Safra National Bank
of New York

Safra National Bank of New York (“SNB”)

Community Reinvestment Act (“CRA”) Public File

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Office of the
Comptroller of the Currency
Washington, DC 20219

WHOLESALE BANK

PUBLIC DISCLOSURE

June 23, 2025

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

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Suite A-30
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 demonstrated an adequate level of community development (CD) loans, qualified investment activity, and CD services.

- The institution exhibited 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 a wholly owned subsidiary of SNBNY Holdings Limited, a Gibraltar-based holding company, and is part of the J. Safra Group, a global network of financial institutions controlled by the Joseph Safra family. The bank has two wholly owned subsidiaries, Safra Securities, LLC and 3050 Aventura Owner, LLC. The bank completed the acquisition of Delta North Bankcorp, including its subsidiary, Delta National Bank and Trust Company (Delta) in 2023.

Safra's primary focus is private banking services to high-net-worth clients. The bank has one branch in Manhattan and three branches in Florida located in Aventura, West Palm Beach, and Miami. The West Palm Beach branch opened in 2023, and the bank acquired the Miami branch from Delta in 2023. The bank also maintains representative offices in Brazil, Chile, and Mexico. The bank does not have any ATMs. The bank's primary credit product is commercial loans secured by cash, securities, or real estate collateral. Other credit products include trade finance loans as well as a small amount of personal and mortgage loans offered to private banking customers. 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, 2024, the bank reported tier 1 capital of $1.0 billion and total assets of $11.3 billion. Net loans and leases totaled $3.1 billion, representing 27.1 percent of total assets. Total deposits were $9.5 billion or 83.7 percent of total assets.

Table 1: Financial Information (000s)

	Year-end 2022	Year-end 2023	Year-end 2024	Average for Evaluation Period
Tier 1 Capital	887,505	952,157	1,009,757	949,806
Total Income	316,457	639,856	729,669	561,994
Net Income	32,540	76,706	116,416	75,221
Total Assets	9,768,688	10,525,457	11,305,158	10,533,101

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. Safra's prior CRA performance evaluation was dated June 21, 2022 and was rated Satisfactory.

Scope of the Evaluation

Evaluation Period/Products Evaluated

In evaluating the bank's performance under the CRA, we reviewed CD activities from January 1, 2022 through December 31, 2024 (evaluation period). We reviewed the level and nature of qualified investments, CD lending, and CD services. At the prior examination dated June 21, 2022, we 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), if applicable 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.

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, income, and assets to the states and subsequent AAs, where feasible and reasonable. The allocation is based on the amount of banking deposits contained in each of the states and AAs. According to the Federal Deposit Insurance Corporation's (FDIC) *Summary of Deposits*, as of June 30, 2024, bank deposits total $8.3 billion. From the total, $6.2 billion, or 75 percent, is attributed to the New York AA and $2.1 billion, or 25 percent, is from the Florida AA. As such, we allocated 75 percent of income and capital to New York and 25 percent to Florida.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) (March 29, 2024) in determining a national banks 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 Consumer Financial Protection Bureau, 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 demonstrated an adequate level of CD loans, qualified investment activity, and CD services in the state of New York.

- The institution exhibited 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, Westchester, and Rockland. 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 MSA. The AA meets the requirements of the CRA and does not arbitrarily exclude low- and moderate-income geographies.

The New York AA is a densely populated urban area. According to the 2024 United States Census data, the AA consists of 2,648 census tracts. There are 306 low-income tracts (11.6 percent), 608 moderate-income tracts (23.0 percent), 786 middle-income tracts (29.7 percent), and 792 upper-income tracts (29.9 percent). There are 156 census tracts for which the income designation is unknown. The total population of the AA is 10.1 million. The AA has 2.2 million families, of which 27.8 percent are low-income families and 15.3 percent are moderate-income families. There are 4 million housing units, of which 57.8 percent are rental units, 33.3 percent are owner-occupied, and 8.9 percent are vacant. The FFIEC median family income for the MD is $85,483 and the median housing value is $574,800. There is a lack of affordable housing within the MD.

According to the FDIC Summary of Deposits report as of June 30, 2024, Safra's deposit market share was 0.3 percent, ranking 25th out of 116 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, N.A., Goldman Sachs Bank USA, The Bank of New York Mellon, Morgan Stanley Private Bank, N.A., Bank of America, N.A., HSBC Bank USA, N.A., Citibank, N.A., and Wells Fargo Bank, N.A. These major competitors have an established presence throughout the AA and provide strong competition for deposits.

Information published by Moody's Analytics in February 2025 indicates the New York-Jersey City-White Plains, NY-NJ MD benefits from high per capita income, limited exposure to manufacturing, and strong international immigration. Weaknesses include high costs associated with taxes, housing, office rents, and energy as well as a rapidly aging infrastructure and troubled fiscal health worsened by population losses.

Top industries in the AA providing employment are the banking and healthcare industries. Major employers include JPMorgan Chase and Company, New York-Presbyterian Healthcare System, and Mount Sinai Health System. According to the Bureau of Labor Statistics (BLS), the non-seasonality adjusted unemployment rate for the New York-Jersey City-White Plains, NY-NJ MD The annual unemployment rates remained relatively stable throughout the evaluation period, with annual rates ranging from 4.8 in 2022 and 2024 and 4.7 percent in 2023. The year-end 2024 unemployment rate remains above the national rate of 4.1 percent.

To determine local economic conditions and community needs, the OCC reviewed information from three community contacts within the bank's AA. These contacts identified affordable housing, small business loans, legal assistance, financial education, economic development, and health and social services as community needs of the AA. These community contacts included a community center that focuses on providing information and referrals for health care, housing, tax/legal assistance, and food pantry services within Bronx County, an economic development center aimed at providing assistance to individuals and families to attain economic stability through small business loans and job placement in Kings County, and an organization that assists with business operations for around 140 businesses, including skills training, business planning, and area development within Westchester County.

New York-Newark-Jersey City, NY-NJ MSA

Assessment Area(s) - 2024 New York MSA						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,648	11.56	22.96	29.68	29.91	5.89
Population by Geography	10,146,976	14.30	25.02	27.60	31.83	1.25
Housing Units by Geography	4,002,531	13.37	22.77	26.50	36.18	1.18
Owner-Occupied Housing by Geography	1,333,904	3.08	14.40	31.59	50.28	0.66
Occupied Rental Units by Geography	2,312,439	20.06	28.10	24.07	26.31	1.45
Vacant Units by Geography	356,188	8.56	19.46	23.16	47.40	1.42
Businesses by Geography	507,670	8.99	18.34	21.83	46.53	4.30
Farms by Geography	4,411	5.53	13.67	22.40	56.09	2.31
Family Distribution by Income Level	2,221,314	27.83	15.33	15.97	40.87	0.00
Household Distribution by Income Level	3,646,343	29.73	13.84	14.53	41.89	0.00
Unemployment rate (%)	6.51	11.28	7.47	6.10	4.60	7.91
Households Below Poverty Level (%)	16.26	36.73	21.20	12.57	7.51	23.21
Median Family Income (35614 - New York-Jersey City-White Plains, NY-NJ MD)		$85,483			Median Housing Value	$574,800
Median Family Income (35614 - New York-Jersey City-White Plains, NY-NJ MD) for 2024		$101,900			Median Gross Rent	$1,531
					Families Below Poverty Level	12.89

FFIEC File - 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

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, economic development, and community services for low- and moderate-income individuals. The bank's CD loans revitalized and stabilized the area and provided community services and affordable housing to low- and moderate-income individual and families.

Qualified Investments

Qualified investments totaled $12.9 million, or 1.8 percent of average tier 1 capital allocated to New York and 3.0 percent of average total income allocated to New York as of December 31, 2024. Safra purchased $2.3 million in investments and provided $167 thousand in grants. The bank has $10.4 million in qualified outstanding investments from prior periods.

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

Table 3b: Qualified Investment Activity (000s)

	Benefits AA**
Originated Investments	$2,298
Originated Grants	$167
Prior-Period Investments that Remain Outstanding	$10,384
Total Qualified Investments	$12,849
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 4b: Qualified Investment Percentages

	Benefits AA (%)*
Total Investments/Average Tier 1 Capital	1.8%
Total Investments/Average Total Income	3.0%
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 that includes the AA.*

During the evaluation period, Safra invested $1.9 million in new certificates of deposit (CDs) at eight minority depository institutions (MDI) or community development financial institutions (CDFI) in the bank's AA. Safra additionally acquired a $400 thousand portion in a bond that supports affordable housing within the AAs. The bank also has five prior period investments with outstanding balances totaling $10.4 million, which includes four mortgage-backed securities comprised of loans made to low- and moderate-income borrowers and one prior MDI CD of $200 thousand in the bank's AA. Additionally, Safra made 20 donations totaling $167 thousand to organizations in the bank's AA that promote affordable housing, economic development, and provide community services for low- and moderate-income individuals.

CD Lending

CD lending totaled $48.6 million, or 6.8 percent of average tier 1 capital allocated to New York and 11.5 percent of average total income as of December 31, 2024. Safra originated one loan totaling $12.4 million and annually extended another loan for a total of $6.4 million. The bank also modified three loans through refinancing and additional funding for $29.9 million and acquired five loans from the acquisition of Delta North Bankcorp.

CD lending included the following:

- Safra originated a $12.4 million loan secured by multiple properties located in moderate and middle-income census tracts. The properties include both affordable housing and commercial mixed used properties.

- Safra refinanced a $28.5 million loan for a property located in a moderate-income census tract in 2024. The property primarily serves as a temporary housing shelter, which occupies 72.1 percent of the net rentable area. The remaining space is dedicated to affordable housing for low- to moderate-income individuals.

- 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 $6.4 million.

Table 5b: CD Lending Percentages

	Benefits AA (%)*
Total CD Lending/Average Tier 1 Capital	6.8%
Total CD Lending/Average Total Income	11.5%
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 demonstrated an adequate level of qualified investment activity and CD services in the state of Florida.

- The institution exhibited adequate responsiveness to CD needs in the state of Florida.

Description of Assessment Area(s)

Safra's Florida AA consists of Miami-Dade, Broward, and Palm Beach Counties. The counties are contiguous and are part of the Miami-Miami Beach-Kendall, FL MD, Fort Lauderdale-Pompano Beach-Sunrise, FL MD, and West Palm Beach-Boca Raton-Delray Beach, FL MD, located in the Miami-Fort Lauderdale-West Palm Beach, FL MSA. Safra's Florida AA expanded since the prior performance evaluation due to the opening of a branch in West Palm Beach, FL and the acquisition of a Delta branch in the Brickell area of Miami, FL. The prior AA contained only the Miami-Miami Beach-Kendall, FL MD. The AA meets the requirements of the CRA and does not arbitrarily exclude low- and moderate-income geographies.

Miami-Dade County is the most southeastern part of Florida and the United States, with Broward and Palm Beach Counties directly north. Miami-Dade, Broward and Palm Beach Counties are the seventh, 17th, and 24th most populous counties in the United States, respectively. According to the 2024 U.S. Census data, the AA contains 1,497 census tracts. There are 79 low-income tracts (5.3 percent), 394 moderate-income tracks (26.3 percent), 456 middle-income tracks (30.5 percent), and 512 upper-income tracks (34.2 percent). There are also 56 census tracts for which the income designation is unknown. The total population of the AA is 6.1 million. The AA has 1.4 million families, of which 22.5 percent are low-income families and 17.7 percent are moderate-income families. There are 2.5 million housing units, of which 51.0 percent are owner-occupied, 34.3 percent are rental units, and 14.8 percent are vacant. The FFIEC median family income for the Miami-Miami Beach-Kendall, FL MD is $60,666, for the Fort Lauderdale-Pompano Beach-Sunrise, FL MD is $73,430, and for the West Palm Beach-Boca Raton-Delray Beach, FL MD is $79,785. The median housing value is $275,800.

According to the FDIC Summary of Deposits report as of June 30, 2024, Safra's deposit market share was 0.6 percent, ranking 26th out of 84 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, N.A., JP Morgan Chase Bank, N.A., Wells Fargo Bank, N.A., and Citibank, N.A.

Information published by Moody's Analytics in February 2025 indicates the strengths of the Miami-Miami Beach-Kendall, FL; Fort Lauderdale-Pompano Beach-Sunrise, FL; and West Palm Beach-Boca Raton-Delray Beach, FL MDs include the area's strong ties to Latin America,

attractive tourist destinations, luxury status which attracts international capital, the world's second-busiest cruise port, vibrant professional and business services, and well-developed shipping and distribution infrastructure. Weaknesses include high household debt, a congested airport and roads, employment volatility, and an industrial structure that leaves the economy susceptible to business cycle downturns. The report notes that the economy is slowing, particularly in the nonfarm, professional and business services sector which is shedding workers and giving up gains made at the start of 2024. However, despite a softening labor market, the unemployment rate has remained low and stable.

Top industries in the area include supermarkets, educational services, airlines, and healthcare. Major employers include Publix Supermarkets, University of Miami, Jackson Health System, and American Airlines. The annual unemployment rates in these MDs during the evaluation period ranged from a low of 1.8 percent to a high of 3.4 percent. As of December 2024, the unemployment rates of the MDs were below the national unemployment rate of 4.1 percent.

To determine local economic conditions and community needs, the OCC reviewed information from two community contacts within the AA.-The first contact is a local government agency that fosters community redevelopment through collaboration with residents, business owners, and other community developers with the aim to stimulate infrastructure improvements, economic development, affordable housing, and business incentives. The contact stated that financial institutions can assist with financing housing development. The second contact is an organization that helps low- and moderate-income borrowers with affordable homeownership. The contact stated that financial institutions can assist with providing affordable housing, revitalizing low-income neighborhoods, and supporting economic development.

Miami-Fort Lauderdale-West Palm Beach, FL MSA

Assessment Area(s) – 2024 Florida MSA						
						2022-2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,497	5.28	26.32	30.46	34.20	3.74
Population by Geography	6,138,333	4.71	27.97	31.44	34.36	1.51
Housing Units by Geography	2,548,767	4.81	27.39	30.86	35.48	1.46
Owner-Occupied Housing by Geography	1,299,739	2.91	21.81	32.09	42.16	1.02
Occupied Rental Units by Geography	873,001	7.80	37.38	30.98	22.05	1.80
Vacant Units by Geography	376,027	4.45	23.50	26.32	43.56	2.18
Businesses by Geography	524,568	2.75	23.17	28.59	43.21	2.29
Farms by Geography	9,692	3.45	25.66	30.28	39.63	0.98
Family Distribution by Income Level	1,418,815	22.46	17.65	18.02	41.88	0.00
Household Distribution by Income Level	2,172,740	24.75	16.01	16.75	42.49	0.00
Unemployment rate (%)	5.56	8.53	7.17	5.09	4.24	8.25
Households Below Poverty Level (%)	14.24	32.13	20.63	12.46	7.84	19.95
Median Family Income (22744 - Fort Lauderdale-Pompano Beach-Sunrise, FL MD)		$73,430			Median Housing Value	$275,800
Median Family Income (33124 - Miami-Miami Beach-Kendall, FL MD)		$60,666			Median Gross Rent	$1,439
Median Family Income (48424 - West Palm Beach-Boca Raton-Delray Beach, FL MD)		$79,785			$79,785Families Below Poverty Level	10.59
Median Family Income (22744 - Fort Lauderdale-Pompano Beach-Sunrise, FL MD) for 2024		$89,100				
Median Family Income (33124 - Miami-Miami Beach-Kendall, FL MD) for 2024		$79,400				
Median Family Income (48424 - West Palm Beach-Boca Raton-Delray Beach, FL MD) for 2024		$104,000				

FFIEC File – 2024 Census
2024 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

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 low- and moderate-income individuals and families and supported MDIs. The bank's grants supported organizations that promote financial literacy and provide community services to low- and moderate-income individuals and families. The bank's CD services supported organizations that provide community services to low- and moderate-income individuals and families.

Qualified Investments

Qualified investments totaled $19.1 million, or 8.0 percent of average tier 1 capital allocated to Florida and 13.6 percent of average total income allocated to Florida. Safra purchased $18.4 million in qualified investments and provided $121,450 in grants. The bank also has $535,746 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 3b: Qualified Investment Activity (000s)

	Benefits AA**
Originated Investments	$18,433
Originated Grants	$122
Prior-Period Investments that Remain Outstanding	$536
Total Qualified Investments	$19,091
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 qualified investment activity in terms of average tier 1 capital and average total income over the evaluation period.

Table 4b: Qualified Investment Percentages

	Benefits AA (%)*
Total Investments/Average Tier 1 Capital	8.0%
Total Investments/Average Total Income	13.6%
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 that includes the AA.*

During the evaluation period, Safra invested $18.4 million in CDs at five MDIs and four securities that support low- and moderate-income housing needs in the Florida AA. The bank has one prior period investment in a security that supports low- and moderate-income housing needs in the Florida AA. The outstanding balance of the security is $535,746. In addition, Safra made 13 donations totaling $121,450 to organizations in the bank's Florida AA that promote financial literacy and provide community services for low- and moderate-income 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, one employee assisted a non-profit which provides community services to low- and moderate-income individuals to prepare and update registration documents and bylaws.

Appendix A: Summary of MMSA and State Ratings

RATINGS	
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 AA.

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 CD loans and qualified investments, branch distribution, and CD services).

Low-Income: Individual income that is at 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.

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 AA.

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**.**

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of evaluation period

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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

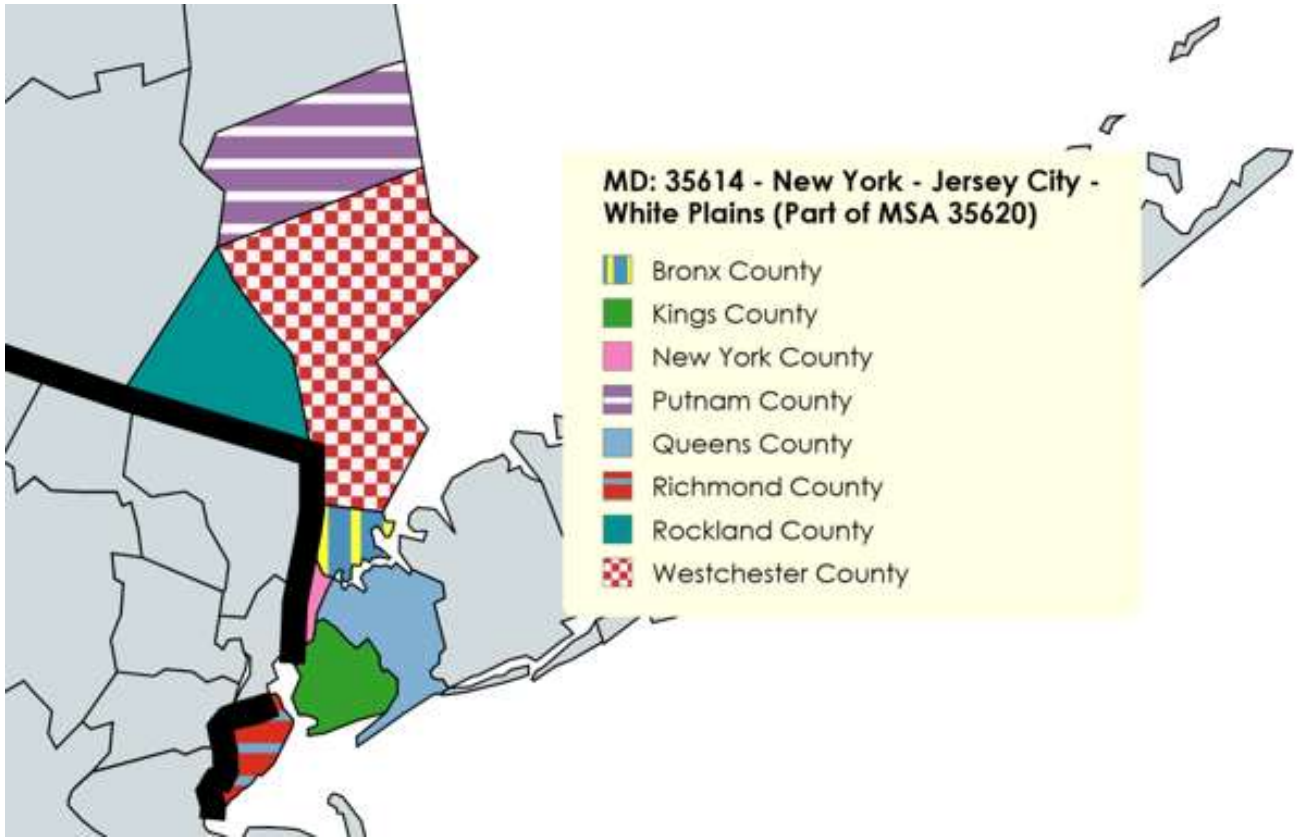
Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Bank Profile & Services Offered

Safra National Bank operates under charter number 20948, issued by the Office of the Comptroller of the Currency (OCC). Headquartered in Manhattan, Safra National Bank is a private bank with a nationwide presence that includes three Florida branches in Aventura, Brickell, and Palm Beach; two California branches in Los Altos and San Francisco; and one branch in Boston, Massachusetts. The bank's core business is private banking, serving high-net-worth individuals and large international corporations. Product offerings include deposit accounts, certificates of deposit, and lending activity, with commercial loans secured by securities and real estate. Since May 21, 1997, Safra National Bank has carried a Wholesale bank designation, meaning the bank does not offer home mortgage, small business, small farm, or consumer loans to retail customers.

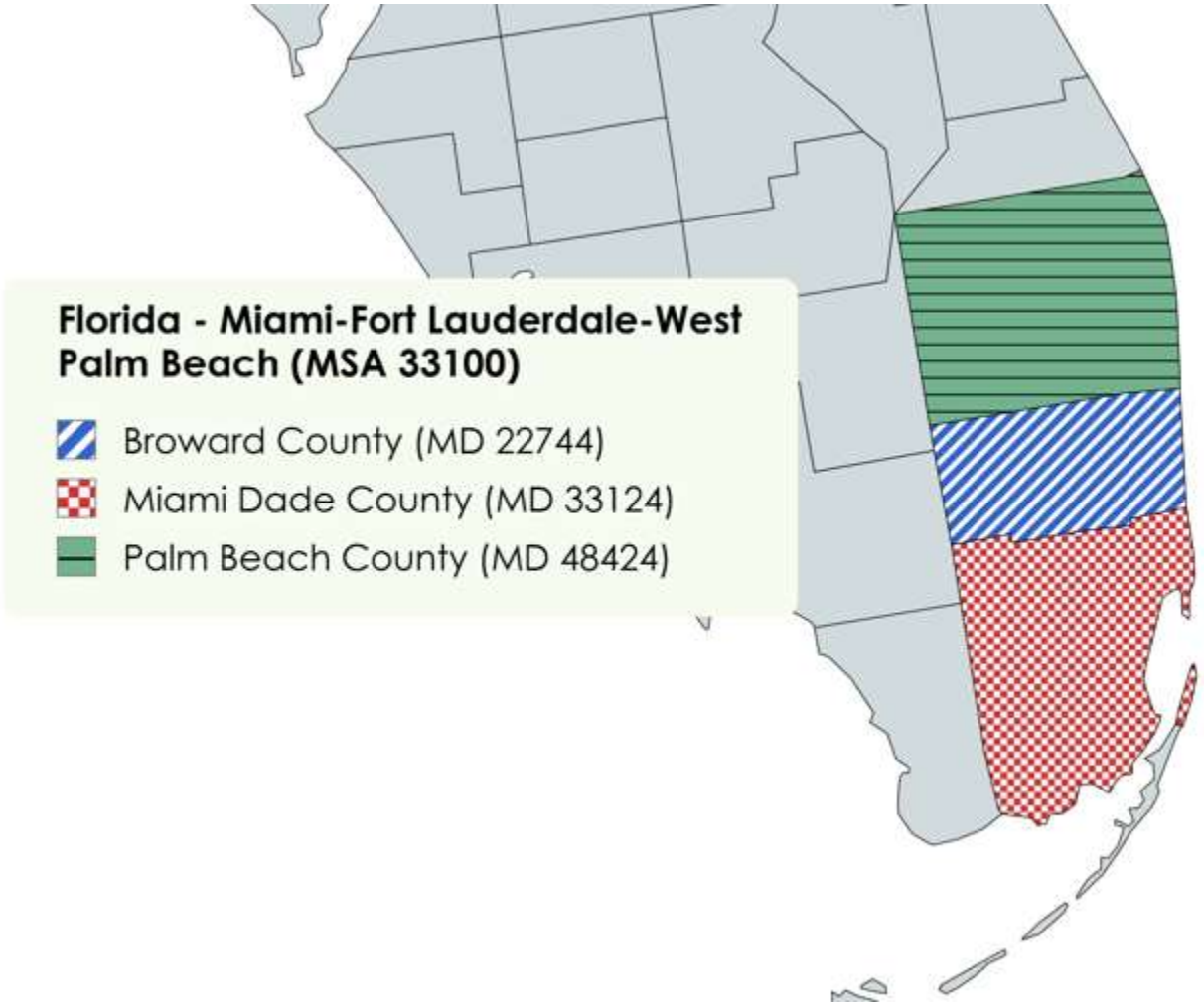
To request a copy of SNB's Public CRA File, or for more additional information on the Bank's CRA program, please email safra.cra@safra.com

Safra National Bank of New York – Assessment Areas



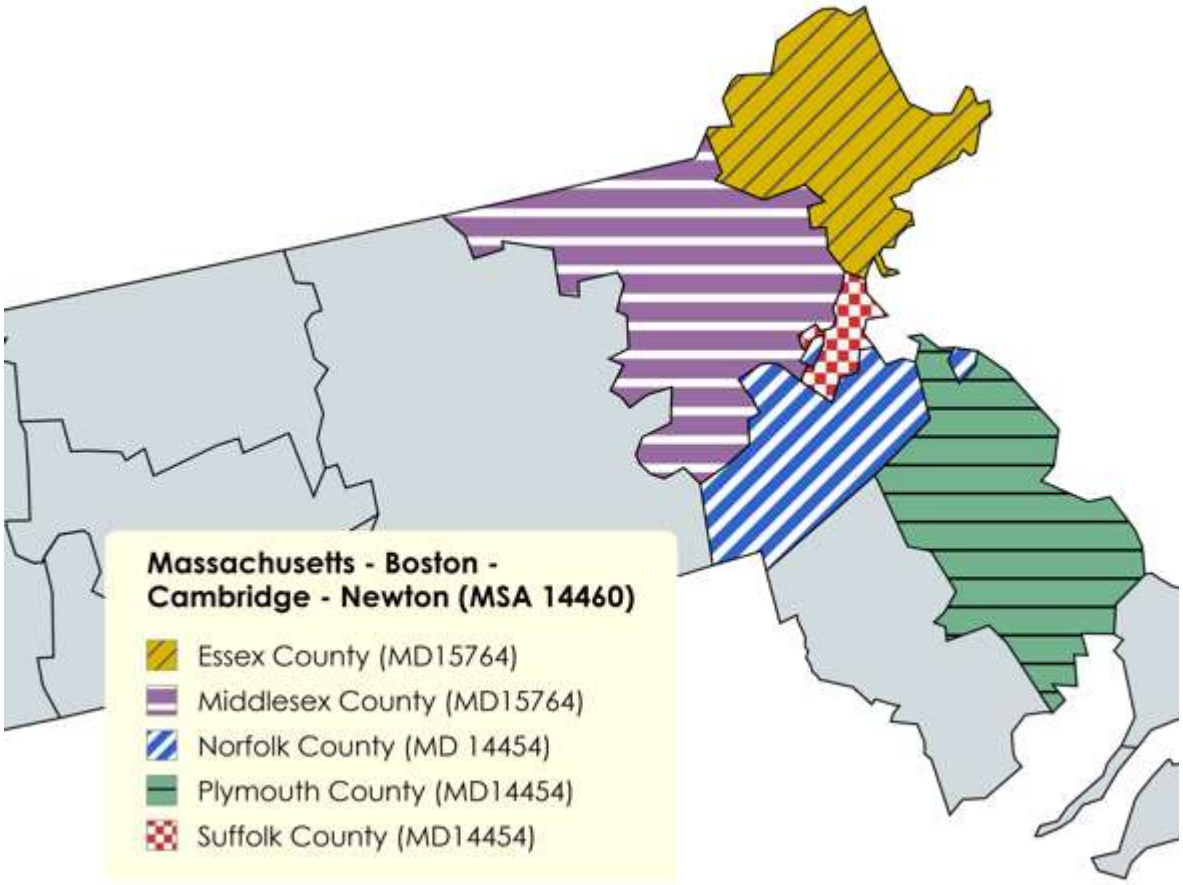
Maps created using mapchart.net

Safra National Bank of New York – Assessment Areas



Maps created using mapchart.net

Safra National Bank of New York – Assessment Areas

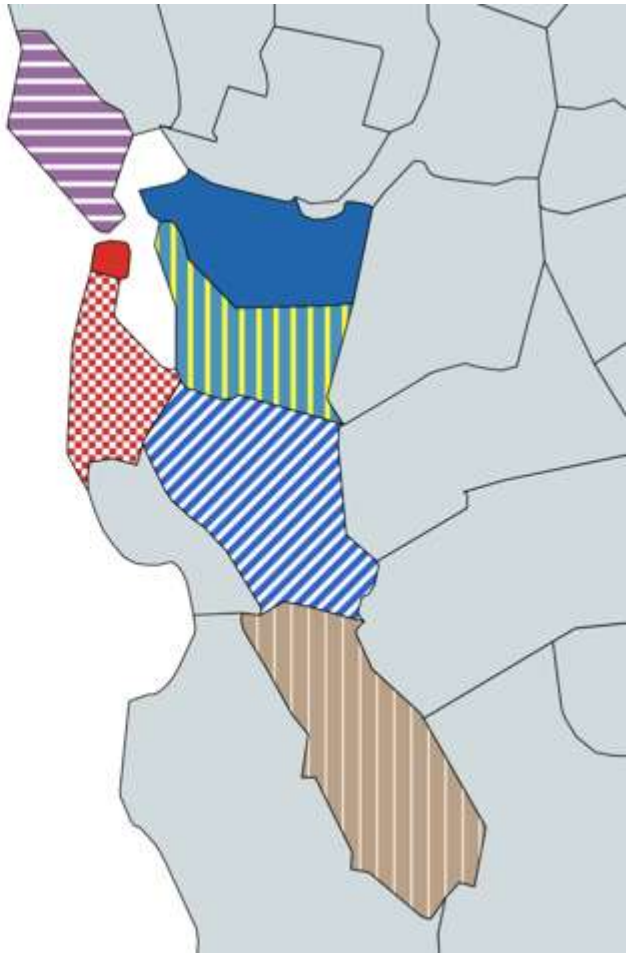


Maps created using mapchart.net

Safra National Bank of New York – Assessment Areas

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

- Alameda County (MD 36084)
- Contra Costa County (MD 36084)
- Marin County (MD 42034)
- San Benito County (MSA 41940)
- San Francisco County (MD 41884)
- San Mateo County (MD 41884)
- Santa Clara County (MSA 41940)



Maps created using mapchart.net

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)

San Francisco Branch
201 Mission Street, Suite 1940
San Francisco, CA 94105
415-293-8600
Branch Hours 9:00AM – 3:00PM (Pacific)

Branch Locations Opened in 2024, 2025 and 2026

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)

San Francisco Branch – Opened in June 2026
201 Mission Street, Suite 1940
San Francisco, CA 94105
415-293-8600
Branch Hours 9:00AM – 3:00PM (Pacific)

Branch Locations Closed in 2024, 2025 and 2026

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