



PUBLIC DISCLOSURE

May 31, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

KEB Hana Bank USA, National Association
Charter Number: 20622

201 Main Street
Fort Lee, NJ 07024

Office of the Comptroller of the Currency

343 Thornall Street
Suite 610
Edison, NJ 08837

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: **Satisfactory**.

The lending test is rated: **Satisfactory**.

The major factors that support this rating include:

- KEB Hana Bank USA, NA (KEB Hana or the Bank's) average loan-to-deposit (LTD) ratio is reasonable based on the Bank's size, financial condition, and credit needs of the assessment area (AA).
- A substantial majority of the Bank's small business loans are inside the AA.
- The Bank exhibits a reasonable geographic distribution of loans originated in the AA.
- The Bank exhibits an excellent distribution of loans to borrowers of different income levels in the AA.
- The Bank has no consumer complaints related to its community reinvestment performance during the evaluation period.

Loan-to-Deposit Ratio

Considering the Bank's size, financial condition, and credit needs of the AA, the LTD ratio is reasonable.

The average quarterly LTD ratio for the 12 quarters of the evaluation period was 67.4 percent. The ratio ranged from a quarterly low of 59.4 percent to a quarterly high of 79.2 percent. The average LTD ratio was compared to the average LTD ratio of its peer group, which includes fifteen banks of similar asset size, location, and product offerings. The average LTD ratio for peer banks was 88.5 percent and ranged from a quarterly low of 44.4 percent to a quarterly high of 116.4 percent.

Lending in Assessment Area

A substantial majority of the Bank's loans are inside its AA.

The Bank originated and purchased 83.3 percent of its small business loans inside the AA during the evaluation period. 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.

Table D - Lending Inside and Outside of the Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business										
2019	9	90.0	1	10.0	10	5,791	85.3	1,000	14.7	6,791
2020	425	84.3	79	15.7	504	17,123	68.8	7,770	31.2	24,893
2021	531	82.5	113	17.5	644	28,416	74.8	9,579	25.2	37,995
Subtotal	965	83.3	193	16.7	1,158	51,330	73.7	18,349	26.3	69,679
Total	965	83.3	193	16.7	1,158	51,330	73.7	18,349	26.3	69,679
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

KEB Hana is a wholly owned subsidiary of Hana Bancorp Incorporated, established on September 16, 1986. Hana Bancorp Incorporated is majority owned by KEB Hana Bank in Seoul, South Korea, which is a member of the Hana Financial Group, a large financial conglomerate also headquartered in Seoul, South Korea. The Bank is headquartered in Fort Lee, New Jersey (NJ). The Bank does not have any subsidiaries.

KEB Hana has three branch offices located in the New York/New Jersey area. The Bank operates a full-service branch in Fort Lee, NJ, a full-service branch in New York City, NY, and a full-service branch in Flushing, NY. All branch hours are reasonable and offer an automatic teller machine (ATM). The Bank has one AA within the multi-state metropolitan statistical area (MMSA) of New York-Newark-Jersey City, NY-NJ-PA MMSA #35620. The AA includes Bergen, Essex, Hudson, Passaic, and Union counties in NJ, as well as Bronx, Kings, New York, Queens, Westchester, and Nassau counties in NY. During the review period, KEB Hana did not open or close any branch offices.

The Bank primarily offers business loans and commercial real estate (CRE) loans. The Bank also originated loans under the Paycheck Protection Program (PPP). This program was implemented by the U.S. Small Business Administration as a low-cost, forgivable loan program for small businesses to help cover payroll costs, interest on mortgages, rent, and utilities during the COVID-19 pandemic. Deposit products include traditional checking accounts, savings accounts, and certificates of deposits.

As of December 31, 2021, KEB Hana reported total assets of \$293.0 million. Net loans and leases totaled \$164.5 million, representing 56.1 percent of total assets. The loan portfolio primarily consists of real estate and commercial loans. Real estate loans total \$124.6 million, representing 75.8 percent of net loans. Commercial loans total \$42.5 million, representing 25.8 percent of net loans. Deposits total \$257.0 million. Tier 1 capital totaled \$33.1 million.

There were no financial or legal impediments that would hinder KEB Hana's ability to meet the credit needs of the communities it serves in the AA. KEB Hana's prior CRA performance evaluation (PE) was dated May 14, 2018 and was rated Satisfactory.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation is an assessment of KEB Hana's ability to meet the credit needs in its AA. We evaluated the Bank using the Small Bank evaluation procedures, which includes a Lending Test. The Lending Test evaluates the Bank's record of meeting the credit needs in its AA through its lending activities. To evaluate performance under the Lending Test, we reviewed small business loan originations and purchases between January 1, 2019 through December 31, 2021 (the evaluation period). The primary product during the evaluation period was small business loans.

Selection of Areas for Full-Scope Review

In each state where the Bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, Bank-delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, Bank-delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The Bank's overall rating is based solely on its performance in the New York-Newark-Jersey City, NY-NJ-PA MMSA.

The MMSA rating and state ratings are based on performance in all AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution 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.

Multistate Metropolitan Statistical Area Rating

New York-Newark-Jersey City, NY-NJ-PA MMSA

CRA rating for the New York-Newark-Jersey City, NY-NJ-PA MMSA: **Satisfactory**.

The Lending Test is rated: **Satisfactory**.

The major factors that support this rating include:

- The lending activity in the AA is reasonable.
- There is a reasonable distribution of small business loans across geographies of different income levels.
- There is an excellent distribution of small business loans across borrowers of different income levels.

Description of Institution's Operations in New York-Newark-Jersey City, NY-NJ-PA MMSA

KEB Hana has designated its AA as Bronx, Kings, Nassau, New York, Queens, and Westchester Counties in the State of New York and Bergen, Essex, Hudson, Passaic, and Union Counties in the State of New Jersey. All 11 designated counties are located within the New York-Jersey City-White Plains, NY-NJ metropolitan division (MD) #35614; Nassau County-Suffolk County, NY MD #35004; and Newark, NJ-PA MD #35084. All three MDs are part of the New York-Newark-Jersey City, NY-NJ-PA Metropolitan Statistical Area (MSA) #35620. The AA consists of 3,327 census tracts (CTs) surrounding the Bank's three full-service branches located in Fort Lee, New York, and Flushing. Of the 3,327 CTs, 13.3 percent are low-income tracts, 23.3 percent are moderate-income tracts, 29.4 percent are middle-income tracts, 31.5 percent are upper-income tracts, and 2.5 percent have not been assigned an income classification. The AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income (LMI) geographies.

According to the June 30, 2021 Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report, KEB Hana ranked 127th out of 150 banks in deposit market share inside of the AA at 0.01 percent or \$248.1 million. The deposits in the AA comprise 100 percent of the Bank's total deposits. The New York-Newark-Jersey City, NY-NJ-PA AA banking market is highly competitive. The New York City market area is dominated by large banks and multi-national institutions. KEB Hana's major competitors include JPMorgan Chase Bank, N.A., Goldman Sachs Bank USA, The Bank of New York Mellon, Bank of America, N.A., and Citibank, N.A. These major competitors have an established presence in the AA and provide strong competition with a combined deposit market share of 63.7 percent.

According to the 2010 Census, KEB Hana competes with 430 small business lenders within the AA. The Bank's major competitors for small business loans, including JPMorgan Chase Bank, N.A., American Express National Bank, Bank of America, N.A., Cross River, and TD Bank N.A., have a combined 60.2 percent of the total market share. As a small institution, KEB Hana did not originate enough small business loans to demonstrate any market share within the AA.

According to the U.S. Bureau of Labor Statistics (BLS), there were significant swings in unemployment rates in the NY-NJ-PA MMSA over the evaluation period. The average unemployment rate changed from a low of 3.1 percent in April 2019 to a high of 17.3 percent in May 2020 and fell to 4.8 percent as of December 2021. Increasing unemployment rates resulted from the coronavirus pandemic.

The February 2022 report from Moody's Analytics indicated the New York-Jersey City-White Plains, NY-NJ MD is in economic recovery. The primary economic drivers are financial centers, tourism, and medical centers. According to the report, economic growth may slow as the continued rebound from the pandemic moderates. Significant industries in the area providing employment include the healthcare and banking industries. Major employers include Montefiore Health System, Mount Sinai Health System, JP Morgan Chase & Co., Bank of America, and New York-Presbyterian Healthcare System.

As part of the CRA evaluation, the OCC reviewed information from three community contacts within the Bank's AA to determine local economic conditions and community needs. The first contact, located in Kings County, provides support to immigrant, low-income, minority, and female entrepreneurs across New York City by providing small business loans and business workshops. The second contact, located in Nassau County, offers a variety of programs and resources with the purpose of attracting new businesses and economic opportunities for residents of Nassau and Suffolk Counties. The third contact, located in Passaic County, provides opportunities to support affordable housing and funding for small businesses and entrepreneurs of Passaic County. These contacts identified affordable housing, small business and entrepreneur financial support, sustainable employment, and improving LMI access to banking services as community needs.

The following table provides a summary of the demographics for the New York-Newark-Jersey City, NY-NJ-PA AA.

Table A - Demographic Information of the Assessment Area

Assessment Area: KEB Hana Bank USA AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3,327	13.3	23.3	29.4	31.5	2.5
Population by Geography	13,713,065	14.5	24.6	27.9	32.7	0.3
Housing Units by Geography	5,400,743	13.6	23.1	26.8	36.2	0.2
Owner-Occupied Units by Geography	2,057,442	3.4	13.1	32.9	50.4	0.1
Occupied Rental Units by Geography	2,883,527	20.7	30.2	23.2	25.7	0.3
Vacant Units by Geography	459,774	14.5	23.5	22.7	39.1	0.3
Businesses by Geography	1,347,054	7.9	17.2	24.9	48.2	1.8
Farms by Geography	11,320	4.3	13.5	27.9	53.6	0.7
Family Distribution by Income Level	3,145,862	28.7	15.8	16.1	39.4	0.0
Household Distribution by Income Level	4,940,969	29.7	14.4	15.4	40.5	0.0
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY		\$108,193	Median Housing Value			\$493,132
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ		\$67,560	Median Gross Rent			\$1,333
Median Family Income MSA - 35084 Newark, NJ-PA		\$90,570	Families Below Poverty Level			13.8%

Source: 2015 ACS 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.

Scope of Evaluation in New York-Newark-Jersey City, NY-NJ-PA MMSA

The OCC completed a full-scope review of the New York-Newark-Jersey City, NY-NJ-PA MMSA AA. The CRA evaluation determines the Bank's record of meeting community credit needs in the state. The OCC used a combination of Bank- and examiner-generated loan and demographic reports to assess CRA performance. In addition, the OCC considered information obtained from community contacts. Examiners also considered the significant amount of market competition and the impact of the coronavirus pandemic when evaluating overall performance.

The evaluation period for the Lending Test was January 1, 2019 through December 31, 2021. The analysis focused on the geographic distribution and borrower distribution of small business loans. Examiners compared the Bank's distribution to demographic information as well as aggregate performance ratios, which provided a comparison to peer banks.

Lending Test

The Bank's performance under the Lending Test in the New York-Newark-Jersey City, NY-NJ-PA MMSA is rated Satisfactory.

Distribution of Loans by Income Level of the Geography

The Bank exhibits reasonable geographic distribution of loans in the MMSA.

Small Loans to Businesses

Refer to Table Q in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the Bank’s originations and purchases of small loans to businesses.

KEB Hana’s distribution of small loans to businesses within the AA is reasonable. The percentage of small loans to businesses in low-income tracts is less than the percentage of businesses in low-income tracts and less than the aggregate distribution. The percentage of small loans to businesses in moderate-income tracts was consistent with the percentage of businesses in moderate-income tracts and consistent with the aggregate distribution.

Distribution of Loans by Income Level of the Borrower

The Bank exhibits an excellent distribution of loans to businesses of different sizes, given the product lines offered by the Bank.

Small Loans to Businesses

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the Bank’s originations and purchases of small loans to businesses.

KEB Hana’s distribution of small business loans within the AA shows excellent distribution to businesses of different income levels. The Bank originated or purchased 80.1 percent of loans to small businesses with gross annual revenue (GAR) of \$1 million or less over the evaluation period. Aggregate data indicates 35.5 percent of commercial loans were made to small businesses. Dun & Bradstreet data indicates 90.1 percent of businesses in the AA had GAR of \$1 million or less.

Responses to Complaints

Management did not receive any complaints regarding KEB Hana’s CRA performance during the evaluation period.

Appendix A: Scope of Examination

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”.

Time Period Reviewed:	1/1/2019 to 12/31/2021	
Bank Products Reviewed:	Small business loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
New York-Newark-Jersey City, NY-NJ-PA	Full-scope	Bergen, Essex, Hudson, Passaic, and Union counties in NJ, and Bronx, Kings, Nassau, New York, Queens, and Westchester counties in NY.

Appendix B: Summary of MMSA and State Ratings

RATINGS KEB Hana Bank, NA	
Overall Bank:	Lending Test Rating
KEB Hana Bank, NA	Satisfactory
MMSA or State:	
New York-Newark-Jersey City, NY-NJ-PA	Satisfactory

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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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: 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.

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

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 are treated 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 30th 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 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.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
KEB Hana Bank USA AA	965	51,330	100.0	496,284	7.9	4.7	7.5	17.2	16.5	16.3	24.9	27.5	24.6	48.2	50.4	49.9	1.8	1.0	1.7
Total	965	51,330	100.0	496,284	7.9	4.7	7.5	17.2	16.5	16.3	24.9	27.5	24.6	48.2	50.4	49.9	1.8	1.0	1.7

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
KEB Hana Bank USA AA	965	51,330	100.0	496,284	90.1	80.1	35.5	4.6	14.0	5.3	5.9
Total	965	51,330	100.0	496,284	90.1	80.1	35.5	4.6	14.0	5.3	5.9

Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%