

# **PUBLIC DISCLOSURE**

November 10, 2025

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Martha's Vineyard Bank  
Certificate Number: 90190

78 Main Street  
Edgartown, MA 02539

Division of Banks  
One Federal Street, Suite 710  
Boston, Massachusetts 02118

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the Division of Banks concerning the safety and soundness of this financial institution.

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This document is an evaluation of the CRA performance of **Martha's Vineyard Bank** (bank) prepared by the Massachusetts Division of Banks (Division), the institution's supervisory agency as of **November 10, 2025**. The Division rates the CRA performance of an institution consistent with the provisions set forth in Massachusetts Regulation 209 CMR 46.00.

## **INSTITUTION RATING**

**INSTITUTION'S CRA RATING:** This institution is rated **Outstanding**.

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

**The Lending Test is rated Satisfactory.**

- The loan-to-deposit (LTD) ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs.
- The bank made a substantial majority of its home mortgage and small business loans in the assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects reasonable penetration of loans among individuals of different income levels and businesses of different sizes.
- The institution did not receive any CRA-related complaints since the prior evaluation; therefore, this factor did not affect the Lending Test rating.

**The Community Development Test is rated Outstanding.**

The institution's community development performance demonstrates excellent responsiveness to community development needs in its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment area.

## DESCRIPTION OF INSTITUTION

### **Background**

Martha's Vineyard Bank is a mutual savings bank headquartered in Edgartown, Massachusetts. Originally chartered in 1955 as Martha's Vineyard Co-operative Bank, later merging with Dukes County Savings Bank in November of 2007. In 2019, the bank changed its name as it was reorganized into a mutual holding company structure. Martha's Vineyard Bank currently operates in Dukes and Barnstable counties.

Martha's Vineyard Bank received an Outstanding rating from the Massachusetts Division of Banks during its prior Performance Evaluation dated September 25, 2023, using Interagency Intermediate-Small Institution (ISI) Examination Procedures.

### **Operations**

Martha's Vineyard Bank, headquartered at 78 Main Street, Edgartown, Massachusetts, maintains nine additional full-service branch locations, located in Chilmark, Edgartown, Falmouth (2), Oak Bluffs (2), Vineyard Haven, West Tisbury (2), and Woods Hole. The bank maintains a 24-hour automated teller machine (ATM) at each branch location. The bank did not open or close any branches during the evaluation period.

The bank offers a variety of deposit products, including both personal and business checking, savings, and money market accounts; passbook savings, certificates of deposit, and individual retirement accounts (IRAs). Home loan products include fixed-rate and adjustable-rate mortgages (ARMs), solar loans, second home and investment property mortgages, and home equity loans and lines of credit. Business lending products include commercial mortgage and construction loans, lines of credit, term and SBA loans, and business credit cards.

Additional services include telephone, online, and mobile banking, bill pay services, and person-to-person payment capabilities. Two branches, located at 14 Oak Bluffs Ave, Oak Bluffs and 84 Main Street, Falmouth, maintain interactive teller machines (ITMs).

### **Ability and Capacity**

As of September 30, 2025, assets totaled \$1.2 billion and included total loans of \$1.1 billion and total securities of \$91.4 million. Deposits totaled approximately \$1.1 billion. Since the prior evaluation, assets decreased by 3.4 percent, loans decreased 4.8 percent and securities increased by 7.8 percent over the evaluation period. The following table illustrates the loan portfolio.

<b>Loan Portfolio Distribution as of 09/30/2025</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	35,684	3.2
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	806,626	71.5
Secured by Multifamily (5 or more) Residential Properties	38,174	3.4
Secured by Nonfarm Nonresidential Properties	216,152	19.2
<b>Total Real Estate Loans</b>	<b>1,096,636</b>	<b>97.2</b>
Commercial and Industrial Loans	24,405	2.2
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	6,399	0.6
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	542	0.0
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>1,127,982</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		

## **DESCRIPTION OF ASSESSMENT AREA**

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. Martha's Vineyard Bank designated a single assessment area that comprises all of Dukes County and a portion of Barnstable County. The bank's CRA assessment area is composed of the Dukes County towns of Chilmark, Edgartown, Oak Bluffs, and Tisbury, as well as the Barnstable County town of Falmouth.

### **Economic and Demographic Data**

Martha's Vineyard Bank's assessment area includes the 13 census tracts. The number of census tracts in the assessment area increased by one since the prior evaluation due to the updated 2020 U.S. Census data. The 2020 U.S. Census data identified the following census tract income designations:

- 0 low-income tracts,
- 3 moderate-income tracts,
- 5 middle-income tracts,
- 3 upper-income tracts, and
- 2 tracts without an income designation.

The moderate-income census tracts are in the towns of Falmouth (2) and Tisbury.

The following table illustrates select demographic characteristics of the assessment area.

<b>Demographic Information of the Assessment Area</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)	13	0.0	23.1	38.5	23.1	15.4
Population by Geography	53,117	0.0	26.2	45.1	28.6	0.0
Housing Units by Geography	40,018	0.0	24.3	43.4	32.3	0.0
Owner-Occupied Units by Geography	16,058	0.0	27.6	46.2	26.2	0.0
Occupied Rental Units by Geography	4,812	0.0	29.2	50.7	20.1	0.0
Vacant Units by Geography	19,148	0.0	20.4	39.1	40.5	0.0
Businesses by Geography	8,111	0.0	24.1	50.5	25.4	0.0
Farms by Geography	359	0.0	22.3	42.3	35.4	0.0
Family Distribution by Income Level	12,522	19.2	17.9	18.8	44.2	0.0
Household Distribution by Income Level	20,870	24.3	19.5	16.8	39.5	0.0
Median Family Income MSA - 12700 Barnstable Town, MA MSA		\$99,410	Median Housing Value			\$626,997
Median Family Income Non-MSAs - MA		\$86,053	Median Gross Rent			\$1,396
			Families Below Poverty Level			3.9%

*Source: 2020 ACS, 2024 D&B Data, and FFIEC Estimated Median Family Income;*  
 (\*) The NA category consists of geographies that have not been assigned an income classification.

The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units. In 2024, of the 40,018 total housing units, 40.1 percent, or 16,058, were owner-occupied. Of the 16,058 owner-occupied units, 27.6 percent were in moderate-income geographies.

Examiners also used the FFIEC updated median family income to analyze the bank’s performance in home mortgage lending under the Borrower Profile criterion. The following table reflects the low-, moderate-, middle-, and upper-income categories in the assessment area.

<b>Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>Barnstable Town, MA MSA Median Family Income (12700)</b>				
2023 (\$124,300)	<\$62,150	\$62,150 to <\$99,440	\$99,440 to <\$149,160	≥\$149,160
2024 (\$122,700)	<\$61,350	\$61,350 to <\$98,160	\$98,160 to <\$147,240	≥\$147,240
2025 (\$124,100)	<\$62,050	\$62,050 to <\$99,280	\$99,280 to <\$148,920	≥\$148,920
<b>MA NA Median Family Income (99999)</b>				
2023 (\$130,000)	<\$65,000	\$65,000 to <\$104,000	\$104,000 to <\$156,000	≥\$156,000
2024 (\$106,700)	<\$53,350	\$53,350 to <\$85,360	\$85,360 to <\$128,040	≥\$128,040
2025 (\$124,700)	<\$62,350	\$62,350 to	\$99,760 to <\$149,640	≥\$149,640

*Source: FFIEC*

## **Competition**

The bank faces a high level of competition for home mortgage loans among banks, credit unions, and non-depository mortgage lenders. In 2024, 206 lenders reported 1,551 originated or purchased residential mortgage loans. Martha's Vineyard Bank ranked 5<sup>th</sup> with a market share of 4.4 percent. The three most prominent home mortgage lenders were The Cape Cod Five Cents Savings Bank (10.5 percent), Rockland Trust (8.2 percent), and Leader Bank (6.8 percent).

## **Community Contact**

As part of the evaluation process, examiners contact community organizations active in the assessment area to understand credit and community development needs. The information helps determine whether local financial institutions are responsive to these needs. The information also shows available credit and community development opportunities in each assessment area.

Examiners performed a community contact interview with an organization that serves the assessment area. The organization offers programs including affordable rental housing for year-round residents, covenant homes, house recycling, and education classes to low- and moderate - income individuals. The contact emphasized that affordable housing is the most pressing community need, as low-income individuals cannot afford market rents and the number of affordable units cannot meet the high demand. The contact stated that the shortage of housing stems from the island's median home price and lack of available land for development. Consequently, homeownership is unaffordable for a significant majority of year-round residents. In addition, the availability of reasonably priced rental units has declined significantly. The contact also expressed that there is a need for down payment assistance programs and financial education seminars.

## **Credit and Community Development Needs and Opportunities**

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that affordable housing, financial literacy, and down payment assistance programs are the area's primary community development needs. Flexible loan products are primary credit needs for low -and moderate -income borrowers and small businesses.

# **SCOPE OF EVALUATION**

## **General Information**

This evaluation covers the period from the prior evaluation dated September 25, 2023, to the current evaluation dated November 10, 2025. Examiners used Interagency Intermediate Small Institution CRA Examination Procedures to evaluate Martha's Vineyard Bank's CRA performance. These procedures include two tests: the CRA Small Bank Lending Test and the Community Development Test.

Bank's must achieve at least a Satisfactory rating under each test to receive an overall Satisfactory rating.

## Activities Reviewed

Examiners determined that Martha’s Vineyard Bank’s major product line is home mortgage loans, based on the number and dollar volume of loans originated during the evaluation period. Examiners did not consider additional loan products, such as small business, small farm, or consumer loans, as these products did not represent a significant portion of the bank’s loan portfolio.

For the Lending Test, examiners analyzed home mortgage loans originated or purchased from January 1, 2023, through December 31, 2024, reported on the bank’s Home Mortgage Disclosure Act (HMDA) loan application registers (LARs). Martha’s Vineyard Bank originated or purchased 100 loans totaling approximately \$76 million in 2023 and 75 loans totaling approximately \$48.2 million in 2024. Examiners compared the bank’s residential lending performance to aggregate lending data and 2020 ACS demographic data.

Examiner analysis focused on the number of loans, rather than the dollar volume, when assessing the institution’s lending performance, as it is a better indicator of the number of individuals served.

For the Community Development Test, examiners reviewed community development activities from the last evaluation date of September 25, 2023, to the current evaluation date of November 10, 2025. Examiners considered qualified community development loans, investments and donations, and community development services.

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **LENDING TEST**

The bank demonstrated reasonable performance under the Lending Test. The following sections summarize the bank’s performance under each criterion.

### **Loan-to -Deposit Ratio**

The loan-to-deposit ratio is more than reasonable, given the institution’s size, financial condition, and assessment area credit needs. The bank’s net LTD ratio, calculated from quarterly Call Report data, averaged 108.1 percent over the past 10 calendar quarters, from August 31, 2023 to September 30, 2025. The bank’s LTD ratio varied over the evaluation period, ranging from a low of 101.5 percent, as of September 30, 2025, to a high of 112.2 percent, as of June 30, 2025. The bank’s LTD ratio was above that of two similarly situated institutions, selected based on asset size, geographic location, and lending focus. Please refer to the table below for a comparison of the banks’ loan-to-deposit ratio.

<b>Loan-to-Deposit Ratio Comparison</b>		
<b>Bank</b>	<b>Total Assets as of 9/30/2025 (\$)</b>	<b>Average LTS Ratio (%)</b>
<b>Martha’s Vineyard Bank</b>	<b>1,295,084</b>	<b>108.1</b>
BankFive	1,879,805	107.8
Cape & Coast Bank	1,668,894	102.8

*Source: Reports of Income and Condition 8/31/2023 through 9/30/2025*

**Assessment Area Concentration**

Martha’s Vineyard Bank originated a substantial majority of its home mortgage loans, by number and dollar amount, inside the assessment area. The following table illustrates the bank’s lending inside and outside the assessment area.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Home Mortgage</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans \$(000)</b>				<b>Total \$(000)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
2023	87	87.0	13	13.0	100	69,165	91.0	6,845	9.0	76,010
2024	68	90.7	7	9.3	75	43,270	89.7	4,985	10.3	48,255
<b>Total</b>	<b>155</b>	<b>88.6</b>	<b>20</b>	<b>11.4</b>	<b>175</b>	<b>112,435</b>	<b>90.5</b>	<b>11,830</b>	<b>9.5</b>	<b>124,265</b>
<i>Source: Bank Data</i>										

**Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. There are no low-income tracts within the assessment area. In 2023, the bank made 12 loans, or 13.8 percent, to moderate-income census tracts, but performed below both aggregate performance and the percentage of owner-occupied housing units. In 2024, the bank made 13 loans, or 19.1 percent of home mortgage loans, to moderate-income census tracts, but again performed below aggregate lenders and the demographic comparator.

Examiner’s note that, of the 13 census tracts in the bank’s assessment area, only three, or 23.1 percent, are moderate-income census tracts, two of which, or 66.7 percent, are located in Falmouth. Although the bank maintains two locations in Falmouth, it has less presence than in Dukes County.

Geographic Distribution of Home Mortgage Loans							
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	Market Share % of #	#	%	\$(000s)	%
Low							
2023	0.0	0.0	0.0	0	0.0	0	0.0
2024	0.0	0.0	0.0	0	0.0	0	0.0
Moderate							
2023	27.6	25.4	2.7	12	13.8	7,860	11.4
2024	27.6	27.5	3.0	13	19.1	7,065	16.3
Middle							
2023	63.2	65.9	6.5	74	85.1	60,590	87.6
2024	46.2	42.7	3.2	21	30.9	14,755	34.1
Upper							
2023	9.2	8.7	0.7	1	1.1	715	1.0
2024	26.2	29.8	7.4	34	50.0	21,450	49.6
Not Available							
2023	0.0	0.0	0.0	0	0.0	0	0.0
2024	0.0	0.0	0.0	0	0.0	0	0.0
<b>Total</b>							
<b>2023</b>	<b>100.0</b>	<b>100.0</b>	<b>5.0</b>	<b>87</b>	<b>100.0</b>	<b>69,165</b>	<b>100.0</b>
<b>2024</b>	<b>100.0</b>	<b>100.0</b>	<b>4.4</b>	<b>68</b>	<b>100.0</b>	<b>43,270</b>	<b>100.0</b>
<i>Source: 2020 ACS; 2023 &amp; 2024 HMDA Aggregate Data</i>							

## **Borrower Profile**

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income). In 2023, the bank made two, or 2.3 percent, of home mortgages to low-income borrowers. In 2024, performance decreased to one, or 1.5 percent, of loans made to low-income borrowers. Lending to low-income borrowers performed below both aggregate lenders and the percentage of families in both 2023 and 2024.

In 2023, the bank originated eight, or 9.2 percent, of loans to moderate income borrowers, performing similarly to aggregate and below the percentage of families. In 2024, performance fell to one loan, or 1.5 percent, performing below aggregate and the demographic comparator.

Examiners note that aggregate lenders performed below the percentage of both low- and moderate-income families in both years of the evaluation period. The assessment area's median housing value is high at \$625,997. Additionally, vacant units are most available in middle- and upper-income census tracts, where the price of housing is likely to exceed the median housing value.

Low-income families, with a maximum household income of \$62,350, would likely experience significant difficulty qualifying for a home mortgage loan under conventional underwriting standards.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>							
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>Market Share % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<b>Low</b>							
2023	22.0	5.9	2.0	2	2.3	2,660	3.8
2024	19.2	4.4	0.0	1	1.5	885	2.0
<b>Moderate</b>							
2023	17.8	10.0	4.6	8	9.2	1,870	2.7
2024	17.9	9.5	0.7	1	1.5	255	0.6
<b>Middle</b>							
2023	20.7	14.7	4.7	12	13.8	5,420	7.8
2024	18.8	12.3	1.6	3	4.4	1,015	2.3
<b>Upper</b>							
2023	39.5	46.2	6.4	51	58.6	47,255	68.3
2024	44.2	56.7	6.6	58	85.2	38,500	89.0
<b>Not Available</b>							
2023	0.0	23.2	3.5	14	16.1	11,960	17.3
2024	0.0	17.2	2.3	5	7.4	2,615	6.0
<b>Total</b>							
<b>2023</b>	<b>100.0</b>	<b>100.0</b>	<b>5.0</b>	<b>87</b>	<b>100.0</b>	<b>69,165</b>	<b>100.0</b>
<b>2024</b>	<b>100.0</b>	<b>100.0</b>	<b>4.4</b>	<b>68</b>	<b>100.0</b>	<b>43,270</b>	<b>100.0</b>

*Source: 2020 ACS; 2023 & 2024 HMDA Aggregate Data*

**Response to Complaints**

The bank has not received any CRA-related complaints since the prior evaluation; therefore, this criterion did not affect the Lending Test rating.

**Fair Lending Policies and Procedures**

The Division of Banks provides comments regarding the institution’s fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-106. A review of the bank’s public comment file indicated the bank received no complaints pertaining to the institution’s CRA performance since the previous examination. Examiners conducted the fair lending review in accordance with the Federal Financial Institutions Examination Council (FFIEC) Interagency Fair Lending Examination Procedures. Based on these procedures, examiners did not note any evidence of disparate treatment.

### Minority Application Flow

The bank’s HMDA LARs for 2023 and 2024 were reviewed to determine if the bank’s application flow from different racial and ethnic groups reflected the assessment area’s demographics.

According to 2020 ACS data, the bank’s assessment area contained a total population of 53, 117 individuals of which 16.7 percent are minorities. The assessment area’s minority and ethnic population consist of 2.6 percent Hispanic or Latino, 1.4 percent Asian, 2.8 percent Black/African American, 0.8 percent American Indian or Alaskan Native, and 11.2 percent other race.

The bank’s level of applications was compared with that of aggregate performance. The comparison of this data assists in deriving reasonable expectations for the rate of applications the bank received from minority home mortgage loan applicants. Please refer to the table below for information on the bank’s minority application flow as well as the aggregate lenders in the bank’s assessment area.

<b>Minority Application Flow</b>						
	<b>2023</b>		<b>2023 Aggregate Data</b>	<b>2024</b>		<b>2024 Aggregate Data</b>
	#	%	%	#	%	%
American Indian/ Alaska Native	0	0.0	0.2	0	0.0	0.3
Asian	0	0.0	0.8	0	0.0	1.0
Black/ African American	9	8.6	4.8	6	6.9	5.1
Hawaiian/Pacific Islander	0	0.0	0.0	0	0.0	0.0
2 or more Minority	0	0.0	0.1	0	0.0	0.1
Joint Race (White/Minority)	9	8.6	2.1	2	2.3	1.7
<b>Total Racial Minority</b>	<b>18</b>	<b>17.2</b>	<b>8.0</b>	<b>8</b>	<b>9.2</b>	<b>8.2</b>
White	57	54.2	62.0	57	65.5	66.8
Race Not Available	30	28.6	30.0	22	25.3	25.0
<b>Total</b>	<b>105</b>	<b>100.0</b>	<b>100.0</b>	<b>87</b>	<b>100.0</b>	
<b>ETHNICITY</b>						
Hispanic or Latino	<b>1</b>	<b>0.9</b>	<b>3.3</b>	<b>2</b>	<b>2.3</b>	<b>3.9</b>
Joint (Hisp/Lat /Not Hisp/Lat)	0	0.0	1.6	0	0.0	1.6
<b>Total Ethnic Minority</b>	<b>1</b>	<b>0.9</b>	<b>4.9</b>	<b>2</b>	<b>2.3</b>	<b>5.5</b>
Not Hispanic or Latino	68	64.8	63.7	55	63.2	67.9
Ethnicity Not Available	36	34.3	31.4	30	34.5	26.6
<b>Total</b>	<b>105</b>	<b>100.0</b>	<b>100.0</b>	<b>87</b>	<b>100.0</b>	<b>100.0</b>

*Source: U.S. Census 2020, HMDA Aggregate Data 2023 and 2024, HMDA LAR Data 2023 and 2024*

In 2023, the bank received 105 home mortgage loan applications from within its assessment area. Of these applications 18, or 17.2 percent, were received from racial minority applicants, more than double that of aggregate lenders. Of these applications, seven, or 39.0 percent, resulted in originations. The aggregate received 8.0 percent of its applications from racial minority applicants, of which 59.5 percent resulted in originations. For the same period, the bank received and originated one application, or 0.9 percent, from ethnic groups of Hispanic origin within its assessment area. Aggregate lenders received 3.3 percent of applications from ethnic minority groups and originated 53.7 percent.

In 2024, the bank received 87 home mortgage loan applications from within its assessment area. Of these applications, eight or 9.2 percent were received from racial minority applicants, again performing above aggregate lenders. Of these applications, six, or 75.0 percent resulted in origination. For the same period, the bank also received two applications or 2.3 percent, from ethnic groups of Hispanic origin, originating one, or 50.0 percent, of the applications. For the same year, aggregate lenders received 8.2 percent of applications from racial minority applicants, originating 58.0 percent. Aggregate lenders received 5.5 percent of applications from ethnic minority borrowers, of which 53.8 percent were originated.

Considering the assessment area’s demographic composition, market competition, and comparisons to 2023 and 2024 aggregate data, the bank’s minority application flow is considered reasonable.

## COMMUNITY DEVELOPMENT TEST

Martha’s Vineyard Bank demonstrates excellent responsiveness to community development needs in its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the institution’s capacity and the need and availability of such opportunities for community development in its assessment area.

### Community Development Loans

Martha’s Vineyard Bank originated 17 community development loans totaling approximately \$30.9 million during the evaluation period. This level of activity represents approximately 2.3 percent of average total assets and 2.7 percent of average total loans since the previous CRA evaluation. The majority of community development loans promoted community services within the assessment area. The following table illustrates community development loans by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2023	0	0	0	0	4	5,892	0	0	4	5,892
2024	2	2,650	0	0	0	0	0	0	2	2,650
YTD 2025	5	7,188	3	13,440	3	1,690	0	0	11	22,318
<b>Total</b>	<b>7</b>	<b>9,838</b>	<b>3</b>	<b>13,440</b>	<b>7</b>	<b>7,582</b>	<b>0</b>	<b>0</b>	<b>17</b>	<b>30,860</b>

*Source: Bank Data*

Below are notable examples of the bank’s qualified community development loan activities:

- In 2025, the bank originated a \$13 million loan to a local community health organization to complete construction for their ongoing campus renovation. The completed facilities will increase access to behavioral health, disability, veteran, elder, and domestic abuse services for low- and moderate-income individuals in Martha’s Vineyard.
- In 2025, the bank originated a \$5.5 million dollar loan to fund the purchase and future development of a 40-unit residential housing development. The majority of units will be

rented below fair market rent for the benefit of low- and moderate-income tenants, supporting affordable housing in the vineyard.

- In 2024, the bank originated a \$2.2 million loan to a nonprofit organization providing community services to mentally disabled individuals and their families. The loan will fund the construction of affordable residential housing for individuals requiring around-the-clock care.

### **Qualified Investments**

During the evaluation period, Martha’s Vineyard Bank made 349 qualifying donations totaling approximately \$2.3 million. These donations demonstrate the bank’s responsiveness to the needs of low- and moderate-income geographies within the assessment area. The following table illustrates community development donations by year and purpose.

<b>Qualified Donations</b>										
<b>Activity Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
2023	12	23	44	602	0	0	0	0	<b>56</b>	<b>625</b>
2024	25	173	129	945	5	3	0	0	<b>159</b>	<b>1,121</b>
YTD 2025	22	107	101	433	11	20	0	0	<b>134</b>	<b>560</b>
<b>Total</b>	<b>59</b>	<b>303</b>	<b>274</b>	<b>1,980</b>	<b>16</b>	<b>23</b>	<b>0</b>	<b>0</b>	<b>349</b>	<b>2,306</b>

*Source: Bank Data*

Below are notable examples of the bank’s donation activities:

- **Falmouth Housing Trust** - Throughout the evaluation period, Martha’s Vineyard Bank Charitable Foundation provided several large dollar donations to Falmouth Housing Trust, a nonprofit and community development corporation (CDC) developing and maintaining affordable workforce housing for low- to moderate-income individuals. The bank’s donation helped fund the Waquoit Highway Project, creating five affordable, deed-restricted housing units for sale to borrowers earning up to 80 and 120 percent area median income.
- **Belonging to Each Other** – Belonging To Each Other is a 501(c)(3) non-profit providing temporary cold-weather transitional housing for individuals experiencing homelessness and provides year-round assistance via its housing case management services to those experiencing housing insecurity.
- **Island Grown Initiative** – Throughout the evaluation period, Martha’s Vineyard Bank Charitable Foundation made several donations, including large dollar donations, to Island Grown Initiative and its associated Island Food Pantry. Island Grown Initiative works to build a local food system to support food access and security for low- and moderate-income individuals and families of Martha’s Vineyard.
- **Island Health Care** – Island Health Care works to provide Martha’s Vineyard with equitable, high-quality, affordable health care. Martha’s Vineyard Bank Charitable

Foundation’s donation helped fund the creation of the Island Health Care Dental Center. A sliding fee discount program is available for anyone whose annual household income is less than 200 percent of the Federal Poverty Level.

- **YMCA of Cape Cod** – The YMCA is a non-profit organization promoting community wellness and healthy living through health, wellness, youth, childcare, and education programs. The YMCA provides financial assistance so that low- and moderate-income Cape Cod and Island families may participate in its wide variety of programming.

**Community Development Services**

During the evaluation period, employees of Martha’s Vineyard Bank provided a total of 32 instances to seven organizations primarily serving low- and moderate-income individuals and families. The bank additionally facilitated financial education seminars, including first-time homebuyer seminars, elder fraud and abuse awareness, and youth and adult financial savings seminars. The following table illustrates the bank’s community development services by year and purpose.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2023	2	3	0	0	5
2024	2	8	0	0	10
YTD 2025	11	6	0	0	17
<b>Total</b>	<b>15</b>	<b>17</b>	<b>0</b>	<b>0</b>	<b>32</b>

*Source: Bank Data*

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

- **YMCA of Martha’s Vineyard** – The YMCA of Martha’s Vineyard is a non-profit organization promoting healthy living and community wellness to island residents. The YMCA maintains a wide variety of recreational and educational programming for youth, adults, and senior members. Financial assistance is available for low- and moderate-income individuals and families, supporting access to community services. A senior staff member of the bank serves on the board of directors.
- **Falmouth Housing Trust** – Falmouth Housing Trust is an independent 501(c)3 nonprofit and community development corporation (CDC) working to develop and maintain deed-restricted affordable workforce housing for low- and moderate-income island residents. A senior loan officer of the bank serves on the board of directors.
- **Hospice & Palliative Care of Martha’s Vineyard** – Hospice & Palliative Care of Martha’s Vineyard is a nonprofit health organization providing care and support to individuals and families facing complex, progressive illnesses, regardless of Medicare hospice eligibility. Care is provided regardless of an individual or family’s ability to pay. A senior staff member of the bank serves on the board of directors.

## APPENDICES

### INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

#### **Community Development Test**

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to the area's community development needs considering the amount and combination of these activities, along with their qualitative aspects.

## GLOSSARY

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose institution:
  - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the institution's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the institution's retail banking services under § 345.24(d).

**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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g, geographic distribution, borrower profile, 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 do 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; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

**Low-Income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

**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 metropolitan area/assessment area.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area** (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multistate metropolitan 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

**Small Business Loan:** A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

**Upper-Income:** Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

## PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 167, Section 14, as amended, require all financial institution to take the following actions within 30 business days of receipt of the CRA evaluation of their institution:

- 1) Make its most current CRA performance evaluation available to the public;
- 2) At a minimum, place the evaluation in the institution's CRA public file located at the head office and at a designated office in each assessment area;
- 3) Add the following language to the institution's required CRA public notice that is posted in each depository facility:

"You may obtain the public section of our most recent CRA Performance Evaluation, which was prepared by the Massachusetts Division of Banks, at (78 Main Street Edgartown, MA 02539)."

- 4) Provide a copy of its current evaluation to the public, upon request. In connection with this, the institution is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the institution's evaluation, as prepared by its supervisory agencies, may not be altered or abridged in any manner. The institution is encouraged to include its response to the evaluation in its CRA public file.