BANKING SERVICES

Socially Responsible & Fair Business Banking Questions

Socially responsible goals of the City of Seattle are designed to assure equality and quality of life for all our citizens and maximize the City's potential for its citizens and its business community. These questions will assist evaluators to determine your institution's commitment to these same goals. The City uses Community Reporting Areas (CRA) to define neighborhoods based on census information.

1. ECONOMIC DEVELOPMENT AND SMALL BUSINESS LENDING

Economic development is a goal of the City to maintain Seattle's position as a center for businesses, jobs, robust neighborhoods, and economic opportunity by promoting access to economic opportunities for all of Seattle's communities. Those goals are promoted by prioritizing investments in low-income areas to help spark economic revitalization while preserving commercial affordability. Economic development is also supported through the following initiatives that are able to use private investment to support private projects.

- The Seattle Investment Fund (SIF) LLC makes investments in Seattle's low- income communities, with funding from private investors via the federal New Markets Tax Credit (NMTC) program. To date, SIF has invested $79 million in economic development projects, with potential for additional funding through private investment.
- The Equitable Development Initiative Fund supports community projects that mitigate displacement and increase access to opportunity in historically redlined neighborhoods. The City has provided an initial capitalization of $16 million to the Fund, with potential for additional funding through private investment.

a) How does the institution support the City's economic development goals? As part of the response, please describe how the institution currently supports, or would propose to support, the SIF LLC and/or the Equitable Development Initiative Fund.

b) Highlight current community reinvestment activities within the City of Seattle.

c) Describe your Seattle-specific (CRA) goals and commitments for the next five years.

d) Provide the number and dollar amount of community development loans and investments including loans and investments by type for (a) affordable housing, (b) small business development, (c) economic development, and (d) community facilities by CRA within the City in 2016.

e) Does your organization have a designated CRA officer that serves the City of Seattle?

f) Provide the total amount and number of small business loans by CRA for lending to businesses with less than $1 million in annual revenues in the past three years.

g) Provide the total amount and number of small business loans by CRA for (a) Small Business Loans in the amount of $100,000 to $250,000 each; and (b) Small Business Loans of less than $100,000 each in the past three years.

h) Does the institution provide a local single point of contact for small business lending?

2. COMMUNITY BANKING AND INVOLVEMENT

Credit

a) Provide summary of consumer loan data for entire City by zip code for past three years.

b) Describe the institution's initiatives to address the credit needs of City residents and businesses, including low and moderate income residents.

c) Does the institution offer a small dollar loan, "payday" loan, direct deposit advance, or similar product? What are the terms and conditions of the product, including APR? Provide the standard fee schedule.

Products and Access to Accounts/Services

d) What capability does the institution have to serve all customers, including those with diverse language, ADA, speech or hearing needs? Please describe.

e) Describe the checking account products and their qualifying requirements (such as minimum balances) available to retail clients.

f) Describe the products that are designed for the following consumers: un-banked or under-banked, elderly, youth, low income, no credit, poor credit, individuals seeking second chance checking accounts, or other target groups.

g) Does the institution provide every consumer access to debit cards, including prepaid and other? Please describe.

h) Describe the institution's participation in the "*Bank On*" program, or participation in similar program(s) meeting the social goals of "*Bank On",* over the past three years.

Policies/Fees

i) What is the monthly maintenance fee for the institution's basic checking account and debit cards? Attach current fee schedule.

j) Describe the institution's retail overdraft policies. Attach current fee schedule.

k) Does the institution charge surcharges if a customer without an account at the institution redeems EBT, other government entitlements, or unemployment OTC or at ATMs? Attach current fee schedule.

Presence in City of Seattle

l) Provide total number of branches and ATMs by site location in the City of Seattle to show how geographically disbursed the institution is by physical presence with the City of Seattle. How may branches within City limits have been closed in the past three years? How many have been opened? How does the institution provide notices for branch closures? Provide a copy of the most recent branch closing policy.

m) Please describe the level and type of services provided through web, IVR, or mobile access.

Community Involvement

n) Does the institution collaborate or support any non-profit organization focused on providing financial services for low income people in Seattle and throughout the holding company? Please list the nonprofit(s) and describe the nature and level of support.

o) Does the institution collaborate or support any non-profit organization providing free tax preparation services for low income workers? Please list the nonprofit(s) and provide the nature and level of support.

3. HOMEOWNERSHIP SUPPORT

Home Loan Programs

a) Does the institution participate in FHA program? How long has it done so?

b) Does the institution have a loan program with flexible underwriting designed for lower income borrowers? If so, how many loans have been made in the last 3 years?

c) Does the institution provide a single point of contact or coordinator in its loan servicing group for the City's home ownership program?

Loan Activity

d) What was the total number and dollar amount of residential loans for one to four occupant family dwellings during 2016 by CRA?

e) Provide the total number of residential mortgage loans by CRA during the last three years.

f) Provide the total number of home equity loans by CRA during the last three years.

Foreclosure Avoidance

g) Describe the institution's specific efforts to support homeowners' efforts to avoid foreclosure.

4. OIL AND GAS LENDING ACTIVITIES

City Resolution 31740. adopted by the Seattle City Council in April 2017, describes the City Council's opposition to the construction of the Keystone XL Pipeline and indicates concerns with doing business with financial institutions that invest in or provide financial services to TransCanada for the Keystone XL project. Considering this Resolution, please respond to the following questions:

(a) What has been your institution's participation in providing financial services to TransCanada in general and in specific for their work on the Keystone XL Pipeline project?

(b) What has been your institution's participation in providing investment/credit services to TransCanada in general and in specific for their work on the Keystone XL Pipeline project?

(c) What other investment have you made in the Keystone XL Pipeline project?

5. FAIR BUSINESS PRACTICES

SMC 20.46 states that is the City's priority to conduct City business with partners that are committed to and consistently demonstrate engaging in fair and responsible business practices and requires the City to ensure the firms it does business with do not engage in unfair business practices.

In two pages or less, briefly describe your company's commitment to fair business practices and the compliance management system or other similar internal policies, controls, and/or processes your company has in place to protect against violations related to the Washington State consumer protection act or other applicable federal consumer protection laws relevant to the scope of this contract. Please include in your narrative, a response to the following statements.

- Provide information on the involvement of your Board of Directors and Management in developing, implementing, communicating and overseeing your company's compliance management system related to fair business practices.

- Provide information on the main elements of your compliance program relating to fair business practices and consumer protection, including:

    - written policies and procedures;
    - training programs;

- program monitoring activities (including but not limited to staff compliance oversight, transaction oversight, third party oversight as applicable
- consumer complaint response system

audits and reviews of compliance management system, including the scope, the frequency, and who is involved in it, whether both internal and independent third party.