



**COMMUNITY REINVESTMENT ACT  
STRATEGIC PLAN  
2024 – 2028**

Introduction .....	4
General Information .....	4
The Bank’s Specialized Business Model .....	4
Financial Information .....	5
The Community Reinvestment Act.....	6
Community Reinvestment Act Requirements .....	6
Strategic Plan – Overall Focus, Effective Date and Term.....	7
The Bank’s Commitment to CRA.....	7
Current and Historical CRA Program.....	8
Program Oversight and Resources.....	9
Development of the Bank’s CRA Strategic Plan .....	9
The Bank’s Assessment Area .....	11
Definition.....	11
Description.....	11
Demographic Characteristics.....	11
State Economic Characteristics .....	13
Performance Context .....	14
The Bank’s Business Model .....	14
Competitive Environment.....	15
Bank Capacity .....	15
Strategic Plan Measurable Goals and Methodology .....	15
Methodology for Consolidated Lending, Investments, and Grant Goals.....	15
Methodology for Community Development Services Goal.....	18
Measurable Goals over the Five-Year Plan .....	19
Measurable Goals for New Originations of CRA Loans, Grants, and Investments	21
Measurable Goals for Cumulative CRA Loans, Grants, and Investments.....	22
Measurable Goals for Community Development Services .....	23
Plan Development and Other Information .....	25
Input to the Development of the Strategic Plan .....	25
Public Comments on the Strategic Plan .....	30
Changes to the Strategic Plan .....	30
Monitoring Strategic Plan Performance .....	30
Appendix A: Assessment Area Maps.....	32

Utah County .....	32
Assessment Area Census Tract Income Levels – Provo-Orem Metropolitan Statistical Area .....	34
Appendix B: Evidence of Public Notice of Green Dot Bank’s draft Strategic Plan .....	39
Appendix C: Bank Balance Sheet Summary as of March 31, 2023 .....	40
Appendix D: Summary of Strategic Plan & Measurable Goals .....	41

## **INTRODUCTION**

### **GENERAL INFORMATION**

Green Dot Bank (“the Bank” or “Green Dot”) is organized as a commercial bank in the State of Utah, headquartered in Provo, Utah. The Bank is a State Chartered member bank with its primary regulator as the Federal Reserve Bank of San Francisco. On December 8, 2011, Green Dot Corporation became a bank holding company through its acquisition of Bonneville Bancorp and its subsidiary, Bonneville Bank. On January 19, 2012, the Bank was approved to convert its charter from non-member to member with the Federal Reserve. The Bank completed this charter conversion on February 6, 2012.

Prior to its acquisition by the Bank, single branch Bonneville Bank had served the Utah County community since 1978. To minimize disruption to its current customers, the Bank retained the Bonneville Bank name as a licensed DBA for the purposes of continuing to conduct its ongoing community banking operations in Utah. The Bank continues to offer traditional consumer and small business deposit and loan products under the Bonneville Bank trade name today in Provo, Utah. The Bank is not intending to expand its branch presence for deposit taking or lending at this time.

Green Dot Bank also operates under the authorized DBAs of GO2bank and GoBank.<sup>1</sup>

### **THE BANK’S SPECIALIZED BUSINESS MODEL**

Within the Utah County community, Green Dot Bank DBA Bonneville Bank has a traditional community bank footprint and product offering, offering consumers and small businesses an array of traditional banking services – including loans and deposit products – to meet the community’s needs.

Beyond the Utah County community, Green Dot Bank has a specialized nationwide business model that differs in important ways from traditional banks. The Bank’s primary product offerings are consumer and small business demand deposit account products which allow customers to acquire and manage their account entirely online or through a mobile application. The Bank’s products are also offered for sale nationwide through more than 90,000 retailers and other distribution partners, rather than through traditional bank branches. Additionally, accounts within eligible product channels include an attached savings feature paying an interest rate

---

<sup>1</sup> For federal deposit insurance purposes, deposits under the trade names Bonneville Bank, GO2bank, and GoBank are aggregated for deposit insurance coverage under a single FDIC-insured bank, Green Dot Bank. Deposits under any of these trade names are aggregated for deposit insurance coverage up to the allowable limits.

generally equal to or exceeding market rates, which encourages consumers to better manage their finances by setting aside funds to meet future needs. Green Dot’s mission is to provide millions of people and small business owners with reliable and affordable deposit accounts that make everyday banking hassle-free and designs its products to serve these customers in a fair and transparent way.

The Bank also issues various demand deposit account, payroll account, and money processing products through its Banking as a Service Channel (“Baas”), which allows Green Dot’s partners to offer bank-issued products directly to their customers or employees under their own brand, such as debit or payroll cards, various payment or transfer services, cash solutions, and tax services.

Green Dot additionally operates the Green Dot Network, which provides our customers and partners the ability to load or pick up cash, or pay bills using cash, at over 90,000 retail partner locations nationwide.<sup>2</sup> This provides a quick and easy way of depositing money to an account or paying a bill for people near their home, without having to visit a traditional bank branch during normal business hours to do so.

The Bank also issues seasonal short-term advances to qualified independent professional tax preparers nationwide for use in providing working capital to meet critical tax season business expenses.

Lastly, the Bank also offers a secured credit card product as part of its GO2bank suite of mobile banking products, for which customers with an existing GO2bank checking account may apply. This product serves as a tool for customers to enhance or improve their credit history and score, using a credit card collateralized by a cash deposit held with the Bank.<sup>3</sup>

## **FINANCIAL INFORMATION**

As of March 31, 2023, the Bank held total deposits of \$3.7 billion and assets of \$3.8 billion. The Tier 1 Capital ratio of 30.9% and the Leverage ratio of 8.9% reflect a high level of ongoing capitalization. The Bank’s small \$36.7 million lending portfolio is composed principally of secured credit card loans totalling \$12.6 million, commercial real estate loans of \$4.6 million, short-term seasonal loans to income tax preparation offices of \$3.8 million, and consumer loans of \$13.2

---

<sup>2</sup> The Bank currently offers demand deposit products and cash load services at major retailers and convenience stores nationwide, such as Walmart, Walgreens, 7-Eleven, CVS, Rite Aid, and in Kroger grocers.

<sup>3</sup> Green Dot Bank expects to continue to offer innovative and consumer friendly products and services over time. Under commitments made to the Federal Reserve Bank and the State of Utah at the time Green Dot Corporation acquired Bonneville Bancorp in 2011, Green Dot Bank must obtain prior approval for any material change to its business plan.

million. The Bank maintains a net loan-to-deposit ratio of only 0.80%, with a loan-to-asset ratio of 0.77%.

A summary balance sheet and a link to the Bank's current and historical Consolidated Reports of Condition and Income (Call Report) are included in Appendix C.

## **THE COMMUNITY REINVESTMENT ACT**

### **COMMUNITY REINVESTMENT ACT REQUIREMENTS**

The Bank is subject to various regulatory requirements administered by the federal banking agencies, one of which is the Community Reinvestment Act (the "CRA"). The CRA encourages banks to help meet the credit needs of the communities in their assessment areas, which include the communities in which they operate full-service branches or other deposit-taking facilities. Although the Bank issues many of its products on a nationwide basis online or through retail partner locations, the Bank's only full-service branch is located in Provo, Utah, and operates under the registered DBA of Bonneville Bank.

The CRA regulations allow banks to elect to be assessed under a strategic plan. Compliance with the CRA through a strategic plan allows a bank an opportunity to design a program that is appropriate to its own capabilities, business strategies, products, and organizational framework, as well as to the communities it serves.<sup>4</sup>

---

<sup>4</sup> The regulation for a strategic plan states:

Any Institution is permitted to develop, and submit for approval by its primary supervisory agency, a strategic plan (the "Plan") for addressing its responsibilities with respect to CRA. The Plan option was developed to provide institutions with more flexibility and certainty regarding what aspects of their performance will be evaluated and what quantitative and qualitative measures will be applied. To exercise this option, an institution must informally seek suggestions from the public while developing its Plan, solicit formal public comment on its Plan and submit the Plan to its regulatory agency (along with any written comments received from the public and an explanation of any changes made to the Plan in response to those public comments).

To be approved by an agency, the Plan must have measurable goals and address how the institution plans to meet the credit needs of its assessment area, in particular, low- and moderate-income geographies and individuals, through lending, investments and services, as appropriate. Although a Plan should generally emphasize lending goals, the rule allows institutions the flexibility to choose a different emphasis, as necessary, given their business strategy and the needs of their community. A Plan must contain goals that, if met, would constitute "satisfactory" performance.

## **STRATEGIC PLAN – OVERALL FOCUS, EFFECTIVE DATE AND TERM**

Consistent with its balance sheet and business model, the Bank’s CRA Strategic Plan (the “Plan”) will be focused on supporting the credit needs of its defined assessment area primarily through direct community development lending, small business lending, CRA-qualified investments, and services in the Metropolitan Statistical Area (“MSA”) of Utah and Juab Counties within the state of Utah. In addition, the Bank will fund grants to community development organizations, and directors and employees will actively seek to participate with organizations serving low- and moderate-income (“LMI”) populations in the assessment area.

In addition, consistent with the Bank’s nationwide business model and focus on meeting the needs of LMI populations across the country, the Bank will actively participate with local, regional or national organizations that align with Green Dot’s mission to serve the unbanked and underbanked populations, many of which also fall into the LMI population. The Bank will work with these organizations to provide direct services or support related to financial education and literacy and/or to promote educational, policy, product development, or other initiatives designed to promote access by underbanked/unbanked populations and LMI populations to financial services and/or the financial literacy and economic security of LMI individuals and communities.

The effective date of the Bank’s Plan is anticipated to be January 1, 2024, or upon approval by the Federal Reserve Bank of San Francisco if received after that date. In order to allow the Bank to focus as many resources as possible in executing the Plan, management has elected to establish a five-year term. If current CRA regulatory compliance requirements are amended and enacted during this five-year term, such as through the issuance of a new interagency Final Rule, the Bank may choose to amend or replace the Plan to ensure continued compliance with the new Final Rule upon its effective date.

## **THE BANK’S COMMITMENT TO CRA**

The Bank acknowledges its important obligation to serve the needs of the communities from which it draws its deposits and in which it operates, including the country’s large populations of unbanked and underbanked individuals. Consistent with this obligation, the Bank is committed to a robust CRA program which includes community development and small business or community development lending, community development investment and service activity to assist in meeting the related needs of its defined assessment area, and the broader geographic region up to and including the state of Utah. The Bank routinely maintains ongoing interactions with community leaders, nonprofit organizations, and other interested parties to determine

critical needs in the community and for assistance in implementation of the CRA program governed by this Plan.

**CURRENT AND HISTORICAL CRA PROGRAM**

Prior to Green Dot Corporation’s acquisition of Bonneville Bancorp (including Bonneville Bank) in 2011, the Bank administered a CRA program focused on the credit needs of its single branch market in Provo, Utah, and the immediate surrounding region of Utah County. The Bank pursued a strategy to meet its CRA obligations primarily through direct small business lending within the community. In addition, the Bank provided additional community support through investments and service activity. The Bank was responsive to local credit needs primarily through commercial lending to small businesses, a practice still in place at Bonneville Bank’s single branch in Provo today. In addition, the Bank originates almost all of its loans in the amount of \$1 million or less. Additional loan products offered by the Bank at its Provo branch include personal lines of credit, automobile loans, consumer-purpose installment loans, and small overdraft lines of credit.

Since January 2012, the Bank has operated under four successive approved CRA Strategic Plans. These Plans have included the components listed above as well as additional focus on community development lending, specific real estate lending and investments benefitting LMI populations, participation with community affordable housing-oriented and educational groups, grants or investments to qualified nonprofits, Small Business Investment Corporations (“SBIC”), Community Development Financial Institutions (“CDFI”), and nationwide educational programs.

Although the Bank has not yet been evaluated for its performance under its 2021-2023 CRA Strategic Plan, an evaluation rating of “Outstanding” was received in March 2021 for performance under its 2018-2020 Plan. The table below summarizes the Bank’s prior performance ratings under all previous Plans.

Strategic Plan Period	Date of Evaluation Rating	Evaluation Rating Achieved
2018 - 2020	March 29, 2021	Outstanding
2015 - 2017	June 11, 2018	Satisfactory
2012 - 2014	August 3, 2015	Outstanding



## **PROGRAM OVERSIGHT AND RESOURCES**

To lead its CRA program, the Bank's Board of Directors has designated the Sr. Director of Lending as its CRA Officer, who is responsible for tracking and reporting the Bank's progress toward the measurable goals outlined in the Plan. The Bank's CRA program is further supported by employees at its single branch office in Provo, UT, and other employees residing in and around the assessment area. The Bank's holding company, Green Dot Corporation, also may support outreach efforts to identify community development investment, educational, and service opportunities within the Bank's assessment area, in the broader local region, or nationwide.

The Board-designated CRA Officer provides ongoing reporting and updates to the CRA Committee of the Board of Directors on a quarterly basis on CRA performance and efforts made to achieve Plan objectives. The CRA Committee provides periodic updates to the full Board of Directors on the Bank's progress in meeting its measurable goals under the Plan.

The Board of Directors participates in supporting community and educational outreach efforts as well. This has previously included directors speaking at financial literacy education conferences on behalf of the Bank, as well as providing educational information targeted at unbanked or underbanked individuals through Green Dot's social media channels.

## **DEVELOPMENT OF THE BANK'S CRA STRATEGIC PLAN**

The Bank's management took the following steps to develop the 2024-2028 CRA Strategic Plan:

- Evaluated the Bank's current business model and strategy, relevant financial information, product offerings, historical performance, and competitive environment;
- Considered demographic information, as well as current and forward-looking economic conditions within the assessment area;
- Assessed the community development, affordable housing, credit, and educational needs of the assessment area as well as the broader state- and nationwide community the Bank serves with its products. During this phase of development, we evaluated numerous resource materials and communicated with various representatives of local community development organizations and other interested parties to informally seek suggestions and feedback on the Plan;
- Analyzed the Bank's historical and forecasted goals in the Plan against peer financial institutions located within the state of Utah operating under strategic plans, including those regulated by both the Federal Reserve Bank and the Federal Deposit Insurance Corporation;

- Requested feedback from the public on the Plan prior to submission to the Federal Reserve Bank of San Francisco; and
- Developed goals for new and cumulative consolidated lending, investment, and grant activities as well as service activities that are responsive to the needs of our assessment area. The identified goals are believed to be appropriate when considering the Bank's size, product mix, and historical performance context.

This document describes the Bank's Plan for the five-year period for calendar years 2024 through 2028. The Bank has established annual goals in the Plan for measuring satisfactory and outstanding performance levels in each of the years covered. Based on the Bank's business model, the Bank would not elect to be evaluated under an alternative assessment method if it fails to achieve a Satisfactory rating under this Plan. It is the intent and expectation of the Board of Directors and management that the Bank will meet or exceed all goals established in this Plan.

Risk factors that could potentially impact the Bank's ability to meet its measurable goals described in this Plan include the following:

- **Size and Capacity:** The Bank has grown its asset base in recent years, increasing from \$1.3 billion on January 1, 2018 to \$4.0 billion on December 31, 2022. This 208% increase was caused largely by an increase in cash on hand and available-for-sale securities due to customer deposit growth. Though the Bank expects asset growth to be significantly lower and more measured going forward, any unplanned significant increase in average assets beyond the moderate organic increases forecasted by the Bank could place constraints on management's ability to meet the Plan's goals and would require careful evaluation to ensure the Bank does not miss the threshold for an acceptable CRA performance rating.
- **Competition for CRA-eligible Loans and Investments:** Because of the high concentration of financial institutions within the state of Utah, there is often significant competition for the relatively limited CRA-qualified lending, investment, and service opportunities within the assessment area. To ensure the Bank can meet its goals, the Bank may from time to time engage in CRA-qualified activities outside the assessment area, but within the broader surrounding geographic area statewide. In addition, as noted below in the Plan, the Bank may engage in CRA-qualified service activities on a nationwide basis, consistent with its unique business model and with the national distribution of its employees under a "Work from Anywhere" arrangement. The criteria governing CRA-qualified activities outside the Bank's assessment area are described below.
- **Economic Factors Outside the Bank's Control:** In the event of a severe or prolonged downturn in the local, state, or national economy, qualified lending or investment opportunities in the assessment area may become difficult to obtain using safe and sound banking practices. Though Bank management is confident it has structured the balance

sheet in a way to avoid a material ongoing negative impact to earnings, a downturn of sufficient magnitude or length may constrain earnings and place limitations on management's abilities to make CRA loans and investments in a safe and sound manner.

- **Lack of Volunteerism or Volunteer Opportunities:** A lack of interest by employees in volunteering to participate in eligible community development service opportunities could constrain the Bank's ability to consistently meet its annual service goal. However, the Bank has an established history of employee volunteerism and in finding unique or innovative ways to provide eligible service. The CRA Officer tracks service hours on a continuing annual basis and shall escalate the need for increased volunteer efforts when required with the support of senior management and the Board of Directors.

## **THE BANK'S ASSESSMENT AREA**

### **DEFINITION**

Pursuant to 12 C.F.R. § 228.41, the Bank designates as its assessment area for purposes of evaluation under the CRA the Provo-Orem Metropolitan Statistical Area ("MSA") 39340, though it may also conduct service and investment activities that benefit a larger geographic area which includes the assessment area, up to and including the state of Utah as described below. The Bank's CRA assessment area is made up of two contiguous counties, Utah and Juab. The Bank's single branch is centrally located in the city of Provo within Utah County.<sup>5</sup>

### **DESCRIPTION**

The Bank's assessment area is located at the base of the Wasatch Range of the Rocky Mountains just 25 miles south of Salt Lake City, Utah's state capital. As of the July 2022 census estimates, 98.2% of the MSA's population resides in Utah County, which is known regionally as Utah Valley. The Provo-Orem MSA is home to many of the largest employers in the state, including Utah Valley University, Brigham Young University, Utah Valley Regional Medical Center, Alpine School District, Vivint, and Doterra International.

### **DEMOGRAPHIC CHARACTERISTICS**

The total population of the Bank's assessment area according to the U.S. Census Bureau's estimates is 715,001.<sup>6</sup> This represents a 36% increase in population since the 2010 U.S. Census

---

<sup>5</sup> Appendix A contains a map of the Bank's assessment area and a detailed listing of the census tracts located within it.

<sup>6</sup> U.S. Census Bureau, *2022 QuickFacts, Utah and Juab Counties*

and a 6.5% increase just since the recent 2020 census, indicating the continued rapid growth of the state that was further increased by the COVID-19 pandemic. In December 2022, the Census Bureau named Utah the 9<sup>th</sup> fastest growing state in the nation by numeric growth, and the 10<sup>th</sup> fastest by percent growth.<sup>7</sup>

The table below shows the median income and annual income range for low-, moderate-, middle-, and upper-income populations within the Bank’s assessment area.

<b>Income Classification for Assessment Area<sup>8</sup></b>					
<b>Assessment Area</b>	<b>2022 Median Family Income</b>	<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>
Provo-Orem MSA	\$96,000	\$47,999 and Below	\$48,000 to \$76,799	\$76,800 to \$115,199	\$115,200 and Above

The table below shows the Bank’s assessment area by geographic income level.

<b>Distribution of Census Tracts within the Assessment Area<sup>9</sup></b>		
<b>Census Tract Type</b>	<b>Number of Census Tracts</b>	<b>% of Total Census Tracts</b>
Low-Income	9	6%
Moderate-Income	24	15%
Middle-Income	79	50%
Upper-Income	43	27%
Income Not Reported	4	3%
<b>Totals</b>	<b>159</b>	<b>100.0%</b>

Overall, there are 187,714 housing units in the Bank’s assessment area, according to the 2022 FFIEC Census Demographic Data Reports. Of the total housing units, 69% are owner-occupied units and 31% are renter-occupied. Of the total available housing units, 85% are 1-4 family units.

In 2021, the median home value was \$459,500 in the Bank’s assessment area. Additionally, the median monthly housing cost was \$1,741 for homeowners with mortgages, \$475 for owners without mortgages, and \$1,253 for renters. 22% of owners with mortgages, 7% of owners

<sup>7</sup> U.S. Census Bureau, *Growth in U.S. Population Shows Early Indication of Recovery Amid COVID-19 Pandemic*, Press Release, December 22, 2022

<sup>8</sup> 2022 FFIEC Census Reports, *Summary Census Demographic Information, Provo-Orem MSA*

<sup>9</sup> 2022 FFIEC Census Reports, *Summary Census Demographic Information, Provo-Orem MSA*

without mortgages, and 47% of renters in the assessment area spent a significant 30% or more of household income on housing.<sup>10</sup>

## STATE ECONOMIC CHARACTERISTICS

**Unemployment** - According to the Utah Department of Workforce Services, the State's unemployment rate was 2.3% as of May 31, 2023, compared to a rate of 2.2% one year earlier. This compares favourably to a national unemployment rate of 3.7% for the same period, indicating Utah's tourism, service, and technology-oriented economy continues to post strong results despite recent economic headwinds related to national inflationary pressures and recession fears.

Additionally, Utah's Real Gross Domestic Product increased by 2.3% in 2022, with the Utah Economic Council forecasting a 1.9% increase in 2023 and 2.8% increase in 2024. These rates also exceed the national growth rates of 1.9% in 2022, and forecasts of 1.0% in 2023 and 2.0% in 2024.<sup>11</sup> It is anticipated that this growth in the state will lead to a softer economic impact from a potential recession, with the state expected to see a lower loss of jobs than the national average.

**Personal Income** - Utah's total personal income reached an estimated \$195.7 billion in 2022, an increase of 14% over 2020 totals, continuing the steady upward trend experienced in recent years that continued through the pandemic. The comparable national change in personal income over the same period was 9%. Utah's average annual pay grew 12% to reach an estimated \$60,849 in 2022, up from \$54,079 in 2020. Looking ahead, Utah's total personal income is forecast to increase 6% in 2023 and 5% in 2024. Average annual pay for Utah is forecasted to increase 4% in 2023 and 2% in 2024<sup>12</sup>, indicating economists believe both metrics will continue to grow steadily despite the macroeconomic concerns nationally.

**Home Prices** – The median sales price for homes in Utah decreased for the first time in 11 years in January 2023, suffering a 7.6% decline year-over-year. As of February 2023, Utah had the 30<sup>th</sup> highest home foreclosure rate in the nation (0.014%), this relatively low rate indicates the decline in the median housing price is due to buyers being scared out of the market by high prices and increasing mortgage interest rates, and not by poor economic conditions leading to foreclosures.<sup>13</sup> While the likely temporary decrease in housing prices coupled with the forecasted increases in Utah salaries may help alleviate the lack of affordable housing in the state minimally,

---

<sup>10</sup> U.S. Census Bureau, *Comparative Housing Characteristics: 2021 American Community Survey 1-Year Estimates, Provo-Orem, UT MSA*

<sup>11</sup> Utah Economic Council, *Economic Report to the Governor - Highlights*, January 2023

<sup>12</sup> Utah Economic Council, *Economic Report to the Governor - Highlights*, January 2023

<sup>13</sup> ATTOM Data Solutions, *U.S. Foreclosure Market Report*, February 2023

it is not expected that prices will decrease to a point where many buyers who are currently priced completely out of the market could return and find something affordable.

**Summary** - As evidenced above, the economic outlook for both the state and the Bank's assessment area appears to be generally favourable through at least 2024, though a significant amount of uncertainty remains due to multiple unknown micro- and macroeconomic variables involved. Continued migration into the assessment area is also expected to be strong in the coming decade due in large part to the expected strength of the local economy, numerous educational opportunities with two large universities, and the anticipated availability of high-quality jobs in the technology sector. The assessment area also includes a significant portion of Silicon Slopes, a well-known and rapidly growing high-tech hub that has incubated multiple well-known companies in recent years. The Silicon Slopes area is known to employers for its skilled and educated workforce and strong entrepreneurial culture, which historically has promoted job growth locally in both new businesses and established firms. Available local business development initiatives such as the Utah Valley University Small Business Development Center, the growing number of business incubators in the area such as RevRoad, the availability of several experienced and well established seed and early-stage venture capital funds in the state, and the Utah Manufacturing Extension Partnership through the University of Utah are expected to continue to further support economic expansion in the assessment area in the years ahead.

## **PERFORMANCE CONTEXT**

### **THE BANK'S BUSINESS MODEL**

As noted above, the Bank is primarily focused on building a robust nationwide offering of basic banking services targeted at unbanked and underbanked consumers through our core products, including a focus on mobile deposit products such as consumer and small business checking accounts with savings features, and a secured credit card portfolio. The Bank's products may be acquired online through its own websites and through partner websites, and in select retailer locations nationwide.

The Bank additionally offers select products through white label BaaS relationships it maintains with select partners.<sup>14</sup> These relationships generally involve the partner marketing demand deposit accounts or funds disbursement services to their customers or employees, which are issued and serviced by the Bank on the partner's behalf. These customers can then additionally utilize the Bank's network of retail locations to load cash to their accounts, bypassing the need for a traditional bank branch or ATM network to accept cash deposits.

---

<sup>14</sup> BaaS partners currently include Apple, Intuit, Uber, and Wealthfront, among others.

In addition, the Bank continues to operate its single community bank branch in Provo, UT, under the registered DBA of Bonneville Bank. Within the branch, the Bank offers traditional banking services such as small business and consumer checking and savings accounts, certificates of deposit, commercial and consumer lending products, and safe deposit box rentals.

## **COMPETITIVE ENVIRONMENT**

Within the assessment area, Green Dot Bank operates in a competitive environment. As of June 30, 2022, the FDIC Deposit Market Share Report shows there were 85 competing branch offices of 15 FDIC-insured financial institutions with approximately \$21.8 billion in total market deposits operating in the assessment area. As of that date, the Bank represented approximately a 17% average market share of deposits in FDIC-insured institutions in the Provo-Orem MSA.<sup>15</sup>

With respect to community development activities, many of the Bank's peer financial institutions have long track records of support for affordable housing and economic development in the assessment area and the broader region. In pursuing its CRA program goals, the Bank competes in a mature and crowded community development marketplace.

## **BANK CAPACITY**

As noted above, the Bank was well-capitalized, and earnings remained healthy and stable as of March 31, 2023. Management believes the Bank has immediate capacity to support the performance goals of this Plan. The goals stated within this Plan are designed to adjust proportionately with the Bank's size over the five-year term, which should aid in minimizing the impact of any ongoing effects of the pandemic on the Bank's ability to achieve the goals defined herein.

## **STRATEGIC PLAN MEASURABLE GOALS AND METHODOLOGY**

### **METHODOLOGY FOR CONSOLIDATED LENDING, INVESTMENTS, AND GRANT GOALS**

As discussed previously, the Bank met with various representatives within the assessment area and broader surrounding region. This included community development organizations and other interested parties to discuss the unmet needs of low- and moderate-income individuals and small businesses within the assessment area. These needs were reviewed and compared to the Bank's products, overall business goals, and objectives. Management then established reasonable measurable goals it believes the Bank is able to achieve based on its financial position, outlook, product mix, and management's experience.

---

<sup>15</sup> Data taken from the FDIC's website, *Deposit Market Share Report*, June 2022

The Bank’s measurable goals were also developed considering commitments outlined in other CRA strategic plans for Utah-based financial institutions, including those not regulated by the Federal Reserve Bank.<sup>16 17</sup>

Peer Bank	Assets (from 12/31/22 call reports)	New Lending & Investment Goal - Satisfactory	New Lending & Investment Goal - Outstanding	% Increase from Satisfactory to Outstanding
First Electronic Bank	\$ 190,809	0.40%	0.60%	50.00%
Optum Bank	\$ 15,675,667	0.40%	0.60%	50.00%
WebBank	\$ 1,961,456	0.40%	0.60%	50.00%
Medallion Bank	\$ 1,954,652	0.40%	0.60%	50.00%
Celtic Bank	\$ 2,136,835	0.40%	0.60%	50.00%
Continental Bank	\$ 174,700	0.40%	0.60%	50.00%
FinWise Bank	\$ 396,974	0.40%	0.60%	50.00%
Regions Bank (EnerBankUSA)	\$ 3,568,340	0.45%	0.55%	22.22%
Sallie Mae Bank	\$ 28,714,313	0.43%	0.55%	27.91%

*in thousands*

The Bank selected the above institutions as comparable peers due both to them being largely non-traditional Utah-based banks operating under approved strategic plans who will continue to be primary competitors for qualified CRA loans and investments within the Bank’s assessment area and the broader surrounding geographic region, and due to the broad cross-section they represent from an asset size and product offerings point of view when comparing against other banks operating under a plan statewide. Finding any perfect match in a peer study comparison is a challenge considering the Bank’s unique business model and very small loan portfolio compared to its assets. These peer institutions established goals for consolidated new or renewed originations of CRA-eligible lending and new purchases of CRA-eligible investments in the range of 0.40% to 0.45% of average annual assets for a “Satisfactory” rating, and 0.55% to 0.60% for an “Outstanding” rating. Seven of the nine peer banks reviewed established a “Satisfactory” goal of 0.40%, and an “Outstanding” goal of 0.60%. The two banks with established goals other than these had a higher “Satisfactory” goal with a lower “Outstanding” goal. The Bank believes this review reflects peer banks establishing goals for new activity that are realistically attainable, while still requiring management to stretch and innovate to achieve the goal each plan year.

<sup>16</sup> Data taken from the respective institution’s Strategic Plans and/or Performance Evaluations available on the FFIEC website <http://www.ffiec.gov/craratings/default.aspx>

<sup>17</sup> The only other bank operating under a strategic plan in the state of Utah who is also regulated by the FRB is Ally Bank. The Bank did not elect to use Ally Bank as a peer institution due to the significant size disparity (they hold \$186.4 billion in assets to the Bank’s \$3.8 billion as of 3/31/2023), and their ability to rely on a significant lending portfolio for much of their CRA required credit.



The Bank additionally reviewed other peer bank plans for cumulative CRA lending and investment goals, which may include eligible charitable grants or donations the bank has made as well. As shown in the table below, not all institutions reviewed established such a goal. The goals reviewed range from 1.15% to 1.30% of average annual assets for a “Satisfactory”, and 1.50% to 1.75% for an “Outstanding” rating. The Bank has extensive experience with goals of this nature, with each prior plan including a similar goal. As a result of this experience, management has found it to be a beneficial goal, as it ensures the Bank is open to consider long-term investment opportunities rather than potentially focusing solely on short-term new investment purchases and lending activity each plan year. The inclusion of both a new activity goal with an ongoing cumulative activity goal ensures the Bank can meet the needs of community development lending and investment requirements in the assessment area regardless of its term.

Peer Bank	Assets (from 12/31/22 call reports)	Cumulative Lending & Investment Goal - Satisfactory	Cumulative Lending & Investment Goal - Outstanding	% Increase from Satisfactory to Outstanding
First Electronic Bank	\$ 190,809	1.15%	1.50%	30.43%
Optum Bank	\$ 15,675,667	1.15%	1.50%	30.43%
WebBank	\$ 1,961,456	1.15%	1.50%	30.43%
Medallion Bank	\$ 1,954,652	1.30%	1.75%	34.62%
Celtic Bank	\$ 2,136,835	None	None	N/A
Continental Bank	\$ 174,700	None	None	N/A
FinWise Bank	\$ 396,974	None	None	N/A
Regions Bank (EnerBankUSA)	\$ 3,568,340	None	None	N/A
Sallie Mae Bank	\$ 28,714,313	None	None	N/A

*in thousands*

Additionally, the Bank also reviewed its own historical cumulative lending and investment performance against previous plan goals dating back to 2015. As the bank has never established a goal in prior Plans related solely to new lending and investment activity, the Bank limited its review to cumulative lending and investment activity goals.

Plan Year	Average Annual Assets	Consolidated Loans & Investments	% of Average Assets	Plan Goal - Satisfactory	Plan Goal - Outstanding	Plan Rating Achieved
2015	\$ 867,272,794	\$ 11,794,910	1.36%	1.25%	1.50%	Satisfactory
2016	\$ 860,323,103	\$ 12,474,685	1.45%	1.25%	1.50%	Satisfactory
2017	\$ 910,022,276	\$ 13,195,323	1.45%	1.25%	1.50%	Satisfactory
2018	\$ 1,396,037,700	\$ 27,735,104	1.99%	1.30%	1.75%	Outstanding
2019	\$ 1,608,312,250	\$ 31,373,473	1.95%	1.30%	1.75%	Outstanding
2020	\$ 2,449,670,000	\$ 49,184,694	2.01%	1.30%	1.75%	Outstanding
2021	\$ 3,494,077,000	\$ 65,627,351	1.88%	1.40%	1.80%	Outstanding
2022	\$ 4,021,456,500	\$ 85,245,204	2.12%	1.40%	1.80%	Outstanding
2023*	\$ 3,958,967,225	\$ 83,646,861	2.11%	1.40%	1.80%	In Process

\*As of May 31, 2023

As evidenced by the tables above, management’s historical cumulative goals for consolidated eligible small business and community development loans, grants, and investments outlined in previous plans have traditionally been equal to or near the top end of the goals established by other banks operating under approved plans in the state, evidencing the Bank’s ongoing commitment to community outreach and development. This analysis also reflects the Bank’s record of meeting and often exceeding the measurable goals established under prior plans.

## METHODOLOGY FOR COMMUNITY DEVELOPMENT SERVICES GOAL

Management additionally reviewed historical community development service activity completed by its employees and directors, as evidenced in the table below:

Plan Year	Required Service Hours - Satisfactory	Required Service Hours - Outstanding	Hours Performed	Number of Employees	Hours Per Employee	Plan Rating Achieved
2015	150	200	174	15	11.6	Satisfactory
2016	165	215	260	14	18.6	Outstanding
2017	180	225	184	13	14.2	Satisfactory
2018	190	240	233	22	10.6	Satisfactory
2019	205	255	285	24	11.9	Outstanding
2020	220	270	281	21	13.4	Outstanding
2021	220	264	325	22	14.8	Outstanding
2022	650	780	801	65	12.3	Outstanding
2023*	810	972	1,030	81	12.7	In Process

\*As of May 31, 2023 - Includes hours forecasted to be complete by year-end based on current commitments and management expectations

As reflected above, management has historically always met at least a “Satisfactory” level of service hours performed by employees and directors. The results show the Bank largely approaching or exceeding the service goal requirements in prior plans, with a range of 10.6 to 18.6 hours per employee completed. Total full-time employees have increased dramatically in recent years, climbing from 22 in 2020 to 90 in 2022, a significant increase not anticipated when the Bank’s prior plan was created. This significant increase in employees led to the Bank’s service

hour requirements jumping from 264 hours for an “Outstanding” rating in 2021 to 972 hours for a similar rating in 2023. The majority of the added Bank employees are non-management or entry-level employees who often lack the necessary experience to participate in many eligible service opportunities in a meaningful way. Due to this, it has become increasingly burdensome on management-level employees to ensure the Bank achieve the rapidly escalating service hour goals in 2022 and 2023.

In addition, management also reviewed the service goals of peer Utah-based financial institutions operating under a strategic plan, to determine those most similarly situated to the Bank in terms of service opportunities available to employees and related historical performance:

Peer Bank	Hours per Employee - Satisfactory	Hours per Employee - Outstanding	Employees in Assessment Area	Total Hours - Satisfactory	Total Hours - Outstanding	% Increase from Satisfactory to Outstanding	Assets (from 12/31/22 call reports)
First Electronic Bank	4.50	6.50	73	329	475	44.44%	190,809
Medallion Bank	5.00	6.00	63	315	378	20.00%	1,954,652
Optum Bank	4.50	6.00	193	869	1,158	33.33%	15,675,667
Regions Bank (EnerBankUSA)	4.75	5.50	610	2,898	3,355	15.79%	3,568,340
FinWise Bank	4.00	5.00	68	272	340	25.00%	396,974
WebBank	4.00	5.00	90	360	450	25.00%	1,961,456
Celtic Bank	3.50	4.50	211	739	950	28.57%	2,136,835
Continental Bank	3.47	4.17	36	125	150	20.00%	174,700
Sallie Mae Bank	3.00	4.00	46	138	184	33.33%	28,714,313

*in thousands*

The results of the comparison against peer banks showed that the Bank traditionally approaches or exceeds the per employee service goals performed by all peers reviewed, regardless of the total employees of each institution.

Management believes retaining the goal levels established in the prior plan would not be sustainable or reasonable given the lack of management-level employees with sufficient expertise to perform many common types of service, such as board or committee service with an eligible nonprofit. Though the Bank showed a significant increase in full-time employees in recent years, many are entry-level or non-management employees who would be unqualified to provide material levels of eligible community development service towards plan goals.

**MEASURABLE GOALS OVER THE FIVE-YEAR PLAN**

The strategic plan regulations provide flexibility regarding a bank’s measurable goals, both in how the goals are expressed and regarding the three performance categories. For example, although the regulations provide that a bank should address in its plan all three performance categories and “emphasize lending and lending-related activities,” they also provide that:

“Nevertheless, a different emphasis, including a focus on one or more performance categories, may be appropriate if responsive to the characteristics and credit needs of its

assessment area(s), considering public comment and the bank's capacity and constraints, product offerings, and business strategy."

In light of the regulatory flexibility for both measurable goals, the Bank requests that the FRB's evaluation of the Bank's CRA lending and investment performance be measured in terms of combined cumulative small business and community development lending, investment, and grant amounts as a percentage of average total assets for each year included in the Bank's Plan.

As in prior plans, a combined cumulative lending, investment, and grant measurable goal would enable the Bank to respond to evolving opportunities more efficiently within the assessment area. This is highly desirable considering the anticipated size and continued organic growth of the Bank's program and the need to have an innovative and flexible approach to its CRA activities.

The Bank additionally proposes to initiate a new measurable goal in this plan related to new annual small business and community development lending: CRA-qualified investment and grant activity as a percentage of total average assets. Doing so will ensure the Bank seeks out new and innovative community development activity in the assessment area on an annual basis, while maintaining the flexibility to focus on investment projects with potentially longer terms, or that are not renewed annually.

The Bank's annual goals for new and cumulative lending, investments, and grants are set forth below. In calculating these metrics the Bank will utilize its quarterly average assets of the prior calendar year to determine the goals for each new plan year. The goals will include the following activity:

- Direct or purchased small business lending within the Bank's assessment area, including loans with a primary business purpose collateralized by residential or commercial real estate;
- Community development lending and qualified investments that benefit the assessment area, or the broader surrounding geographic region which includes the assessment area; and
- Grants to qualified community development nonprofit organizations that benefit the assessment area, or the broader surrounding geographic region which includes the assessment area.

## Measurable Goals for New Originations of CRA Loans, Grants, and Investments

PLAN YEAR	New Originations <sup>18</sup> of CRA-Qualifying Loans, Investments, and Grants for “Satisfactory” rating as a % of Average Annual Assets <sup>19 20</sup>	New Originations of CRA-Qualifying Loans, Investments, and Grants for “Outstanding” rating as a % of Average Annual Assets
2024	0.40%	0.60%
2025	0.40%	0.60%
2026	0.40%	0.60%
2027	0.40%	0.60%
2028	0.40%	0.60%

The Bank anticipates that a significant majority of funds committed to the goals established in the plan will continue to be comprised of CRA-qualified investments rather than small business or community development lending. This is due primarily to the Bank having only a single retail branch within the assessment area with a small loan portfolio consisting of an assortment of small business and consumer loans averaging approximately \$7.5 million in outstanding balances. The Bank additionally originates short-term seasonal working capital advances to independent tax preparers nationwide, but a significant majority of these borrowers reside outside the Bank’s assessment area and are unable to make a meaningful impact towards our goal. Additionally, the Bank does not collect or utilize annual borrower gross annual revenues in the making of these advances, which complicates any determination of their applicability as small business loans under the requirements of the CRA. The Bank also has limited staff with the experience necessary to conduct significant lending volumes in the assessment area that could help attain the plan goals. The Bank’s primary reliance on CRA-qualified investments, rather than lending activity, is consistent with previous strategic plans the Bank has operated under since 2012.

The Bank’s qualified community development loans and CRA investment portfolio will focus on the assessment area, or must benefit a broader region, up to statewide or larger, that includes the assessment area. The Bank plans to continue seeking out new and innovative lending and investment vehicles, such as early-stage venture equity funds that will make investments to CRA

<sup>18</sup> “New Originations” for a calendar year will include new community development investments, eligible grants and donations made by the Bank during the year, new CRA-qualifying loans either originated or purchased by Green Dot Bank, and existing CRA-qualifying loans that are renewed and credit underwritten that year (can only count each loan once per year).

<sup>19</sup> The Bank’s average assets for any given plan year will be calculated using the amounts from line 9 of Schedule RC-K of the Bank’s four filed Call Reports for the prior calendar year. This allows the Bank to define its target goals at the beginning of each new plan year, providing greater stability in management’s community development activity planning each year.

<sup>20</sup> Any amount exceeding the annual “Outstanding” goal in one plan year may be applied toward the next plan year’s annual goal.

qualified small businesses throughout the state of Utah and surrounding regions. Such investments can lead to the creation of large numbers of stable well-paying jobs in and around the assessment area and assist in improving economic conditions in local neighborhoods. Additionally, the Bank expects to continue purchasing eligible mortgage-backed securities wherein the underlying loans are made predominantly or entirely to low- and moderate-income borrowers located within the assessment area, and if needed, to a broader region.

Grants and charitable contributions made by the Bank that meet the definition of community development will be considered qualified for CRA credit under the goals if they meet the needs of LMI populations within the Bank’s assessment area or a broader surrounding geographic region up to statewide.

Examples of community development activities the Bank may consider include the following notable examples:

- Affordable Housing – Provide assistance to organizations who finance or directly provide single- and multi-family housing to LMI or homeless residents.
- Poverty Assistance – Providing education, legal services, health care, financial services (such as tax preparation), and necessities such as food and shelter.
- Community Development – Offer lessons in financial literacy education, entrepreneurship, and workforce readiness skills in Title 1 or LMI elementary, junior high, and high school students, or to LMI adults.

### Measurable Goals for Cumulative CRA Loans, Grants, and Investments

PLAN YEAR	Cumulative <sup>21</sup> CRA-Qualifying loans, grants, and investments as a % of Average Annual Assets <sup>22</sup> for a “Satisfactory” rating	Cumulative CRA-Qualifying loans, grants, and investments as a % of Average Annual Assets for an “Outstanding” rating
2024	1.4%	1.8%
2025	1.4%	1.8%
2026	1.4%	1.8%
2027	1.4%	1.8%
2028	1.4%	1.8%

<sup>21</sup> The cumulative balance for a plan year will include new CRA-qualifying loans either originated or purchased by Green Dot Bank, existing CRA-qualifying loans that are renewed and credit underwritten that year (can only count each loan once per year), eligible grants and donations made during the plan year, new CRA-qualifying investments, and the year-end balance of investments purchased in prior years.

<sup>22</sup> The Bank’s average assets for any given plan year will be calculated using the amounts from line 9 of Schedule RC-K of the Bank’s four filed Call Reports for the prior calendar year. This allows the Bank to define its target goals at the beginning of each new plan year, providing greater stability in management’s community development activity planning each year.

The Bank adopted the 1.4% “Satisfactory” and 1.8% “Outstanding” goals listed above for cumulative activity for its previous plan covering the years 2021-2023. The Bank operated under lower goals in prior plans starting at 1.25% for a “Satisfactory” rating, and 1.50% for an “Outstanding” rating. The Bank’s asset growth during the term of these plans resulted in a significant increase in community development loans and CRA investments by the Bank.<sup>23</sup>

Management has determined that these goals evidence the Bank’s ongoing commitment to serving low- and moderate-income individuals within the assessment area. Comparing new and cumulative CRA-qualified activity as a percentage of annual average assets ensures funds committed to lending, grant, and investment goals will continually increase as the Bank continues to grow. Comparison with similarly situated local peer banks operating under strategic plans reflect the Bank establishing its goals equal to or above each of the peer goals, further evidencing the Bank’s commitment to providing for the most pressing needs of its assessment area.

### **Measurable Goals for Community Development Services**

The Bank’s measurable goals for community development services are set forth below. In its previous plan, the Bank established service goals of 10 hours per-employee for a “Satisfactory” rating, and 12 hours per-employee for an “Outstanding” rating. As noted previously, the Bank has experienced rapid growth in the number of full-time employees over the course of the prior plan, increasing from 22 employees in 2020 to 90 in 2022 (a 309% increase in two years). As of year-end 2022, 71% of the Bank’s employees are in non-management or entry-level positions, who are largely unqualified or unable to participate in many eligible activities, such as service on the board or committee of a nonprofit. Due to this, the Bank believes it is logical and reasonable to reduce the goals established in the new plan, to ensure they are realistically attainable by management, while still requiring significant effort of available resources to achieve. Analysis of peer bank strategic plans reflect a range of per-employee service hour goals of between 3 and 5 hours for a “Satisfactory” rating, and between 4 and 6.5 hours for an “Outstanding” rating. These peer banks report between 36 to 610 employees, in comparison to 90 for the Bank. The Bank has established its goals at levels that exceed those of all other peer banks analyzed within the plan. Management believes the goals established herein are material for a Bank of its size, resources, and complexity. The Bank has elected to exceed the maximum of the service hour goals identified in peer institutions with similar per-employee annual goals to ensure the Bank’s efforts reflect a true stretch goal similar to previous plans and a continued commitment to the communities it serves. The Bank believes the goals set forth are realistically reachable with the current resources

---

<sup>23</sup> The Bank had total assets at 12/31/2012 of \$344 million, and assets at 12/31/2022 of \$3.96 billion, a 1,051% increase in the 10-year period.

and employees available, and with expected organic growth in Bank staffing levels over the term of the plan.

The Bank’s goals are expressed in terms of the number of hours spent performing qualifying community development services, both within the Bank’s assessment area and on a national basis, due to Green Dot Bank operating on a “Work from Anywhere” employment model.<sup>24</sup>

<b>PLAN YEAR</b>	<b>Bank’s CD Service Hours for “Satisfactory” rating</b>	<b>Bank’s CD Service Hours for “Outstanding” rating</b>
2024	6.5 Hours per Full-time Equivalent Employee <sup>25 26</sup>	8 Hours per Full-time Equivalent Employee <sup>26 27</sup>
2025		
2026		
2027		
2028		

As of March 31<sup>st</sup>, 2023, only seven of the 90 full-time equivalent employees are located within the assessment area, due to the Bank’s employment model. Because of these constraints, it is prudent to set measurable goals that can be realistically performed by the Bank’s relatively small staff and to provide for an appropriate mix of service hour opportunities within and beyond the assessment area. As in its previous plans, service hours may be considered when performed by Green Dot Bank employees or employees of an affiliated entity, including Green Dot Corporation.

Community development service activities offered will generally consist of affordable housing assistance, financial education and literacy programs, and services directly benefitting LMI individuals, both within the assessment area and to the broader nationwide community where many of the Bank’s employees live and work. The Bank has formed extensive long-term partnerships with nonprofit organizations to provide financial education to LMI individuals, including students. The Bank additionally has partnered with the United Way of Utah County and the IRS to participate as a designated site for its annual Volunteer Income Tax Assistance (“VITA”) program, wherein Bank employees have become certified by the IRS as qualified tax preparers, and eligible LMI individuals and families may visit the branch to have their federal and state tax

<sup>24</sup> Qualified service hours performed within the assessment area will be equal to or greater than the total number of required service hours for the plan year, multiplied by the percentage of total Bank employees based within the assessment area (calculated as the number of full-time equivalent employees based in the assessment area as of January 1<sup>st</sup> each plan year divided by the number of full-time equivalent employees listed on the December 31<sup>st</sup> previous year-end Call Report, Schedule RI Memoranda, line 5).

<sup>25</sup> Service hours in excess of the “Outstanding” goal for one plan year may be applied toward the next plan year’s goal.

<sup>26</sup> Total employees for a given Plan Year will be calculated as of the number of full-time equivalent employees listed on the December 31<sup>st</sup> previous year-end Call Report, Schedule RI Memoranda, line 5.



returns prepared for free. The Bank has found this to be an effective and vital service in the local community, as the Earned Income Tax Credit (“EITC”) and child tax credits have proven to be a reliable method for lifting individuals and families out of poverty. The tax refunds processed by Bank employees directly benefit the local community within the assessment area by returning funds directly into the pockets of those most in need.

Through discussions and outreach conducted in the drafting of this plan, the Bank has found a national need for the provision of financial literacy education programs to LMI populations regardless of their location. While this has been an ongoing concern for many years, it is believed to have been exacerbated by the impact of pandemic and inflationary pressures leading to real wages not keeping up with the cost of living nationally at even greater rates than previously observed.<sup>27</sup> Research conducted by the Financial Industry Regulatory Authority (“FINRA”) showed that individuals educated in financial literacy were more likely to make ends meet than those with less such education. This was accomplished through better management of their income and expenses, and setting aside both emergency and retirement funds at higher rates.<sup>28</sup> National organizations such as Junior Achievement and Banzai help close this gap by providing curriculum to schools that build on each other throughout the educational lifecycle, allowing students to become more informed and educated on budgeting and debt management than peer students who did not participate in these programs in school. As a result of this, Green Dot regularly encourages its employees to find opportunities in their local communities to provide financial literacy education to LMI students or adult populations whenever possible.

Additionally, employees volunteer service on nonprofit boards and committees which provide education, services, and expertise in areas such as affordable housing, financial literacy education, and other innovative solutions which directly benefit LMI individuals and families.

The Bank’s measurable goals are established at a level that management believes are reasonable and sustainable, depending on the relevant economic conditions at that time. Management feels the goals compare favorably with peer institutions reviewed during the creation of this plan.

## **PLAN DEVELOPMENT AND OTHER INFORMATION**

### **INPUT TO THE DEVELOPMENT OF THE STRATEGIC PLAN**

The Bank has informally sought suggestions from the public on credit and investment needs within its assessment area and service activities that would be responsive to those needs both locally and nationally. Employees performed interviews and surveys of individuals involved in the affordable housing, community development, and small business sectors of the assessment area.

---

<sup>27</sup> <https://jausa.ja.org/dA/fad7acfd5a/criticalIssuePdfDocument/Why%20JA%20Why%20Now%202022.pdf>

<sup>28</sup> <https://www.finra.org/investors/insights/finra-foundation-national-financial-capability-study>

In addition, input on the plan was solicited from advocates and organizations specializing in financial literacy and educational initiatives both locally and nationwide. In discussion with these CRA advocates, management assessed the following high priority needs:

**Affordable Housing** – The need for safe and energy efficient affordable housing, including multifamily rental assistance, and the ability for low- to moderate-income borrowers to obtain home financing continues to increase faster than ever in the assessment area. Due to many consecutive years of significant price increases in the Utah House Price Index dating back to 2012, including significant jumps in 2020 and 2021 due largely to the COVID-19 pandemic, families continue to be priced out of homes or acquire mortgages that require more than 30% of their available income. Average rents in the area have similarly continued to increase dramatically in recent years, making it harder for individuals and families to afford to stay in their home and reducing their ability to set money aside for a future home purchase and other critical needs. There are available housing programs such as low-income housing tax credits, the HOME Program, community development block grants, economic development initiatives, and American Homeownership Preservation funds at work locally, however the demand far outpaces the supply.

Several advocates work within the assessment area and surrounding regions to provide LMI households an opportunity to find safe and affordable homes for purchase or lease. The Bank has previously provided innovative funding packages for the purchase and rehabilitation of dilapidated homes which are then rented out to low- and moderate-income families by NeighborWorks Mountain Country Home Solutions (“NMCHS”) and are seeking to continue this longstanding partnership as additional properties suitable to the arrangement are identified. A Bank employee participates on their Housing Development Committee, which manages their affordable housing portfolio statewide, and seeks out opportunities to expand the portfolio. Among these is Central Park Station, a 59-unit development built specifically for qualified LMI families in the assessment area.

**Education** – As the overall economy continues to improve, the need for financial literacy education has remained in high demand. However, the focus in recent years continues to be the need for curriculum around repairing poor credit, debt and budget management, understanding all aspects of a mortgage loan (including reverse mortgages), and choosing the right home to fit physical and financial requirements. Educated homebuyers and renters are better equipped to keep their finances balanced, know their rights under the law, and avoid the possibility of foreclosure or eviction. Additionally, with the largest asset of most senior citizens being their primary residence, many are turning to reverse mortgages to subsidize their retirement income, with mortgagors requiring they complete a counselling course prior to closing on these types of

loans in order to assure they understand the nature of the product's terms. NMCHS is a significant provider of these counselling services both within the assessment area and statewide, having certified 1,477 reverse mortgage applicants in 2021-2022, and provided foreclosure avoidance counselling to 95 homeowners.

Additionally, the need for student financial literacy education, after-school programs, and job training for individuals in the community remains strong. A number of public schools in the Bank's assessment area are classified as Title I, or with a majority of students qualifying for the free and reduced cost school lunch program. There is a need for students to develop the tools they need to own their economic success, develop real-world problem-solving skills, plan for their future, and make smart academic and economic choices. It is proven that these students benefit from participation in in-class or virtual programs, related field trips, or special events where these skills are taught in fun, original, and meaningful ways. Organizations such as Junior Achievement of Utah ("JA") and Banzai provide core content areas of work readiness, budget training, entrepreneurship, and financial literacy to low- and moderate-income school children within the assessment area from kindergarten through high school. The Bank partners with both organizations to provide ongoing in-class and virtual lessons to the students of various local LMI public schools sponsored by the Bank.

Employees may volunteer for the JA City program at JA City locations in Orem or Salt Lake City, which provide a hands-on experience through a day-long visit by 5<sup>th</sup> and 8<sup>th</sup> grade students. During their day at JA City, students work as employees in various businesses facilitated by volunteer educators and business professionals. They are paid for their labour, and they learn to manage personal and business checking accounts and budgets. Throughout the day students also learn first-hand about time and money management as they work, bank and shop as consumers using their earned wages. The Bank sponsors the JA City location in Orem, having designed a GO2bank-branded kiosk that a student may be "employed" at during their field trip, offering payment cards to students for use in paying their personal expenses during their visit.<sup>29</sup> The JA City and in-class programs are proven resources which aid students in developing the competitive financial and life skills needed in today's economy.

Similarly, Banzai is an entirely virtual educational program available for teachers to use in their classroom at their convenience, and has additionally proven to be an excellent tool available to a number of local LMI school's sponsored by the Bank. Students learn to create budgets and play games which teach them the importance of making smart financial decisions by balancing risk

---

<sup>29</sup> Students visiting JA City in Orem, UT, are given GO2bank-branded debit cards during their visit, that can be used to purchase their lunch, snacks, and assorted other small goods during their visit using fictional money. <https://www.heraldextra.com/news/local/2023/may/05/orems-university-place-new-home-to-woodbury-junior-achievement-city/>

and reward, and ensuring they understand the critical need to have appropriate savings set aside for unexpected emergencies in life.

**Services Directly Benefitting LMI Individuals or Families** – The Bank noted from its outreach the continued need for services providing financial support, education, and health benefits (covering both physical and mental wellbeing) to LMI residents. Project Read stated that families who improve one area of these needs are more likely able to then improve the others. As a way of meeting the financial support needs of LMI residents, the Bank continues to participate in the VITA program offered through the United Way of Utah County. According to the Center on Budget and Policy Priorities, “the Earned Income Tax Credit (EITC) and Child Tax Credit together lifted 10.6 million people above the Supplemental Poverty Measure line and made poverty less severe for 17.5 million others in 2018.”<sup>30</sup> As individuals who file taxes themselves or possibly don’t file at all may miss out on these tax credits and accompanying benefits, the Bank’s IRS-certified tax preparers are able to ensure these assessment area residents receive all financial assistance available to them under state and federal tax law. The Bank completed 316 federal and state tax returns onsite during the 2023 tax filing season between January and April. The refunds processed by Bank employees brought back \$555,411 into some of the neediest families in the community.

Another way the Bank assists with this need is assistance provided to Project Read, a Provo-based nonprofit which provides free adult literacy and math tutoring services to assessment area residents. Project Read tutors work one-on-one with students using instructional materials designed to teach adults basic life skills such as filling out employment applications, creating a budget, or depositing money in a bank. These goals and materials help students progress beyond subsistence-level employment, with students who graduate from their program gaining the ability to apply for higher paying jobs as a result of their new skills. It has been found that increased math and literacy skills also help reduce threats to health, safety, and loss of property. With 12% of Utah County and 14% of Juab County residents reportedly reading at less than a high school level,<sup>31</sup> the Bank has found this partnership to be an efficient and effective way to significantly improve the quality of life for many local LMI residents. A Bank employee serves as the Past-Chair of Project Read’s Board of Directors and Executive Committee and chairs the Sustainable Development Committee. Bank employees also periodically volunteer to serve as tutor assistants in Project Read’s weekly Literacy Labs held in their offices at the Provo City Library.

**Food Security & Nutrition** – According to multiple needs assessments reviewed by the Bank, there is growing need for food security in the form of ensuring LMI residents are able to access sufficient nutritious food items for their families. This was the 2<sup>nd</sup> highest need in the assessment

---

<sup>30</sup> <https://www.cbpp.org/research/federal-tax/the-earned-income-tax-credit>, updated April 28, 2023.

<sup>31</sup> <https://nces.ed.gov/surveys/piaac/skillsmap/>

conducted by Utah Community Action in 2021-2022 (cited by 47% of respondents), after the need for affordable rental housing (66%).<sup>32</sup> The Six County Association of Governments, which includes rural Juab County, also cited the need for more food pantries in the area, and the limited hours of operation for those that do exist.<sup>33</sup> The lack of access to food banks or affordable grocery stores directly leads to poor nutrition among LMI residents and their families. As a result, the Bank routinely donates funds to various food banks, and the Provo branch conducts an annual food and warm clothing drive, with all customer and employee donations going to Community Action Services & Food Bank.

**Summary** - Through the Bank's planned and continued employee participation on boards and key committees of several organizations, as well as needs assessments reviewed, and formal or informal discussions with representatives of the following community development and government organizations, the Bank has made a reasonable effort to determine the leading needs of the assessment area. The Bank will continue to seek out and contact key community groups throughout the term of the plan.

- NeighborWorks Mountain Country Home Solutions
- United Way of Utah County
- United Way of Central and Southern Utah
- Project Read
- Junior Achievement of Utah
- Banzai!
- The Kickstart Fund
- The Children's Center of Utah
- Utah Food Bank
- Utah Youth Village
- Senior Housing Crime Prevention Foundation
- Utah Homelessness Council
- Utah Department of Health
- Benevity
- Community Action Services & Food Bank
- Utah Microloan Fund
- Six County Association of Governments Executive Board
- Rocky Mountain Community Reinvestment Corporation
- Dept. of Workforce Services, Housing & Community Development

---

<sup>32</sup> [https://www.utahca.org/wp-content/uploads/2022/09/Final\\_print\\_08\\_31-compressed.pdf](https://www.utahca.org/wp-content/uploads/2022/09/Final_print_08_31-compressed.pdf)

<sup>33</sup> <http://sixcounty.com/wp-content/uploads/2017/02/Community-Needs-Assessment.pdf>

- Pacific Island Chamber of Commerce
- Alpine School District
- Orem Kiwanis Club
- Various Trade Association Foundations and Committees
- CRA Officers of other financial institutions throughout the state of Utah

## **PUBLIC COMMENTS ON THE STRATEGIC PLAN**

### **Public Comment Period**

The Bank published notice of the availability of its proposed draft Plan on July 27, 2023 in The Daily Herald, a newspaper of general circulation within the Bank's established assessment area. Evidence of this Public Notice is attached as Appendix B.

### **Summary of Public Comment Letters Received**

No public comments were received.

### **Summary of Bank's Response to the Received Public Comment Letters**

No public comments were received.

## **CHANGES TO THE STRATEGIC PLAN**

The Bank will request the Federal Reserve Bank of San Francisco's approval to modify or amend the Plan if there is a material change in its underlying assumptions or in the Bank's mission, objectives, or operations. In such an event, the Bank would prepare the modified or amended Plan in accordance with the Federal Reserve Bank of San Francisco's requirements, timeframes, and guidelines for approval of a CRA strategic plan.

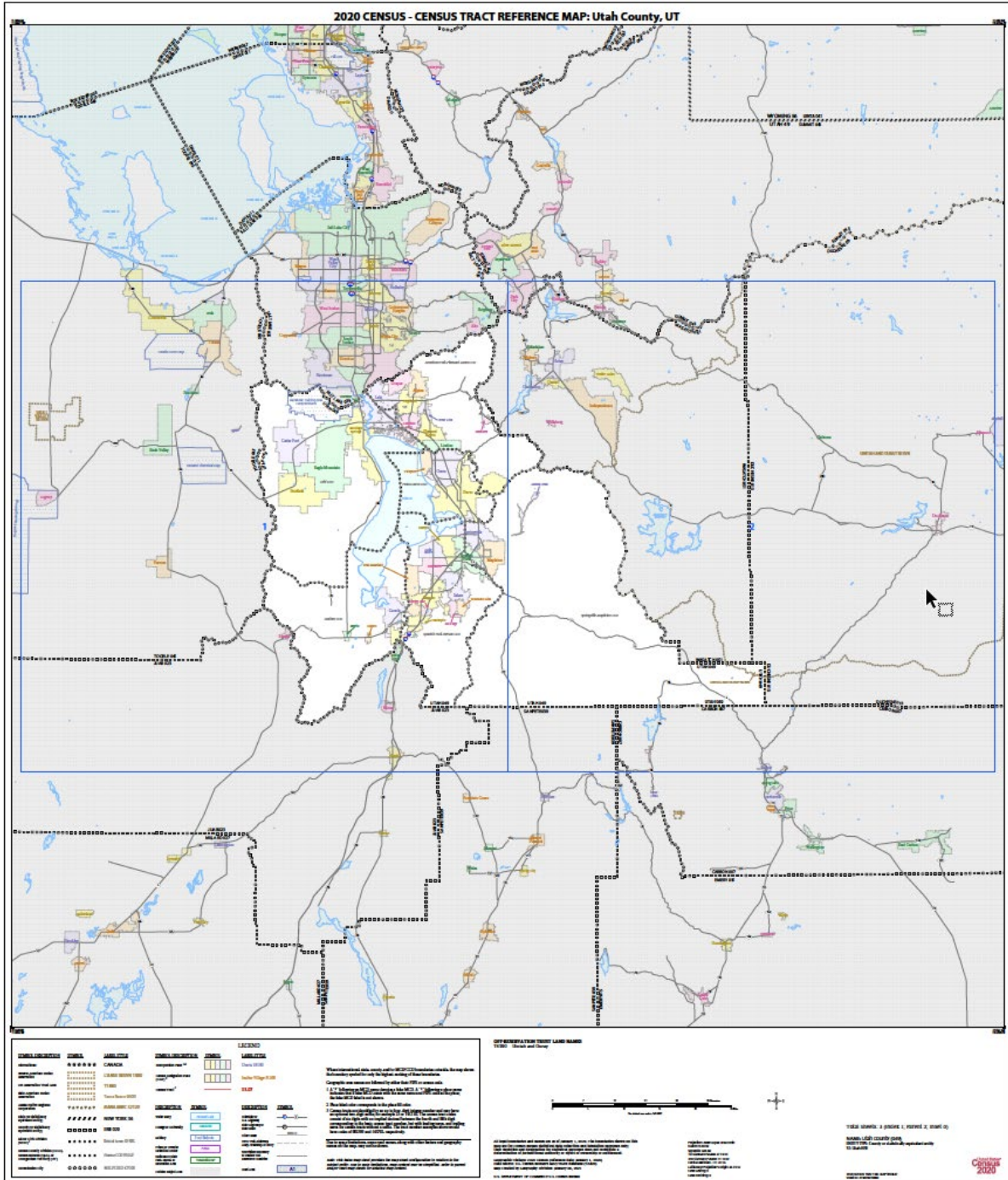
## **MONITORING STRATEGIC PLAN PERFORMANCE**

The Green Dot Bank Board of Directors, including the Board CRA Committee, and senior management will ensure appropriate resources are dedicated to implementing the plan and will oversee the Bank's progress in meeting the measurable goals outlined in the plan. The Bank recognizes that the goals outlined in this strategic plan are based on general assumptions about the Bank's business model and industry as well as current and forecasted future economic conditions which are subject to change. As a result, the CRA Committee will monitor the Bank's

performance on a periodic basis and report key updates and concerns to the full Board, as needed.

# APPENDIX A: ASSESSMENT AREA MAPS

Utah County<sup>34</sup>



<sup>34</sup> A more detailed view of this map can be found at: [https://www2.census.gov/geo/maps/DC2020/PL20/st49\\_ut/censustract\\_maps/c49049\\_utah/DC20CT\\_C49049.pdf](https://www2.census.gov/geo/maps/DC2020/PL20/st49_ut/censustract_maps/c49049_utah/DC20CT_C49049.pdf)





## Assessment Area Census Tract Income Levels – Provo-Orem Metropolitan Statistical Area

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2022 Est. Tract Median Family Income	2020 Tract Median Family Income
49	23	101	Middle	No	93.29	\$89,558	\$78,061
49	23	102	Middle	No	91.04	\$87,398	\$76,175
49	23	9999.99	Middle	No	91.71	\$88,042	\$76,736
49	49	1.02	Middle	No	90.13	\$86,525	\$75,417
49	49	1.03	Middle	No	107.24	\$102,950	\$89,731
49	49	1.04	Upper	No	120.01	\$115,210	\$100,417
49	49	1.05	Middle	No	106.71	\$102,442	\$89,290
49	49	2.03	Moderate	No	77.55	\$74,448	\$64,891
49	49	2.05	Upper	No	168.07	\$161,347	\$140,625
49	49	2.06	Upper	No	125.79	\$120,758	\$105,250
49	49	2.07	Middle	No	103.38	\$99,245	\$86,504
49	49	2.08	Middle	No	95.09	\$91,286	\$79,567
49	49	4	Middle	No	84.65	\$81,264	\$70,833
49	49	5.04	Middle	No	99.31	\$95,338	\$83,095
49	49	5.05	Middle	No	103.95	\$99,792	\$86,979
49	49	5.06	Middle	No	100.19	\$96,182	\$83,828
49	49	5.07	Middle	No	113.66	\$109,114	\$95,104
49	49	5.08	Middle	No	89.95	\$86,352	\$75,264
49	49	5.1	Moderate	No	76.96	\$73,882	\$64,399
49	49	5.11	Moderate	No	50.87	\$48,835	\$42,566
49	49	6.01	Middle	No	93.17	\$89,443	\$77,962
49	49	6.03	Middle	No	116.39	\$111,734	\$97,386
49	49	6.04	Upper	No	180.64	\$173,414	\$151,146
49	49	7.03	Moderate	No	73.11	\$70,186	\$61,173
49	49	7.06	Middle	No	87.77	\$84,259	\$73,438
49	49	7.07	Middle	No	96.77	\$92,899	\$80,972
49	49	7.08	Upper	No	134.97	\$129,571	\$112,930
49	49	7.09	Middle	No	102.11	\$98,026	\$85,441
49	49	7.1	Upper	No	169.08	\$162,317	\$141,471
49	49	7.11	Upper	No	139.28	\$133,709	\$116,538
49	49	8.01	Moderate	No	69.58	\$66,797	\$58,218
49	49	8.03	Middle	No	83.08	\$79,757	\$69,519
49	49	8.04	Moderate	No	64.60	\$62,016	\$54,052
49	49	9.01	Moderate	No	60.57	\$58,147	\$50,682

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2022 Est. Tract Median Family Income	2020 Tract Median Family Income
49	49	9.03	Middle	No	109.71	\$105,322	\$91,800
49	49	9.04	Middle	No	98.37	\$94,435	\$82,311
49	49	10.01	Middle	No	97.70	\$93,792	\$81,750
49	49	10.02	Middle	No	86.80	\$83,328	\$72,625
49	49	11.03	Middle	No	98.05	\$94,128	\$82,045
49	49	11.05	Middle	No	109.55	\$105,168	\$91,667
49	49	11.06	Middle	No	85.37	\$81,955	\$71,429
49	49	11.07	Middle	No	80.92	\$77,683	\$67,708
49	49	11.08	Moderate	No	52.40	\$50,304	\$43,844
49	49	12.01	Middle	No	106.20	\$101,952	\$88,864
49	49	12.02	Moderate	No	67.38	\$64,685	\$56,382
49	49	13	Middle	No	88.24	\$84,710	\$73,831
49	49	14.01	Middle	No	118.52	\$113,779	\$99,167
49	49	14.03	Moderate	No	63.74	\$61,190	\$53,333
49	49	14.04	Moderate	No	56.73	\$54,461	\$47,472
49	49	15.01	Middle	No	119.65	\$114,864	\$100,117
49	49	15.03	Upper	No	129.58	\$124,397	\$108,421
49	49	15.04	Middle	No	103.73	\$99,581	\$86,793
49	49	16.01	Low	No	31.62	\$30,355	\$26,462
49	49	16.02	Unknown	No	-	\$0	\$0
49	49	17.01	Upper	No	133.71	\$128,362	\$111,875
49	49	17.02	Low	No	47.80	\$45,888	\$40,000
49	49	18.01	Low	No	35.43	\$34,013	\$29,648
49	49	18.02	Low	No	31.96	\$30,682	\$26,747
49	49	18.03	Low	No	38.22	\$36,691	\$31,981
49	49	19	Low	No	42.24	\$40,550	\$35,342
49	49	20.01	Moderate	No	52.11	\$50,026	\$43,608
49	49	20.02	Moderate	No	50.15	\$48,144	\$41,964
49	49	21.01	Middle	No	98.07	\$94,147	\$82,056
49	49	21.02	Middle	No	91.75	\$88,080	\$76,771
49	49	22.04	Middle	No	89.63	\$86,045	\$75,000
49	49	22.05	Middle	No	84.64	\$81,254	\$70,824
49	49	22.06	Middle	No	87.02	\$83,539	\$72,813
49	49	22.08	Upper	No	120.88	\$116,045	\$101,141
49	49	22.09	Moderate	No	73.06	\$70,138	\$61,136
49	49	22.1	Middle	No	89.89	\$86,294	\$75,217
49	49	22.11	Moderate	No	56.34	\$54,086	\$47,143
49	49	22.12	Upper	No	121.97	\$117,091	\$102,059

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2022 Est. Tract Median Family Income	2020 Tract Median Family Income
49	49	22.13	Middle	No	92.62	\$88,915	\$77,500
49	49	23	Moderate	No	72.04	\$69,158	\$60,281
49	49	24	Low	No	44.81	\$43,018	\$37,500
49	49	25	Moderate	No	50.25	\$48,240	\$42,045
49	49	27.02	Middle	No	87.14	\$83,654	\$72,917
49	49	27.03	Moderate	No	73.51	\$70,570	\$61,513
49	49	29.01	Middle	No	94.71	\$90,922	\$79,250
49	49	29.02	Middle	No	83.89	\$80,534	\$70,197
49	49	30.01	Middle	No	99.51	\$95,530	\$83,266
49	49	30.02	Middle	No	95.46	\$91,642	\$79,875
49	49	31.03	Middle	No	106.57	\$102,307	\$89,167
49	49	31.04	Upper	No	135.20	\$129,792	\$113,125
49	49	31.05	Middle	No	84.65	\$81,264	\$70,833
49	49	31.06	Middle	No	85.30	\$81,888	\$71,375
49	49	32.01	Moderate	No	69.89	\$67,094	\$58,482
49	49	32.03	Upper	No	130.62	\$125,395	\$109,293
49	49	32.04	Moderate	No	68.72	\$65,971	\$57,500
49	49	32.05	Middle	No	99.94	\$95,942	\$83,625
49	49	33.01	Middle	No	87.99	\$84,470	\$73,622
49	49	33.02	Middle	No	90.38	\$86,765	\$75,625
49	49	34.01	Middle	No	84.32	\$80,947	\$70,551
49	49	34.03	Moderate	No	72.99	\$70,070	\$61,071
49	49	34.04	Middle	No	110.12	\$105,715	\$92,143
49	49	34.05	Middle	No	96.40	\$92,544	\$80,658
49	49	101.07	Middle	No	118.98	\$114,221	\$99,554
49	49	101.1	Upper	No	158.42	\$152,083	\$132,554
49	49	101.14	Middle	No	94.98	\$91,181	\$79,474
49	49	101.15	Middle	No	91.78	\$88,109	\$76,792
49	49	101.16	Upper	No	146.99	\$141,110	\$122,986
49	49	101.17	Upper	No	124.09	\$119,126	\$103,825
49	49	101.18	Middle	No	104.26	\$100,090	\$87,234
49	49	101.19	Middle	No	90.61	\$86,986	\$75,815
49	49	101.2	Middle	No	103.86	\$99,706	\$86,900
49	49	101.21	Upper	No	125.88	\$120,845	\$105,324
49	49	101.22	Middle	No	108.71	\$104,362	\$90,962
49	49	101.23	Upper	No	122.37	\$117,475	\$102,391
49	49	101.24	Upper	No	165.21	\$158,602	\$138,235
49	49	101.25	Middle	No	96.04	\$92,198	\$80,357

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2022 Est. Tract Median Family Income	2020 Tract Median Family Income
49	49	101.26	Upper	No	130.90	\$125,664	\$109,531
49	49	101.27	Middle	No	110.24	\$105,830	\$92,237
49	49	101.28	Middle	No	88.42	\$84,883	\$73,984
49	49	101.29	Upper	No	121.31	\$116,458	\$101,500
49	49	101.3	Middle	No	112.71	\$108,202	\$94,308
49	49	101.31	Middle	No	117.35	\$112,656	\$98,188
49	49	101.32	Middle	No	116.98	\$112,301	\$97,880
49	49	102.08	Upper	No	185.29	\$177,878	\$155,033
49	49	102.09	Upper	No	165.98	\$159,341	\$138,875
49	49	102.1	Upper	No	161.52	\$155,059	\$135,147
49	49	102.11	Upper	No	181.79	\$174,518	\$152,109
49	49	102.12	Upper	No	151.25	\$145,200	\$126,550
49	49	102.13	Upper	No	183.75	\$176,400	\$153,750
49	49	102.16	Upper	No	157.14	\$150,854	\$131,484
49	49	102.17	Upper	No	189.19	\$181,622	\$158,299
49	49	102.19	Upper	No	173.89	\$166,934	\$145,493
49	49	102.2	Upper	No	133.58	\$128,237	\$111,767
49	49	102.21	Middle	No	106.65	\$102,384	\$89,236
49	49	102.22	Upper	No	153.82	\$147,667	\$128,702
49	49	102.23	Upper	No	179.97	\$172,771	\$150,585
49	49	102.24	Upper	No	170.37	\$163,555	\$142,550
49	49	102.25	Upper	No	142.55	\$136,848	\$119,271
49	49	102.26	Upper	No	150.89	\$144,854	\$126,250
49	49	103.03	Upper	No	132.04	\$126,758	\$110,481
49	49	103.05	Upper	No	155.18	\$148,973	\$129,844
49	49	103.06	Moderate	No	71.60	\$68,736	\$59,911
49	49	103.07	Upper	No	131.47	\$126,211	\$110,000
49	49	103.08	Upper	No	131.47	\$126,211	\$110,000
49	49	104.04	Upper	No	126.98	\$121,901	\$106,250
49	49	104.05	Middle	No	101.21	\$97,162	\$84,688
49	49	104.06	Middle	No	117.62	\$112,915	\$98,417
49	49	104.07	Middle	No	118.72	\$113,971	\$99,333
49	49	104.08	Middle	No	109.50	\$105,120	\$91,620
49	49	104.09	Middle	No	114.74	\$110,150	\$96,002
49	49	104.1	Middle	No	96.81	\$92,938	\$81,000
49	49	104.11	Upper	No	135.16	\$129,754	\$113,090
49	49	105.03	Middle	No	89.93	\$86,333	\$75,250
49	49	105.04	Middle	No	84.49	\$81,110	\$70,700

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2022 Est. Tract Median Family Income	2020 Tract Median Family Income
49	49	105.05	Middle	No	80.05	\$76,848	\$66,979
49	49	105.06	Moderate	No	68.58	\$65,837	\$57,386
49	49	106	Middle	No	109.67	\$105,283	\$91,767
49	49	107	Middle	No	95.81	\$91,978	\$80,165
49	49	109	Upper	No	124.00	\$119,040	\$103,750
49	49	9801	Unknown	No	-	\$0	\$0
49	49	9802	Low	No	26.73	\$25,661	\$22,367
49	49	9803	Moderate	No	60.15	\$57,744	\$50,331
49	49	9804	Unknown	No	-	\$0	\$0
49	49	9805	Low	No	40.91	\$39,274	\$34,236
49	49	9806	Unknown	No	-	\$0	\$0

## **APPENDIX B: EVIDENCE OF PUBLIC NOTICE OF GREEN DOT BANK'S DRAFT STRATEGIC PLAN**

Below is a copy of the notice published in The Daily Herald, a newspaper of general circulation in the assessment area, on July 27, 2023.

### **Community Reinvestment Act ("CRA") Strategic Plan Public Comment Invited Notice of Proposed CRA Strategic Plan Green Dot Bank Provo, UT**

The CRA regulations require a bank that has developed a Strategic Plan to publish Notice of the plan and solicit formal written public comment for at least a 30-day period. In conformance with this requirement, Green Dot Bank (the "Bank") hereby provides notice to the public of its plan to submit a five (5) year CRA Strategic Plan to the Federal Reserve Bank (FRB) in San Francisco, CA.

Written comments from the public concerning the Strategic Plan are encouraged. To obtain a copy of the Bank's Strategic Plan at no charge to the requesting party, individuals may request a copy by mail or phone by contacting Michael Christensen, Green Dot Bank's CRA Officer, 1675 N. Freedom Blvd., Building #1, Provo, UT 84604, or at (801) 344-7006.

All written comments regarding the plan should be directed to Michael Christensen, CRA Officer, at the address listed above or via e-mail at [mchristensen@greendotcorp.com](mailto:mchristensen@greendotcorp.com).

Comments and suggestions will be accepted until August 27, 2023, following which time the plan will be submitted for approval to the Federal Reserve Bank. Green Dot Bank will review all comments and incorporate suggestions to the plan at its discretion. Green Dot Bank received an outstanding evaluation from its last CRA performance evaluation under a strategic plan, as of March 29, 2021, copies of same are also available upon request without charge.

## APPENDIX C: BANK BALANCE SHEET SUMMARY AS OF MARCH 31, 2023

A summary of Green Dot Bank’s Balance Sheet as of March 31, 2023, is displayed below. The following link provides access to the full Green Dot Bank Call Report for this and other periods, which includes detailed information on the Bank’s financial position. Amounts shown below are in thousands.

<https://cdr.ffiec.gov/public/ManageFacsimiles.aspx>

<b>Green Dot Bank</b>	<b>As of 3/31/2023 (in thousands)</b>
<b>Cash &amp; Securities</b>	<b>\$ 3,190,457</b>
<b>Loans, net of allowance</b>	<b>\$ 29,509</b>
<b>Other Assets</b>	<b><u>\$ 621,319</u></b>
<b>Total Assets</b>	<b>\$ 3,841,285</b>
<b>Deposits</b>	<b>\$ 3,702,039</b>
<b>Other Liabilities</b>	<b>\$ 49,937</b>
<b>Total Liabilities</b>	<b><u>\$ 3,751,976</u></b>
<b>Equity</b>	<b><u>\$ 89,309</u></b>
<b>Total Liabilities &amp; Equity</b>	<b>\$ 3,841,285</b>



## APPENDIX D: SUMMARY OF STRATEGIC PLAN & MEASURABLE GOALS

Institution: Green Dot Bank

Plan Coverage Period: January 1, 2024 – December 31, 2028 (Five Years)

Assessment Area: Provo-Orem MSA (Utah and Juab counties)

---

### Measurable Goal #1 (New Lending and Investment):

PLAN YEAR	New Originations <sup>36</sup> of CRA-Qualifying Loans, Investments, and Grants for “Satisfactory” rating as a % of Average Annual Assets <sup>37 38</sup>	New Originations of CRA-Qualifying Loans, Investments, and Grants for “Outstanding” rating as a % of Average Annual Assets
2024	0.40%	0.60%
2025	0.40%	0.60%
2026	0.40%	0.60%
2027	0.40%	0.60%
2028	0.40%	0.60%

### Measurable Goal #2 (Cumulative Lending and Investment):

---

<sup>36</sup> “New Originations” for a calendar year will include new community development investments, eligible grants and donations made by the Bank during the year, new CRA-qualifying loans either originated or purchased by Green Dot Bank, and existing CRA-qualifying loans that are renewed and credit underwritten that year (can only count each loan once per year).

<sup>37</sup> The Bank’s average assets for any given plan year will be calculated using the amounts from line 9 of Schedule RC-K of the Bank’s four filed Call Reports for the prior calendar year. This allows the Bank to define and establish its target goals at the beginning of each new plan year, providing greater stability in management’s community development activity planning each year.

<sup>38</sup> Any amount exceeding the annual “Outstanding” goal in one plan year may be applied toward the next plan year’s annual goal.

<b>PLAN YEAR</b>	<b>Cumulative<sup>39</sup> CRA-Qualifying loans, grants, and investments as a % of Average Annual Assets<sup>40</sup> for a “Satisfactory” rating</b>	<b>Cumulative CRA-Qualifying loans, grants, and investments as a % of Average Annual Assets for an “Outstanding” rating</b>
2024	1.4%	1.8%
2025	1.4%	1.8%
2026	1.4%	1.8%
2027	1.4%	1.8%
2028	1.4%	1.8%

**Measurable Goal #3 (Community Development Services):**

<b>PLAN YEAR</b>	<b>Bank’s CD Service Hours for “Satisfactory” rating</b>	<b>Bank’s CD Service Hours for “Outstanding” rating</b>
2024	6.5 Hours per Full-time Equivalent Employee <sup>41 42</sup>	8 Hours per Full-time Equivalent Employee <sup>40 41</sup>
2025		
2026		
2027		
2028		

<sup>39</sup> The cumulative balance for a plan year will include new CRA-qualifying loans either originated or purchased by Green Dot Bank, existing CRA-qualifying loans that are renewed and credit underwritten that year (can only count each loan once per year), eligible grants and donations made during the plan year, new CRA-qualifying investments, and the year-end balance of investments purchased in prior years.

<sup>40</sup> The Bank’s average assets for any given plan year will be calculated using the amounts from line 9 of Schedule RC-K of the Bank’s four filed Call Reports for the prior calendar year. This allows the Bank to define and establish its target goals at the beginning of each new plan year, providing greater stability in management’s community development activity planning each year.

<sup>41</sup> Service hours in excess of the “Outstanding” goal for one plan year may be applied toward the next plan year’s goal.

<sup>42</sup> Total employees for a given Plan Year will be calculated as of the number of full-time equivalent employees listed on the December 31st previous year-end Call Report, Schedule RI Memoranda, line 5.