



Banesco USA Community Reinvestment Act (CRA) Public Statement

At Banesco USA, we are committed to serving the financial needs of the communities where we operate, including low- and moderate-income (LMI) neighborhoods. In alignment with the Community Reinvestment Act (CRA), we actively support initiatives that promote economic growth, affordable housing, and financial education.

Our Commitment

Banesco USA ensures that our products, services, and community engagement efforts are inclusive and accessible to all individuals and businesses, regardless of income level. We strive to:

- Provide fair and responsible access to credit for homeownership, small businesses, and community development projects that are credit worthy
- Partner with local organizations to support affordable housing initiatives, small businesses, and financial literacy programs
- Invest in community development efforts that create or retain jobs, enhance infrastructure, revitalize/stabilize LMI neighborhoods, and promote economic sustainability

Lending Practices

We actively extend credit and/or purchase loans to individuals and businesses through:

- Mortgage loans that support homeownership to credit worthy borrowers
- Small business loans that foster entrepreneurship and local economic growth
- Community development loans that finance affordable housing, enhance neighborhood stabilization/revitalization, and support economic development including the retention and/or creation of jobs for LMI workers

Designated Assessment Areas

Our CRA efforts are focused within our two designated assessment areas:

- The Miami-Fort Lauderdale-West Palm Beach Metropolitan Statistical Area (MSA) in Florida
- 40 Municipios of the San Juan-Bayamon-Caguas, PR MSA in the Commonwealth of Puerto Rico

Also, with the acquisition of the SBA lending business from BayFirst Financial Corp., Banesco USA has established a presence in the Greater Tampa Bay region which enhances the Bank's ability to better serve small and mid-sized businesses across the continental U.S.

We recognize the importance of determining and meeting the needs of our delineated communities, including those of creditworthy low- and moderate-income individuals.

Investments, Donations, and Service

Our commitment extends beyond lending, with targeted investments/donations in:

- Local nonprofits, community development financial institutions (CDFIs), small businesses, and affordable housing



- Financial education workshops to empower low- and moderate-income individuals (and students) with money management skills
- Employee volunteerism and Bank-sponsored initiatives that support community enrichment
- A commitment for senior management and other employees to provide financial expertise by serving on boards, committees, and advisory councils for community development organizations

Robust Community Outreach Program

At Banesco USA, we believe that strong community engagement is key to financial empowerment. Our Community Relations strategy is designed to build meaningful relationships and create sustainable impact in our designated assessment areas:

- Regular meetings with community leaders
- Partnerships with nonprofits, CDFI's, and related agencies
- Regular needs assessments to understand and address market conditions
- Being a leader in the community through memberships, engagement, and involvement in: chambers of commerce, local universities, community development agencies, trade associations, and related non-profit organizations
- Sponsorships of fundraising events, conferences, and forums that support community development initiatives
- Hosting relevant events at the Bank to raise awareness and engage the community

Anti-discrimination

The Board of Directors and Management promote a strong policy prohibiting discriminatory practices, while advising our personnel to adhere to fair lending directives. The Bank follows a Fair Lending Policy, emulating the spirit and letter of the Equal Credit Opportunity Act, the Fair Housing Act, the Fair Credit Reporting Act, and the Community Reinvestment Act.

Our Pledge

At Banesco USA, we recognize the importance of equitable access to financial resources and remain dedicated to meeting the credit needs of all communities we serve in a safe and sound manner. We welcome feedback and collaboration from our stakeholders to strengthen our CRA efforts and ensure meaningful community impact.

For more information about our CRA initiatives or to share feedback, please contact us at:

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