.00\* 0894.00\* 0902.00\* 0922.00\* 1124.00\*  
1126.00\* 1142.01\* 1158.00\* 1174.00\* 1182.01\* 1184.00\* 1202.00\*

**Median Family Income 80-90%**

0062.00\* 0117.00\* 0130.00\* 0178.00\* 0179.00\* 0188.00\* 0194.00\* 0200.00\* 0214.00\* 0227.00\* 0245.00\*  
0250.00\* 0253.00\* 0256.00\* 0268.00\* 0269.00\* 0278.00\* 0279.00\* 0284.00\* 0290.00\* 0294.00\* 0301.00\*  
0313.00\* 0328.00\* 0348.00\* 0364.00\* 0367.00\* 0377.00\* 0398.00\* 0402.00\* 0404.00\* 0414.01\* 0420.00\*  
0426.00\* 0428.00\* 0440.00\* 0446.00\* 0462.02\* 0470.00\* 0472.00\* 0488.00\* 0494.00\* 0542.00\* 0546.00\*  
0560.00\* 0590.00\* 0610.03\* 0626.00\* 0680.00\* 0750.00\* 0760.00\* 0762.00\* 0774.00\* 0826.00\* 0828.00\*  
0846.00\* 0866.00\* 0880.00\* 0928.00\* 0930.00\* 0964.00\* 0974.00\* 1132.00\* 1150.00\* 1172.01\* 1172.02\*  
1220.00\*

**Median Family Income 90-100%**

0066.00\* 0132.00\* 0160.00\* 0176.00\* 0180.00\* 0215.00\* 0217.00\* 0219.00\* 0241.00\* 0243.00\* 0262.00\*

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

0266.00\* 0270.00\* 0274.00\* 0275.00\* 0280.00\* 0282.00\* 0302.00\* 0314.00\* 0323.00\* 0327.00\* 0335.00\*  
 0374.01\* 0388.00\* 0394.00\* 0408.00\* 0436.00\* 0444.00\* 0448.00\* 0526.00\* 0544.00\* 0548.00\* 0558.00\*  
 0579.00\* 0586.00\* 0642.00\* 0672.00\* 0696.01\* 0720.00\* 0722.00\* 0738.00\* 0740.00\* 0764.00\* 0766.00\*  
 0768.00\* 0770.00\* 0782.00\* 0798.02\* 0814.00\* 0840.00\* 0848.00\* 0856.00\* 0858.00\* 0864.00\* 0868.00\*  
 0876.00\* 0946.00\* 0956.00\* 1008.00\* 1010.00\* 1014.00\* 1104.00\*

**Median Family Income 100-110%**

0054.00\* 0059.00\* 0064.00\* 0134.00\* 0143.00\* 0193.00\* 0198.00\* 0204.00\* 0267.00\* 0300.00\* 0317.01\*  
 0336.00\* 0354.00\* 0356.02\* 0383.00\* 0396.00\* 0442.00\* 0454.00\* 0458.00\* 0496.00\* 0499.00\* 0501.00\*  
 0549.00\* 0551.00\* 0563.00\* 0570.00\* 0576.00\* 0596.00\* 0598.00\* 0608.00\* 0622.00\* 0632.00\* 0648.00\*  
 0650.00\* 0670.00\* 0686.00\* 0736.00\* 0772.00\* 0776.00\* 0796.01\* 0800.00\* 0832.00\* 0950.00\* 0958.00\*  
 0986.00\* 0988.00\* 0992.00\* 0996.00\* 1004.00\* 1012.00\* 1022.00\* 1078.00\*

**Median Family Income 110-120%**

0020.00\* 0056.02\* 0058.00\* 0129.01\* 0136.00\* 0140.00\* 0145.00\* 0174.00\* 0186.00\* 0191.00\* 0231.00\*  
 0295.00\* 0306.00\* 0370.00\* 0452.00\* 0485.00\* 0498.00\* 0503.00\* 0532.00\* 0562.00\* 0569.00\* 0571.00\*  
 0584.00\* 0592.00\* 0593.00\* 0600.00\* 0628.00\* 0638.00\* 0690.00\* 0728.00\* 0742.00\* 0748.00\* 0834.00\*  
 0836.00\* 0838.00\* 0850.00\* 0934.00\* 0936.00\* 0944.01\* 0954.00\* 0962.00\* 0966.00\* 0984.00\* 0994.00\*  
 0998.00\* 1024.00\* 1026.00\* 1028.00\* 1070.00\*

**Median Family Income >= 120%**

0001.00\* 0003.01\* 0005.01\* 0005.02\* 0007.00\* 0009.00\* 0011.00\* 0013.00\* 0015.00\* 0021.00\* 0030.00\*  
 0031.00\* 0033.00\* 0034.00\* 0035.00\* 0036.00\* 0037.00\* 0038.00\* 0039.00\* 0041.00\* 0043.00\* 0044.00\*  
 0045.00\* 0046.00\* 0047.00\* 0049.00\* 0050.00\* 0051.00\* 0052.01\* 0052.02\* 0053.00\* 0056.01\* 0060.00\*  
 0063.00\* 0065.00\* 0067.00\* 0069.00\* 0075.00\* 0077.00\* 0119.00\* 0121.00\* 0129.02\* 0131.00\* 0133.00\*  
 0135.00\* 0137.00\* 0139.00\* 0141.00\* 0147.00\* 0148.00\* 0149.00\* 0150.00\* 0151.00\* 0152.00\* 0153.00\*  
 0155.00\* 0157.00\* 0159.00\* 0161.00\* 0162.00\* 0163.00\* 0164.00\* 0165.00\* 0166.00\* 0167.00\* 0168.00\*  
 0169.00\* 0170.00\* 0171.00\* 0172.00\* 0181.00\* 0183.00\* 0184.00\* 0187.00\* 0195.00\* 0197.00\* 0199.00\*  
 0201.00\* 0202.00\* 0203.00\* 0205.00\* 0206.00\* 0207.00\* 0285.01\* 0422.00\* 0477.00\* 0481.00\* 0495.00\*  
 0497.00\* 0500.00\* 0502.02\* 0504.00\* 0515.00\* 0517.00\* 0518.00\* 0519.00\* 0528.00\* 0543.00\* 0553.00\*  
 0555.00\* 0557.00\* 0561.00\* 0564.00\* 0565.00\* 0566.00\* 0568.00\* 0573.00\* 0574.00\* 0575.00\* 0588.00\*  
 0589.00\* 0591.00\* 0594.02\* 0610.02\* 0612.00\* 0616.00\* 0620.00\* 0636.00\* 0640.00\* 0644.00\* 0646.00\*

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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0652.00\* 0654.00\* 0656.00\* 0658.00\* 0660.00\* 0662.00\* 0674.00\* 0676.00\* 0678.00\* 0682.00\* 0688.00\*  
0692.00\* 0696.02\* 0698.00\* 0700.00\* 0702.01\* 0706.00\* 0724.00\* 0726.00\* 0730.00\* 0732.00\* 0734.00\*  
0744.00\* 0746.00\* 0752.00\* 0754.00\* 0756.00\* 0758.00\* 0780.00\* 0784.00\* 0798.01\* 0932.00\* 0968.00\*  
0970.00\* 0990.00\* 1006.00\* 1016.00\* 1018.00\* 1020.00\* 1502.00\* 1522.00\*

**Median Family Income Not Known**

0018.00\* 0086.00\* 0154.00\* 0175.00\* 0177.00\* 0407.00\* 0450.00\* 0666.00\* 0702.02\* 0702.03\* 0852.00\*  
0960.00\* 1180.00\* 9901.00\*

**NEW YORK COUNTY (061), NY**

**MSA: 35614**

**Median Family Income 20-30%**

0192.00\*

**Median Family Income 30-40%**

0002.01\* 0006.00\* 0014.02\* 0020.00\* 0025.00\* 0182.00\* 0194.00\* 0219.00\* 0242.00\* 0243.02\*

**Median Family Income 40-50%**

0008.00\* 0010.02\* 0016.00\* 0024.00\* 0028.00\* 0029.00\* 0036.01\* 0162.00\* 0168.00\* 0174.01\* 0178.00\*  
0186.00\* 0189.00\* 0210.00\* 0223.02\* 0224.00\* 0232.00\* 0235.02\* 0263.00\* 0277.00\* 0291.00\* 0293.00\*  
0299.00\*

**Median Family Income 50-60%**

0002.02\* 0018.00\* 0030.01\* 0041.00\* 0043.00\* 0164.00\* 0166.00\* 0172.00\* 0180.00\* 0184.00\* 0188.00\*  
0209.01\* 0213.03\* 0215.00\* 0218.00\* 0223.01\* 0229.00\* 0235.01\* 0237.00\* 0243.01\* 0245.00\* 0251.00\*  
0253.00\* 0261.00\* 0269.00\* 0285.00\* 0309.00\*

**Median Family Income 60-70%**

0022.01\* 0083.00\* 0170.00\* 0174.02\* 0193.00\* 0196.00\* 0226.00\* 0231.00\* 0234.00\* 0236.00\* 0239.00\*  
0247.00\* 0249.00\* 0279.00\* 0303.00\*

**Median Family Income 70-80%**

0026.01\* 0156.02\* 0203.00\* 0208.00\* 0214.00\* 0221.02\* 0230.00\* 0233.00\* 0241.00\* 0255.00\* 0259.00\*  
0267.00\* 0271.00\* 0283.00\* 0287.00\*

**Median Family Income 80-90%**

0135.00\* 0206.00\* 0212.00\* 0216.00\* 0220.00\* 0225.00\* 0228.00\* 0265.00\*

**Median Family Income 90-100%**

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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0197.02\* 0201.02\* 0222.00\* 0227.00\*

**Median Family Income 100-110%**

0038.00\* 0117.00\* 0295.00\*

**Median Family Income 110-120%**

0012.00\* 0027.00\* 0093.00\* 0097.00\* 0207.01\* 0257.00\*

**Median Family Income >= 120%**

0007.00\* 0009.00\* 0010.01\* 0013.00\* 0014.01\* 0015.01\* 0015.02\* 0021.00\* 0022.02\* 0026.02\* 0030.02\*

0031.00\* 0032.00\* 0033.00\* 0034.00\* 0036.02\* 0037.00\* 0039.00\* 0040.00\* 0042.00\* 0044.00\* 0045.00\*

0047.00\* 0048.00\* 0049.00\* 0050.00\* 0052.00\* 0054.00\* 0055.01\* 0055.02\* 0056.00\* 0057.00\* 0058.00\*

0059.00\* 0060.00\* 0061.00\* 0062.00\* 0063.00\* 0064.00\* 0065.00\* 0067.00\* 0068.00\* 0069.00\* 0070.00\*

0071.00\* 0072.00\* 0073.00\* 0074.00\* 0075.00\* 0076.00\* 0077.00\* 0078.00\* 0079.00\* 0080.00\* 0081.00\*

0082.00\* 0084.00\* 0086.01\* 0086.03\* 0087.00\* 0088.00\* 0089.00\* 0090.00\* 0091.00\* 0092.00\* 0095.00\*

0096.00\* 0098.00\* 0099.00\* 0100.00\* 0101.00\* 0103.00\* 0104.00\* 0106.01\* 0106.02\* 0108.00\* 0109.00\*

0110.00\* 0111.00\* 0112.01\* 0112.02\* 0112.03\* 0114.01\* 0114.02\* 0115.00\* 0116.00\* 0118.00\* 0120.00\*

0121.00\* 0122.00\* 0124.00\* 0125.00\* 0126.00\* 0127.00\* 0128.00\* 0129.00\* 0130.00\* 0131.00\* 0132.00\*

0133.00\* 0134.00\* 0136.00\* 0137.00\* 0138.00\* 0139.00\* 0140.00\* 0142.00\* 0144.01\* 0144.02\* 0145.00\*

0146.01\* 0146.02\* 0147.00\* 0148.01\* 0148.02\* 0149.00\* 0150.01\* 0150.02\* 0151.00\* 0152.00\* 0153.00\*

0154.00\* 0155.00\* 0156.01\* 0157.00\* 0158.01\* 0158.02\* 0159.00\* 0160.01\* 0160.02\* 0161.00\* 0163.00\*

0165.00\* 0167.00\* 0169.00\* 0171.00\* 0173.00\* 0175.00\* 0177.00\* 0179.00\* 0181.00\* 0183.00\* 0185.00\*

0187.00\* 0190.00\* 0191.00\* 0195.00\* 0198.00\* 0199.00\* 0200.00\* 0201.01\* 0205.00\* 0211.00\* 0238.01\*

0238.02\* 0273.00\* 0275.00\* 0281.00\* 0307.00\* 0317.03\* 0317.04\*

**Median Family Income Not Known**

0001.00\* 0005.00\* 0066.00\* 0086.02\* 0094.00\* 0102.00\* 0113.00\* 0119.00\* 0143.00\* 0197.01\* 0217.03\*

0240.00\* 0297.00\* 0311.00\* 0319.00\*

**QUEENS COUNTY (081), NY**

**MSA: 35614**

**Median Family Income 20-30%**

0025.00\*

**Median Family Income 30-40%**

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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0845.00\* 0972.03\*

**Median Family Income 40-50%**

0043.00\* 0047.00\* 0087.00\* 0163.00\* 0273.00\* 0437.02\* 0443.01\* 0460.00\* 0467.00\* 0797.02\* 0849.00\*

1205.00\* 1227.02\*

**Median Family Income 50-60%**

0085.00\* 0159.00\* 0238.00\* 0240.00\* 0309.02\* 0375.00\* 0399.00\* 0405.00\* 0407.00\* 0427.00\* 0439.00\*

0481.00\* 0589.00\* 0853.00\* 0857.00\* 0859.00\* 0863.00\* 0865.00\* 0869.00\* 0871.00\* 1163.00\* 1167.00\*

**Median Family Income 60-70%**

0033.00\* 0039.00\* 0051.00\* 0069.00\* 0073.00\* 0079.00\* 0083.00\* 0114.00\* 0120.00\* 0157.00\* 0181.01\*

0198.00\* 0204.00\* 0212.00\* 0235.00\* 0254.00\* 0260.00\* 0261.00\* 0263.00\* 0270.00\* 0275.00\* 0277.00\*

0363.00\* 0365.00\* 0377.00\* 0379.00\* 0401.00\* 0403.00\* 0411.00\* 0414.00\* 0415.00\* 0437.01\* 0444.00\*

0446.01\* 0446.02\* 0461.00\* 0463.00\* 0469.00\* 0471.00\* 0483.00\* 0500.00\* 0535.00\* 0549.00\* 0553.00\*

0555.00\* 0557.00\* 0564.00\* 0717.02\* 0799.00\* 0855.00\* 0861.00\* 0889.01\* 0942.02\* 0972.02\* 0972.04\*

0998.02\* 1010.01\* 1032.01\* 1171.00\* 1187.00\* 1191.00\* 1201.00\*

**Median Family Income 70-80%**

0004.00\* 0030.00\* 0040.02\* 0042.00\* 0044.01\* 0057.00\* 0094.00\* 0100.00\* 0108.00\* 0112.00\* 0118.00\*

0119.00\* 0142.01\* 0153.00\* 0156.00\* 0161.00\* 0178.00\* 0179.00\* 0189.00\* 0214.00\* 0236.00\* 0251.00\*

0253.02\* 0259.00\* 0265.00\* 0267.00\* 0269.01\* 0269.02\* 0278.00\* 0279.00\* 0291.00\* 0347.00\* 0353.00\*

0361.00\* 0381.00\* 0409.00\* 0413.00\* 0448.00\* 0455.00\* 0459.00\* 0462.00\* 0465.00\* 0468.00\* 0473.00\*

0545.00\* 0547.00\* 0551.00\* 0587.00\* 0591.00\* 0693.00\* 0779.08\* 0790.00\* 0803.01\* 0919.00\* 0925.00\*

0942.03\* 0964.00\* 0992.00\* 1032.02\* 1161.00\* 1185.00\* 1257.00\*

**Median Family Income 80-90%**

0008.00\* 0018.00\* 0022.00\* 0031.00\* 0038.00\* 0052.00\* 0055.00\* 0062.02\* 0063.00\* 0091.00\* 0098.00\*

0102.00\* 0103.00\* 0106.00\* 0122.00\* 0124.00\* 0125.00\* 0126.01\* 0134.00\* 0135.00\* 0137.00\* 0148.00\*

0152.00\* 0154.00\* 0155.00\* 0166.00\* 0170.00\* 0176.00\* 0180.00\* 0183.00\* 0196.00\* 0202.00\* 0208.00\*

0247.00\* 0249.00\* 0253.01\* 0272.00\* 0276.00\* 0281.00\* 0283.00\* 0293.00\* 0297.00\* 0309.03\* 0328.00\*

0329.00\* 0334.02\* 0351.00\* 0440.00\* 0443.02\* 0452.00\* 0458.00\* 0466.00\* 0470.00\* 0479.00\* 0485.00\*

0497.00\* 0540.00\* 0559.00\* 0565.00\* 0581.00\* 0583.00\* 0585.00\* 0593.00\* 0641.02\* 0679.00\* 0713.04\*

0719.00\* 0814.00\* 0818.00\* 0837.00\* 0864.00\* 0929.00\* 0942.01\* 1008.02\* 1047.00\* 1193.00\* 1215.00\*

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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1227.01\*

**Median Family Income 90-100%**

0002.00\* 0010.00\* 0014.00\* 0016.00\* 0024.00\* 0054.00\* 0065.01\* 0065.02\* 0081.00\* 0095.00\* 0101.00\*  
0104.00\* 0105.00\* 0113.00\* 0115.00\* 0116.00\* 0126.02\* 0132.00\* 0141.00\* 0142.02\* 0143.00\* 0144.00\*  
0145.00\* 0158.01\* 0164.00\* 0168.00\* 0169.00\* 0172.00\* 0174.00\* 0184.02\* 0185.02\* 0186.00\* 0205.00\*  
0206.00\* 0216.00\* 0220.01\* 0243.00\* 0262.00\* 0264.00\* 0266.00\* 0271.00\* 0274.00\* 0284.00\* 0285.00\*  
0288.00\* 0289.00\* 0317.00\* 0327.00\* 0337.00\* 0357.00\* 0367.00\* 0371.00\* 0373.00\* 0394.00\* 0398.00\*  
0404.00\* 0454.00\* 0475.00\* 0480.00\* 0499.00\* 0502.02\* 0512.00\* 0516.00\* 0517.00\* 0526.00\* 0528.00\*  
0531.00\* 0577.00\* 0601.00\* 0627.00\* 0711.00\* 0721.00\* 0743.00\* 0779.06\* 0779.07\* 0788.00\* 0792.00\*  
0803.02\* 0840.00\* 0947.00\* 0954.00\* 0998.01\* 1010.02\* 1139.00\* 1157.00\* 1159.00\* 1203.00\* 1347.00\*

1367.00\*

**Median Family Income 100-110%**

0006.00\* 0012.00\* 0028.00\* 0032.00\* 0036.00\* 0040.01\* 0059.00\* 0110.00\* 0111.00\* 0121.00\* 0128.00\*  
0130.00\* 0138.00\* 0140.00\* 0149.00\* 0158.02\* 0181.02\* 0182.00\* 0184.01\* 0185.01\* 0187.00\* 0192.00\*  
0194.00\* 0199.00\* 0232.00\* 0245.00\* 0257.00\* 0258.00\* 0282.00\* 0287.00\* 0320.00\* 0339.00\* 0384.00\*  
0450.00\* 0456.00\* 0484.00\* 0489.00\* 0493.01\* 0493.02\* 0504.00\* 0505.00\* 0513.00\* 0525.00\* 0539.00\*  
0552.00\* 0554.00\* 0556.00\* 0560.00\* 0566.00\* 0579.00\* 0595.00\* 0610.00\* 0613.01\* 0619.00\* 0621.00\*  
0629.00\* 0657.02\* 0683.00\* 0687.00\* 0745.00\* 0779.03\* 0779.04\* 0797.01\* 0838.00\* 0846.01\* 0846.02\*  
1085.00\* 1151.00\* 1175.00\* 1181.00\* 1189.00\* 1199.00\* 1241.00\* 1377.00\* 1385.01\* 1471.00\* 1571.02\*

**Median Family Income 110-120%**

0020.00\* 0026.00\* 0034.00\* 0086.00\* 0147.00\* 0150.00\* 0151.00\* 0188.00\* 0190.00\* 0220.02\* 0295.00\*  
0306.00\* 0309.04\* 0334.01\* 0366.00\* 0368.00\* 0376.00\* 0457.00\* 0495.00\* 0496.00\* 0502.01\* 0508.00\*  
0530.00\* 0538.00\* 0542.00\* 0548.00\* 0568.00\* 0580.00\* 0582.00\* 0590.00\* 0623.00\* 0625.00\* 0635.00\*  
0641.01\* 0656.00\* 0682.00\* 0690.00\* 0694.00\* 0695.00\* 0703.00\* 0747.00\* 0809.00\* 0884.00\* 0907.00\*  
0938.00\* 0939.00\* 0945.00\* 1008.01\* 1029.00\* 1099.00\* 1155.00\* 1207.00\* 1429.00\* 1447.00\* 1463.00\*  
1467.00\* 1551.01\* 1567.00\* 1621.00\*

**Median Family Income >= 120%**

0001.00\* 0007.00\* 0019.00\* 0045.00\* 0053.00\* 0058.00\* 0061.00\* 0062.01\* 0071.00\* 0075.00\* 0077.00\*  
0088.00\* 0096.00\* 0097.00\* 0117.00\* 0123.01\* 0136.00\* 0230.00\* 0255.00\* 0280.00\* 0294.00\* 0330.00\*

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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0352.00\* 0358.00\* 0400.00\* 0402.00\* 0424.00\* 0432.00\* 0434.00\* 0464.00\* 0472.00\* 0476.00\* 0478.00\*  
0482.00\* 0492.00\* 0506.00\* 0507.00\* 0510.00\* 0511.00\* 0515.00\* 0518.00\* 0520.00\* 0521.00\* 0522.00\*  
0524.00\* 0532.00\* 0534.01\* 0536.01\* 0558.00\* 0561.00\* 0562.00\* 0567.00\* 0592.00\* 0594.00\* 0596.00\*  
0598.00\* 0599.00\* 0600.00\* 0603.00\* 0606.00\* 0608.00\* 0612.00\* 0614.00\* 0616.01\* 0616.02\* 0618.00\*  
0620.00\* 0622.00\* 0626.00\* 0630.00\* 0632.00\* 0633.01\* 0633.02\* 0637.00\* 0638.00\* 0639.00\* 0645.00\*  
0646.00\* 0650.00\* 0654.00\* 0657.03\* 0659.00\* 0660.00\* 0661.00\* 0663.00\* 0664.00\* 0665.01\* 0667.01\*  
0669.00\* 0671.00\* 0677.00\* 0680.00\* 0697.01\* 0697.02\* 0707.00\* 0709.00\* 0713.03\* 0713.05\* 0713.06\*  
0717.01\* 0723.00\* 0729.00\* 0731.00\* 0737.00\* 0739.00\* 0741.00\* 0749.00\* 0757.01\* 0757.02\* 0769.01\*  
0769.02\* 0773.00\* 0775.00\* 0779.02\* 0779.05\* 0892.00\* 0916.01\* 0922.00\* 0928.00\* 0934.01\* 0934.02\*  
0973.00\* 0981.00\* 0987.00\* 0991.00\* 0997.01\* 0997.03\* 0997.04\* 0997.05\* 1017.00\* 1033.00\* 1039.00\*  
1059.00\* 1072.01\* 1093.00\* 1097.00\* 1113.00\* 1123.00\* 1129.00\* 1133.00\* 1141.00\* 1147.00\* 1195.00\*  
1223.00\* 1247.00\* 1265.00\* 1267.00\* 1277.00\* 1291.02\* 1291.03\* 1291.04\* 1301.00\* 1333.00\* 1339.00\*  
1341.00\* 1399.00\* 1403.00\* 1409.01\* 1409.02\* 1417.00\* 1435.00\* 1441.00\* 1451.01\* 1451.02\* 1459.00\*  
1479.00\* 1483.00\* 1507.01\* 1507.02\* 1529.01\* 1529.02\* 1551.02\* 1571.01\* 1579.01\* 1579.02\* 1579.03\*  
1617.00\*

**Median Family Income Not Known**

0037.00\* 0050.00\* 0099.00\* 0107.01\* 0171.00\* 0219.00\* 0229.00\* 0246.00\* 0299.00\* 0331.00\* 0383.01\*  
0383.02\* 0426.00\* 0607.01\* 0613.02\* 0624.00\* 0655.01\* 0716.00\* 0793.00\* 0916.02\* 0918.00\* 0999.00\*  
1072.02\* 1211.00\* 1283.00\* 1385.02\* 9901.00\*

**ASSESSMENT AREA - 0003**

**ALAMEDA COUNTY (001), CA**

**MSA: 36084**

**Median Family Income 10-20%**

4025.00\*

**Median Family Income 20-30%**

4018.00\* 4026.00\* 4060.00\* 4089.00\* 4105.00\*

**Median Family Income 30-40%**

4014.00\* 4022.00\* 4024.00\* 4029.00\* 4030.00\* 4033.00\* 4035.01\* 4053.02\* 4054.02\* 4059.01\* 4062.01\*  
4062.02\* 4070.00\* 4071.01\* 4072.00\* 4075.00\* 4084.00\* 4086.00\* 4088.00\* 4094.00\* 4095.00\* 4096.00\*

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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4103.00\* 4339.00\*

**Median Family Income 40-50%**

4007.00\* 4013.00\* 4016.00\* 4028.00\* 4054.01\* 4057.00\* 4058.00\* 4059.02\* 4061.00\* 4063.00\* 4065.00\*

4074.00\* 4087.00\* 4091.00\* 4093.00\* 4097.00\* 4204.00\* 4276.00\* 4356.01\* 4375.00\* 4377.01\* 4377.02\*

**Median Family Income 50-60%**

4010.00\* 4015.00\* 4017.00\* 4034.00\* 4037.01\* 4055.00\* 4066.02\* 4071.02\* 4073.00\* 4085.00\* 4090.00\*

4101.00\* 4102.00\* 4229.00\* 4240.01\* 4240.02\* 4305.00\* 4309.00\* 4331.03\* 4331.04\* 4332.00\* 4340.00\*

4351.04\* 4354.00\* 4356.02\* 4362.00\* 4365.00\* 4366.02\*

**Median Family Income 60-70%**

4031.00\* 4036.00\* 4053.01\* 4056.00\* 4064.00\* 4066.01\* 4076.00\* 4082.00\* 4092.00\* 4104.00\* 4227.00\*

4251.04\* 4312.00\* 4324.00\* 4326.00\* 4338.00\* 4353.00\* 4366.01\* 4368.00\* 4369.00\* 4376.00\* 4382.01\*

4403.07\* 4514.04\*

**Median Family Income 70-80%**

4008.00\* 4009.00\* 4011.00\* 4039.00\* 4052.00\* 4069.00\* 4224.00\* 4272.00\* 4280.00\* 4284.00\* 4285.00\*

4310.00\* 4311.00\* 4331.02\* 4336.00\* 4337.00\* 4355.00\* 4357.00\* 4358.00\* 4363.00\* 4371.02\* 4373.00\*

4374.00\* 4379.00\* 4380.00\* 4383.00\* 4402.00\* 4403.06\* 4403.31\* 4419.23\* 4425.00\* 4443.02\*

**Median Family Income 80-90%**

4048.00\* 4083.00\* 4098.00\* 4221.00\* 4228.00\* 4232.00\* 4235.00\* 4239.01\* 4251.01\* 4273.00\* 4322.00\*

4325.01\* 4325.02\* 4330.00\* 4333.00\* 4360.00\* 4361.00\* 4364.01\* 4367.00\* 4370.00\* 4372.00\* 4378.00\*

4382.04\* 4384.00\* 4401.00\* 4403.01\* 4403.36\* 4419.26\* 4423.01\* 4430.02\* 4444.00\*

**Median Family Income 90-100%**

4035.02\* 4077.00\* 4078.00\* 4205.00\* 4220.00\* 4233.00\* 4277.00\* 4286.00\* 4334.00\* 4359.00\* 4382.03\*

4403.08\* 4416.02\* 4423.02\* 4426.02\* 4442.00\* 4445.00\* 4446.01\* 4515.03\* 4515.06\*

**Median Family Income 100-110%**

4005.00\* 4040.00\* 4203.00\* 4234.00\* 4251.02\* 4251.03\* 4279.00\* 4308.00\* 4323.00\* 4327.00\* 4335.00\*

4352.00\* 4381.00\* 4403.04\* 4417.00\* 4419.27\* 4424.00\* 4428.00\* 4430.01\* 4443.01\* 4504.00\* 4512.01\*

4514.01\* 4516.02\*

**Median Family Income 110-120%**

4067.00\* 4068.00\* 4079.00\* 4202.00\* 4217.00\* 4222.00\* 4223.00\* 4231.00\* 4236.02\* 4278.00\* 4281.00\*

4283.01\* 4287.00\* 4303.00\* 4307.00\* 4321.00\* 4371.01\* 4403.05\* 4414.01\* 4415.22\* 4416.01\* 4418.00\*



**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

4419.21\* 4429.00\* 4441.00\* 4446.02\* 4502.00\* 4503.00\* 4506.07\* 4507.50\* 4517.01\* 4517.04\* 9832.00\*

**Median Family Income >= 120%**

4001.00\* 4002.00\* 4003.00\* 4004.00\* 4006.00\* 4012.00\* 4037.02\* 4038.00\* 4041.01\* 4041.02\* 4042.00\*

4043.00\* 4044.00\* 4045.01\* 4045.02\* 4046.00\* 4047.00\* 4049.00\* 4050.00\* 4051.00\* 4080.00\* 4081.00\*

4099.00\* 4100.00\* 4201.00\* 4206.00\* 4211.00\* 4212.00\* 4213.00\* 4214.00\* 4215.00\* 4216.00\* 4218.00\*

4219.00\* 4225.00\* 4226.00\* 4230.00\* 4236.01\* 4237.00\* 4238.00\* 4239.02\* 4261.00\* 4262.00\* 4271.00\*

4282.00\* 4283.02\* 4301.01\* 4301.02\* 4302.00\* 4304.00\* 4306.00\* 4328.00\* 4351.02\* 4351.03\* 4364.02\*

4403.32\* 4403.33\* 4403.34\* 4403.35\* 4411.00\* 4412.00\* 4413.01\* 4413.02\* 4414.02\* 4415.01\* 4415.03\*

4415.21\* 4415.23\* 4415.24\* 4419.24\* 4419.25\* 4420.00\* 4421.00\* 4422.00\* 4426.01\* 4427.00\* 4431.02\*

4431.03\* 4431.04\* 4431.05\* 4432.00\* 4433.01\* 4433.21\* 4433.22\* 4501.01\* 4501.02\* 4505.01\* 4505.02\*

4506.01\* 4506.02\* 4506.03\* 4506.04\* 4506.05\* 4506.06\* 4507.01\* 4507.41\* 4507.42\* 4507.43\* 4507.44\*

4507.45\* 4507.46\* 4507.51\* 4507.52\* 4511.01\* 4511.02\* 4512.02\* 4513.00\* 4514.03\* 4515.01\* 4515.04\*

4515.05\* 4516.01\* 4517.03\* 9820.00\*

**Median Family Income Not Known**

4027.00\* 9819.00\* 9900.00\*

**ASSESSMENT AREA - 0004**

**SAN FRANCISCO COUNTY (075), CA**

**MSA: 41884**

**Median Family Income 20-30%**

0107.00\* 0113.00\* 0118.00\* 0123.01\* 0124.01\* 0125.01\* 0125.02\* 0161.00\* 0179.02\* 0231.02\* 0231.03\*

0605.02\* 0611.00\* 9805.01\*

**Median Family Income 30-40%**

0106.00\* 0120.00\* 0122.02\* 0123.02\* 0201.00\* 0209.00\* 0228.02\* 0234.00\*

**Median Family Income 40-50%**

0117.00\* 0119.02\* 0158.01\* 0176.01\* 0202.00\* 0232.00\* 0264.01\* 0264.04\*

**Median Family Income 50-60%**

0121.00\* 0122.01\* 0159.00\* 0229.01\* 0230.01\* 0257.02\* 0263.01\* 0264.03\* 0612.00\*

**Median Family Income 60-70%**

0177.00\* 0178.02\* 0208.00\* 0228.03\* 0233.00\* 0258.00\* 0260.01\* 0260.03\* 0260.04\* 0261.00\* 0313.02\*

**2021 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

**Respondent ID: 0000024440**

**\* denotes no loans made in specified tracts**

**Agency: OCC - 1**

**Institution: IND & COMM BNK OF CHINA (USA)**

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0314.00\* 0332.03\* 0332.04\* 0604.00\*

**Median Family Income 70-80%**

0101.00\* 0155.00\* 0160.00\* 0254.03\* 0256.00\* 0257.01\* 0260.02\* 0262.00\* 0263.02\* 0263.03\* 0264.02\*

0312.01\* 0353.00\* 0452.00\* 0477.01\*

**Median Family Income 80-90%**

0103.00\* 0108.00\* 0156.00\* 0203.00\* 0204.02\* 0229.02\* 0229.03\* 0230.03\* 0312.02\* 0328.02\* 0329.01\*

0352.01\* 0352.02\* 0426.01\* 0478.01\* 0478.02\*

**Median Family Income 90-100%**

0111.00\* 0251.00\* 0313.01\* 0326.01\* 0326.02\* 0327.00\* 0330.00\* 0354.00\* 0426.02\* 0427.00\* 0451.00\*

0476.00\* 0477.02\* 0479.01\* 0479.02\* 0610.00\*

**Median Family Income 100-110%**

0104.00\* 0110.00\* 0112.00\* 0157.00\* 0164.00\* 0165.00\* 0254.01\* 0255.00\* 0259.00\* 0328.01\* 0329.02\*

0351.00\* 0401.00\*

**Median Family Income 110-120%**

0129.02\* 0153.00\* 0166.00\* 0210.00\* 0253.00\* 0301.01\* 0302.02\* 0311.00\* 0402.00\* 0614.00\*

**Median Family Income >= 120%**

0102.00\* 0105.00\* 0109.00 0119.01\* 0126.01\* 0126.02\* 0127.00\* 0128.00\* 0129.01\* 0130.00\* 0131.01\*

0131.02\* 0132.00\* 0133.00\* 0134.00\* 0135.00\* 0151.00\* 0152.00\* 0154.00\* 0158.02\* 0163.00\* 0167.00\*

0168.01\* 0169.00\* 0170.00\* 0171.01\* 0171.02\* 0180.00\* 0204.01\* 0205.00\* 0206.00\* 0207.00\* 0211.00\*

0212.00\* 0213.00\* 0214.00\* 0215.00\* 0216.00\* 0217.00\* 0218.00\* 0226.00\* 0227.02\* 0227.04\* 0228.01\*

0252.00\* 0254.02\* 0301.02\* 0302.01\* 0303.01\* 0303.02\* 0304.00\* 0305.00\* 0306.00\* 0307.00\* 0308.00\*

0309.00\* 0310.00\* 0331.00\* 0428.00\* 0601.00\* 0607.00\* 0615.00\* 9802.00\* 9809.00\*

**Median Family Income Not Known**

0124.02\* 0162.00\* 0168.02\* 0178.01\* 0332.01\* 9803.00\* 9804.01\* 9806.00\* 9901.00\*

**2021 Institution Disclosure Statement - Table E-1**

PAGE: 1 OF 1

**Error Status Information****Respondent ID: 0000024440****Institution: IND & COMM BNK OF CHINA (USA)****Agency: OCC - 1**

<b>Record Identifier: <sup>11</sup></b>	<b>Total Composite Records on File</b>	<b>Total Composite Records Without Errors</b>	<b>Total Validity<sup>10</sup> Errors</b>	<b>Percentage of Validity Errors</b>
Transmittal Sheet	1	1	0	0.00%
Small Business Loans	3	3	0	0.00%
Small Farm Loans	0	0	0	0.00%
Community Development Loans	1	1	0	0.00%
Consortium/Third Party Loans (Optional)	0	0	0	0.00%
Assessment Area	4,622	4,622	0	0.00%
Total	4,627	4,627	0	0.00%

**Footnote:**

10. A validity edit helps to verify the accuracy of the data reported. An institution's CRA submission that passes all validity edits does not ensure 100% accurate data. True accuracy is determined during the examination process.

11. A record represents one row of data reported to the Federal Reserve Board. This does not in any way represent the number of loans originated or purchased by the institution.

2022 Institution Disclosure Statement - Table 5  
Community Development/Consortium-Third Party Activity  
Institution: IND & COMM BNK OF CHINA (USA)

PAGE: 1 OF 1

Respondent ID: 0000024440  
Agency: OCC - 1

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Memo Item: Loans by Affiliates

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	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
Community Development Loans				
Originated	12	98,937	0	0
Purchased	0	0	0	0
Total	12	98,937	0	0
Consortium/Third Party Loans (optional)				

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

ASSESSMENT AREA - 0001

LOS ANGELES COUNTY (037), CA

MSA: 31084

Median Family Income 20-30%

2243.20\* 2244.20\* 2421.00\* 2426.00\*

Median Family Income 30-40%

1012.22\* 1200.20\* 1201.03\* 1902.01\* 1917.10\* 2051.20\* 2071.02\* 2089.02\* 2089.04\* 2091.03\* 2091.05\*

2092.02\* 2094.03\* 2095.10\* 2098.10\* 2100.10\* 2121.02\* 2214.01\* 2240.20\* 2260.01\* 2289.00\* 2311.00\*

2318.00\* 2362.05\* 2375.00\* 2422.02\* 2431.00\* 3022.01\* 5716.00\* 9104.05\*

Median Family Income 40-50%

1174.05\* 1174.07\* 1174.08\* 1175.10\* 1193.40\* 1200.30\* 1201.06\* 1201.08\* 1232.06\* 1275.20\* 1276.05\*

1282.10\* 1283.03\* 1912.03\* 1912.04\* 1916.20\* 1917.20\* 1919.01\* 1957.10\* 1991.20\* 1997.00\* 2035.00\*

2044.20\* 2060.10\* 2060.53\* 2060.54\* 2071.03\* 2083.01\* 2084.01\* 2087.20\* 2089.03\* 2091.04\* 2093.00\*

2094.01\* 2094.02\* 2095.20\* 2111.22\* 2113.20\* 2122.02\* 2122.04\* 2123.04\* 2123.05\* 2123.06\* 2131.00\*

2132.01\* 2133.20\* 2134.01\* 2200.00\* 2211.10\* 2213.02\* 2213.03\* 2215.00\* 2219.00\* 2240.10\* 2246.00\*

2264.10\* 2267.02\* 2284.20\* 2285.00\* 2287.10\* 2312.10\* 2317.10\* 2319.02\* 2349.01\* 2349.02\* 2362.04\*

2362.06\* 2377.20\* 2383.20\* 2392.01\* 2396.02\* 2397.01\* 2400.10\* 2409.02\* 2411.20\* 2420.00\* 2422.01\*

2423.00\* 2920.01\* 2941.20\* 2948.20\* 2962.10\* 2962.20\* 3107.01\* 4027.02\* 4328.01\* 4335.06\* 4338.04\*

4620.02\* 4823.04\* 5316.04\* 5326.06\* 5329.00\* 5330.02\* 5331.03\* 5331.05\* 5334.02\* 5342.02\* 5402.01\*

5406.00\* 5414.01\* 5542.04\* 5703.05\* 5706.03\* 5730.02\* 5733.00\* 5753.00\* 5758.01\* 5758.03\* 5763.02\*

5764.02\* 5764.03\* 5769.03\* 6002.02\* 6003.03\* 6003.04\* 6012.11\* 6015.01\* 6017.00\* 6025.10\* 6028.01\*

6037.06\* 9008.06\* 9105.01\* 9203.41\*

Median Family Income 50-60%

1042.03\* 1047.01\* 1047.04\* 1064.07\* 1175.20\* 1201.04\* 1201.05\* 1201.07\* 1221.22\* 1224.10\* 1235.20\*

1241.02\* 1242.04\* 1243.00\* 1253.22\* 1271.02\* 1272.20\* 1276.03\* 1279.10\* 1281.02\* 1282.20\* 1283.02\*

1343.05\* 1345.20\* 1347.10\* 1395.05\* 1838.20\* 1864.01\* 1901.02\* 1902.02\* 1905.20\* 1909.01\* 1911.20\*

1914.10\* 1916.10\* 1918.10\* 1926.10\* 1926.20\* 1977.00\* 1994.00\* 1998.01\* 1998.02\* 2031.00\* 2037.20\*

2038.00\* 2042.00\* 2048.10\* 2049.10\* 2051.10\* 2062.01\* 2080.02\* 2083.02\* 2085.02\* 2088.01\* 2091.06\*

2098.20\* 2112.02\* 2118.02\* 2118.04\* 2119.21\* 2119.22\* 2122.03\* 2124.10\* 2124.20\* 2132.02\* 2134.02\*

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

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2181.10*	2181.20*	2188.00*	2190.10*	2199.01*	2201.00*	2211.20*	2212.20*	2214.02*	2226.00*	2242.00*
2243.10*	2264.20*	2267.01*	2270.10*	2281.00*	2282.10*	2283.10*	2283.20*	2284.10*	2286.00*	2287.20*
2288.00*	2293.00*	2294.10*	2313.01*	2316.02*	2316.03*	2317.20*	2321.20*	2326.01*	2327.01*	2328.00*
2361.01*	2362.03*	2371.01*	2371.02*	2376.00*	2377.10*	2383.10*	2392.02*	2393.10*	2393.30*	2395.02*
2396.01*	2397.02*	2404.01*	2405.00*	2408.00*	2427.00*	2755.00*	2761.02*	2932.05*	2941.10*	2944.21*
2947.01*	2949.00*	2965.00*	2966.00*	2971.10*	3016.01*	3022.02*	3024.01*	3025.04*	3202.01*	4023.04*
4025.01*	4025.04*	4028.01*	4087.24*	4088.00*	4333.05*	4809.02*	4817.12*	4817.14*	4822.01*	4824.03*
5018.03*	5309.02*	5311.02*	5313.02*	5315.02*	5316.02*	5320.01*	5328.00*	5330.01*	5331.04*	5331.08*
5332.01*	5333.00*	5334.01*	5336.03*	5337.01*	5338.03*	5338.04*	5339.01*	5339.02*	5340.01*	5341.01*
5341.02*	5342.03*	5343.02*	5344.05*	5344.06*	5350.02*	5355.01*	5356.03*	5356.07*	5358.04*	5359.01*
5402.02*	5404.00*	5416.03*	5416.04*	5416.06*	5425.02*	5426.01*	5538.02*	5702.03*	5732.01*	5751.01*
5751.02*	5751.03*	5752.02*	5754.01*	5762.00*	5763.01*	5765.01*	5769.01*	6002.01*	6009.02*	6011.00*
6015.02*	6021.03*	6024.04*	6025.05*	9001.02*	9001.03*	9005.10*	9006.02*	9006.06*	9006.09*	9006.10*
9007.01*	9007.03*	9007.04*	9008.04*	9100.02*	9105.02*	9105.04*	9106.02*	9106.06*	9106.07*	9800.17*
Median Family Income 60-70%										
1012.21*	1041.05*	1041.08*	1044.04*	1046.10*	1047.03*	1095.00*	1114.02*	1132.38*	1132.39*	1134.25*
1153.02*	1172.01*	1175.30*	1193.20*	1193.41*	1200.10*	1218.01*	1219.00*	1221.20*	1221.21*	1222.00*
1230.10*	1232.03*	1232.05*	1233.04*	1235.10*	1239.01*	1241.03*	1241.04*	1249.02*	1271.03*	1271.04*
1276.04*	1277.12*	1278.05*	1278.06*	1281.01*	1310.21*	1310.22*	1318.01*	1323.01*	1325.02*	1343.06*
1345.21*	1345.22*	1903.03*	1904.01*	1905.10*	1912.01*	1913.02*	1925.20*	1927.00*	1956.00*	1990.01*
1992.01*	2012.00*	2014.02*	2015.03*	2032.00*	2033.00*	2036.01*	2036.02*	2044.10*	2046.00*	2048.20*
2060.50*	2086.10*	2086.20*	2088.02*	2111.24*	2112.01*	2113.10*	2117.03*	2119.10*	2123.03*	2125.01*
2125.02*	2126.20*	2182.10*	2187.02*	2190.20*	2193.00*	2198.00*	2212.10*	2213.04*	2216.01*	2216.02*
2217.10*	2218.20*	2220.02*	2221.00*	2222.00*	2244.10*	2270.20*	2282.20*	2294.20*	2312.20*	2321.10*
2324.01*	2324.02*	2327.02*	2340.02*	2372.01*	2372.02*	2382.00*	2393.20*	2395.01*	2398.02*	2400.20*
2402.00*	2404.02*	2406.00*	2407.00*	2410.01*	2412.01*	2412.02*	2413.00*	2414.00*	2430.01*	2673.00*
2696.02*	2772.00*	2774.00*	2912.10*	2932.03*	2932.06*	2933.07*	2944.10*	2945.20*	2946.20*	2948.10*
2948.30*	2969.01*	3015.02*	3020.02*	3021.04*	3023.02*	3025.03*	3025.05*	4023.03*	4024.05*	4025.03*
4026.01*	4028.03*	4028.04*	4043.01*	4050.02*	4062.01*	4077.01*	4090.00*	4328.02*	4333.02*	4333.04*

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

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4333.06*	4334.03*	4335.05*	4336.02*	4339.01*	4340.01*	4809.03*	4814.03*	4817.11*	4822.02*	4823.03*
4824.01*	5018.04*	5301.01*	5303.02*	5304.00*	5308.01*	5309.01*	5310.00*	5312.01*	5312.02*	5313.01*
5317.01*	5319.01*	5321.01*	5323.02*	5326.07*	5327.00*	5335.01*	5335.04*	5336.02*	5337.02*	5340.02*
5342.01*	5343.01*	5344.03*	5344.04*	5345.01*	5348.02*	5348.03*	5348.04*	5350.01*	5351.01*	5351.02*
5352.00*	5355.02*	5355.03*	5356.04*	5356.05*	5357.01*	5358.03*	5360.00*	5402.03*	5405.02*	5415.00*
5416.05*	5418.01*	5418.02*	5421.03*	5421.05*	5421.06*	5432.03*	5505.01*	5522.00*	5535.03*	5536.01*
5537.02*	5539.02*	5541.05*	5543.02*	5544.03*	5703.04*	5703.06*	5704.03*	5705.03*	5705.04*	5717.04*
5725.00*	5726.00*	5730.04*	5732.02*	5752.01*	5754.02*	5758.02*	5759.01*	5764.01*	5780.00*	6001.00*
6006.02*	6013.03*	6014.01*	6016.00*	6018.01*	6020.03*	6025.04*	6025.06*	6025.07*	6030.08*	6039.02*
9001.04*	9005.05*	9005.09*	9008.08*	9010.10*	9013.00*	9104.04*	9106.05*	9111.00*	9200.38*	9203.43*
9800.35*										
Median Family Income 70-80%										
1012.20*	1042.04*	1043.21*	1048.21*	1048.22*	1064.08*	1154.03*	1204.00*	1224.20*	1230.20*	1231.03*
1232.04*	1233.03*	1234.10*	1234.20*	1236.02*	1241.05*	1242.03*	1272.10*	1278.03*	1278.04*	1279.20*
1321.01*	1349.06*	1393.02*	1393.03*	1395.04*	1835.20*	1838.10*	1853.20*	1863.01*	1864.04*	1899.04*
1904.02*	1909.02*	1910.00*	1911.10*	1925.10*	1957.20*	1992.02*	1999.00*	2014.01*	2015.04*	2016.01*
2016.02*	2037.10*	2041.20*	2043.00*	2049.20*	2071.01*	2084.02*	2114.10*	2117.04*	2118.03*	2126.10*
2129.00*	2133.10*	2145.05*	2184.00*	2187.01*	2189.00*	2197.00*	2225.00*	2260.02*	2291.00*	2313.02*
2314.00*	2322.00*	2325.00*	2326.02*	2345.02*	2348.00*	2352.02*	2374.01*	2378.00*	2398.01*	2411.10*
2430.02*	2696.01*	2702.00*	2943.02*	2945.10*	2969.02*	2972.01*	3018.01*	3019.02*	3020.03*	3021.03*
3025.06*	3105.01*	4024.06*	4029.03*	4029.04*	4030.00*	4037.22*	4041.00*	4045.01*	4047.03*	4049.03*
4051.01*	4051.02*	4052.01*	4072.02*	4076.01*	4324.01*	4324.02*	4327.00*	4329.01*	4332.00*	4339.03*
4340.03*	4341.00*	4615.02*	4619.01*	4622.01*	4623.01*	4803.04*	4811.02*	4814.01*	4816.03*	4816.04*
4823.01*	5004.02*	5014.00*	5015.04*	5042.00*	5302.03*	5303.01*	5305.00*	5311.01*	5315.03*	5315.04*
5316.03*	5318.00*	5320.02*	5322.00*	5323.03*	5325.00*	5332.04*	5334.03*	5336.01*	5337.03*	5338.05*
5338.06*	5349.00*	5354.00*	5356.06*	5357.02*	5358.02*	5361.04*	5407.00*	5411.00*	5422.00*	5424.01*
5428.00*	5429.00*	5511.01*	5511.02*	5512.01*	5526.02*	5529.00*	5536.02*	5537.01*	5538.01*	5541.01*
5551.06*	5552.11*	5702.02*	5703.03*	5704.04*	5706.01*	5717.01*	5717.03*	5723.01*	5731.01*	5734.01*
5765.03*	5769.04*	6008.02*	6009.12*	6010.02*	6012.12*	6013.02*	6019.00*	6020.02*	6021.04*	6021.05*

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

6024.03*	6025.11*	6025.13*	6029.00*	6030.05*	6038.01*	6041.01*	9003.01*	9005.04*	9006.07*	9006.08*
9007.05*	9008.07*	9106.01*	9106.08*	9107.07*	9107.14*	9107.15*	9200.47*	9200.50*	9203.42*	9800.16*
Median Family Income 80-90%										
1021.03*	1043.22*	1044.01*	1044.03*	1045.00*	1061.14*	1064.05*	1065.20*	1066.04*	1066.48*	1096.03*
1113.04*	1152.04*	1154.01*	1154.04*	1193.10*	1193.42*	1198.02*	1210.20*	1211.01*	1211.02*	1212.22*
1242.01*	1253.21*	1254.04*	1276.06*	1277.11*	1286.01*	1310.23*	1317.02*	1325.01*	1331.01*	1331.02*
1340.01*	1340.02*	1341.01*	1341.04*	1833.00*	1834.01*	1837.01*	1852.03*	1864.03*	1871.02*	1881.00*
1892.01*	1898.02*	1907.01*	1908.02*	1913.01*	1915.00*	1924.20*	1958.02*	1959.01*	1959.03*	1972.00*
1974.20*	1976.00*	1991.10*	2015.01*	2017.00*	2039.00*	2041.10*	2047.00*	2085.01*	2087.10*	2111.21*
2114.20*	2121.01*	2127.01*	2172.00*	2185.00*	2186.00*	2199.02*	2292.00*	2316.01*	2347.00*	2361.02*
2379.00*	2381.00*	2409.01*	2410.02*	2675.03*	2676.00*	2699.03*	2751.02*	2911.10*	2912.20*	2946.10*
2976.01*	3012.03*	3017.02*	3018.02*	3023.01*	3107.04*	3118.01*	3203.00*	4017.07*	4020.02*	4023.01*
4042.01*	4042.03*	4045.04*	4047.02*	4048.04*	4048.05*	4048.06*	4071.01*	4073.02*	4075.01*	4081.39*
4081.40*	4082.13*	4086.28*	4087.05*	4301.01*	4309.01*	4310.02*	4311.00*	4323.00*	4326.01*	4326.02*
4331.03*	4336.01*	4340.04*	4620.01*	4803.03*	4808.04*	4809.01*	4810.02*	4811.03*	4812.03*	4813.00*
4816.06*	4825.02*	4825.21*	4825.22*	5005.00*	5007.00*	5015.03*	5020.03*	5020.05*	5023.03*	5024.01*
5025.00*	5026.02*	5031.04*	5031.05*	5041.01*	5300.06*	5301.02*	5306.03*	5307.00*	5308.02*	5317.02*
5323.04*	5326.05*	5347.00*	5353.00*	5361.02*	5362.02*	5400.00*	5401.02*	5405.01*	5409.01*	5410.03*
5414.02*	5417.00*	5424.02*	5425.01*	5426.02*	5427.00*	5431.00*	5432.01*	5439.05*	5440.01*	5509.01*
5513.00*	5514.01*	5521.00*	5524.00*	5535.02*	5535.04*	5540.02*	5542.03*	5544.04*	5544.05*	5549.00*
5552.12*	5702.04*	5704.02*	5705.02*	5706.02*	5715.02*	5727.00*	5765.02*	5777.00*	6003.02*	6009.11*
6018.02*	6031.01*	6033.01*	6037.05*	6039.01*	6040.01*	6042.00*	6099.00*	6506.04*	7018.02*	9005.01*
9005.06*	9005.08*	9006.11*	9012.09*	9107.06*	9107.13*	9107.18*	9107.19*	9107.20*	9107.21*	9110.01*
Median Family Income 90-100%										
1031.02*	1041.24*	1042.01*	1046.20*	1048.24*	1070.20*	1133.23*	1134.26*	1152.03*	1199.00*	1203.00*
1216.00*	1233.01*	1253.10*	1274.00*	1313.00*	1323.02*	1327.00*	1341.03*	1395.06*	1433.01*	1832.20*
1834.02*	1836.20*	1852.02*	1853.10*	1872.00*	1899.05*	1899.06*	1899.07*	1903.02*	1914.20*	1918.20*
1958.03*	1975.00*	2011.20*	2013.01*	2128.00*	2164.02*	2182.20*	2220.01*	2323.00*	2343.02*	2352.01*
2374.02*	2380.00*	2722.01*	2722.02*	2766.05*	2766.06*	2911.20*	2911.30*	2942.00*	2971.20*	2972.02*





2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

Median Family Income 110-120%

1021.05*	1064.03*	1091.00*	1096.04*	1112.05*	1133.03*	1134.23*	1173.03*	1190.03*	1190.04*	1192.01*
1192.02*	1210.10*	1212.10*	1212.21*	1238.00*	1251.01*	1252.00*	1284.00*	1349.01*	1349.04*	1392.00*
1814.00*	1831.03*	1851.01*	1871.01*	1895.02*	1898.01*	1899.03*	1920.01*	2115.00*	2117.01*	2195.00*
2343.01*	2345.01*	2384.00*	2652.03*	2701.01*	2718.04*	2719.02*	2932.04*	2933.01*	2933.02*	2975.02*
3102.02*	4006.03*	4012.03*	4013.11*	4015.00*	4026.02*	4033.18*	4033.23*	4033.28*	4036.01*	4039.01*
4040.00*	4046.00*	4054.00*	4058.00*	4067.02*	4074.00*	4075.02*	4078.02*	4080.04*	4081.33*	4085.04*
4086.26*	4307.24*	4308.01*	4308.03*	4309.02*	4315.02*	4320.02*	4616.00*	4621.00*	4800.12*	4801.01*
4803.02*	4806.01*	4821.02*	4827.01*	4828.01*	5004.03*	5004.04*	5028.01*	5032.02*	5037.02*	5038.01*
5412.00*	5436.01*	5436.03*	5436.06*	5437.05*	5438.04*	5439.03*	5506.02*	5510.01*	5515.02*	5518.01*
5520.01*	5530.00*	5542.01*	5545.21*	5548.02*	5550.02*	5551.07*	5553.00*	5712.02*	5722.02*	5749.02*
5766.01*	5766.02*	5779.00*	6005.01*	6006.01*	6007.03*	6022.02*	6024.02*	6027.00*	6032.00*	6034.00*
6035.00*	6041.02*	6506.03*	6506.06*	6511.02*	6700.01*	7004.00*	7028.02*	9010.11*	9011.02*	9012.14*
9102.17*	9103.02*	9107.17*	9200.29*	9200.31*	9200.48*	9201.06*	9203.40*			

Median Family Income >= 120%

1011.22*	1013.00*	1014.00*	1021.04*	1031.01*	1032.01*	1032.02*	1033.00*	1034.01*	1034.02*	1041.03*
1060.10*	1061.11*	1061.12*	1061.13*	1064.06*	1065.10*	1066.03*	1066.41*	1066.42*	1066.43*	1066.45*
1066.46*	1066.49*	1081.01*	1081.02*	1081.03*	1081.04*	1082.02*	1082.03*	1082.04*	1092.00*	1093.00*
1094.00*	1096.01*	1097.00*	1098.00*	1111.00*	1112.01*	1112.02*	1112.04*	1112.06*	1113.03*	1114.01*
1131.01*	1131.02*	1132.11*	1132.12*	1132.13*	1132.31*	1132.32*	1132.35*	1132.37*	1133.01*	1133.22*
1134.24*	1134.28*	1151.01*	1151.04*	1153.01*	1171.01*	1172.02*	1173.01*	1173.02*	1174.04*	1197.00*
1198.01*	1240.00*	1244.00*	1245.00*	1247.00*	1251.02*	1254.02*	1254.03*	1255.01*	1255.02*	1256.00*
1285.00*	1286.02*	1287.03*	1287.04*	1288.02*	1289.10*	1310.24*	1311.00*	1312.00*	1319.00*	1320.01*
1343.02*	1343.03*	1343.04*	1344.21*	1344.22*	1344.23*	1344.24*	1348.01*	1349.05*	1349.07*	1351.02*
1351.11*	1351.13*	1352.01*	1352.02*	1352.04*	1352.05*	1370.00*	1371.04*	1372.02*	1372.03*	1373.01*
1373.02*	1374.01*	1374.02*	1375.01*	1375.02*	1375.04*	1380.00*	1390.01*	1393.01*	1394.02*	1395.02*
1396.00*	1397.01*	1397.03*	1397.04*	1397.05*	1398.01*	1398.02*	1411.02*	1412.01*	1412.02*	1413.04*
1413.05*	1413.06*	1414.00*	1415.00*	1416.00*	1417.00*	1431.01*	1431.02*	1432.00*	1433.02*	1434.01*
1434.02*	1435.00*	1436.02*	1436.03*	1436.05*	1436.06*	1437.00*	1438.01*	1438.02*	1439.01*	1439.02*

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

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1810.00*	1813.00*	1815.00*	1816.00*	1831.04*	1832.21*	1832.22*	1837.02*	1851.02*	1852.04*	1861.00*
1862.01*	1862.02*	1862.03*	1863.02*	1873.00*	1882.01*	1882.02*	1883.00*	1891.01*	1891.02*	1892.02*
1893.00*	1894.00*	1895.01*	1896.00*	1897.03*	1897.04*	1901.01*	1920.02*	1923.00*	1924.10*	1941.01*
1941.02*	1942.00*	1943.00*	1944.01*	1944.02*	1945.00*	1951.00*	1952.01*	1952.02*	1954.00*	1955.00*
1959.02*	1973.00*	1974.10*	1993.00*	2013.02*	2060.51*	2060.52*	2073.04*	2073.05*	2074.00*	2075.01*
2077.11*	2079.01*	2079.02*	2092.01*	2110.00*	2127.02*	2140.00*	2141.00*	2144.00*	2145.01*	2145.03*
2145.04*	2146.00*	2147.00*	2148.00*	2149.02*	2149.03*	2149.04*	2151.02*	2161.00*	2162.01*	2162.02*
2163.01*	2163.02*	2167.00*	2168.00*	2169.01*	2169.02*	2170.01*	2170.02*	2171.02*	2247.01*	2340.01*
2342.00*	2351.00*	2360.01*	2364.00*	2611.02*	2611.03*	2611.04*	2612.00*	2621.00*	2622.00*	2623.01*
2623.02*	2623.03*	2624.00*	2625.01*	2626.01*	2626.04*	2627.04*	2627.06*	2628.02*	2640.00*	2641.02*
2641.03*	2643.03*	2643.04*	2643.05*	2643.06*	2651.00*	2652.01*	2653.07*	2654.10*	2654.20*	2655.22*
2655.23*	2655.24*	2656.01*	2656.02*	2657.01*	2657.02*	2671.01*	2671.02*	2672.01*	2672.02*	2674.04*
2674.05*	2674.06*	2675.04*	2677.00*	2678.00*	2679.01*	2679.02*	2690.00*	2691.00*	2693.00*	2695.00*
2697.00*	2698.00*	2699.05*	2699.06*	2699.07*	2699.08*	2703.00*	2711.00*	2712.00*	2713.00*	2714.00*
2715.00*	2716.00*	2717.03*	2717.04*	2719.01*	2721.00*	2723.01*	2731.00*	2732.00*	2734.03*	2735.02*
2736.00*	2737.00*	2738.00*	2739.02*	2741.00*	2742.02*	2751.01*	2752.00*	2753.11*	2753.12*	2754.00*
2756.03*	2756.04*	2756.05*	2760.00*	2761.01*	2764.00*	2765.00*	2766.01*	2766.07*	2766.08*	2770.00*
2771.00*	2780.01*	2781.02*	2913.00*	2920.02*	2933.06*	2951.03*	2963.00*	2964.01*	2964.02*	2970.01*
2970.02*	2973.00*	2974.00*	2975.01*	2976.02*	3001.00*	3002.00*	3003.01*	3004.00*	3005.01*	3005.03*
3006.01*	3006.02*	3007.01*	3007.02*	3008.00*	3009.01*	3009.02*	3010.00*	3011.00*	3012.04*	3012.05*
3013.00*	3014.00*	3015.01*	3021.02*	3101.00*	3102.01*	3103.00*	3104.00*	3106.02*	3108.00*	3109.00*
3110.00*	3111.00*	3113.00*	3114.00*	3115.00*	3116.02*	3117.00*	4002.05*	4002.06*	4002.07*	4002.08*
4002.09*	4003.04*	4004.02*	4004.03*	4004.04*	4005.01*	4006.05*	4008.01*	4010.01*	4010.02*	4012.01*
4012.02*	4013.03*	4013.04*	4013.12*	4016.01*	4016.02*	4017.05*	4018.01*	4018.02*	4019.01*	4019.02*
4020.01*	4033.05*	4033.16*	4033.17*	4033.19*	4033.20*	4033.21*	4033.24*	4033.25*	4033.27*	4034.01*
4034.02*	4034.03*	4034.04*	4034.07*	4034.08*	4034.09*	4035.00*	4037.02*	4037.03*	4039.02*	4056.00*
4057.01*	4061.01*	4063.00*	4064.13*	4065.00*	4066.01*	4067.01*	4068.01*	4078.01*	4079.01*	4080.03*
4080.05*	4081.34*	4081.36*	4083.02*	4083.03*	4084.02*	4085.03*	4085.05*	4086.24*	4086.25*	4086.27*
4086.29*	4087.03*	4087.07*	4087.22*	4089.00*	4300.03*	4300.04*	4300.05*	4302.00*	4303.01*	4303.02*

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

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4304.00*	4305.01*	4305.02*	4306.00*	4307.01*	4307.21*	4308.02*	4310.03*	4312.00*	4313.00*	4314.00*
4316.00*	4317.01*	4318.00*	4320.01*	4321.01*	4321.02*	4600.01*	4600.02*	4601.01*	4602.00*	4603.01*
4604.01*	4605.01*	4605.02*	4606.01*	4607.00*	4608.00*	4610.00*	4611.00*	4612.00*	4613.00*	4614.00*
4617.00*	4624.00*	4625.00*	4626.00*	4627.00*	4629.00*	4630.00*	4631.03*	4632.00*	4633.00*	4634.00*
4635.00*	4636.01*	4636.02*	4637.00*	4638.00*	4639.00*	4640.00*	4641.01*	4641.02*	4642.00*	4800.02*
4800.11*	4801.02*	4802.01*	4802.02*	4804.00*	4805.00*	4806.02*	4807.02*	4807.03*	4807.04*	4808.03*
4818.00*	4819.01*	4820.01*	4827.02*	5001.00*	5002.02*	5002.03*	5002.04*	5003.00*	5010.02*	5012.00*
5015.01*	5017.00*	5026.03*	5026.04*	5029.01*	5032.01*	5033.01*	5034.01*	5034.02*	5035.02*	5036.01*
5036.02*	5037.04*	5037.05*	5038.02*	5039.01*	5039.02*	5040.01*	5040.02*	5300.05*	5433.04*	5433.21*
5433.22*	5434.00*	5435.02*	5436.05*	5436.07*	5437.01*	5437.03*	5437.04*	5501.01*	5505.02*	5507.00*
5510.02*	5532.01*	5532.02*	5545.11*	5545.12*	5545.13*	5545.14*	5545.15*	5545.16*	5545.17*	5545.18*
5545.19*	5545.22*	5552.02*	5700.01*	5700.02*	5700.03*	5707.01*	5707.03*	5708.00*	5709.01*	5709.02*
5710.00*	5711.01*	5711.02*	5712.01*	5713.00*	5714.00*	5718.00*	5719.00*	5720.01*	5734.02*	5734.03*
5736.01*	5737.00*	5738.00*	5739.02*	5740.00*	5741.00*	5742.01*	5742.02*	5743.00*	5744.00*	5745.00*
5746.02*	5748.00*	5749.01*	5760.01*	5767.00*	5771.00*	5772.00*	5773.00*	5774.00*	5775.01*	5775.04*
5776.02*	5776.04*	5776.05*	5776.06*	5778.00*	5990.00*	6007.02*	6008.01*	6010.01*	6022.01*	6023.01*
6023.02*	6037.02*	6037.03*	6200.01*	6200.02*	6201.01*	6201.02*	6202.01*	6203.01*	6203.03*	6203.05*
6204.00*	6205.01*	6205.21*	6205.22*	6206.01*	6206.02*	6207.01*	6207.03*	6207.04*	6208.01*	6208.02*
6209.01*	6209.04*	6210.01*	6210.05*	6211.02*	6211.04*	6212.01*	6212.04*	6213.01*	6213.24*	6213.26*
6214.00*	6500.01*	6500.04*	6501.01*	6501.02*	6502.00*	6503.00*	6504.01*	6505.01*	6505.02*	6506.05*
6506.07*	6507.01*	6507.02*	6508.01*	6508.02*	6509.01*	6509.03*	6509.04*	6510.01*	6510.02*	6511.01*
6512.01*	6512.21*	6512.22*	6513.02*	6513.04*	6514.01*	6514.02*	6700.02*	6700.03*	6701.01*	6702.01*
6702.02*	6703.24*	6703.26*	6703.28*	6704.05*	6704.06*	6704.07*	6704.13*	6704.16*	6704.17*	6704.18*
6705.00*	6706.03*	6706.04*	6707.01*	6707.02*	7001.01*	7003.00*	7005.01*	7005.02*	7006.00*	7007.00*
7008.01*	7008.02*	7009.01*	7009.02*	7010.00*	7012.01*	7012.02*	7013.02*	7013.04*	7014.02*	7015.01*
7015.02*	7016.01*	7016.02*	7019.02*	7020.02*	7021.02*	7022.01*	7022.02*	7023.00*	7024.00*	7025.01*
7025.02*	7026.00*	7027.00*	7028.01*	7028.03*	7029.00*	7030.02*	7030.03*	7031.00*	7032.00*	8001.01*
8001.03*	8001.04*	8002.02*	8002.04*	8002.05*	8002.06*	8003.24*	8003.25*	8003.28*	8003.33*	8003.34*
8003.35*	8003.36*	8003.37*	8003.38*	8004.06*	8004.10*	8004.11*	8004.12*	8005.04*	8005.06*	9010.12*

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

9010.13\* 9010.14\* 9012.15\* 9012.16\* 9012.17\* 9012.18\* 9102.10\* 9102.11\* 9102.12\* 9102.13\* 9102.14\*  
 9102.16\* 9103.01\* 9108.04\* 9108.07\* 9108.08\* 9108.09\* 9108.10\* 9108.14\* 9108.15\* 9200.13\* 9200.15\*  
 9200.16\* 9200.17\* 9200.18\* 9200.20\* 9200.28\* 9200.30\* 9200.34\* 9200.39\* 9200.40\* 9200.42\* 9200.43\*  
 9200.44\* 9200.45\* 9200.49\* 9201.02\* 9201.04\* 9201.09\* 9201.10\* 9201.11\* 9201.12\* 9201.14\* 9201.15\*  
 9201.16\* 9201.18\* 9201.19\* 9201.20\* 9201.21\* 9203.03\* 9203.12\* 9203.13\* 9203.14\* 9203.26\* 9203.28\*  
 9203.29\* 9203.30\* 9203.31\* 9203.32\* 9203.34\* 9203.38\* 9203.39\* 9304.00\* 9800.19\* 9800.24\*

Median Family Income Not Known

1134.27\* 1151.03\* 1351.16\* 1897.02\* 1907.02\* 1908.01\* 1919.02\* 1958.04\* 2062.02\* 2063.01\* 2063.02\*  
 2063.03\* 2073.03\* 2073.06\* 2073.07\* 2073.08\* 2075.02\* 2077.12\* 2080.01\* 2151.01\* 2164.01\* 2171.01\*  
 2218.10\* 2227.00\* 2247.02\* 2319.01\* 2403.01\* 2403.02\* 2652.04\* 2653.01\* 2653.03\* 2653.04\* 2653.06\*  
 2733.00\* 2734.04\* 2753.13\* 3107.05\* 4024.04\* 5781.00\* 5991.00\* 7001.02\* 7002.00\* 7017.02\* 9010.03\*  
 9202.00\* 9800.01\* 9800.02\* 9800.03\* 9800.04\* 9800.05\* 9800.06\* 9800.07\* 9800.08\* 9800.09\* 9800.10\*  
 9800.11\* 9800.12\* 9800.13\* 9800.14\* 9800.15\* 9800.18\* 9800.20\* 9800.21\* 9800.22\* 9800.23\* 9800.26\*  
 9800.28\* 9800.30\* 9800.31\* 9800.33\* 9800.34\* 9800.37\* 9800.38\* 9800.39\* 9901.00\* 9902.00\* 9903.00\*

ASSESSMENT AREA - 0002

KINGS COUNTY (047), NY

MSA: 35614

Median Family Income 10-20%

1210.00\*

Median Family Income 20-30%

0023.00\* 0085.00\* 0255.00\* 0259.02\* 0382.00\* 0449.01\* 0531.01\* 0539.00\* 0908.00\* 0982.00\* 1156.00\*

1214.00\*

Median Family Income 30-40%

0029.01\* 0092.02\* 0104.02\* 0220.00\* 0234.00\* 0236.00\* 0281.00\* 0326.00\* 0330.00\* 0340.00\* 0342.00\*  
 0347.00\* 0349.01\* 0453.00\* 0489.00\* 0493.01\* 0509.00\* 0529.00\* 0533.00\* 0535.00\* 0545.00\* 0572.00\*  
 0906.00\* 0910.00\* 0944.02\* 1034.01\* 1058.01\* 1106.00\* 1110.00\* 1178.00\* 1208.02\*

Median Family Income 40-50%

0072.00\* 0108.02\* 0116.00\* 0122.00\* 0128.01\* 0185.01\* 0210.00\* 0212.00\* 0216.00\* 0222.00\* 0230.00\*  
 0238.00\* 0240.00\* 0283.00\* 0293.00\* 0307.00\* 0328.00\* 0351.01\* 0353.01\* 0356.01\* 0357.01\* 0359.00\*

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

0360.02\* 0361.00\* 0363.00\* 0417.00\* 0427.00\* 0429.00\* 0433.00\* 0447.00\* 0491.00\* 0493.02\* 0505.00\*  
 0511.00\* 0525.00\* 0537.00\* 0563.02\* 0610.03\* 0886.00\* 0894.00\* 0900.00\* 0912.00\* 0920.00\* 1058.04\*  
 1198.00\* 1202.00\* 1237.00\*

Median Family Income 50-60%

0022.00\* 0074.00\* 0084.00\* 0090.02\* 0094.01\* 0096.00\* 0098.00\* 0104.01\* 0106.01\* 0108.01\* 0112.00\*  
 0114.00\* 0120.00\* 0228.00\* 0232.00\* 0235.00\* 0244.00\* 0247.00\* 0254.00\* 0258.00\* 0266.00\* 0270.00\*  
 0285.02\* 0287.00\* 0292.00\* 0298.00\* 0299.00\* 0303.00\* 0348.00\* 0360.01\* 0369.00\* 0379.00\* 0381.00\*  
 0409.00\* 0419.00\* 0425.00\* 0430.00\* 0431.00\* 0441.00\* 0480.00\* 0507.00\* 0510.02\* 0531.02\* 0547.00\*  
 0556.00\* 0610.04\* 0788.01\* 0820.00\* 0870.00\* 0888.00\* 0916.00\* 0918.00\* 0924.00\* 1070.01\* 1098.00\*  
 1122.00\* 1134.00\* 1168.00\* 1172.02\* 1174.00\* 1194.00\* 1196.00\* 1200.00\* 1220.00\*

Median Family Income 60-70%

0020.00\* 0071.00\* 0076.00\* 0100.00\* 0102.00\* 0106.02\* 0118.00\* 0126.00\* 0190.00\* 0192.00\* 0196.00\*  
 0214.00\* 0224.00\* 0250.00\* 0259.01\* 0260.00\* 0268.00\* 0276.00\* 0285.01\* 0286.00\* 0290.00\* 0294.00\*  
 0296.00\* 0301.00\* 0304.00\* 0306.00\* 0315.00\* 0325.00\* 0329.00\* 0333.00\* 0345.00\* 0351.02\* 0364.00\*  
 0365.01\* 0373.00\* 0391.00\* 0393.00\* 0394.00\* 0400.00\* 0401.00\* 0403.00\* 0411.00\* 0434.00\* 0435.00\*  
 0437.00\* 0474.00\* 0484.00\* 0486.00\* 0490.00\* 0506.00\* 0510.01\* 0527.00\* 0530.00\* 0534.00\* 0542.00\*  
 0590.00\* 0768.00\* 0788.02\* 0790.02\* 0794.00\* 0810.00\* 0862.00\* 0868.00\* 0872.00\* 0884.00\* 0890.00\*  
 0896.00\* 0902.00\* 0922.00\* 0932.00\* 1120.00\* 1124.00\* 1150.00\* 1152.00\* 1160.00\* 1176.02\* 1182.02\*  
 1184.00\* 1188.00\*

Median Family Income 70-80%

0015.01\* 0094.02\* 0140.00\* 0184.00\* 0194.00\* 0198.00\* 0213.00\* 0218.00\* 0226.00\* 0233.00\* 0241.00\*  
 0242.00\* 0246.00\* 0248.00\* 0251.00\* 0252.00\* 0256.00\* 0261.00\* 0264.00\* 0273.00\* 0277.00\* 0284.00\*  
 0295.00\* 0300.00\* 0321.00\* 0327.00\* 0337.01\* 0339.00\* 0341.00\* 0350.00\* 0356.02\* 0362.00\* 0365.02\*  
 0366.00\* 0367.00\* 0392.00\* 0397.00\* 0405.00\* 0406.00\* 0414.01\* 0416.00\* 0422.00\* 0423.00\* 0438.00\*  
 0439.00\* 0444.00\* 0446.00\* 0448.00\* 0462.01\* 0464.00\* 0470.00\* 0472.00\* 0482.00\* 0485.00\* 0492.00\*  
 0496.00\* 0508.01\* 0508.03\* 0512.00\* 0516.01\* 0518.00\* 0546.00\* 0554.00\* 0592.00\* 0738.00\* 0742.00\*  
 0758.00\* 0762.00\* 0792.02\* 0802.00\* 0804.00\* 0806.00\* 0816.00\* 0824.00\* 0826.00\* 0854.00\* 0876.00\*  
 0878.00\* 0882.00\* 0966.00\* 1104.00\* 1126.00\* 1128.00\* 1130.00\* 1132.00\* 1144.00\* 1146.00\* 1158.00\*  
 1162.00\* 1164.00\* 1166.00\* 1176.01\*

Median Family Income 80-90%

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

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0054.00*	0058.00*	0068.00*	0078.00*	0088.00*	0090.01*	0110.00*	0138.00*	0142.00*	0178.00*	0182.00*
0186.00*	0208.00*	0217.00*	0253.00*	0263.00*	0272.00*	0274.00*	0282.00*	0308.00*	0311.00*	0331.00*
0337.02*	0349.02*	0353.02*	0354.00*	0355.00*	0374.01*	0374.02*	0375.00*	0377.00*	0387.00*	0395.00*
0398.00*	0410.00*	0414.02*	0418.00*	0424.00*	0428.00*	0445.00*	0456.00*	0460.00*	0476.00*	0478.00*
0481.00*	0514.00*	0516.02*	0523.00*	0526.00*	0584.00*	0586.00*	0598.00*	0606.00*	0650.00*	0720.00*
0722.00*	0736.00*	0764.00*	0766.00*	0772.00*	0782.00*	0786.01*	0796.01*	0796.02*	0814.00*	0822.00*
0828.00*	0830.00*	0836.00*	0850.00*	0856.00*	0858.00*	0860.00*	0866.00*	0874.01*	0880.01*	0898.00*
0956.00*	0958.00*	0996.00*	1022.00*	1116.00*	1118.00*	1142.01*	1142.02*	1172.01*	1182.01*	
Median Family Income 90-100%										
0056.02*	0070.00*	0080.00*	0082.00*	0101.00*	0150.00*	0180.00*	0188.00*	0193.00*	0200.00*	0257.00*
0262.00*	0278.00*	0279.00*	0280.00*	0288.00*	0289.00*	0291.00*	0302.00*	0319.00*	0336.00*	0371.00*
0383.00*	0386.00*	0389.00*	0399.00*	0402.00*	0415.00*	0420.00*	0421.00*	0426.00*	0432.00*	0436.00*
0450.00*	0497.00*	0513.00*	0532.00*	0544.00*	0549.00*	0552.00*	0558.00*	0574.00*	0576.00*	0580.00*
0594.04*	0608.00*	0622.00*	0626.00*	0662.00*	0676.00*	0696.02*	0724.00*	0726.00*	0750.00*	0774.00*
0798.02*	0832.00*	0834.00*	0846.00*	0864.00*	0934.00*	0936.00*	0938.00*	0962.00*	0974.00*	1004.00*
1014.00*	1018.00*	1186.00*	1192.00*							
Median Family Income 100-110%										
0064.00*	0066.00*	0092.01*	0127.00*	0130.00*	0152.00*	0170.00*	0176.00*	0211.00*	0219.00*	0269.00*
0297.00*	0309.00*	0317.01*	0323.00*	0335.00*	0370.00*	0388.00*	0390.00*	0396.00*	0404.00*	0413.00*
0440.00*	0499.00*	0508.04*	0538.00*	0550.00*	0560.00*	0568.00*	0570.00*	0575.00*	0578.00*	0582.00*
0588.00*	0589.01*	0594.03*	0596.00*	0644.00*	0646.00*	0682.00*	0728.00*	0740.00*	0776.00*	0818.00*
0838.00*	0840.00*	0968.00*	0970.00*	0986.00*	0988.00*	0992.00*	1010.00*	1012.00*	1078.00*	1208.01*
Median Family Income 110-120%										
0036.00*	0059.00*	0060.00*	0148.00*	0160.00*	0179.00*	0245.00*	0265.00*	0275.00*	0305.00*	0314.01*
0412.00*	0442.00*	0452.00*	0458.00*	0462.02*	0498.00*	0504.01*	0551.00*	0557.00*	0563.01*	0566.00*
0571.00*	0593.00*	0610.02*	0632.00*	0642.00*	0656.00*	0670.00*	0672.00*	0678.00*	0680.00*	0696.01*
0700.00*	0732.00*	0760.00*	0770.00*	0784.00*	0790.01*	0848.00*	0880.02*	0930.00*	0950.00*	0984.00*
0994.00*	0998.00*	1006.00*	1008.00*	1016.00*	1024.00*	1026.00*				
Median Family Income >= 120%										

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

0001.00\* 0003.01\* 0005.01\* 0005.02\* 0007.00\* 0009.00\* 0011.00\* 0013.00\* 0015.02\* 0021.00\* 0030.00\*  
 0031.01\* 0033.00\* 0034.00\* 0035.00\* 0037.00\* 0038.00\* 0039.00\* 0041.00\* 0043.00\* 0044.00\* 0045.00\*  
 0046.00\* 0047.00\* 0049.00\* 0050.00\* 0051.00\* 0052.01\* 0052.02\* 0053.01\* 0056.01\* 0062.00\* 0063.00\*  
 0065.00\* 0067.00\* 0069.01\* 0069.02\* 0075.00\* 0077.00\* 0117.00\* 0119.01\* 0121.00\* 0129.01\* 0129.02\*  
 0131.00\* 0132.00\* 0133.00\* 0134.00\* 0135.00\* 0136.00\* 0137.00\* 0139.00\* 0141.01\* 0141.02\* 0143.00\*  
 0145.00\* 0147.00\* 0149.01\* 0149.02\* 0151.00\* 0153.00\* 0155.00\* 0157.00\* 0159.00\* 0161.00\* 0162.00\*  
 0163.00\* 0164.00\* 0165.00\* 0166.00\* 0167.00\* 0168.00\* 0169.00\* 0171.00\* 0172.00\* 0174.00\* 0181.00\*  
 0183.00\* 0187.00\* 0191.00\* 0195.00\* 0197.00\* 0199.00\* 0201.00\* 0202.00\* 0203.00\* 0204.00\* 0205.00\*  
 0206.00\* 0207.00\* 0215.00\* 0227.00\* 0229.00\* 0231.00\* 0243.00\* 0249.00\* 0267.00\* 0271.00\* 0313.00\*  
 0317.02\* 0385.00\* 0408.00\* 0454.00\* 0477.00\* 0494.00\* 0495.00\* 0500.01\* 0500.02\* 0501.00\* 0502.02\*  
 0503.00\* 0504.02\* 0515.00\* 0517.00\* 0519.00\* 0520.00\* 0528.00\* 0548.00\* 0553.00\* 0555.00\* 0561.00\*  
 0562.00\* 0564.00\* 0565.00\* 0569.00\* 0573.00\* 0591.00\* 0594.02\* 0600.00\* 0612.00\* 0616.00\* 0620.00\*  
 0628.00\* 0636.00\* 0638.00\* 0640.00\* 0648.00\* 0652.00\* 0654.00\* 0658.00\* 0660.00\* 0674.00\* 0686.00\*  
 0688.00\* 0690.00\* 0692.00\* 0698.00\* 0702.01\* 0706.01\* 0730.00\* 0734.00\* 0744.00\* 0746.00\* 0748.00\*  
 0752.00\* 0754.00\* 0756.00\* 0780.00\* 0798.01\* 0800.00\* 0928.00\* 0944.01\* 0946.00\* 0954.00\* 0964.00\*  
 0990.00\* 1020.00\* 1028.01\* 1502.00\* 1522.00\*

Median Family Income Not Known

0002.00\* 0018.01\* 0018.02\* 0018.03\* 0018.04\* 0031.02\* 0053.02\* 0053.03\* 0086.00\* 0119.02\* 0154.00\*  
 0175.00\* 0177.00\* 0221.00\* 0314.02\* 0343.00\* 0352.00\* 0357.02\* 0407.00\* 0443.00\* 0449.02\* 0468.00\*  
 0488.00\* 0543.00\* 0579.01\* 0579.02\* 0589.02\* 0666.00\* 0702.02\* 0702.03\* 0706.02\* 0786.02\* 0792.01\*  
 0808.00\* 0852.00\* 0892.00\* 0960.00\* 1028.02\* 1034.02\* 1070.02\* 1070.03\* 1170.00\* 1180.00\* 1190.00\*  
 1208.03\* 9901.00\*

NEW YORK COUNTY (061), NY

MSA: 35614

Median Family Income 20-30%

0006.00\* 0020.00\* 0024.00\* 0219.00\*

Median Family Income 30-40%

0002.01\* 0010.02\* 0022.01\* 0025.00\* 0162.00\* 0168.00\* 0172.00\* 0174.01\* 0180.00\* 0184.00\* 0188.00\*  
 0189.00\* 0192.00\* 0243.02\* 0277.00\*



2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

Median Family Income 40-50%

0008.00\* 0018.00\* 0029.02\* 0083.00\* 0151.01\* 0164.00\* 0166.00\* 0182.00\* 0194.00\* 0209.01\* 0230.00\*  
0232.00\* 0234.00\* 0239.00\* 0242.00\* 0299.00\* 0309.00\*

Median Family Income 50-60%

0002.02\* 0036.01\* 0174.02\* 0186.00\* 0196.00\* 0210.00\* 0215.00\* 0223.01\* 0224.00\* 0229.00\* 0236.00\*  
0237.00\* 0245.00\* 0249.00\* 0251.00\* 0279.00\* 0293.00\*

Median Family Income 60-70%

0016.00\* 0178.00\* 0213.03\* 0223.02\* 0231.00\* 0235.02\* 0253.00\* 0261.00\* 0263.00\* 0267.00\* 0285.00\*  
0291.00\*

Median Family Income 70-80%

0026.01\* 0030.01\* 0038.00\* 0043.00\* 0129.02\* 0170.00\* 0211.00\* 0216.00\* 0218.00\* 0222.00\* 0225.00\*  
0226.00\* 0241.00\* 0243.01\* 0269.00\*

Median Family Income 80-90%

0012.00\* 0132.03\* 0193.00\* 0214.00\* 0233.00\* 0235.01\* 0247.00\* 0283.00\* 0287.00\* 0303.00\*

Median Family Income 90-100%

0022.02\* 0026.02\* 0034.00\* 0121.01\* 0206.00\* 0227.00\* 0228.00\* 0259.00\*

Median Family Income 100-110%

0030.02\* 0041.00\* 0156.02\* 0190.00\* 0203.00\* 0271.00\*

Median Family Income 110-120%

0093.00\* 0097.00\* 0200.00\* 0212.00\* 0220.00\* 0255.00\* 0257.00\* 0295.00\*

Median Family Income >= 120%

0007.00\* 0009.00\* 0010.01\* 0013.00\* 0014.01\* 0015.01\* 0015.02\* 0021.00\* 0027.00\* 0031.00\* 0032.00\*  
0033.00\* 0036.02\* 0037.00\* 0039.00\* 0040.01\* 0040.02\* 0042.00\* 0044.00\* 0045.00\* 0047.00\* 0048.00\*  
0049.00\* 0050.00\* 0052.00\* 0054.00\* 0055.01\* 0055.02\* 0056.00\* 0057.00\* 0058.00\* 0059.00\* 0060.00\*  
0061.00\* 0062.00\* 0063.00\* 0064.00\* 0065.00\* 0066.00\* 0067.00\* 0068.00\* 0069.00\* 0070.01\* 0070.02\*  
0071.00\* 0072.00\* 0073.00\* 0074.00\* 0075.00\* 0076.00\* 0077.00\* 0078.00\* 0079.00\* 0080.00\* 0081.00\*  
0082.00\* 0084.00\* 0086.01\* 0086.03\* 0087.00\* 0088.00\* 0089.00\* 0090.00\* 0091.00\* 0092.00\* 0095.00\*  
0099.01\* 0099.02\* 0099.03\* 0100.00\* 0101.00\* 0103.00\* 0104.00\* 0106.01\* 0106.02\* 0108.01\* 0108.02\*  
0108.03\* 0109.00\* 0110.00\* 0111.00\* 0112.01\* 0112.02\* 0112.03\* 0114.01\* 0114.02\* 0115.00\* 0116.00\*  
0117.00\* 0118.00\* 0120.00\* 0122.00\* 0124.00\* 0125.00\* 0126.01\* 0126.02\* 0127.00\* 0128.00\* 0129.01\*

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

0130.00\* 0131.00\* 0133.00\* 0134.00\* 0135.01\* 0136.01\* 0136.02\* 0136.03\* 0136.04\* 0137.00\* 0138.00\*  
 0139.00\* 0140.00\* 0142.00\* 0144.01\* 0144.02\* 0145.00\* 0146.01\* 0146.02\* 0147.00\* 0148.01\* 0148.02\*  
 0149.00\* 0150.01\* 0150.02\* 0151.02\* 0152.00\* 0153.01\* 0153.02\* 0154.01\* 0154.02\* 0154.03\* 0155.01\*  
 0155.02\* 0156.01\* 0157.00\* 0158.01\* 0158.02\* 0159.00\* 0160.01\* 0160.02\* 0161.00\* 0163.00\* 0165.00\*  
 0167.00\* 0169.00\* 0171.00\* 0173.00\* 0175.00\* 0177.00\* 0179.00\* 0181.00\* 0183.00\* 0185.00\* 0187.00\*  
 0191.00\* 0195.00\* 0197.02\* 0198.00\* 0199.00\* 0201.01\* 0201.02\* 0205.00\* 0207.01\* 0208.00\* 0221.02\*  
 0238.02\* 0238.03\* 0238.04\* 0265.00\* 0273.00\* 0275.00\* 0281.00\* 0307.00\* 0317.03\* 0317.04\*

Median Family Income Not Known

0001.00\* 0005.00\* 0014.02\* 0028.00\* 0029.01\* 0086.02\* 0094.00\* 0096.00\* 0098.00\* 0102.00\* 0113.00\*  
 0119.00\* 0121.02\* 0132.01\* 0132.02\* 0135.02\* 0143.00\* 0197.01\* 0217.03\* 0240.00\* 0297.00\* 0311.00\*  
 0319.00\*

QUEENS COUNTY (081), NY

MSA: 35614

Median Family Income 20-30%

0087.00\*

Median Family Income 30-40%

0399.02\* 0849.01\* 0972.02\* 0972.05\*

Median Family Income 40-50%

0025.00\* 0043.00\* 0047.00\* 0163.00\* 0254.02\* 0273.02\* 0405.01\* 0407.01\* 0427.00\* 0797.01\* 0797.02\*  
 0799.00\* 0865.00\* 0869.00\* 0871.00\* 0972.06\* 1161.00\* 1163.01\* 1163.02\* 1167.00\* 1227.02\*

Median Family Income 50-60%

0033.02\* 0039.00\* 0040.02\* 0235.02\* 0273.01\* 0275.00\* 0367.00\* 0401.01\* 0403.01\* 0403.02\* 0413.00\*  
 0415.00\* 0437.02\* 0439.00\* 0443.01\* 0446.02\* 0463.00\* 0467.00\* 0471.00\* 0545.00\* 0559.00\* 0849.02\*  
 0853.00\* 0855.00\* 0857.00\* 0861.00\* 0863.00\* 0889.02\* 0942.02\* 1008.03\* 1185.00\* 1187.00\* 1191.00\*  
 1205.00\*

Median Family Income 60-70%

0051.00\* 0062.02\* 0085.00\* 0144.00\* 0205.00\* 0212.00\* 0238.00\* 0240.00\* 0249.00\* 0265.01\* 0267.00\*  
 0269.02\* 0271.01\* 0278.00\* 0334.04\* 0339.00\* 0375.01\* 0375.02\* 0379.00\* 0381.00\* 0401.02\* 0407.02\*  
 0409.02\* 0437.01\* 0443.02\* 0444.00\* 0446.01\* 0454.00\* 0455.00\* 0460.00\* 0461.00\* 0469.01\* 0549.00\*

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

0679.00\* 0683.00\* 0779.07\* 0803.01\* 0803.02\* 0845.00\* 0925.00\* 0947.00\* 0972.04\* 0992.00\* 1032.01\*  
 1085.00\* 1155.00\* 1157.00\*

Median Family Income 70-80%

0002.00\* 0028.00\* 0044.01\* 0052.00\* 0057.00\* 0103.00\* 0105.00\* 0112.00\* 0114.00\* 0122.00\* 0126.02\*  
 0142.01\* 0148.00\* 0151.00\* 0152.00\* 0157.00\* 0181.01\* 0182.00\* 0192.00\* 0214.00\* 0235.01\* 0236.00\*  
 0253.01\* 0259.00\* 0261.00\* 0266.00\* 0274.00\* 0277.02\* 0281.00\* 0287.00\* 0291.00\* 0309.06\* 0327.00\*  
 0347.00\* 0351.00\* 0361.00\* 0363.00\* 0365.00\* 0409.01\* 0411.00\* 0440.00\* 0457.00\* 0462.00\* 0466.00\*  
 0479.00\* 0481.00\* 0483.01\* 0489.00\* 0493.01\* 0499.00\* 0500.00\* 0551.00\* 0553.00\* 0555.00\* 0579.00\*  
 0581.00\* 0593.00\* 0687.00\* 0717.01\* 0719.00\* 0743.00\* 0779.08\* 0837.00\* 0907.00\* 0919.00\* 0938.00\*  
 1099.00\* 1171.00\* 1181.00\* 1189.00\* 1193.00\* 1201.00\* 1203.00\* 1257.00\* 1417.00\* 1451.02\*

Median Family Income 80-90%

0004.00\* 0012.00\* 0014.00\* 0024.00\* 0032.00\* 0034.00\* 0042.00\* 0054.00\* 0062.01\* 0081.00\* 0098.00\*  
 0101.00\* 0120.00\* 0124.00\* 0138.00\* 0156.00\* 0159.00\* 0166.00\* 0176.00\* 0178.00\* 0179.01\* 0184.01\*  
 0185.01\* 0186.00\* 0189.00\* 0208.00\* 0216.02\* 0245.00\* 0247.00\* 0255.00\* 0257.00\* 0258.00\* 0260.00\*  
 0263.00\* 0265.02\* 0269.01\* 0271.02\* 0277.01\* 0283.00\* 0293.00\* 0295.00\* 0329.00\* 0353.00\* 0373.00\*  
 0377.00\* 0448.00\* 0452.00\* 0456.00\* 0470.00\* 0473.00\* 0475.00\* 0482.00\* 0492.01\* 0497.00\* 0502.02\*  
 0535.01\* 0547.00\* 0548.00\* 0565.00\* 0577.00\* 0589.00\* 0591.00\* 0595.02\* 0613.01\* 0621.00\* 0745.00\*  
 0779.06\* 0809.00\* 0818.00\* 0846.02\* 0859.00\* 0889.03\* 0929.00\* 0942.03\* 0945.00\* 0998.02\* 1010.04\*  
 1032.02\* 1039.00\* 1047.00\* 1159.00\* 1175.00\* 1347.01\* 1447.00\* 1451.01\* 1463.00\*

Median Family Income 90-100%

0008.00\* 0016.00\* 0022.00\* 0030.00\* 0038.00\* 0040.01\* 0065.02\* 0071.00\* 0079.00\* 0094.00\* 0104.00\*  
 0108.00\* 0110.00\* 0116.00\* 0126.01\* 0141.00\* 0143.00\* 0147.00\* 0149.00\* 0150.00\* 0154.00\* 0161.00\*  
 0170.00\* 0172.00\* 0180.00\* 0184.02\* 0190.00\* 0194.00\* 0196.00\* 0202.00\* 0204.00\* 0206.00\* 0220.01\*  
 0243.00\* 0251.00\* 0253.02\* 0272.00\* 0279.00\* 0280.00\* 0282.00\* 0309.03\* 0320.00\* 0334.03\* 0384.00\*  
 0399.01\* 0404.00\* 0405.02\* 0414.00\* 0424.00\* 0458.00\* 0465.00\* 0468.00\* 0469.02\* 0480.00\* 0483.02\*  
 0485.00\* 0493.02\* 0502.01\* 0518.00\* 0520.00\* 0530.00\* 0531.00\* 0540.00\* 0542.00\* 0552.00\* 0554.00\*  
 0557.00\* 0587.00\* 0595.01\* 0629.00\* 0635.00\* 0639.00\* 0641.01\* 0664.03\* 0939.00\* 0942.01\* 0954.00\*

1139.00\* 1227.03\* 1241.00\* 1347.02\* 1403.00\*

Median Family Income 100-110%

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

0006.00\* 0020.00\* 0036.00\* 0055.00\* 0058.00\* 0059.00\* 0061.00\* 0083.00\* 0096.00\* 0102.00\* 0119.00\*  
 0125.00\* 0128.00\* 0130.00\* 0132.00\* 0142.02\* 0145.00\* 0158.01\* 0158.02\* 0164.00\* 0169.00\* 0187.00\*  
 0198.00\* 0220.02\* 0254.01\* 0262.00\* 0264.00\* 0276.00\* 0285.00\* 0289.00\* 0309.05\* 0317.00\* 0328.00\*  
 0330.00\* 0366.00\* 0371.00\* 0394.00\* 0450.00\* 0459.00\* 0464.00\* 0478.01\* 0478.02\* 0507.00\* 0510.00\*  
 0512.00\* 0513.00\* 0515.00\* 0525.00\* 0532.00\* 0536.01\* 0560.00\* 0567.00\* 0568.00\* 0583.00\* 0585.00\*  
 0598.00\* 0603.00\* 0606.00\* 0627.00\* 0645.00\* 0654.01\* 0657.02\* 0680.00\* 0690.00\* 0693.00\* 0694.00\*  
 0717.02\* 0790.00\* 0814.00\* 0840.00\* 0998.01\* 1008.04\* 1017.00\* 1033.00\* 1147.00\* 1195.00\* 1227.04\*  
 1341.00\* 1377.00\* 1409.02\* 1529.01\* 1621.00\*

Median Family Income 110-120%

0007.02\* 0010.00\* 0018.00\* 0086.00\* 0088.00\* 0095.00\* 0113.00\* 0117.00\* 0118.00\* 0121.00\* 0137.00\*  
 0140.00\* 0168.00\* 0183.00\* 0185.02\* 0188.00\* 0230.00\* 0270.00\* 0284.00\* 0288.02\* 0294.00\* 0297.00\*  
 0306.00\* 0309.04\* 0334.01\* 0357.00\* 0472.00\* 0484.00\* 0492.02\* 0496.00\* 0505.00\* 0508.00\* 0522.00\*  
 0526.00\* 0534.01\* 0538.00\* 0539.01\* 0556.00\* 0562.00\* 0620.00\* 0623.00\* 0626.00\* 0633.01\* 0637.00\*  
 0646.00\* 0656.00\* 0660.00\* 0664.02\* 0682.00\* 0695.00\* 0697.02\* 0709.00\* 0713.05\* 0741.00\* 0779.03\*  
 0779.04\* 0779.05\* 0792.00\* 0838.00\* 0846.01\* 0964.00\* 0991.00\* 1029.00\* 1059.00\* 1072.01\* 1151.00\*  
 1199.00\* 1215.00\* 1301.00\* 1367.00\* 1385.01\* 1459.00\* 1467.00\* 1551.03\* 1579.02\*

Median Family Income >= 120%

0001.01\* 0001.02\* 0007.01\* 0019.01\* 0019.02\* 0019.03\* 0026.00\* 0031.00\* 0033.01\* 0045.00\* 0053.00\*  
 0063.00\* 0065.01\* 0069.00\* 0073.00\* 0075.00\* 0077.00\* 0091.00\* 0097.00\* 0100.00\* 0106.00\* 0111.00\*  
 0115.00\* 0123.01\* 0134.00\* 0135.00\* 0136.00\* 0153.00\* 0155.00\* 0174.00\* 0181.02\* 0216.01\* 0232.00\*  
 0288.01\* 0334.05\* 0337.00\* 0352.00\* 0358.00\* 0368.00\* 0376.00\* 0398.00\* 0400.00\* 0402.00\* 0432.00\*  
 0434.00\* 0476.00\* 0495.00\* 0504.00\* 0506.00\* 0511.00\* 0516.00\* 0517.00\* 0521.00\* 0524.00\* 0528.00\*  
 0558.00\* 0564.00\* 0580.00\* 0582.00\* 0592.00\* 0594.00\* 0596.00\* 0600.00\* 0601.00\* 0608.00\* 0610.00\*  
 0612.00\* 0614.00\* 0616.01\* 0616.02\* 0618.00\* 0619.00\* 0622.00\* 0625.00\* 0630.00\* 0632.00\* 0633.02\*  
 0638.00\* 0650.00\* 0657.03\* 0659.00\* 0661.00\* 0663.01\* 0664.01\* 0665.01\* 0667.01\* 0669.00\* 0671.00\*  
 0677.00\* 0697.01\* 0703.00\* 0707.00\* 0711.00\* 0713.03\* 0713.04\* 0713.06\* 0721.00\* 0723.00\* 0729.00\*  
 0731.00\* 0737.00\* 0739.00\* 0747.00\* 0749.00\* 0757.01\* 0757.02\* 0769.01\* 0769.02\* 0773.00\* 0775.00\*  
 0779.02\* 0788.00\* 0864.00\* 0884.00\* 0892.01\* 0916.03\* 0922.00\* 0928.00\* 0934.01\* 0934.02\* 0973.00\*  
 0981.00\* 0987.00\* 0997.01\* 0997.03\* 0997.04\* 0997.05\* 1008.01\* 1010.02\* 1093.00\* 1097.00\* 1113.00\*

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

1123.00\* 1129.00\* 1133.00\* 1141.00\* 1207.01\* 1223.00\* 1247.00\* 1265.00\* 1267.00\* 1277.00\* 1291.02\*  
 1291.03\* 1291.04\* 1333.00\* 1339.00\* 1399.00\* 1409.01\* 1429.00\* 1435.00\* 1441.00\* 1471.00\* 1479.00\*  
 1483.00\* 1507.01\* 1507.02\* 1529.02\* 1551.01\* 1551.04\* 1571.01\* 1571.02\* 1579.01\* 1579.03\* 1617.00\*

Median Family Income Not Known

0001.03\* 0001.04\* 0037.00\* 0050.00\* 0099.00\* 0107.01\* 0171.01\* 0171.02\* 0179.02\* 0199.01\* 0199.02\*  
 0199.03\* 0216.03\* 0219.00\* 0229.00\* 0246.00\* 0288.03\* 0299.00\* 0331.00\* 0383.01\* 0383.02\* 0426.00\*  
 0535.02\* 0539.02\* 0561.00\* 0566.00\* 0590.00\* 0599.00\* 0607.01\* 0613.02\* 0624.00\* 0641.02\* 0654.02\*  
 0655.01\* 0663.02\* 0664.04\* 0716.00\* 0793.00\* 0892.02\* 0916.02\* 0916.04\* 0918.00\* 0972.07\* 0999.00\*  
 1010.03\* 1072.02\* 1207.02\* 1211.00\* 1283.00\* 1385.02\* 1567.00\* 9901.00\*

ASSESSMENT AREA - 0003

ALAMEDA COUNTY (001), CA

MSA: 36084

Median Family Income 10-20%

4029.00\*

Median Family Income 20-30%

4024.00\* 4030.00\* 4033.01\* 4075.00\* 4105.00\*

Median Family Income 30-40%

4014.00\* 4025.00\* 4026.00\* 4034.02\* 4059.02\* 4060.00\* 4062.02\* 4063.00\* 4071.01\* 4087.00\* 4088.00\*  
 4089.00\* 4094.00\* 4095.00\* 4204.02\*

Median Family Income 40-50%

4016.00\* 4022.00\* 4054.01\* 4054.02\* 4059.01\* 4062.01\* 4065.00\* 4072.00\* 4086.00\* 4092.00\* 4093.00\*  
 4096.00\* 4097.00\* 4103.00\* 4204.01\* 4331.04\* 4339.00\* 4340.00\* 4362.00\*

Median Family Income 50-60%

4034.01\* 4058.00\* 4061.00\* 4066.01\* 4066.02\* 4070.00\* 4071.02\* 4073.00\* 4085.00\* 4090.00\* 4091.00\*  
 4101.00\* 4102.00\* 4224.00\* 4229.01\* 4231.00\* 4332.00\* 4338.01\* 4365.00\* 4377.01\* 4377.02\*

Median Family Income 60-70%

4015.00\* 4018.00\* 4036.00\* 4053.01\* 4056.00\* 4057.00\* 4074.00\* 4076.00\* 4084.00\* 4235.00\* 4276.00\*  
 4309.00\* 4324.00\* 4325.01\* 4325.02\* 4331.03\* 4336.00\* 4353.00\* 4355.00\* 4356.01\* 4356.02\* 4366.01\*  
 4366.02\* 4367.00\* 4369.00\* 4373.00\* 4375.00\* 4382.01\* 4402.00\*

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

Median Family Income 70-80%

4007.00\* 4008.00\* 4009.00\* 4013.00\* 4040.00\* 4055.00\* 4064.00\* 4082.00\* 4104.00\* 4221.00\* 4284.00\*  
 4305.00\* 4310.00\* 4326.02\* 4330.00\* 4333.00\* 4337.00\* 4354.00\* 4357.00\* 4360.00\* 4363.02\* 4371.02\*  
 4372.00\* 4374.00\* 4379.00\* 4382.04\* 4384.00\* 4403.06\* 4444.00\* 4514.04\*

Median Family Income 80-90%

4010.00\* 4027.00\* 4035.01\* 4098.00\* 4225.00\* 4240.01\* 4240.02\* 4251.04\* 4272.00\* 4280.00\* 4308.00\*  
 4311.00\* 4312.00\* 4331.02\* 4335.00\* 4351.04\* 4359.00\* 4363.01\* 4368.00\* 4370.00\* 4371.01\* 4376.00\*  
 4383.00\* 4401.00\* 4403.07\* 4403.31\* 4419.26\* 4425.02\* 4445.00\* 4502.00\* 4515.06\*

Median Family Income 90-100%

4006.00\* 4031.00\* 4035.02\* 4037.01\* 4053.02\* 4077.00\* 4078.00\* 4203.02\* 4220.00\* 4230.00\* 4232.00\*  
 4234.00\* 4273.00\* 4277.00\* 4282.00\* 4285.00\* 4307.00\* 4338.02\* 4352.00\* 4358.00\* 4361.00\* 4364.03\*  
 4380.00\* 4403.01\* 4403.04\* 4403.08\* 4423.02\* 4425.01\* 4426.02\* 4430.01\* 4430.02\* 4512.01\* 4514.01\*

Median Family Income 100-110%

4005.00\* 4011.00\* 4012.00\* 4017.00\* 4041.02\* 4052.00\* 4068.00\* 4069.00\* 4083.00\* 4100.00\* 4202.00\*  
 4203.01\* 4205.00\* 4222.00\* 4251.01\* 4278.00\* 4279.00\* 4286.00\* 4306.00\* 4322.00\* 4323.00\* 4351.02\*  
 4378.00\* 4381.00\* 4382.03\* 4403.33\* 4403.34\* 4403.36\* 4413.01\* 4415.25\* 4416.02\* 4417.02\* 4419.23\*  
 4419.27\* 4419.28\* 4423.01\* 4433.21\* 4443.04\* 4503.00\* 4507.50\*

Median Family Income 110-120%

4067.00\* 4079.00\* 4219.00\* 4233.00\* 4236.01\* 4239.01\* 4251.02\* 4281.00\* 4287.00\* 4327.00\* 4328.00\*  
 4334.00\* 4364.02\* 4364.04\* 4414.01\* 4419.21\* 4424.00\* 4429.00\* 4441.00\* 4442.00\* 4443.01\* 4501.02\*  
 4504.00\* 4507.41\* 4512.02\* 4513.00\* 4514.03\* 4515.04\*

Median Family Income >= 120%

4001.00\* 4002.00\* 4003.00\* 4004.00\* 4033.02\* 4037.02\* 4038.00\* 4039.00\* 4041.01\* 4042.00\* 4043.00\*  
 4044.00\* 4045.01\* 4045.02\* 4046.00\* 4047.00\* 4048.00\* 4049.00\* 4050.00\* 4051.00\* 4080.00\* 4081.00\*  
 4099.00\* 4201.00\* 4206.00\* 4211.00\* 4212.00\* 4213.00\* 4214.00\* 4215.00\* 4216.00\* 4217.00\* 4218.00\*  
 4223.00\* 4227.00\* 4237.00\* 4238.00\* 4239.02\* 4251.03\* 4261.00\* 4262.00\* 4271.00\* 4283.01\* 4283.02\*  
 4301.01\* 4301.02\* 4302.00\* 4303.00\* 4304.00\* 4321.00\* 4351.03\* 4403.05\* 4403.32\* 4403.37\* 4403.38\*  
 4411.00\* 4412.00\* 4413.02\* 4414.02\* 4415.01\* 4415.03\* 4415.21\* 4415.22\* 4415.23\* 4415.24\* 4416.01\*  
 4417.01\* 4418.00\* 4419.24\* 4419.29\* 4420.00\* 4421.00\* 4422.00\* 4426.01\* 4427.00\* 4428.00\* 4431.02\*  
 4431.03\* 4431.04\* 4431.05\* 4432.00\* 4433.01\* 4433.22\* 4446.01\* 4446.02\* 4501.01\* 4505.01\* 4505.02\*

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

4506.01\* 4506.03\* 4506.04\* 4506.05\* 4506.06\* 4506.07\* 4506.08\* 4506.09\* 4507.01\* 4507.42\* 4507.43\*

4507.44\* 4507.45\* 4507.46\* 4507.51\* 4507.52\* 4511.02\* 4511.03\* 4511.04\* 4515.01\* 4515.03\* 4515.05\*

4516.01\* 4516.02\* 4517.01\* 4517.03\* 4517.04\* 9832.00\*

Median Family Income Not Known

4028.01\* 4028.02\* 4228.00\* 4229.02\* 4236.02\* 4326.01\* 4443.03\* 9819.00\* 9820.00\* 9821.00\* 9900.00\*

SAN FRANCISCO COUNTY (075), CA

MSA: 41884

Median Family Income < 10%

0122.03\*

Median Family Income 10-20%

0101.02\* 0107.01\* 0125.04\* 0161.01\* 0611.02\* 9805.01\*

Median Family Income 20-30%

0118.00\* 0124.04\* 0161.02\* 0179.03\* 0231.03\* 0605.02\* 0611.01\*

Median Family Income 30-40%

0123.01\* 0125.02\*

Median Family Income 40-50%

0106.00\* 0113.00\* 0123.02\* 0124.03\* 0125.03\* 0229.01\* 0233.00\* 0234.00\*

Median Family Income 50-60%

0101.01\* 0158.01\* 0202.02\* 0208.01\* 0228.02\* 0229.03\* 0263.01\* 0264.01\* 0264.03\* 0264.04\* 0314.01\*

0332.04\* 0479.04\* 0604.00\* 0610.00\* 0612.00\*

Median Family Income 60-70%

0111.02\* 0159.00\* 0209.00\* 0230.01\* 0232.00\* 0260.01\* 0262.01\* 0263.02\* 0263.03\* 0302.01\* 0312.01\*

0312.02\* 0313.02\*

Median Family Income 70-80%

0119.02\* 0120.02\* 0157.01\* 0176.03\* 0208.02\* 0228.03\* 0256.00\* 0257.01\* 0257.02\* 0258.00\* 0260.03\*

0260.04\* 0262.02\* 0264.02\* 0302.02\* 0328.01\* 0329.02\* 0332.03\* 0352.01\* 0352.02\* 0427.00\*

Median Family Income 80-90%

0160.00\* 0177.00\* 0228.01\* 0229.02\* 0230.03\* 0259.00\* 0260.02\* 0261.00\* 0313.01\* 0314.02\* 0330.01\*

0332.01\* 0354.00\* 0426.01\* 0477.01\* 0478.02\*

Median Family Income 90-100%

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

0109.02\* 0119.01\* 0124.05\* 0153.00\* 0156.00\* 0201.02\* 0254.03\* 0255.01\* 0326.01\* 0328.02\* 0329.01\*  
0351.01\* 0353.00\* 0401.00\* 0478.01\* 9806.00\*

Median Family Income 100-110%

0163.00\* 0166.02\* 0168.02\* 0206.02\* 0253.00\* 0301.01\* 0304.00\* 0305.00\* 0326.02\* 0327.00\* 0331.00\*  
0351.02\* 0452.02\* 0477.02\* 0479.03\*

Median Family Income 110-120%

0103.00\* 0104.01\* 0121.00\* 0130.01\* 0155.00\* 0178.04\* 0201.01\* 0207.02\* 0254.01\* 0254.02\* 0310.00\*  
0330.02\* 0476.00\* 0479.02\*

Median Family Income >= 120%

0102.01\* 0102.02\* 0104.02\* 0105.00\* 0108.00\* 0109.01\* 0111.01\* 0112.00\* 0126.01\* 0126.02\* 0127.00\*  
0128.01\* 0128.02\* 0129.01\* 0129.02\* 0130.02\* 0131.01\* 0131.02\* 0132.00\* 0133.00\* 0134.01\* 0134.02\*  
0135.00\* 0151.00\* 0152.02\* 0154.02\* 0157.02\* 0158.02\* 0162.00\* 0164.00\* 0165.00\* 0166.01\* 0167.00\*  
0168.01\* 0169.00\* 0170.00\* 0171.01\* 0171.02\* 0180.00\* 0202.01\* 0203.00\* 0204.01\* 0204.02\* 0205.00\*  
0206.01\* 0207.01\* 0210.00\* 0211.00\* 0212.00\* 0213.00\* 0214.00\* 0215.00\* 0216.00\* 0217.00\* 0218.00\*  
0226.00\* 0227.02\* 0227.04\* 0252.00\* 0301.02\* 0303.01\* 0303.02\* 0306.00\* 0307.00\* 0308.00\* 0309.00\*  
0311.00\* 0402.00\* 0426.02\* 0428.00\* 0451.00\* 0452.01\* 0601.00\* 0607.01\* 0607.03\* 0614.02\* 0615.01\*  
0615.02\* 0615.03\* 0615.04\* 0615.05\* 0615.06\* 0615.08\* 9809.00\*

Median Family Income Not Known

0107.02\* 0110.01\* 0110.02\* 0117.00\* 0120.01\* 0122.02\* 0122.04\* 0124.06\* 0152.01\* 0154.01\* 0176.02\*  
0176.04\* 0178.01\* 0178.03\* 0231.02\* 0251.00\* 0255.02\* 0607.02\* 0614.01\* 0615.07\* 9802.00\* 9803.00\*  
9804.01\* 9901.00\* 9902.00\*

SAN MATEO COUNTY (081), CA

MSA: 41884

Median Family Income 30-40%

6102.03\* 6108.00\* 6121.01\* 6121.02\*

Median Family Income 40-50%

6021.00\* 6102.01\* 6106.01\*

Median Family Income 50-60%

6005.01\* 6007.01\* 6008.00\* 6022.02\* 6060.00\* 6104.00\* 6105.00\* 6109.01\* 6118.00\* 6120.02\*



2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000024440

\* denotes no loans made in specified tracts

Agency: OCC - 1

Institution: IND & COMM BNK OF CHINA (USA)

Median Family Income 60-70%

6006.00\* 6013.01\* 6013.02\* 6014.00\* 6015.02\* 6020.01\* 6022.01\* 6042.00\* 6059.02\* 6061.00\* 6103.02\*  
6109.02\* 6117.00\* 6120.01\*

Median Family Income 70-80%

6002.00\* 6004.02\* 6005.02\* 6010.00\* 6012.00\* 6016.01\* 6019.01\* 6019.02\* 6038.01\* 6041.03\* 6041.04\*  
6044.00\* 6062.02\* 6077.02\* 6101.00\* 6107.00\* 6137.02\*

Median Family Income 80-90%

6007.02\* 6011.00\* 6016.04\* 6024.00\* 6026.01\* 6040.00\* 6041.02\* 6048.00\* 6077.01\* 6119.01\*

Median Family Income 90-100%

6004.01\* 6016.03\* 6016.05\* 6018.00\* 6020.02\* 6023.00\* 6025.00\* 6026.02\* 6027.00\* 6029.00\* 6030.00\*  
6032.00\* 6034.00\* 6038.02\* 6049.00\* 6055.01\* 6063.00\* 6072.00\* 6076.00\* 6079.00\* 6084.00\* 6092.02\*  
6110.00\* 6119.02\* 6135.01\*

Median Family Income 100-110%

6003.00\* 6009.00\* 6015.01\* 6037.00\* 6039.00\* 6045.00\* 6046.00\* 6051.00\* 6059.01\* 6074.00\* 6078.00\*  
6085.01\* 6085.02\* 6106.02\*

Median Family Income 110-120%

6001.00\* 6017.00\* 6028.00\* 6031.00\* 6033.00\* 6080.01\* 6081.00\* 6083.00\* 6086.00\* 6098.00\* 6136.00\*  
6140.00\*

Median Family Income >= 120%

6047.00\* 6050.00\* 6052.00\* 6053.00\* 6054.00\* 6055.02\* 6056.00\* 6057.00\* 6058.00\* 6064.00\* 6065.00\*  
6066.00\* 6067.00\* 6068.00\* 6069.00\* 6070.00\* 6071.00\* 6073.00\* 6075.00\* 6080.02\* 6080.13\* 6080.23\*  
6080.24\* 6080.25\* 6082.00\* 6087.00\* 6088.00\* 6089.00\* 6090.00\* 6091.00\* 6092.01\* 6093.00\* 6094.00\*  
6095.00\* 6096.01\* 6096.02\* 6096.03\* 6097.00\* 6099.00\* 6100.00\* 6102.02\* 6103.03\* 6103.04\* 6111.00\*  
6112.00\* 6113.00\* 6114.00\* 6115.00\* 6116.00\* 6125.00\* 6126.00\* 6127.00\* 6128.00\* 6129.00\* 6130.00\*  
6132.00\* 6133.00\* 6134.00\* 6135.02\* 6137.01\* 6138.00\* 6139.00\*

Median Family Income Not Known

6062.01\* 9843.00\* 9901.00\*

Error Status Information

Respondent ID: 0000024440

Institution: IND & COMM BNK OF CHINA (USA)

Agency: OCC - 1

Record Identifier: <sup>11</sup>	Total Composite Records on File	Total Composite Records Without Errors	Total Validity <sup>10</sup> Errors	Percentage of Validity Errors
Transmittal Sheet	1	1	0	0.00%
Small Business Loans	0	0	0	0.00%
Small Farm Loans	0	0	0	0.00%
Community Development Loans	1	1	0	0.00%
Consortium/Third Party Loans (Optional)	0	0	0	0.00%
Assessment Area	5,135	5,135	0	0.00%
Total	5,137	5,137	0	0.00%

Footnote:

10. A validity edit helps to verify the accuracy of the data reported. An institution's CRA submission that passes all validity edits does not ensure 100% accurate data. True accuracy is determined during the examination process.

11. A record represents one row of data reported to the Federal Reserve Board. This does not in any way represent the number of loans originated or purchased by the institution.

NEW YORK REGION		
List of Branches	<u>Canal Street Main Branch</u> 202 Canal Street New York, NY 10013	Mon – Fri 9am – 4pm Sat 10am – 2pm
	<u>Brooklyn Branch</u> 57-14 8 <sup>th</sup> Ave Brooklyn, NY 11220	Mon – Fri 9am – 4pm Sat 10am – 2pm
	<u>Flushing Branch</u> 39-02 Main Street Flushing, NY 11354	Mon – Fri 9am – 4pm Sat 10am – 2pm
Retail Banking Products and Services For Personal Customers	Basic Checking	Jumbo Certificates of Deposit (CD)
	Personal Checking	Safe Deposit Boxes
	Senior Citizen NOW	Direct Deposit Services
	Super Yield Statement Savings	Global Package
	Super Yield Money Market Deposit	Internet Banking
	Student Checking Account	Billpay
	Certificates of Deposit (CD)	Personal Debit Cards
	Certificates of Deposit (CD) - Traditional & Roth IRA	Check Collection
	Money Order	Wire Remittances
	Credit Cards	Cashier's Checks
	Mobile Banking	ATM Service
	Premier Package (Checking, Savings and Money Market Deposit)	
Retail Banking Products and Services For Business Customers	Business Checking	Business Debit Card
	Super Yield Money Market Deposit	Internet Banking
	IOLA (Interest on Lawyer Account)	Billpay
	Certificates of Deposit (CD)	Direct Deposit Services
	Jumbo Certificates of Deposit (CD)	Remote Deposit Capture for Businesses
	Safe Deposit Boxes	Wire Remittances
	Check Collection	Money Order, Cashier's Checks
	Certificates of Deposit (CD)	Night Depository
	ATM Service	
Lending Products	Commercial Letters of Credit	Small Business Loans
	Professional Lines of Credit	Commercial Mortgages
	Construction Financing	Residential Mortgages
	Commercial Installment Loans	Syndicated Loans
	Import/Export Trade Financing	Business Term and Revolving Loan
	Stand-By Letter of Credit (SBLC)	Business Line of Credit
Branches Opened or Closed since 2022	None	
Written comments received from public relating to the Bank's performance in helping to meet community credit needs received since 2022.	None	



- Kings, Queens, New York County – MD 35644
- ▲ Industrial and Commercial Bank of China (USA) NA Branches

<b>Personal Accounts Fees Schedule-New York Region</b>	
<b>Check Collection:</b>	
Domestic	\$50.00
International	\$65.00+Postal Charge
<b>Fax:</b>	
Domestic	\$5.00
International	\$10.00
<b>Monetary Instrument:</b>	
Money Order	\$5.00
Cashier's Check	\$10.00
Counter Check (per check)	\$1.00
<b>Wire Transfer:</b>	
Incoming	\$10.00
Outgoing (International)	\$35.00
Outgoing (Domestic)	\$25.00
Amendment	\$15.00
Confirmation	\$3.00
Fund Returned	\$15.00
Tracer	\$20.00
<b>Account Service:</b>	
Saving Deposits Including Money Market Deposit Account More Than 6 Transfers/Checks/Withdrawals (per item)	\$15.00
Certificate of Balance (per occasion)	\$10.00
Replacement CD Certification (per item)	\$10.00
Interim Statement (per statement)	\$10.00
Stop Payment (per check)	\$20.00
Duplicate Copies – Account transaction (per copy)	\$5.00
Close Account within 6 months (per account)	\$25.00
Legal Process (per account per item)	\$125.00
<b>Overdraft Fees</b>	
Overdrafts (Returned/Paid per item)	\$30.00*
Uncollected Funds (Returned/ Paid per item)	\$30.00*
Deposited Check Returned Unpaid (per item)	\$10.00
<b>Research</b>	
Less Than 6 Months Old (per copy)	\$5.00
More Than 6 Months Old (per hour Research)	\$25.00

\*Overdraft Fees may not be charged under certain circumstances.

<b>Business Accounts Fees Schedule-New York Region</b>	
<b>Check Collection:</b>	
Domestic	\$50.00
International	\$65.00+Postal Charge
<b>Fax:</b>	
Domestic	\$5.00
International	\$10.00
<b>Monetary Instrument:</b>	
Money Order	\$5.00
Cashier's Check	\$10.00
Counter Check (per check)	\$1.00
<b>Wire Transfer:</b>	
Incoming	\$10.00
Outgoing (International)	\$35.00
Outgoing (Domestic)	\$25.00
Amendment	\$15.00
Confirmation	\$3.00
Fund Returned	\$15.00
Tracer	\$20.00
<b>Account Service:</b>	
Coins Paid Out (Per Roll)	\$0.15
Coins Deposited (Per Roll)	\$0.10
Currency Deposited (Per \$1,000)	\$1.20
Currency Paid Out (Per \$1,000)	\$1.20
Courier/ Armored Service	Cost plus 10%
Saving Deposits Including Money Market Deposit Account More Than 6 Transfers/Checks/Withdrawals (per item)	\$15.00
Certificate of Balance (per occasion)	\$10.00
Replacement Certificates	\$10.00
Interim Statement (per statement)	\$10.00
Stop Payment (per check)	\$20.00
Duplicate Copies – Account transaction (per copy)	\$5.00
Close Account within 6 months (per account)	\$25.00
Legal Process (per account per item)	\$125.00
<b>Overdraft Fees</b>	
Overdrafts (Returned/Paid per item)	\$30.00
Uncollected Funds (Returned/ Paid per item)	\$30.00
Deposit Check Returned Unpaid (per item)	\$10.00
<b>Research</b>	
Less Than 6 Months Old (per copy)	\$5.00
More Than 6 Months Old (per hour Research)	\$25.00

**Safe Deposit Box Rental Fees Schedule-New York Region**

Box Size in inches	Annual Rent
3"x5"x24"	\$75.00
3"x5"x24" (Flushing Branch only)	\$115.00
3"x10"x24"	\$135.00
5"x10"x24"	\$180.00
10"x10"x24"	\$250.00
<b>Other Charges for Safe Deposit Box</b>	
Lost One Key	\$50.00
Lost Both Keys (Break Open)	\$300.00

SOUTHERN CALIFORNIA REGION		
List of Branches	<b>Alhambra Branch</b> 388 East Valley Blvd., # 118 Alhambra, CA 91801	Mon – Fri 9am – 4pm Sat 10am – 2pm
	<b>Hacienda Heights Branch</b> 17180 Colima Road Hacienda Heights, CA 91745	Mon – Fri 9am – 4pm Sat 10am – 2pm
	<b>San Gabriel Branch</b> 168 West Valley Blvd. San Gabriel, CA 91776	Mon – Fri 9am – 4pm New account openings (including, but not limited to, credit cards, loans, or investment products) not available at the San Gabriel Branch
	<b>Temple City Branch</b> 5773 Rosemead Blvd. Temple City, CA 91780	Mon – Fri 9am – 4pm Sat 10am – 2pm
	<b>Torrance Branch</b> 23133 Hawthorne Blvd., #100, Torrance, CA 90505	Mon – Fri 9am – 4pm
Retail Banking Products and Services For Personal Customers	Basic Checking	Jumbo Certificates of Deposit (CD)
	Personal Checking	Safe Deposit Boxes
	Senior Citizen NOW	Direct Deposit Services
	Super Yield Statement Savings	Global Package
	Super Yield Money Market Deposit	Internet Banking
	Student Checking Account	Billpay
	Certificates of Deposit (CD)	Personal Debit Cards
	Credit Cards	Check Collection
	Mobile Banking	Wire Remittances
	Certificates of Deposit (CD) - Traditional & Roth IRA	Cashier's Checks
Premier Package (Checking, Savings and Money Market Deposit)	ATM Service	
Retail Banking Products and Services For Business Customers	Business Checking	Business Debit Card
	Super Yield Money Market Deposit	Billpay
	IOLTA (Interest on Lawyer Account)	Direct Deposit Services
	Certificates of Deposit (CD)	Remote Deposit Capture for Businesses
	Jumbo Certificates of Deposit (CD)	Wire Remittances
	Safe Deposit Boxes	Cashier's Checks
	Check Collection	Night Depository
	ATM Service	
Lending Products	Commercial Letters of Credit	Small Business Loans
	Professional Lines of Credit	Commercial Mortgages
	Construction Financing	Residential Mortgages
	Commercial Installment Loans	Syndicated Loans
	Import/Export Trade Financing	Business Term and Revolving Loan
	Stand-By Letter of Credit (SBLC)	Mock Asset Base Financing
Business Line of Credit	U.S. Small Business Administration Guaranty Loan	
Branches Opened or Closed since 2022	None	



SOUTHERN CALIFORNIA REGION	
Written comments received from public relating to the Bank's performance in helping to meet community credit needs received since 2022.	None



- Los Angeles County – MD 31084
- ▲ Industrial and Commercial Bank of China (USA) NA Branches

<b>Personal Accounts Fees Schedule-Southern California Region</b>	
<b>Check Collection:</b>	
Domestic	\$50.00
International	\$65.00+Postal Charge
<b>Fax:</b>	
Domestic	\$5.00
International	\$10.00
<b>Monetary Instrument:</b>	
Cashier's Check	\$10.00
Counter Check (per check)	\$1.00
Money Order	\$5.00
<b>Wire Transfer:</b>	
Incoming	\$10.00
Outgoing (International)	\$35.00
Outgoing (Domestic)	\$25.00
Amendment	\$15.00
Confirmation	\$3.00
Fund Returned	\$15.00
Tracer	\$20.00
<b>Account Service:</b>	
Saving Deposits Including Money Market Deposit Account More Than 6 Transfers/Checks/Withdrawals (per item)	\$15.00
Certificate of Balance (per occasion)	\$10.00
Replacement CD Certification (per item)	\$10.00
Interim Statement (per statement)	\$10.00
Stop Payment (per check)	\$20.00
Duplicate Copies – Account transaction (per copy)	\$5.00
Close Account within 6 months (per account)	\$25.00
Legal Process (per account per item)	\$125.00
<b>Overdraft Fees</b>	
Insufficient Funds (Returned/Paid per item)	\$30.00*
Uncollected Funds (Returned/ Paid per item)	\$30.00*
Deposit Check Returned Unpaid (per item)	\$10.00
<b>Research</b>	
Less Than 6 Months Old (per copy)	\$5.00
More Than 6 Months Old (per hour Research)	\$25.00

\*Overdraft Fees may not be charged under certain circumstances.

<b>Business Accounts Fees Schedule-Southern California Region</b>	
<b>Check Collection:</b>	
Domestic	\$50.00
International	\$65.00+Postal Charge
<b>Fax:</b>	
Domestic	\$5.00
International	\$10.00
<b>Monetary Instrument:</b>	
Cashier's Check	\$10.00
Counter Check (per check)	\$1.00
Money Order	\$5.00
<b>Wire Transfer:</b>	
Incoming	\$10.00
Outgoing (International)	\$35.00
Outgoing (Domestic)	\$25.00
Amendment	\$15.00
Confirmation	\$3.00
Fund Returned	\$15.00
Tracer	\$20.00
<b>Account Service:</b>	
Coins Paid Out (Per Roll)	\$0.15
Coins Deposited (Per Roll)	\$0.10
Currency Deposited (Per \$1,000)	\$1.20
Currency Paid Out (Per \$1,000)	\$1.20
Courier/ Armored Service	Cost plus 10%
Saving Deposits Including Money Market Deposit Account More Than 6 Transfers/Checks/Withdrawals (per item)	\$15.00
Certificate of Balance (per occasion)	\$10.00
Replacement Certificates	\$10.00
Interim Statement (per statement)	\$10.00
Stop Payment (per check)	\$20.00
Duplicate Copies – Account transaction (per copy)	\$5.00
Close Account within 6 months (per account)	\$25.00
Legal Process (per account per item)	\$125.00
<b>Overdraft Fees</b>	
Overdrafts (Returned/Paid per item)	\$30.00
Uncollected Funds (Returned/ Paid per item)	\$30.00
Deposit Check Returned Unpaid (per item)	\$10.00
<b>Research</b>	
Less Than 6 Months Old (per copy)	\$5.00
More Than 6 Months Old (per hour Research)	\$25.00

**Safe Deposit Box Rental Fees Schedule-Southern California Region**

Box Size in inches	Annual Rent
3"x5"x24"	\$60.00
3"x10"x24"	\$80.00
5"x10"x24"	\$100.00
10"x10"x24"	\$180.00
<b>Other Charges for Safe Deposit Box</b>	
Lost One Key	\$50.00
Lost Both Keys (Break Open)	\$300.00

NORTHERN CALIFORNIA REGION		
List of Branches	<u>San Francisco Chinatown Branch</u> 1001 Grant Avenue San Francisco, CA 94133	Mon – Fri 9am – 4pm Sat 10am – 2pm
	<u>Clement St Branch</u> 622 Clement Street San Francisco, CA 94118	Mon – Fri 9am – 4pm
	<u>Noriega Branch</u> 1250 Noriega Street San Francisco, CA 94122	Mon – Fri 9am – 4pm
	<u>South San Francisco Branch</u> 235 Grand Avenue, Suite No. 101 South San Francisco, CA 94080	Mon – Fri 9am – 4pm
	<u>Oakland Branch</u> 401 Ninth Street Oakland, CA 94607	Mon – Fri 9am – 4pm Sat 10am – 2pm
Retail Banking Products and Services For Personal Customers	Basic Checking	Jumbo Certificates of Deposit (CD)
	Personal Checking	Safe Deposit Boxes
	Senior Citizen NOW	Direct Deposit Services
	Super Yield Statement Savings	Global Package
	Super Yield Money Market Deposit	Internet Banking
	Student Checking Account	Billpay
	Certificates of Deposit (CD)	Personal Debit Cards
	Credit Cards	Check Collection
	Premier Package (Checking, Savings and Money Market Deposit)	Certificates of Deposit (CD) - Traditional & Roth IRA
	Wire Remittances	Cashier's Checks
	ATM Service	
Retail Banking Products and Services For Business Customers	Business Checking	Business Debit Card
	Super Yield Money Market Deposit	Internet Banking
	IOLTA (Interest on Lawyer Account)	Billpay
	Certificates of Deposit (CD)	Direct Deposit Services
	Jumbo Certificates of Deposit (CD)	Remote Deposit Capture for Businesses
	Safe Deposit Boxes	Wire Remittances
	Check Collection	Cashier's Checks
	ATM Service	Night Depository
Lending Products	Commercial Letters of Credit	Small Business Loans
	Professional Lines of Credit	Commercial Mortgages
	Construction Financing	Residential Mortgages
	Commercial Installment Loans	Business Term and Revolving Loan
	Import/Export Trade Financing	Asset Base Financing
	Stand-By Letter of Credit (SBLC)	Syndicated Loans
	Business Line of Credit	U.S. Small Business Administration Guaranty Loan
Branches Opened or Closed since 2022	None	

NORTHERN CALIFORNIA REGION	
Written comments received from public relating to the Bank's performance in helping to meet community credit needs received since 2022.	None



- San Francisco – MD 41884
- Oakland – MD 36084
- Industrial and Commercial Bank of China (USA) NA Branches



<b>Personal Accounts Fees Schedule-Northern California Region</b>	
<b>Check Collection:</b>	
Domestic	\$50.00
International	\$65.00+Postal Charge
<b>Fax:</b>	
Domestic	\$5.00
International	\$10.00
<b>Monetary Instrument:</b>	
Cashier's Check	\$10.00
Counter Check (per check)	\$1.00
Money Order	\$5.00
<b>Wire Transfer:</b>	
Incoming	\$10.00
Outgoing (International)	\$35.00
Outgoing (Domestic)	\$25.00
Amendment	\$15.00
Confirmation	\$3.00
Fund Returned	\$15.00
Tracer	\$20.00
<b>Account Service:</b>	
Saving Deposits Including Money Market Deposit Account More Than 6 Transfers/Checks/Withdrawals (per item)	\$15.00
Certificate of Balance (per occasion)	\$10.00
Replacement CD Certification (per item)	\$10.00
Interim Statement (per statement)	\$10.00
Stop Payment (per check)	\$20.00
Duplicate Copies – Account transaction (per copy)	\$5.00
Close Account within 6 months (per account)	\$25.00
Legal Process (per account per item)	\$125.00
<b>Overdraft Fees</b>	
Overdrafts (Returned/Paid per item)	\$30.00*
Uncollected Funds (Returned/ Paid per item)	\$30.00*
Deposit Check Returned Unpaid (per item)	\$10.00
<b>Research</b>	
Less Than 6 Months Old (per copy)	\$5.00
More Than 6 Months Old (per hour Research)	\$25.00

\*Overdraft Fees may not be charged under certain circumstances.

<b>Business Accounts Fees Schedule-Northern California Region</b>	
<b>Check Collection:</b>	
Domestic	\$50.00
International	\$65.00+Postal Charge
<b>Fax:</b>	
Domestic	\$5.00
International	\$10.00
<b>Monetary Instrument:</b>	
Cashier's Check	\$10.00
Counter Check (per check)	\$1.00
Money Order	\$5.00
<b>Wire Transfer:</b>	
Incoming	\$10.00
Outgoing (International)	\$35.00
Outgoing (Domestic)	\$25.00
Amendment	\$15.00
Confirmation	\$3.00
Fund Returned	\$15.00
Tracer	\$20.00
<b>Account Service:</b>	
Coins Paid Out (Per Roll)	\$0.15
Coins Deposited (Per Roll)	\$0.10
Currency Deposited (Per \$1,000)	\$1.20
Currency Paid Out (Per \$1,000)	\$1.20
Courier/ Armored Service	Cost plus 10%
Saving Deposits Including Money Market Deposit Account More Than 6 Transfers/Checks/Withdrawals (per item)	\$15.00
Certificate of Balance (per occasion)	\$10.00
Replacement Certificates	\$10.00
Interim Statement (per statement)	\$10.00
Stop Payment (per check)	\$20.00
Duplicate Copies – Account transaction (per copy)	\$5.00
Close Account within 6 months (per account)	\$25.00
Legal Process (per account per item)	\$125.00
<b>Overdraft Fees</b>	
Overdrafts (Returned/Paid per item)	\$30.00
Uncollected Funds (Returned/ Paid per item)	\$30.00
Deposit Check Returned Unpaid (per item)	\$10.00
<b>Research</b>	
Less Than 6 Months Old (per copy)	\$5.00
More Than 6 Months Old (per hour Research)	\$25.00

**Safe Deposit Box Rental Fees Schedule-Northern California Region**

Box Size in inches	Annual Rent
2"x5"x24"	\$50.00
3"x5"x24"	\$60.00
4"x5"x24"	\$80.00
5"x5"x24"	\$90.00
3"x10"x24"	\$100.00
5"x10"x24"	\$120.00
6"x10"x24"	\$135.00
10"x10"x24"	\$180.00
<b>Other Charges for Safe Deposit Box</b>	
Lost One Key	\$50.00
Lost Both Keys (Break Open)	\$300.00

Charter Number: 24440



**ICBC**

**工 银 美 国**

**Industrial and Commercial Bank of China (USA) NA**

**Community Reinvestment Act (CRA) Strategic Plan**

**2021 – 2025**

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## **I. INTRODUCTION**

As a federally insured depository institution, the Industrial and Commercial Bank of China (USA) NA (“Bank” or “ICBC (USA)”) is subject to the Community Reinvestment Act (codified at 12 U.S.C. §§ 2901-2908 (2006) (“CRA”)), which requires banks to identify and help meet the credit needs of its entire community, including low to moderate-income (“LMI”) families and geographies, consistent with the safe and sound operation of the institution.

ICBC (USA) is committed to maintaining a vibrant and diverse network that supports and strengthens the communities it serves. ICBC (USA) has provided financing for affordable housing as well as for commercial real estate containing retail units leased to small businesses that serve the low-to-moderate income communities.

The Bank has concluded that a CRA “strategic plan” would be the most appropriate method for the OCC to evaluate the Bank’s CRA performance, especially in light of the limited nature of the Bank’s one-to-four family mortgage products and services to consumers and the fact that the Bank’s primary lending product is commercial real estate. The Bank conducted extensive research and surveyed several community groups to assess needs in the process of formulating this strategic plan.

## **II. BANK PROFILE**

### **A. Overview**

ICBC (USA) is a federally chartered bank, incorporated as a national association headquartered in New York, New York. It provides retail and commercial banking services such as deposit-taking, lending, remittances, and settlement. ICBC (USA) operates three branches in New York City in addition to its Head Office, five branches in the greater Los Angeles area, and five branches in the greater San Francisco area.

ICBC (USA)’s majority shareholder is Industrial and Commercial Bank of China, Limited (“ICBC-Ltd”), the largest wholesale and retail bank in China. ICBC-Ltd acquired 80 percent of the shares of common stock of the Bank of East Asia (USA) National Association in July 2012 from East Asia Holding Company, Inc., the U.S. intermediate bank holding company under The Bank of East Asia, Limited (“BEA”). The Bank was renamed as “Industrial and Commercial Bank of China (USA), National Association” in November 2012. The other 20 percent of the shares of common stock of ICBC (USA) remain held by BEA.

On December 31, 2015, ICBC (USA) met the Community Reinvestment Act asset-size threshold for both of the prior two calendar years for transitioning the Bank from the Intermediate-

Small Bank CRA Examination Procedures evaluation standard to the Large Bank CRA Examination Procedures standard.

## **B. Financial Information**

The total assets as of June 30, 2019 were \$2.928 billion.

The June 30, 2019 FDIC Deposit Market Share Report (most recent available) indicates that:

- a. In the New York Metropolitan Area, ICBC USA maintains a 0.05% market share of the total deposits. Of the 5,135 branches located in this area, 3 of them are ICBC USA.
- b. In the Los Angeles Metropolitan Area, ICBC USA maintains a 0.11% market share of the total deposits. Of the 2,354 branches located in this area, 5 of them are ICBC USA.
- c. In the San Francisco Metropolitan Area, ICBC USA maintains a 0.18% market share of the total deposits. Of the 1,017 branches located in this area, 5 of them are ICBC USA.

These percentages of deposit market share are based on the total amount of deposits of the Bank, which is \$2.223 billion. However, it has to be taken into consideration that the total amount of deposits includes brokered deposits, deposits raised through national listing services, and non-resident alien (NRA) accounts totaling \$486 million or 22 percent of the total. None of these depend on our branch locations.

## **C. ICBC (USA)'s Assessment Areas**

### 1. New York Region

ICBC (USA)'s New York Region (NYR) consists of the Bank's Headquarters, and branches located in Manhattan's Chinatown, Main Street Flushing, and Brooklyn's Chinatown.

The Bank has chosen to include in its Assessment Areas (AAs) three counties within the New York-Jersey City-White-Plains, NY-NJ MD 35614, which is part of the greater New York-Newark-Jersey City, NY-NJ-PA MSA 35620. The three counties are Kings (47), New York (61), and Queens (81) based on the location of its three branches.

The Bank's New York branch locations:

1633 Broadway Head Office (no walk-in services)

Canal St (County 61 – Tract 0029.00): Low<sup>1</sup>  
Brooklyn (County 47 – Tract 0104.00): Moderate  
Flushing (County 81 – Tract 0871.00): Moderate

2. Southern California Region-Los Angeles

The Bank's Southern California Region (SCR) operates 5 branches in the greater Los Angeles area. Its assessment area contains all census tracts within the Los Angeles-Long Beach-Glendale MD 31084.

The Bank's Los Angeles branch locations:

Alhambra (County 37 – Tract 4816.06): Moderate  
Hacienda Heights (County 37 – Tract 4086.28): Upper  
San Gabriel (County 37 – Tract 4814.01): Moderate  
Temple City (County 37 – Tract 4801.01): Upper  
Torrance (County 37 – 6512.21): Upper

3. Northern California Region

ICBC (USA)'s Northern California Region is separated into two Assessment Areas: San Francisco Region AA and the Oakland AA. The San Francisco Region AA consists of all the counties in the San Francisco-Redwood City-South San Francisco, CA MD 41884. The Oakland Region AA consists of Alameda County within the Oakland-Hayward-Berkeley, CA MD 36084. Both MDs are located in the San Francisco-Oakland-Hayward, CA MSA 41860.

The Bank's branch locations:

San Francisco Chinatown (County 75 – Tract 0611.00): Low  
Clement St. (County 75 – Tract 0402.00): Middle  
Noriega St. (County 75 – Tract 0328.02): Middle  
South San Francisco (County 81 – Tract 6022.00): Low  
Oakland (County 1 – Tract 4030.00): Low

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<sup>1</sup> All tract income levels are based on the 2019 FFIEC Geocode Census Report.



**III. STRATEGIC PLAN****A. Election of Alternative CRA Assessment Method**

ICBC (USA)'s Board of Directors and management are committed to meet the goals set forth in this Strategic Plan. Pursuant to 12 C.F.R. § 25.27(f)(4), if for unforeseen circumstances the Bank fails to meet substantially its plan goals for a "Satisfactory" CRA rating, the Bank elects to have the Bank's performance evaluated under the Large Bank Performance Test.

**B. Strategic Plan Effective Date and Term****1. Proposed Effective Date**

The proposed effective date of ICBC (USA)'s CRA Strategic Plan is January 1, 2021 after approval by the OCC.

**2. Plan Term**

The term of ICBC (USA)'s CRA Strategic Plan covers five calendar years: 2021, 2022, 2023, 2024, and 2025. The Bank's CRA Strategic Plan sets forth measurable goals for a five (5) year period under which the OCC can evaluate the Bank's performance, as required by 12 C.F.R. § 25.21.

**C. Public Participation and Submission Process**

ICBC (USA) has made a great effort to assess the needs of the communities it serves and to seek public participation in development of this CRA Strategic Plan. The OCC regulations governing public participation fall into three categories: (1) the informal seeking of suggestions from members of the public in its assessment areas covered by the plan while developing the plan; (2) the formal solicitation of public comment on the developed plan for at least 30 days by publication of a notice in at least one newspaper of general circulation in each assessment area covered by the plan; and (3) the availability of copies at no cost at all offices of the Bank in any assessment area covered by the plan for review by the public during the period of formal public comment. The Bank has complied fully with these requirements.

**1. Public Participation and Informal Suggestions**

ICBC (USA) has informally sought input and suggestions from various sources, including entities representing nonprofit and community development-focused organizations within its assessment areas.

The identified community development needs in the Bank's assessment areas, based on the community contact information include the following:

- Affordable housing (rental and homeownership)
- Letters of credit for affordable housing builders
- Rehabilitation funding for multifamily housing
- Community development lending
- Grant funding
- Financial education and awareness training for families, recent immigrants, and the elderly
- Small business lending
- Flexible and low-cost lending and capital for organizations that provide microloans to start ups and small businesses
- Training on credit risk and underwriting standards for CDFI focused on microlending

The Bank will focus its CRA Program primarily to direct CRA activities and resources in these areas of need within the community.

## 2. Formal Public Comment Process

The Bank has solicited formal public comment on its Strategic Plan for at least 30 days by publishing notice in at least one newspaper of general circulation in each assessment area covered by the plan, as required by 12 C.F.R. § 25.27(d)(2).

## **IV. PERFORMANCE CONTEXT**

The OCC applies the different CRA tests and standards in the context of seven factors collectively referred to as a bank's CRA "performance context." The OCC also considers those same "performance context" factors when deciding to approve a proposed strategic plan (12 C.F.R. § 25.21(b)). These seven factors of a bank's CRA performance context outlined in 12 C.F.R. § 25.21(b)(1) - (7) are:

- (1) Demographic data on median income levels, distribution of household income, nature of housing stock, housing costs, and other relevant data pertaining to a bank's assessment area(s);
- (2) Any information about lending, investment, and service opportunities in the bank's assessment area(s) maintained by the bank or obtained from community organizations, state, local, and tribal governments, economic development agencies, or other sources;
- (3) The bank's product offerings and business strategy as determined from data provided by the bank;
- (4) Institutional capacity and constraints, including the size and financial condition of the bank, the economic climate (national, regional, and local), safety and soundness limitations, and any

other factors that significantly affect the bank's ability to provide lending, investments, or services in its assessment area(s);

- (5) The bank’s past performance and the performance of similarly situated lenders;
- (6) The bank’s public file, as described in § 25.43, and any written comments about the bank's CRA performance submitted to the bank or the OCC; and
- (7) Any other information deemed relevant by the OCC.

In the following, the elements of ICBC (USA)’s CRA performance context are addressed.

**A. Demographic and Other Relevant Data (12 C.F.R. §12 CFR 25.21(b)(1))**

**New York Assessment Area**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	Unclassified % of #
Census Tracts/BNAs	1,718	11.06	30.56	32.13	23.28	2.97
Population by Geography	6,321,295	13.67	34.30	27.76	24.19	0.09
Business by Geography	429,131	8.46	22.33	22.49	43.13	3.60
Distribution of LMI Families throughout AA	665,656	22.27	43.83	24.64	9.25	0.00
Median Family Income for AA:		\$72,047				
2019 Adjusted Median Family Income for MSA:		\$79,300				
Households Below Poverty Level:		16.74%				
Median Housing Value:		\$541,823				
Source: 2010 US Census and 2019 FFIEC updated Medial Family Income						

According to the 2010 U.S. Census, the total population of the New York assessment area (AA) was 6.32 million. The distribution of families by income level was 13.67 percent low income, 34.30 percent moderate income, 27.76 percent middle-income, and 24.19 percent upper income. The percentage of families in the AA living below the poverty level is high at 16.74 percent. The 2010-weighted average of median family income for the AA was \$72,047. Low income families in the AA earned median annual income of \$39,000 or less, while moderate income families earned an annual income of \$39,000 to \$62,400.

According to the nonprofit, Community Service Society, 78 percent of low income tenant households in NYC are rent burdened, meaning they spend more than 30 percent of their income on rent.<sup>2</sup> This is due to the dwindling supply of affordable housing.

**Los Angeles Assessment Area**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	Unclassified % of #
Census Tracts/BNAs	2,346	8.99	28.64	26.77	34.02	1.58
Population by Geography	9,818,605	8.01	29.43	28.26	33.92	0.39
Business by Geography	683,317	6.40	18.12	25.27	48.94	1.27
Distribution of LMI Families throughout AA	878,498	13.64	41.84	26.84	17.67	0.01
Median Family Income for AA:		\$62,703				
2019 Adjusted Median Family Income for MSA:		\$73,100				
Households Below Poverty Level:		14.14%				
Median Housing Value:		\$526,439				
Source: 2010 US Census and 2019 FFIEC updated Medial Family Income						

According to the 2010 U.S. Census, the total population of the Los Angeles AA was 9.82 million. The distribution of families by income level was 8.01 percent low income, 29.43 percent moderate income, 28.26 percent middle income, and 33.92 percent upper income. The percentage of families in the AA living below the poverty level is high at 14.14 percent. The 2010-weighted average of median family income for the AA was \$62,703. Low income families in the AA earned median annual income of \$34,650 or less, while moderate income families earned an annual income of \$34,650 to \$55,440.

According to the California Housing Partnership Corporation, the County’s lowest income renters spend 71% of income on rent, leaving only 29% left for food, transportation, health care, and other essentials.<sup>3</sup> The US Census considers households to be cost burdened if they spend more

<sup>2</sup> Community Service Society of New York, *Rental Housing Affordability in Urban New York: A Statewide Crisis* (May 2019), available at [https://smhttp-ssl-58547.nexcesscdn.net/nycss/images/uploads/pubs/Rental\\_Housing\\_in\\_Urban\\_New\\_York\\_A\\_Statewide\\_Crisis\\_WEB.pdf](https://smhttp-ssl-58547.nexcesscdn.net/nycss/images/uploads/pubs/Rental_Housing_in_Urban_New_York_A_Statewide_Crisis_WEB.pdf)

<sup>3</sup> California Housing Partnership, *Los Angeles County’s Housing Emergency and Proposed Solutions* (May 2018), available at <https://1p08d91kd0c03rlxhmhtydpr-wpengine.netdna-ssl.com/wp-content/uploads/2018/05/Los-Angeles-2018-HNR.pdf>.

than 30% of their incomes on housing costs, and severely cost burdened if they spend more than 50%. The fact that lowest income renters spend 71% of income on rent demonstrates the high cost burden of housing in Los Angeles. Furthermore, the California Housing Partnership Corporation calculated that renters would need to earn four times the local minimum wage to afford the current median asking rent of \$2,499 in Los Angeles.<sup>4</sup>

In 2017, the Los Angeles Homeless Services Authority (LAHSA) reported that the Greater Los Angeles Homeless Count of the sheltered and unsheltered homeless population in the County increased 23 percent from 46,874 in 2016 to 57,794 in 2017.<sup>5</sup>

**San Francisco Assessment Area**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	Unclassified % of #
Census Tracts/BNAs	411	10.22	17.03	38.93	32.12	1.70
Population by Geography	1,776,095	9.90	18.10	41.82	29.90	0.28
Business by Geography	143,621	18.14	11.17	31.42	39.17	0.10
Distribution of LMI Families throughout AA	153,117	14.81	25.97	41.62	17.59	0.01
Median Family Income for AA:		\$103,742				
2019 Adjusted Median Family Income for MSA:		\$133,800				
Households Below Poverty Level:		8.95%				
Median Housing Value:		\$794,296				
Source: 2010 US Census and 2019 FFIEC updated Medial Family Income						

According to the 2010 U.S. Census, the total population of the San Francisco AA was 1.78 million. The distribution of families by income level was 9.90 percent low income, 18.10 percent moderate income, 41.82 percent middle income, and 29.90 percent upper income. The percentage of families in the AA living below the poverty level is 8.95 percent. The 2010-weighted average of median family income for the AA was \$103,742. Low income families in the AA earned median annual income of \$58,200 or less, while moderate income families earned an annual income of \$58,200 to \$93,120.

<sup>4</sup> *Id.*

<sup>5</sup> Los Angeles Homeless Services Authority, *Greater Los Angeles Homeless Count Results* (June 2017), available at <https://www.lahsa.org/documents?id=1385-2017-homeless-count-results-los-angeles-county-presentation.pdf>.

According to the San Francisco Planning Department, in 2017, almost 7,500 individuals were identified as homeless in San Francisco, with approximately 4,350 counted as unsheltered. Of the total number of unsheltered homeless individuals, a little over 500 were unaccompanied children or transitional-age youth (between the ages of 18 and 24).<sup>6</sup>

**Oakland Assessment Area**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	Unclassified % of #
Census Tracts/BNAs	361	16.07	23.27	31.86	28.25	0.55
Population by Geography	1,510,271	14.59	22.80	33.64	28.97	0.00
Business by Geography	174,032	10.39	17.51	32.15	39.91	0.04
Distribution of LMI Families throughout AA	141,345	23.65	29.33	32.24	14.78	0.00
Median Family Income for AA: \$93,822 2019 Adjusted Median Family Income for MSA: \$111,700 Households Below Poverty Level: 10.71% Median Housing Value: \$551,319						
Source: 2010 US Census and 2019 FFIEC updated Medial Family Income						

According to the 2010 U.S. Census, the total population of the Oakland AA was 1.51 million. The distribution of families by income level was 14.59 percent low-income, 22.80 percent moderate income, 33.64 percent middle income, and 28.97 percent upper income. The percentage of families in the AA living below the poverty level is high at 10.71 percent. The 2010-weighted average of median family income for the AA was \$93,822. Low income families in the AA earned median annual income of \$52,200 or less, while moderate income families earned an annual income of \$52,200 to \$83,520.

**B. Lending, Investment, and Service Opportunities (12 C.F.R. §12 CFR 25.21(b)(2))**

ICBC (USA) engaged a number of community development organizations, government agencies, and community advocates in developing an assessment of needs related to lending, investment, and service opportunities in the Bank’s assessment area. In addition, the Bank

<sup>6</sup> San Francisco Planning Department, *San Francisco Housing Needs and Trends Report* (July 2018) at 71, available at [http://default.sfplanning.org/publications\\_reports/Housing-Needs-and-Trends-Report-2018.pdf](http://default.sfplanning.org/publications_reports/Housing-Needs-and-Trends-Report-2018.pdf).

reviewed and analyzed reports from government and community development organizations to assess needs within the Assessment Areas.

The opportunities for community development participation within the assessment areas are broad. There are numerous community development and governmental organizations representing affordable housing, economic development, and services to low- and moderate-income families.

The Bank received feedback from a Community Development Financial Institution (CDFI) in New York City indicating their greatest need is flexible and low-cost lending capital for organizations like theirs that provide microloans to start ups and small businesses. The CDFI also explained their staff needs training on credit risk and underwriting standards.

Several other community organizations in California with which the Bank communicated voiced the need for capacity building for nonprofits as well as the need for financial education and awareness for families, recent immigrants, and the elderly. Awareness on even basic financial lessons on personal finances, budgeting, savings, and banking resources are extremely important to these vulnerable groups of people.

According to the San Francisco Planning Department, San Francisco and the Bay Area are “currently in the midst of a housing affordability crisis unprecedented in their history.”<sup>7</sup> The San Francisco Planning Department has suggested that some of the demand for housing to lower-income households can be met through units that are restricted to families and individuals with incomes at specified levels, but there has been a limited number of public and private funding to finance such projects.<sup>8</sup> Additionally, homelessness is a significant challenge for San Francisco. According to the San Francisco Planning Department, there is a lack of shelter for homeless individuals and families and a need for housing development to close that gap in San Francisco’s housing stock.<sup>9</sup>

Moreover, according to the California Housing Partnership, Los Angeles County needs 568,255 more affordable rental homes to meet current demand.<sup>10</sup> Likewise, according to Community Service Society, the rental market in New York City is not producing enough new affordable housing units even with the existing amount of public subsidies.<sup>11</sup> Aggravating the affordable housing crisis in New York City is the continuous loss of low-rent apartments offset by increases in high-rent apartments, leading many low-income New Yorkers to face extremely

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<sup>7</sup> *Id.*, at 1.

<sup>8</sup> *Id.*, at 29.

<sup>9</sup> *Id.*, at 71.

<sup>10</sup> Partnership, *supra* note 3.

<sup>11</sup> Community Service Society of New York, *Where Have All the Affordable Rentals Gone?* (May 2019), available at [https://smhttp-ssl-58547.nexcesscdn.net/nycss/images/uploads/pubs/Where\\_Have\\_All\\_the\\_Affordable\\_Rentals\\_Gone\\_-\\_web.pdf](https://smhttp-ssl-58547.nexcesscdn.net/nycss/images/uploads/pubs/Where_Have_All_the_Affordable_Rentals_Gone_-_web.pdf).

difficult housing situations in which they either have to assume severe rent burdens or be displaced or become homeless.<sup>12</sup>

### **C. Bank's Product Offerings and Business Strategy (12 C.F.R. §12 CFR 25.21(b)(3))**

#### *1. Commercial Lending – Primary Business*

The Bank's strategic objectives include improving lending revenue through achieving organic loan growth by providing new credit products to meet the needs of its typical customer base as well as a broader customer base. The Bank's primary business is commercial lending which is clearly evident in its loan portfolio that as of June 30, 2020 is comprised of \$2,278 million in commercial and commercial real estate loans representing 89% of the total loans, whereas consumer loans (i.e., one to four family loans and credit cards) total \$281 million or 11% of the total loans.

#### *2. Community Development Lending to Meet Need*

Moreover, as will be discussed in the following section, the high cost of homeownership in the Bank's assessment areas, coupled with the need for affordable rental housing, has led ICBC (USA) to focus on community development lending as a product to help to meet community development needs. For example, in 1998 the predecessor bank of ICBC USA provided a two-year line of credit to a CDFI in California and in 2016, ICBC USA agreed to increase the commitment from \$400,000 to \$1 million. Then in 2018, ICBC USA agreed to increase the commitment again for the CDFI to \$2 million. The CDFI is a non-profit organization focusing on providing permanent loans for multifamily rental housing throughout California.

Additionally, the commercial lending team has attracted borrowers with projects that serve community development purposes. For example, several commercial loans have been for the purchase of residential hotel properties containing Single Resident Occupancy (SRO) units. SRO units are known to provide affordable housing for low-to-moderate income (LMI) individuals. Other commercial loans include those for projects that contribute to the city's redevelopment initiatives, such as a loan that helped finance the purchase of a recently gut-renovated and opened community supermarket in the downtown Jamaica, NY redevelopment zone.

Historically, a large portion of the Bank's community development lending has also focused on supporting small businesses and commercial real estate loans (CRE) for properties with commercial units leased to small businesses that serve low-to-moderate income communities. The Bank's CRE financing allows for the continuation of the small business operations in these properties enabling them to stay in the local community and provide for the continuation of jobs

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<sup>12</sup> *Id.*



and income to local residents thereby revitalizing and stabilizing low-to-moderate income communities.

The Bank's focus on community development lending is a natural business strategy as they have been generated through already existing loan products.

#### **D. Institutional Capacity and Constraints (12 C.F.R. §12 CFR 25.21(b)(4))**

ICBC (USA)'s low volume of home mortgage loans is explainable not only because the Bank's primary product is commercial lending, but also due to several external factors.

##### *1. Strong Banking Competition*

There is very strong banking competition in the ICBC (USA)'s assessment areas with 5,135 branches from 187 depository institutions in New York; 2,354 branches from 119 depository institutions in Los Angeles; and 1,017 branches from 70 depository institutions in San Francisco.

Based on the FDIC Summary of Deposits as of June 30, 2019, ICBC (USA) ranked 80th out of 187 institutions with a 0.05 percent market share in New York. The top competitors included JPMorgan Chase Bank, Bank of America, Citibank, The Bank of New York Mellon, and HSBC Bank USA. Deposits are heavily concentrated with these top five institutions holding over 57 percent of the total deposits in the New York assessment area.

ICBC (USA) ranked 48th out of 121 institutions with a 0.11 percent market share in Los Angeles. The top competitors included Bank of America, Wells Fargo, JPMorgan Chase Bank, MUFG Union Bank, CIT Bank. Deposits are heavily concentrated with these top five institutions holding 59 percent of the total deposits in the Los Angeles assessment area.

ICBC (USA) ranked 28th out of 69 institutions with a 0.18 percent market share in San Francisco. The top competitors included Bank of America, Wells Fargo, First Republic Bank, and JPMorgan Chase Bank. Deposits are heavily concentrated with these four five institutions holding over 70 percent of the total deposits in the San Francisco assessment area.

##### *2. High-Cost Housing*

In addition, ICBC (USA)'s assessment areas are high-cost housing areas causing housing affordability to be a challenge, particularly for low- and moderate-income families. The median sales price of existing single-family homes in the New York metropolitan division was over \$540 thousand; in Los Angeles was over \$526 thousand; in San Francisco was over \$794 thousand; and in Oakland was over \$551 thousand. When compared to the national median average of \$313,200 for 2020, this highlights the high cost of home ownership in the assessment areas.

As discussed in the “Demographic and Other Relevant Data” section, based on 2010 census data, the annual incomes for low- and moderate-income families in New York is less than \$39,000 and \$62,400, respectively. In Los Angeles, low-income families in the AA earned median annual income of \$34,650 or less, and moderate-income families earned an annual income of \$34,650 to \$55,440, while in San Francisco, low-income families in the AA earned median annual income of \$58,200 or less, while moderate-income families earned an annual income of \$58,200 to \$93,120. In Oakland, low-income families in the AA earned median annual income of \$52,200 or less, and moderate-income families earned an annual income of \$52,200 to \$83,520. This disparity between housing costs and family income produces a significant challenge for low- and moderate-income families to become first-time homeowners. In fact, according to the San Francisco Planning Department, the household income needed to afford the median home in San Francisco is \$250,000 based on the assumption that a household would not spend more than 30% of income on their mortgage after making a down payment of 10% of purchase price.<sup>13</sup>

### 3. Primarily Rental Housing Markets

Moreover, another relevant performance context factor which affects the Bank’s home mortgage lending activity, is the relatively low percentage of owner-occupied housing units in the assessment area. According to the New York City Rent Guidelines Board’s “2018 Housing Supply Report,” most New York residents live in multi-family rental housing rather than owning homes, with rental units comprising 62.9% of NYC’s available housing stock, which is a far greater share than the nationwide average of 36.9%.<sup>14</sup> Similarly, San Francisco’s residents live mostly in rental housing, in which there are roughly 225,000 renter households in the city, compared to 130,000 homeowner households.<sup>15</sup>

In summary, the strong lending competition, high cost of housing, and the fact that the Bank’s assessment areas are primarily rental housing markets contribute to the Bank’s low volume in home mortgage loans. Furthermore, these factors also explain the uneven distribution of loans among borrowers of different income levels. Specifically, there are relatively limited opportunities for one-to-four family mortgage lending to low-to-moderate-income individuals in the assessment areas.

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<sup>13</sup> San Francisco Planning, *supra* note 6 at 23.

<sup>14</sup> New York City Rent Guidelines Board, *2018 Housing Supply Report* (May 24, 2018), available at <https://www1.nyc.gov/assets/rentguidelinesboard/pdf/18HSR.pdf>.

<sup>15</sup> *Id.*, at 37

**E. Bank's Past Performance (12 C.F.R. §12 CFR 25.21(b)(5))**

ICBC (USA)'s evaluations from the prior exams were as follows:

<b>Year</b>	<b>Performance Criteria</b>		<b>Rating</b>
2010	Intermediate Small	Lending Test:	Outstanding
		Community Development Test:	Outstanding
2013		Lending Test:	Outstanding
		Community Development Test:	Outstanding
2017	Large	Lending Test:	Low Satisfactory
		Investment Test:	Low Satisfactory
		Service Test:	Low Satisfactory

In 2010 and 2013, when ICBC (USA) was evaluated under the Intermediate Small Bank procedures, its lending performance was evaluated based on its commercial loans as it was the primary lending product and its residential mortgage lending was limited. It was noted that the distribution of loans reflected excellent penetration among businesses of different sizes in the assessment areas; the geographic distribution of loans reflected excellent dispersion throughout the assessment areas; and the Bank's community development performance demonstrated excellent responsiveness to the needs of the AAs through loans, qualified investments, and services.

In 2017, when the Bank was first evaluated under the large bank performance criteria, it was noted that community development lending had a significantly positive impact on the assessment areas because of the volume of loans and responsiveness to community development needs. For example, several commercial loans in New York, Oakland, and San Francisco were for the purchase of residential hotel properties containing SRO units known to provide affordable housing for LMI individuals. Typically, SRO properties have common/shared hall bathrooms and do not provide kitchens. One particular commercial loan in New York was for a property that contained 134 cubicle-style SRO units which are 20 to 30 square feet in size, are divided by plywood or sheetrock, do not offer windows or natural lighting, and contain little more than a single size bed and locker for personal items. These cubicle rooms meet the absolute minimum standard for legal housing.

Other qualified community development loans during the evaluation period included one loan in New York to a facility to house a public benefit medical facility located in a moderate-income area that serves the entire county. Also, a community development loan in New York was to an adult daycare center whose clients are low-and-moderate income patients who are qualified for Medicaid. Another important community development loan in New York was a loan for \$17.10 million that addressed the need to revitalize and stabilize an LMI geography by lending to a supermarket in the process of renovation and located in a redevelopment and revitalization area identified by the city. In Los Angeles, there was a community development loan that promoted the

economic development needs of the area and was originated using the U.S. Small Business Administration's 504-loan program.

#### **F. Bank's Public File and Written Comments (12 C.F.R. §12 CFR 25.21(b)(6))**

ICBC (USA)'s public file is maintained in compliance with the requirements of 12 C.F.R. §25.43. The Bank's CRA Notice is prominently displayed in the Bank's reception room of its main office, as required by 12 C.F.R. § 25.44. To date, the Bank's Public file contains no written comments received from the public.

### **V. STRATEGIC PLAN – MEASURABLE GOALS**

#### **A. Execution of CRA Strategic Plan**

ICBC (USA) has established a CRA program governance structure and mechanisms to monitor, control, and evaluate the execution of the CRA Strategic Plan. The program has internal controls and reporting mechanisms to ensure that information is communicated throughout the Bank. Moreover, the CRA Officer will monitor the Bank's performance under the Plan and communicate any gaps for them to be addressed appropriately. The business units will be responsible for working with the CRA Officer and will be held accountable for the success in meeting the lending, investment and service goals listed below.

#### **B. ICBC (USA) CRA Goals**

ICBC (USA) is committed to making every effort to meet the needs of the communities it serves in a safe and sound manner. Thus, ICBC (USA) has set the following targets, giving consideration to the performance context factors described above. The targets specified below are measurable goals that constitute “**Satisfactory**” and “**Outstanding**” performance. ICBC (USA)'s overall goal is to maintain at least a “Satisfactory” CRA performance rating throughout its AAs. However, the Bank believes it may have an opportunity to exceed targets such that it would merit an “Outstanding” rating.

The goals are outlined below under the categories of community development lending, community development qualified investments, and community development services. The goals have been established for a five-year period ending on December 31, 2025.

Under the CRA Strategic Plan, the ICBC (USA) intends to respond to the community needs identified by the Bank in the community needs assessment described in Section III.C.1 and Section IV.B by making loans and investments consistent with the Bank's core strategies and business model.

### C. Adjusted Tier 1 Capital

The goals set forth below have been determined using an “Adjusted Tier 1 Capital.” This Adjusted Tier 1 Capital is Tier 1 Capital as of June 30, 2020 adjusted by proportioning it from total amount of deposits as of June 30, 2020 less those deposits not sourced from the Bank’s branches, namely, wholesale deposits and NRA deposits, in order to better reflect the deposits that are actually attributed to individual retail customers located within the assessment areas. This use of an adjusted Tier 1 Capital is consistent with the spirit of CRA to ensure that deposits collected from local neighborhoods are being used to fund lending activities within those same local areas.

The total deposits as of June 30, 2020 excluding NRA and brokered deposits (i.e., qualifying deposits) is \$1,472 million, which is 72 percent of the original total. Therefore, 72 percent of the Tier 1 Capital as of June 30, 2020 (of \$390 million) is \$283 million which is referred to as the “Adjusted Tier 1 Capital.”

The Adjusted Tier 1 Capital is then apportioned among the AAs based on the deposits sourced from the Bank’s branches within the respective AA.

Industrial and Commercial Bank of China (USA) NA									
Allocated Capital									
June 30, 2020									
(amounts in \$ thousands)									
SOD #	Region #	BR #	Location	Report Per SOD	Exclude Brokered CD & NRA Accounts	Qualifying Deposits	% to Total Deposits	Allocated Capital	Allocated Capital by Region
0	1000	1000	1633 Broadway	\$ 374,945	\$ (363,717)	\$ 11,228	0.76%	\$ 2,000	
13	1000	1001	202 Canal Street	267,849	(31,812)	236,037	16.03%	45,000	
8	1000	1002	8th Avenue	67,229	(3,777)	63,452	4.31%	12,000	
9	1000	1003	Main Street	170,014	(18,491)	151,523	10.29%	29,000	\$ 88,000
3	2000	2001	Alhambra	206,130	(26,066)	180,064	12.23%	35,000	
1	2000	2002	Hacienda	141,070	(19,624)	121,446	8.25%	23,000	
11	2000	2003	San Gabriel	50,948	(12,565)	38,383	2.61%	7,000	
2	2000	2004	Temple City	79,775	(10,797)	68,978	4.68%	13,000	
4	2000	2005	Torrence	49,853	(6,635)	43,218	2.93%	8,000	\$ 86,000
5	3000	3001	Grant Ave, SF	258,254	(30,616)	227,638	15.46%	44,000	
6	3000	3002	Clement St, SF	66,772	(1,355)	65,417	4.44%	13,000	
7	3000	3003	Noriega St, SF	82,197	(1,323)	80,874	5.49%	16,000	
10	3000	3005	Grand Ave, SM	113,784	(12,160)	101,624	6.90%	20,000	\$ 93,000
12	4000	3004	401 9th St, Alameda	102,994	(20,104)	82,890	5.63%	16,000	\$ 16,000
<b>Total per Schedule</b>				<b>\$ 2,031,814</b>	<b>\$ (559,042)</b>	<b>\$ 1,472,772</b>	<b>100.00%</b>	<b>\$ 283,000</b>	<b>\$ 283,000</b>
<b>Totals per Call Rep Sch E</b>				<b>2,031,814</b>					
				<b>-</b>					
<b>Qualified Dep to Total</b>						<b>72%</b>			
Tier 1 Capital - 6/30/20								390,410	
Qualifying %								72%	
Adjusted Tier 1 Capital								<b>283,000</b>	

## D. Target Percentages and Amounts

The target dollar amounts for Satisfactory and Outstanding performance for community development lending and investments represent percentages of Adjusted Tier 1 Capital (as of June 30, 2020). The target percentages are cumulative, in other words, they reflect a total percentage and amount of loans and investments within the five-year plan period. The target amounts for community services are based on the Bank's headcount.

These goals for community development lending and investments have been established based upon projected increase in allocated Tier 1 Capital. Should the Bank not reach its Capital targets as expected, the goals will be modulated down commensurately. If, during the term of this Strategic Plan, there is a material change in circumstance, ICBC (USA) may request an amendment to this Strategic Plan as provided for in 12 C.F.R. § 25.27(h).

### *1. Adjustments Per Historical Performance*

Some target amounts within certain AAs have been adjusted to ensure amounts are not significantly below historical performance within that AA as described in prior CRA performance evaluations.

#### *a. Community Development Lending Target Adjustments*

The NY AA had one large outlier in the community development loans within the scope of the 2017 CRA Performance Evaluation that significantly distorts the performance in that AA.<sup>16</sup>

The \$17.10 million loan booked in 2016 to finance the construction of a supermarket in a redevelopment zone in New York City was a unique opportunity for the Bank and does not reflect the community development loans that the Bank has otherwise been able to make.<sup>17</sup> Thus, the community development lending targets for New York have been limited slightly below prior performance. In this regard, however, the Bank has imposed a premium for the New York AA of 25% over what its methodology would otherwise require to give some recognition to the outliers in its past performance.

The community development lending targets for Oakland have also been limited slightly below prior performance. The Bank operates only one branch in Oakland, with staff dedicated to

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<sup>16</sup> The Bank had six Community Development loans in the NY AA within the scope of the 2017 CRA Performance Evaluation, the average of which was \$2.6 million, excluding a significant outlier for \$17.10 million. The smallest community development loan amount was \$380,000, while the second largest loan amount was \$6.5 million. The median amount of these loans was \$1.8 million.

<sup>17</sup> It was a coincidence of circumstance that the \$17.10 million loan was a CRA qualified community development loan. The principals were long-time customers of the Bank who are experienced real estate developers, investors, and partners in hotel, restaurant and Chinese supermarket operations. The fact that the personal guarantees of these long-time customers of the Bank provided substantial mitigation of the risks and the fact that the loan involved a project in a redevelopment zone presented favorable circumstances to permit for the large loan size of \$17.10 million. The Bank believes that it would not be reasonable to expect it would have similar opportunities in the future.

lending, including community development lending, primarily based in San Francisco. While opportunities for community development lending are sought out in both the San Francisco and Oakland AAs, which are adjacent to each other, the Bank is largely dependent upon the opportunities that arise and the competition for them. The Bank expects that its success in finding community development lending opportunities aligning with the Bank's business strategies and risk appetite will correlate with the volume of deposits it originates. In the period subject to the 2013 CRA examination, however, a few more opportunities arose in Oakland than in San Francisco.

*b. Community Development Investment Target Adjustments*

The community development investment targets for New York are set below prior performance. During the scope of prior CRA examinations, investments disproportionately favored the New York AA. The Bank believes that investment commitments should be redistributed on the basis of uniform criteria for all of the AAs. Thus, the Plan apportions investment targets among the AAs based on their respectively allocated Adjusted Tier 1 Capital.

The Plan sets more aggressive target for community development lending and for community services than it does for community investment. The Bank believes its lending and service activities have more of an impact in meeting the specific needs of the Bank's AAs and are more in line with the Bank's strengths and expertise.



**1. Community Development Lending**

Plan Years	5			Year 1	Year 2	Year 3	Year 4	Year 5		Year 5			
Estimated Capital Accretion	2%	Actual Adjusted Tier 1 Capital for Preceding June 30		283,000,000	288,660,000	294,433,200	300,321,864	306,328,301		306,328,301			
<b>Community Development Lending Goals</b>													
Targets/Assumptions		Rating	% of AA Adjusted Tier 1 Capital	Assessment Area	Year 1	Year 2	Year 3	Year 4	Year 5	Cumulative	% of Final AA Allocated Adjusted Tier 1 Capital		
% of Capital	25%												
NYR Increment	20%												
YTY Growth	2%												
Minimum per Year	50%												
Outstanding Differential	25%												
		<b>Satisfactory</b>	31.1%	New York	\$ 5,280,000	\$ 5,491,200	\$ 5,708,736	\$ 5,932,777	\$ 6,163,496	\$ 28,576,209	30%		
				Minimum per year*	\$ 2,640,000	\$ 2,745,600	\$ 2,854,368	\$ 2,966,388	\$ 3,081,748				
			30.4%	Los Angeles	\$ 4,300,000	\$ 4,472,000	\$ 4,649,160	\$ 4,831,618	\$ 5,019,514	\$ 23,272,291	25%		
				Minimum per year*	\$ 2,150,000	\$ 2,236,000	\$ 2,324,580	\$ 2,415,809	\$ 2,509,757				
			5.7%	Oakland	\$ 800,000	\$ 832,000	\$ 864,960	\$ 898,906	\$ 933,863	\$ 4,329,729	25%		
				Minimum per year*	\$ 400,000	\$ 416,000	\$ 432,480	\$ 449,453	\$ 466,932				
			32.9%	San Francisco	\$ 4,650,000	\$ 4,836,000	\$ 5,027,580	\$ 5,224,889	\$ 5,428,079	\$ 25,166,548	25%		
				Minimum per year*	\$ 2,325,000	\$ 2,418,000	\$ 2,513,790	\$ 2,612,444	\$ 2,714,039				
		Total									\$ 81,344,777		
		% of Final Adjusted Tier One Capital									<b>27%</b>		
		<b>Outstanding</b>			31.1%	New York	\$ 6,600,000	\$ 6,864,000	\$ 7,135,920	\$ 7,415,971	\$ 7,704,370	\$ 35,720,261	38%
					30.4%	Los Angeles	\$ 5,375,000	\$ 5,590,000	\$ 5,811,450	\$ 6,039,522	\$ 6,274,392	\$ 29,090,364	31%
					5.7%	Oakland	\$ 1,000,000	\$ 1,040,000	\$ 1,081,200	\$ 1,123,632	\$ 1,167,329	\$ 5,412,161	31%
					32.9%	San Francisco	\$ 5,812,500	\$ 6,045,000	\$ 6,284,475	\$ 6,531,111	\$ 6,785,099	\$ 31,458,185	31%
Total									\$ 101,680,971				
% of Final Adjusted Tier One Capital									<b>33%</b>				

\* Minimum per year for at least satisfactory rating. Excess in other years can be applied to cover differential between target and minimum.



**Community Development Lending Strategy**

The community development loan cumulative dollar volume targets for the review period are spread out within each plan year by respective AAs. While annual interim community development lending goals have been established to provide yearly benchmarks in achieving the cumulative targets within the five-year plan period, there are also minimum target amount levels set within each AA for each year of the Plan. This minimum amount establishes an expectation that a certain acceptable level of activity is conducted every year of the Plan. This framework reflects the Bank acknowledgement that negotiations and underwriting for large credit facilities may take several months resulting in disbursements to be made in the following year. The Bank also recognizes there may be circumstances in which the interim goal may not be reached for a particular year, but can be recouped in the following year by exceeding that year's goals. Thus, once the minimum AA target levels are achieved, the Bank is permitted to carry over an excess amount to a following year or a prior year to satisfy that year's benchmark. This will allow for flexibility in responding to the community needs and opportunities while considering market conditions and internal constraints.

To achieve the community development loan targets, the Bank will leverage its current loan products to respond to community needs. ICBC (USA) actively offers loans for purchase, refinancing, or construction of multifamily rental properties within all its AAs. These loans that support affordable housing have demonstrated to be particularly impactful in meeting the need for housing for LMI families as the AAs are in markets with high housing costs. The Bank plans to continue its strong commitments to help meet the needs for multifamily housing financing, which it recognizes as an important alternative to owner-occupied housing units among LMI households residing in the AAs.

ICBC (USA) will also endeavor to achieve its community development targets by partnering with CDFIs focused on affordable housing. Historically, the Bank has partnered with a CDFI that specializes in affordable housing programs for families and seniors, citizens with special needs and mixed-use developments throughout California. The Bank plans to continue its partnership with this CDFI by providing a line of credit for their affordable housing initiatives. Additionally, the Bank is currently in discussions with CDFIs in New York City and Los Angeles that seek loans to support their affordable housing projects in NYC and Los Angeles respectively.

Additionally, ICBC (USA) plans to continue to extend loans that contribute towards the revitalization and stabilization of LMI geographies. In the past, ICBC (USA) has provided commercial real estate loans that offer a wide range of financing options for purchasing, developing, or refinancing commercial property in areas designated by the local government within its area of economic redevelopment program or similar plan. Additionally, the Bank has provided financing for commercial property with retail space leased to small businesses that serve the LMI area it is located in. The Bank's financing of such commercial property allows for the

continuation of the small business operations in the buildings. This enables the small businesses to stay in the local community and provides for the continuation of jobs and income to local residents thereby revitalizing and stabilizing the LMI community. The Bank will continue to pursue these types of community development loans within its AAs in an effort to respond to the needs of the Bank's communities in the target amounts listed in the chart above.

Furthermore, the Bank plans to make loans to small businesses with gross annual revenues of \$1 million or less and promote economic development as they support permanent job creation, retention, and/or improvement for LMI persons or LMI areas.

ICBC (USA) also plans to achieve its community development targets by partnering with CDFIs focused on providing low-interest loans to small businesses in the Bank's AAs. Most recently, the Bank has provided loan capital to a CDFI in New York City to help finance their COVID-19 Emergency Recovery Loan Program. The Bank appreciates the importance of such organizations providing low-interest small business loans, training and counseling services, especially during times of crisis.

The Bank's planned efforts, as described above, are the principal means to achieve its community development targets. However, the Bank recognizes there are numerous other types of community development loans that can be responsive to the needs of LMI individuals, especially as they face new unique challenges presented by an emergency, such as COVID-19. The Bank will be attentive to community development loan opportunities that address any new needs of the LMI communities within the Bank's AAs.

## 2. Community Development Qualified Investments

Community Development Investment Goals											
	Rating	% of Adjusted Tier 1 Capital	Assessment Area	Year 1	Year 2	Year 3	Year 4	Year 5	Cumulative	% of Final AA Allocated Adjusted Tier 1 Capital	
% of Capital	1%										
YTY Growth	15%										
Outstanding Differential	20%										
	<b>Satisfactory</b> (minimum amounts that must be met each year of the Plan)*	31.1%	New York	\$ 200,000	\$ 300,000	\$ 400,000	\$ 500,000	\$ 600,000	\$ 2,000,000	2%	
		30.4%	Los Angeles	\$ 200,000	\$ 300,000	\$ 400,000	\$ 500,000	\$ 600,000	\$ 2,000,000	2%	
		5.7%	Oakland	\$ 100,000	\$ 200,000	\$ 300,000	\$ 400,000	\$ 500,000	\$ 1,500,000	9%	
		32.9%	San Francisco	\$ 200,000	\$ 300,000	\$ 400,000	\$ 500,000	\$ 600,000	\$ 2,000,000	2%	
	Total									\$ 7,500,000	
	% of Final Adjusted Tier One Capital									2%	
	<b>Outstanding</b>	31.1%	New York	\$ 300,000	\$ 400,000	\$ 500,000	\$ 600,000	\$ 800,000	\$ 2,600,000	3%	
		30.4%	Los Angeles	\$ 300,000	\$ 400,000	\$ 500,000	\$ 600,000	\$ 800,000	\$ 2,600,000	3%	
		5.7%	Oakland	\$ 200,000	\$ 300,000	\$ 400,000	\$ 500,000	\$ 600,000	\$ 2,000,000	12%	
		32.9%	San Francisco	\$ 300,000	\$ 400,000	\$ 500,000	\$ 600,000	\$ 800,000	\$ 2,600,000	3%	
Total									\$ 9,800,000		
% of Final Adjusted Tier One Capital									3%		

\* The minimum required amount that must be met each year of the Plan. This minimum amount establishes an expectation that a certain acceptable level of activity is conducted every year of the Plan. Amounts in excess of the yearly benchmarks may be used to satisfy the prior or following year's benchmark. The minimum required amount is also the target for a Satisfactory rating as the Bank feels it should achieve this amount every year of the Plan.

**Community Development Qualified Investments Strategy**

ICBC (USA) will seek to make qualifying investments throughout its four AAs in proportion to the distribution of the Bank’s deposits among its assessment areas as are reflected in the adjusted Tier 1 Capital. ICBC (USA) intends to be responsive to the needs of the community by investing in targeted affordable housing backed Mortgage Backed Securities (MBS). The Bank will also invest in municipal bonds that support community development in one or more of the Bank’s AAs (or broader statewide or regional area that includes the Bank’s AA). These investments support efforts to meet the critical need for affordable housing, access to credit for LMI borrowers, and revitalizing distressed neighborhoods in the Bank’s AAs. For as long as the MBS and bonds are maintained in the Bank’s portfolio, the book value will count towards the interim annual goals as well as the cumulative target for the review period.

Potential investment activities also include placing funds in community development banks through the Certificate of Deposit Account Registry Service (CDARS), which banks are CDFI Certified by the Treasury Department’s CDFI Fund. Placing funds at CDFI Certified deposit-taking banks will support their efforts in providing, for example, affordable small business loans, innovative and responsible personal loans, and asset building services in low- and moderate-income communities.

Additionally, the Bank will make grants to community-based organizations that focus on addressing community development needs in the Bank’s assessment areas. Based on feedback from outreach to local organizations, there is a high need for grants to continue their efforts in, for example: providing leadership building and job-readiness programs for at risk youth; offering translation services to recent immigrants to ensure they get access to medical care and services; acquiring and distributing food and other products to the needy; and providing shelters for the homeless as well as assistance for people to overcome addictions. Thus, ICBC (USA) will continue to support such organizations through grants as they have demonstrated to be impactful in responding to a wide variety of needs in the communities the Bank serves.

**3. Community Development Services**

Community Development Service Goals								
Initial Hours per Employee	2							
YTY Growth	10%							
Outstanding Differential	50%							
Rating	# of Branch Employees + 10% of Support Management & Staff	Assessment Area	Year 1	Year 2	Year 3	Year 4	Year 5	Cumulative Target Amount (Hours)
Satisfactory (minimum amounts that must be met each year of the Plan)*	46	New York	92	101	111	122	135	562
	33	Los Angeles	66	73	80	88	97	403
	7	Oakland	14	15	17	19	20	85
	27	San Francisco	54	59	65	72	79	330
Total								1,380
Outstanding	46	New York	138	152	167	184	203	844
	33	Los Angeles	99	109	120	132	145	605
	7	Oakland	21	24	26	28	31	130
	27	San Francisco	81	90	99	108	119	497
Total								2,076

\* The minimum required amount that must be met each year of the Plan. This minimum amount establishes an expectation that a certain acceptable level of activity is conducted every year of the Plan. Amounts in excess of the yearly benchmarks may be used to satisfy the prior or following year's benchmark. The minimum required amount is also the target for a Satisfactory rating as the Bank feels it should achieve this amount every year of the Plan.

**Community Development Services Strategy**

ICBC (USA)'s measurable goals for community development services are expressed in terms of the number of hours spent performing the activity. While the Bank encourages all staff to participate in a volunteer capacity in support of community reinvestment and development, branch staff will be responsible for a bulk of the community development services as they are principal points of contact and the most visible in the community.

The Bank will endeavor to provide various community development services to LMI persons and LMI geographies. Local conditions demonstrate an opportunity for the Bank staff to continue their service activities focused on financial education for low to moderate income new immigrants, most of whom have very limited English language skills. Additionally, Bank staff will continue to host financial education courses at local senior citizen centers serving LMI populations especially since elder financial exploitation is a growing concern in the communities the Bank serves. Through the Bank's outreach, local organizations in all the AAs had also voiced the need for financial literacy programs targeted to LMI populations. Thus, the Bank will continue its partnerships with local organizations and to participate in service activities that address this highly important need for financial education for LMI individuals and geographies.

Moreover, through the Bank's outreach, an organization expressed its need for technical assistance. Therefore, the Bank plans to leverage its staff's professional expertise and skillsets to provide, for example, loan underwriting training and assistance to local Community Development Financial Institutions (CDFI).

The Bank will also continue to encourage staff to serve on the boards of local community development organizations. Currently a branch manager serves as a board member of a non-profit business improvement district organization focused on overseeing and funding the maintenance, improvement, and promotion of small businesses in the New York Chinatown commercial district, which is within a low-income area. Additionally, Bank staff have provided assistance in fundraising initiatives for local organizations providing much needed services to LMI families. For example, branch staff have a long history of providing fundraising assistance to a women's residence in San Francisco, which offers a sanctuary for victims of domestic violence and human trafficking and offers programs that help them develop life skills. The Bank plans to continue its strong relationships with LMI community groups and to have staff available to provide assistance to these groups.

**E. Overall CRA Plan Rating**

In order to derive the Overall ICBC USA CRA Performance Evaluation Rating, the Bank proposes the following methodology based on a point system and average performance in lending, investments, and services across assessment areas.

Rating					
Assessment Area (AA)	Lending	Investments	Service	Average Points	Composite Rating
New York					
Los Angeles					
Oakland					
San Francisco					
<b>Average</b>					

Performance lending, investments, and services will be assigned points based on the parameters set forth below.

Parameters			
Performance Rating	Minimum % of Satisfactory Goals		Points
Substantial Noncompliance	<	75%	0
Needs to Improve	< =	85%	5
Low Satisfactory	< =	95%	10
High Satisfactory	< =	125%	15
Outstanding	> =	125%	20

The average performance in lending, investments, and services across assessment areas will yield a number, and that number will determine the Overall ICBC USA CRA Performance Evaluation Rating based on the Composite Rating Scale set forth below.

Composite Rating Scale		
Minimum Average Points	Minimum Average Points	Result
Less than	8	Evaluate on Large Bank Performance Test
Less than or equal to	15	Satisfactory
Less than or equal to	20	Outstanding

As mentioned in Section III.A., if for unforeseen circumstances the Bank fails to meet at least an overall “Satisfactory” rating under the Plan, the Bank elects to have the Bank’s performance evaluated under the Large Bank Performance Test.