



Safra National Bank
of New York

Safra National Bank of New York (“SNB”)

Community Reinvestment Act (“CRA”) Public File



Safra National Bank of New York

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PUBLIC DISCLOSURE

June 21, 2022

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Safra National Bank of New York
Charter Number: 20948

546 Fifth Avenue
New York, NY 10036

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, 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 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 major factors that support this rating include:

- The institution demonstrates an adequate level of qualified investments, community development (CD) lending, and CD services.
- The institution exhibits adequate responsiveness to credit and CD needs in its assessment areas (AAs).

Description of Institution

Safra National Bank of New York (Safra or the Bank) is a private bank headquartered in New York, New York. The Bank is wholly-owned by SNBNY Holdings Limited, a Gibraltar-based holding company, and is part of the J. Safra Group, an international network of financial institutions controlled by the Joseph Safra family. There was no merger or acquisition activity that impacted the scope of the Bank's operations during the evaluation period.

Safra's primary focus is to provide private banking services to high-net-worth clients. The Bank has branches in Manhattan and Aventura, Florida, as well as representative offices in Brazil, Chile, Mexico, and Panama. The Bank does not have any ATMs. The Bank's primary credit product is commercial loans secured by cash, securities, or real-estate collateral. With branches in two different states, Safra is an interstate bank with two AAs. The AAs and their respective CRA performance are discussed separately in this performance evaluation.

As of December 31, 2021, the Bank had tier 1 capital of \$826.4 million and total assets of \$9.4 billion. Net loans and leases totaled \$3.4 billion, representing 35.8 percent of total assets. Total deposits were \$7.6 billion or 81.2 percent of total assets.

Table 1: Financial Information (000s)

	Year-end 2019	Year-end 2020	Year-end 2021	Average for Evaluation Period
Tier 1 Capital	720,924	806,717	826,424	784,688
Total Income	342,374	296,249	269,730	302,784
Net Income	79,000	79,759	82,220	80,326
Total Assets	8,296,257	9,624,044	9,418,665	9,112,989

Source: Consolidated Report of Condition and Income and bank reported data.

In 1997, the Office of the Comptroller of the Currency (OCC) designated Safra as a wholesale bank for CRA purposes. An institution so designated is evaluated pursuant to the CD test, which assesses a bank's record of meeting AA credit needs through qualified investments, CD loans, or CD services, as applicable. Aside from restrictions imposed by Safra's wholesale designation, scope of operations, and business strategy, there are no legal, financial, or other factors impeding the Bank's ability to help meet the credit needs in its AAs.

Scope of the Examination

Evaluation Period/Products Evaluated

To evaluate the Bank's performance under the CRA, the OCC reviewed CD activities from January 1, 2019 through December 31, 2021 (evaluation period). The evaluation considered the level and nature of qualified investments, CD lending, and CD services. The prior performance evaluation, dated August 5, 2019, rated the Bank Satisfactory.

For purposes of this evaluation, Bank-delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) were

combined and evaluated as a single AA. Similarly, Bank-delineated non-MSA AAs within the same state were combined and evaluated as a single area.

The evaluation rates the overall CRA performance of Safra based on the performance in the States of New York and Florida. The ratios of financial measures contained in this public evaluation were determined by allocating Bank capital and income to the states and subsequent assessment areas, where feasible and reasonable. The allocation is based on the amount of deposits contained in each of the states and assessment areas. According to the Federal Deposit Insurance Corporation's (FDIC) *Summary of Deposits*, as of June 30, 2021, Bank deposits total \$7.5 billion. From the total, \$5.0 billion, or 66.3 percent, is attributed to the New York AA and \$2.5 billion, or 33.7 percent, is from the Florida AA. As such, we allocated 66.3 percent of income and capital to New York and 33.7 percent to Florida.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area 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.

State Rating

State of New York

CRA Rating for New York: Satisfactory

The major factors that support this rating include:

- The institution demonstrates an adequate level of qualified investments and CD loans in the state of New York.
- The institution exhibits adequate responsiveness to credit and CD needs in the state of New York.

Description of Assessment Area(s)

Safra's New York AA consists of seven whole counties: Bronx, Kings, New York, Queens, Richmond, Rockland, and Westchester. The counties are contiguous and are all part of the New York-Jersey City-White Plains, NY-NJ Metropolitan Division (MD) located in the New York-Newark-Jersey City, NY-NJ-PA MSA. The AA meets the requirements of the CRA and does not arbitrarily exclude low- and moderate-income (LMI) geographies.

The New York AA is a densely populated urban area. According to the 2015 American Community Survey (ACS) United States (U.S.) Census data, the AA contains 2,455 census tracts. There are 300 low-income tracts (12.2 percent), 605 moderate-income tracts (24.6 percent), 689 middle-income tracts (28.1 percent), and 790 upper-income tracts (32.2 percent). There are also 71 census tracts for which the income designation is unknown. The total population of the AA is 9.7 million. The AA has 2,177,717 families, of which 30.2 percent are low-income families and 15.6 percent are moderate-income families. There are 3.9 million housing units, of which 58.6 percent are rental units, 32.6 percent are owner-occupied, and 8.8 percent are vacant. Additionally, 56.6 percent of housing units are multifamily compared to 43.2 percent in 1-4 family units. The FFIEC Updated MSA Median Family Income is \$85,500, and the median housing value is \$529,975. There is a lack of affordable housing within the MSA.

Table 2: New York Assessment Area Description

	Number	Low	Moderate	Middle	Upper
Tracts	2,455	12.2%	24.6%	28.1%	32.2%
Families	2,177,717	30.2%*	15.6%*	15.4%*	38.8%*
Businesses	972,696	7.7%**	19.0%**	19.7%**	51.1%**

Source: Demographic Data – 2015 ACS, Dun & Bradstreet Data. *Represents families by income level. **Represents businesses by income level of census tract.

According to the FDIC Summary of Deposits report as of June 30, 2021, Safra's deposit market share was 0.2 percent, ranking 25th out of 124 banks. The New York banking market is highly competitive, and the deposit market is dominated by large multinational institutions. Safra's major competitors include JPMorgan Chase Bank, Goldman Sachs Bank USA, The Bank of New York Mellon, HSBC Bank USA, Citibank, Morgan Stanley Private Bank, and Bank of America. These major competitors have an established presence throughout the AA and provide strong competition for deposits.

Information published by Moody's Analytics in November 2021 indicates the New York-Jersey City-White Plains, NY-NJ MD (NY-NJ MD) benefits from high per capita income, limited exposure to manufacturing, and strong international immigration. Weaknesses include high costs of living, a rapidly aging infrastructure, deteriorating fiscal health as a result of the COVID-19 pandemic, and population losses. The report indicates the NY-NJ MD continues to be in economic recovery after the effects of the COVID-19 pandemic.

Top industries in the area providing employment are 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. According to the Bureau of Labor Statistics (BLS), the non-seasonally adjusted unemployment rate for the NY-NJ MD increased from 4.4 percent to 5.4 percent throughout the evaluation period. The increasing unemployment rate is a result of the COVID-19 pandemic. The average unemployment rates have improved since reaching a peak of 18.6 percent in May 2020.

To determine local economic conditions and community needs, the OCC reviewed information from three community contacts within the Bank's AA. These community contacts included a Queens community development corporation that focuses on the housing and economic needs of low-income South Asian and Indo-Caribbean New Yorkers, a Brooklyn economic development corporation that provides career training and small business workshops, and a Westchester County organization that promotes area businesses. These contacts identified affordable housing, affordable housing loans, financial education, economic development, and health services as community needs of the AA.

Conclusions About Performance

Summary

Safra made an adequate level of qualified investments and CD loans, demonstrating adequate responsiveness to credit and CD needs in the New York AA. The level of CD activities was adequate based on the Bank's scope of operations, strategic direction, competitive pressures, and available opportunities in the AA.

- Safra has an adequate level of qualified investments and CD lending in relation to available opportunities and the Bank's capacity. The total dollar amount of the Bank's qualified investments and CD loans is adequate in relation to average tier 1 capital and average total income.
- Safra demonstrated adequate responsiveness to credit and CD needs in the AA. The Bank's investments in mortgage-backed securities provided affordable housing to LMI individuals. The Bank's grants supported affordable housing, economic development, and community services for LMI individuals. The Bank's CD loans revitalized and stabilized the area, provided affordable housing for LMI individuals and families, and provided community services to LMI individuals and families.

Qualified Investments

Qualified investments totaled \$13.2 million or 2.5 percent of average tier 1 capital allocated to New York and 6.6 percent of average total income allocated to New York. Safra purchased \$3.5 million in investments and provided \$323,000 in grants. The Bank also has \$9.4 million in qualified outstanding investments from prior periods. Safra has no unfunded commitments.

The following table summarizes the Bank's investments, grants, and unfunded commitments inside the New York AA.

Table 3: Qualified Investment Activity (000s)

	Benefits AA**
Purchased Investments	\$3,502
Originated Grants	\$323
Prior-Period Investments that Remain Outstanding	\$9,379
Total Qualified Investments	\$13,204
Unfunded Commitments*	\$0

* "Unfunded Commitments" means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system. ** Investments included in the Benefits AA column are located in the AA or in the broader statewide or regional area that includes the AA.

The following table measures the level of total qualified investment activity in terms of average tier 1 capital and average total income over the evaluation period.

Table 4: Qualified Investment Percentages

	Benefits AA (%) *
Total Investments/Average Tier 1 Capital	2.5%
Total Investments/Average Total Income	6.6%
Total Investments/Average Pass-Through Receivables	0

* Investments included in the Benefits AA column are located in the AA or in the broader statewide or regional area

During the evaluation period, Safra invested \$3.5 million in two mortgage-backed securities comprised of loans made to LMI borrowers in the Bank's AA. The Bank also has three prior period investments with outstanding balances totaling \$9.4 million, which are also mortgage-backed securities comprised of loans made to LMI borrowers in the Bank's AA. In addition, Safra made 30 donations totaling \$323,000 to organizations in the Bank's AA that promote affordable housing, promote economic development, and provide community services for LMI individuals.

CD Lending

CD lending totaled \$35.1 million or 6.8 percent of average tier 1 capital allocated to New York and 17.5 percent of average total income allocated to New York. Safra originated two loans totaling \$28.2 million and annually extended another loan for a total of \$6.9 million.

CD lending included:

- Safra originated a \$14.2 million loan secured by multiple properties located in a moderate-income census tract. The tenants of the properties revitalize and stabilize the area by providing services and jobs to the community. Additionally, three of the properties have residential apartments that provide affordable housing for LMI individuals and families.
- Safra originated a \$50.0 million loan for a mixed used property in a moderate-income census tract. Of the \$50.0 million, \$14.0 million or 28.1 percent is attributed to qualifying CRA activities. A portion of the residential units, totaling 20.5 percent, are part of the Inclusionary Housing Program under NYC

Housing Preservation and Development. These units are reserved for LMI individuals. An additional 7.6 percent of the property is occupied by a community healthcare clinic that provides healthcare services to LMI individuals and families.

- Safra annually extended a \$2.3 million loan for a property located in a low-income census tract that is primarily occupied by a non-profit that provides home health care to low-income individuals. The amount extended over the evaluation period totaled \$6.9 million.

Table 5: CD Lending Percentages

	Benefits AA (%) *
Total CD Lending/Average Tier 1 Capital	6.8%
Total CD Lending/Average Total Income	17.5%
Total CD Lending/Average Pass-Through Receivables	0%

* CD loans included in the Benefits AA column are located in the AA or in the broader statewide or regional area that includes the AA

CD Services

Safra did not conduct any CD services in the New York AA.

State Rating

State of Florida

CRA Rating for Florida: Satisfactory

The major factors that support this rating include:

- The institution demonstrates an adequate level of qualified investments and CD services in the state of Florida.
- The institution exhibits adequate responsiveness to CD needs in the state of Florida.

Description of Assessment Area(s)

Safra's Florida AA consists of Miami-Dade County. The AA is part of the Miami-Miami Beach-Kendall, FL MD located in the Miami-Fort Lauderdale-West Palm Beach, FL MSA. This AA meets the requirements of the CRA and does not arbitrarily exclude LMI geographies.

Miami-Dade County is the most southeastern part of Florida and the United States. The county is the seventh most populous county in the United States. According to the 2015 ACS U.S. Census data, the AA contains 519 census tracts. There are 30 low-income tracts (5.8 percent), 144 moderate-income tracts (27.8 percent), 150 middle-income tracts (28.9 percent), and 177 upper-income tracts (34.1 percent). There are also 18 census tracts for which the income designation is unknown. The total population of the AA is 2.6 million. The AA has 572,388 families, of which 24.0 percent are low-income families and 16.6 percent are moderate-income families. There are 998,833 housing units, of which 45.3 percent are owner occupied, 39.0 percent are rental units, and 15.7 percent are vacant. The FFIEC Updated MSA Median Family Income is \$61,000, and the median housing value is \$244,010.

Table 2: Florida Assessment Area Description

	Number	Low	Moderate	Middle	Upper
Tracts	519	5.8%	27.8%	28.9%	34.1%
Families	572,388	24.0%*	16.6%*	16.9%*	42.5%*
Businesses	533,780	3.1%**	20.8%**	25.9%**	47.8%**

Source: Demographic Data – 2015 ACS, Dun & Bradstreet Data. *Represents families by income level. **Represents businesses by income level of census tract.

According to the FDIC Summary of Deposits report as of June 30, 2021, Safra's deposit market share was 1.4 percent, ranking 16th out of 55 banks in the AA. The Miami banking market is highly competitive, and the deposit market is dominated by large multinational institutions. Safra's major competitors include Bank of America, Wells Fargo Bank, JPMorgan Chase Bank, and Citibank. Similar to the New York AA, these competitors have an established presence in the AA and provide strong competition for deposits.

Information published by Moody's Analytics in November 2021 indicates the strengths of the Miami-Miami Beach- Kendall, FL MD include the area's strong ties to Latin America, the world's busiest cruise port, and well-developed shipping and distribution infrastructure. Weaknesses include high household debt, a congested airport and roads, and a dependency on industries that are susceptible to

business cycle downturns. The report also indicates the Miami-Miami Beach-Kendall, FL MD continues to be in economic recovery after the COVID-19 pandemic.

Top industries in the area include supermarkets, healthcare, and airlines. Major employers include Publix Super Markets, Baptist Health South Florida, American Airlines, and Jackson Health System. According to the BLS, the non-seasonally adjusted unemployment rate for the Miami-Miami Beach-Kendall, FL MD decreased from 3.3 percent to 3.0 percent throughout the evaluation period. During the COVID-19 pandemic, the unemployment rate reached a high of 15.3 percent in July 2020.

To determine local economic conditions and community needs, the OCC reviewed information from two community contacts within the AA. One contact is a nonprofit, economic development organization that provides bilingual assistance to Hispanic entrepreneurs. The contact indicated that banks could assist small businesses by providing technical assistance, developing more creative and flexible ways to provide credit to small businesses, and lending in nontraditional small business sectors. The second contact is a nonprofit community land trust (CLT) that provides and preserves quality, sustainable, affordable housing for underserved populations in South Florida. The contact indicated banks can assist by providing loans on flexible terms that allow CLTs and nonprofit housing developers to acquire land for affordable housing development. Additionally, banks can assist by providing grants to subsidize affordable homebuilding.

Conclusions About Performance

Summary

Safra made an adequate level of qualified investments and CD services, demonstrating adequate responsiveness to CD needs in the Florida AA. The level of CD activities was adequate based on the Bank's scope of operations, strategic direction, competitive pressures, and available opportunities in the AA.

- Safra made an adequate level of qualified investments and CD services in relation to available opportunities and the Bank's capacity. The total dollar amount of the Bank's investments is adequate in relation to average tier 1 capital and average total income.
- Safra demonstrated adequate responsiveness to CD needs in the AA. The Bank's investments provided affordable housing to LMI individuals and families. The Bank's grants promoted financial literacy and provided community services for LMI individuals. The Bank's CD services supported organizations that provide community services to LMI individuals and families.

Qualified Investments

Qualified investments totaled \$13.4 million or 5.1 percent of average tier 1 capital allocated to Florida and 13.1 percent of average total income allocated to Florida. Safra purchased \$3.5 million in qualified investments and provided \$86,000 in grants. The Bank also has \$9.8 million in outstanding qualified investments from prior periods. Safra has no unfunded commitments.

The following table summarizes the Bank's investments, grants, and unfunded commitments inside the Florida AA.

Table 3: Qualified Investment Activity (000s)

	Benefits AA **
Purchased Investments	\$3,500
Originated Grants	\$86
Prior-Period Investments that Remain Outstanding	\$9,778
Total Qualified Investments	\$13,364
Unfunded Commitments*	\$0

* “Unfunded Commitments” means legally binding investment commitments that are tracked and recorded by the bank’s financial reporting system. ** Investments included in the Benefits AA column are located in the AA or in the broader statewide or regional area that includes the AA.

The following table measures the level of total qualified investment activity in terms of average tier 1 capital and average total income over the evaluation period.

Table 4: Qualified Investment Percentages

	Benefits AA (%) *
Total Investments/Average Tier 1 Capital	5.1%
Total Investments/Average Total Income	13.1%
Total Investments/Average Pass-Through Receivables	0

* Investments included in the Benefits AA column are located in the AA or in the broader statewide or regional area

Safra invested \$3.5 million in a security that supports LMI housing needs in the Florida AA. The Bank has one prior period investment in a mortgage-backed security comprised of loans made to LMI borrowers in the Bank’s AA. The outstanding balance of the security is \$9.8 million. In addition, Safra made nine donations totaling \$86,000 to organizations in the AA that promote financial literacy and provide community services for LMI individuals and families.

CD Lending

Safra did not originate any CD loans in the Florida AA during this evaluation period.

CD Services

Safra demonstrated an adequate level of CD services in the Florida AA. During the evaluation period, a Bank employee served as a board member for a non-profit organization that provides community services to LMI individuals and families.

Appendix A: Summary of MMSA and State Ratings

RATINGS Safra National Bank of New York	
Overall Bank:	Overall Bank Rating
Safra National Bank of New York	Satisfactory
State/MMSA Name	State/MMSA Rating
New York	Satisfactory
Florida	Satisfactory

Appendix B: Definitions and Common Abbreviations

The following terms and abbreviations may be 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 assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households

always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the 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 CD.

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.



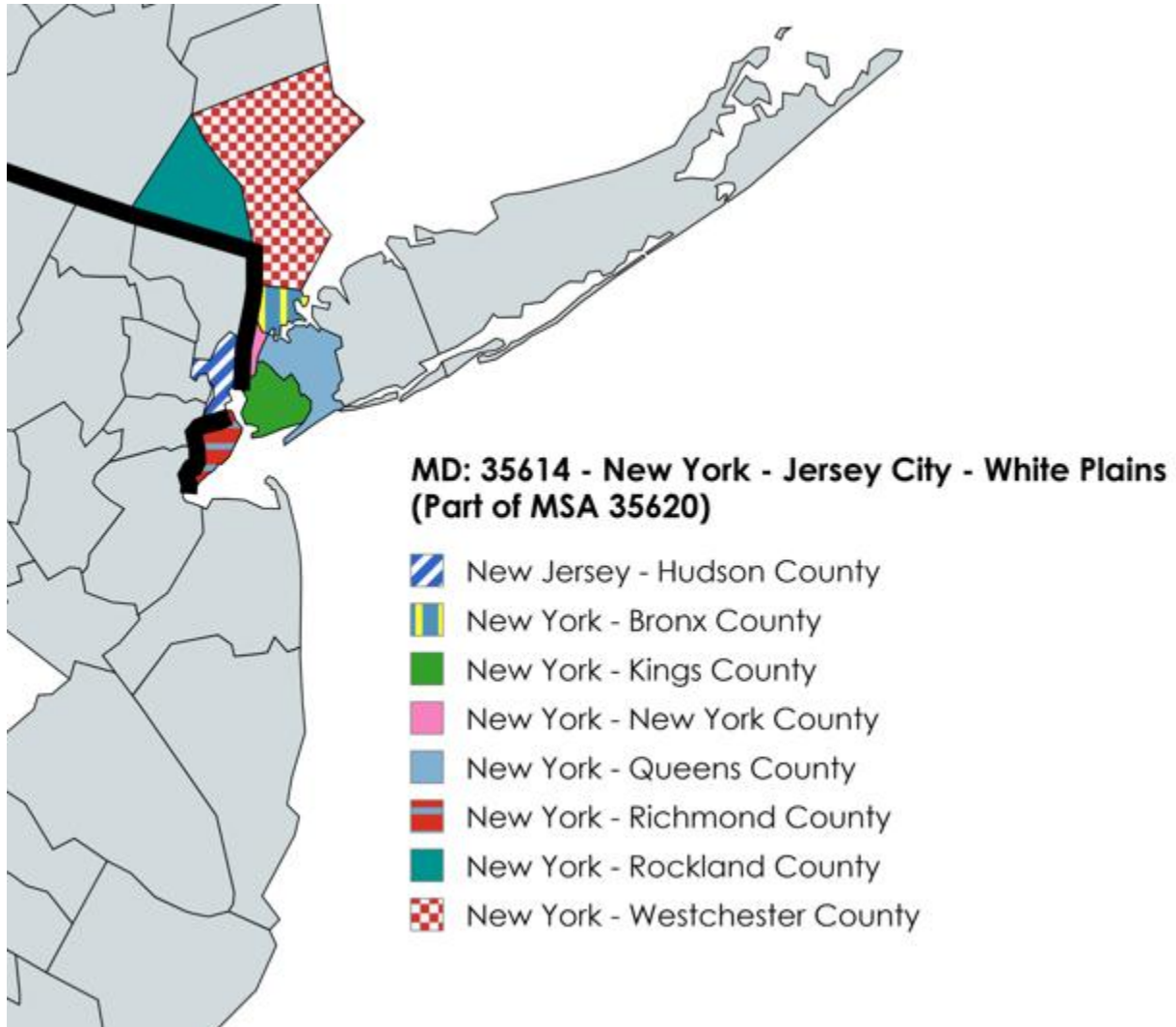
Safra National Bank of New York

Bank Profile & Services Offered

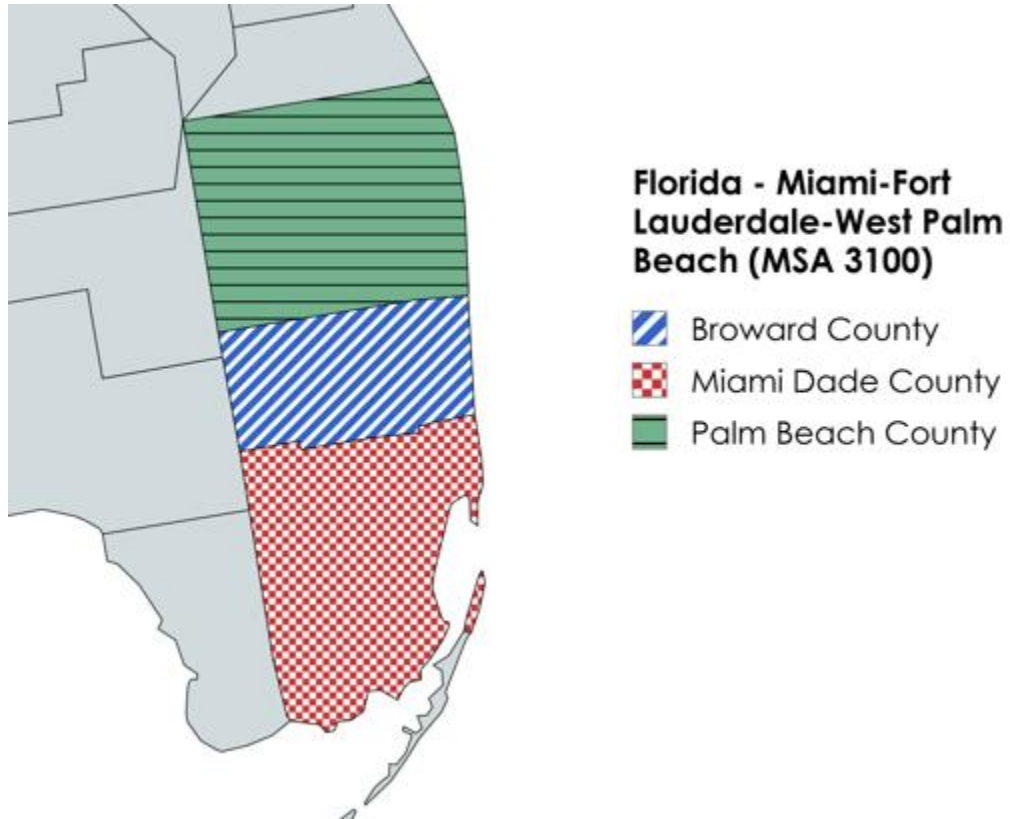
Safra National Bank is chartered by the Office of the Comptroller of the Currency (“OCC”) under charter number 20948. Safra National Bank is a private bank with a main office located in midtown Manhattan. Safra has three branches in Florida, which are in Aventura, Brickell and Palm Beach. Additionally, Safra has one branch in Los Altos, CA and one in Boston, MA. Safra provides private banking services to high-net-worth individuals and large international corporations through its main branch in New York, NY. The core business of the bank is private banking. The bank offers deposit accounts and CD related lending activity. The primary credit product offered is commercial loans fully secured by securities and real estate collateral. Other credit products include trade finance loans. Safra National Bank of New York was designated as a Wholesale bank on May 21, 1997. A Wholesale bank is not in the business of extending home mortgage, small business, small farm, or consumer loans to retail customers.

To request a copy of SNB’s Public CRA File, or for more additional information on the Bank’s CRA program, please email safra.cra@safra.com

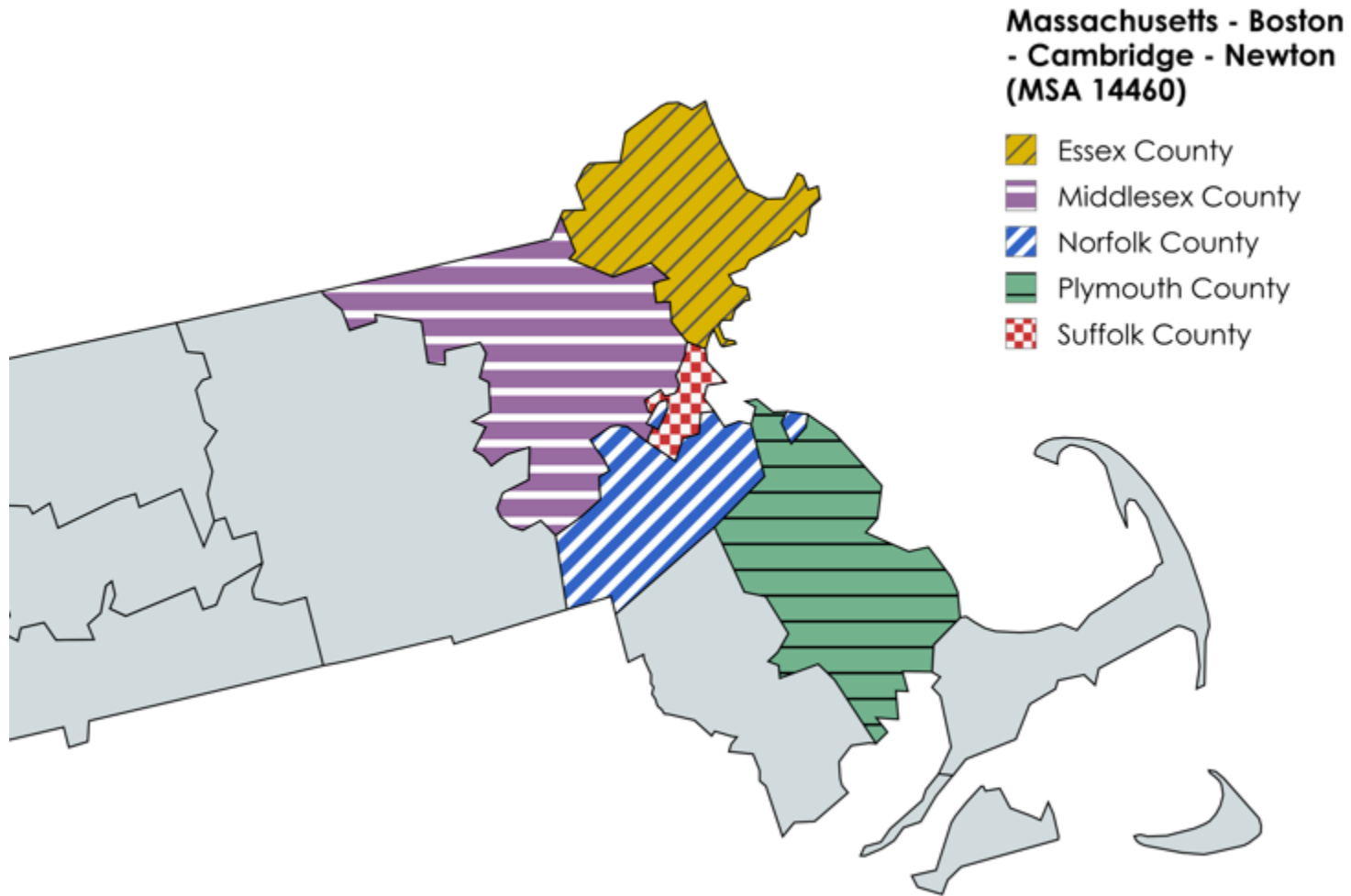
Safra National Bank of New York – Assessment Areas



Safra National Bank of New York – Assessment Areas










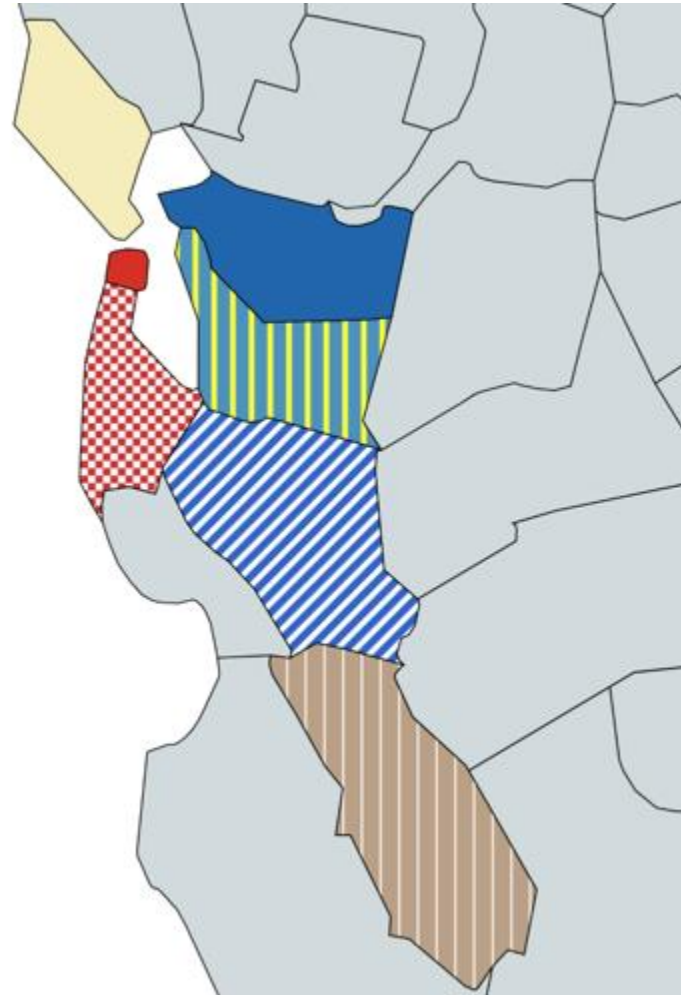
Safra National Bank of New York – Assessment Areas



Safra National Bank of New York – Assessment Areas

San Francisco-Oakland-Fremont (MSA 41860) and San Jose, Sunnyvale and Santa Clara (MSA 41940)

-  Alameda County
-  Contra Costa County
-  Marin County
-  San Benito County
-  San Francisco County
-  San Mateo County
-  Santa Clara County





Safra National Bank of New York

Branch Locations

New York, NY Branch

546 Fifth Avenue
New York, NY 10036
212-704-5500
Branch Hours 9:00AM – 3:00PM (Eastern)

Aventura, FL Branch

21500 Biscayne Boulevard #1224
Suite #503
Aventura, FL 33180
305-682-3800
Branch Hours 9:00AM – 3:00PM (Eastern)

Palm Beach, FL Branch

350 Royal Palm Way
Suite #500
Aventura, FL 33180
305-682-3800
Branch Hours 9:00AM – 3:00PM (Eastern)

Miami, FL Branch

1221 Brickell Avenue
Suite #5
Miami, FL 33131
305-536-3131
Branch Hours 9:00AM – 3:00PM (Eastern)

Boston MA Branch

30 Rowes Wharf
Suite #2200
Boston, MA 02110
614-7-218-4400
Branch Hours 9:00AM – 3:00PM (Eastern)

Los Altos Branch

369 South San Antonio Road
Los Altos, CA 94022
650-383-2400
Branch Hours 9:00AM – 3:00PM (Pacific)



Safra National Bank of New York

Branch Locations Opened in 2023, 2024 and 2025

Palm Beach, FL Branch - January 2023

350 Royal Palm Way
Suite #500
Aventura, FL 33180
305-682-3800
Branch Hours 9:00AM – 3:00PM (Eastern)

Miami, FL Branch - Formerly Delta National Bank of New York, acquired in 2023

1221 Brickell Avenue
Suite #5
Miami, FL 33131
305-536-3131
Branch Hours 9:00AM – 3:00PM (Eastern)

Boston MA Branch - Opened in May 2025

30 Rowes Wharf
Suite #2200
Boston, MA 02110
614-7-218-4400
Branch Hours 9:00AM – 3:00PM (Eastern)

Los Altos Branch - Opened in May 2025

369 South San Antonio Road
Los Altos, CA 94022
650-383-2400
Branch Hours 9:00AM – 3:00PM (Pacific)

Branch Locations Closed in 2023, 2024 and 2025

There were no branch closures during this period.



Safra National Bank of New York

Safra National Bank's CRA Disclosure Statements for the prior two years can be viewed on the Financial Institutions Examinations Council's ("FFIEC") website: [FFIEC CRA Disclosure Statements](#)