



PUBLIC DISCLOSURE

June 17, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Westfield Bank
Charter Number 717968

141 Elm Street
Westfield, MA 01085

Office of the Comptroller of the Currency

99 Summer Street
Suite 1400
Boston, MA 02110

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**.

The following table indicates the performance level of Westfield Bank (Bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Westfield Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The Bank's lending activity is good;
- A majority of home mortgage loans and a substantial majority of small loans to businesses were made within the Bank's assessment area (AA);
- The borrower distribution of home mortgage loans by income level of the geography is adequate and distribution of small loans to businesses is excellent;
- The borrower distribution of home mortgage loans by income level of the borrower is excellent and distribution of small loans to businesses is adequate.
- Community development lending has a positive impact on the lending test;
- The Bank has an excellent level of community development investments and is responsive to identified credit needs; and,
- The Bank is a leader in providing community development services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development.

Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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 do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancing's, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

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

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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states

within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan 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) and the Thrift Financial Reporting (TFR) 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 One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

Westfield Bank, headquartered in Westfield, Massachusetts (MA), is an interstate federally chartered savings bank. As of March 31, 2013, the Bank had total assets of \$1.3 billion. Westfield Bank is a wholly-owned subsidiary of Westfield Financial, Inc., a one bank holding company with total assets of \$1.3 billion as of March 31, 2013. The Bank does not have any affiliates. Westfield Financial, Inc. is traded on the NASDAQ Global Select Market under the symbol WFD.

Westfield Bank operates eleven full-service branches within the Massachusetts County of Hampden and one full-service branch within the Connecticut County of Hartford. In addition, the Bank operates one full-service automated teller machine (ATM) within the town of Southwick, MA and eleven cash dispensing ATMs located throughout the Greater Springfield area. Hampden County is located in the Springfield, MA Metropolitan Statistical Area (MSA) and Hartford County is located in the Hartford-West Hartford-East Hartford, CT MSA. The Bank recently opened a full-service banking office in Connecticut on May 30, 2013. No branches were closed during the evaluation period. The Bank closed their Feeding Hills, MA remote ATM due to the close proximity of a banking branch, which offers a full-service ATM. Please refer to Appendices A and B for a detailed description of the Bank's AA.

Westfield Bank is a full-service institution, offering a standard array of traditional loan and deposit products for both personal and business customers. The Bank's website www.westfieldbank.com provides a full listing and description of its deposit and loan services. The Bank also offers a variety of different account access alternatives including telephone banking, online banking with bill pay options, e-statements, and a mobile banking application. In addition, to the above services for consumer accounts, the Bank also offers a wide variety of account access alternatives for their business customers, which include online banking for business customers, cash management services, automated clearing house (ACH) manager, credit card merchant services, and lockbox services. The Bank operates full-service ATMs at all of its branches. The Bank also operates one full-service remote ATM in Southwick, MA and eleven stand-alone cash dispensing ATMs in Springfield, MA; Westfield, MA; West Springfield, MA; and Holyoke, MA.

As of March 31, 2013, deposits totaled \$773 million, and net Tier One Capital was \$164 million. The loan portfolio totaled \$596 million, or 46% of total assets, as of the same date. Commercial lending remains a strategic focus of the Bank. The following table provides a summary of the loan mix:

Loan Portfolio Summary by Loan Product March 31, 2013	
Loan Category	% of Gross Loans and Leases
1-4 Family Residential Mortgage – Closed End	35%
Home Equity	3%
Commercial & Industrial	21%
Commercial Real Estate	39%
Construction and Development	2%
Consumer Loans	<1%

Source: FDIC Call Report

There are no legal, financial, or other factors impeding the Bank's ability to help meet the credit needs in its AA. The last CRA examination was dated April 5, 2010, and used intermediate small bank procedures. Westfield Bank received a "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test, with the exception of Community Development loans, is January 1, 2010, through December 31, 2012. For the period from January 1, 2010, through December 31, 2011, the Bank's performance was compared to the 2000 U.S. Census data. For the period from January 1, 2012, through December 31, 2012, the performance was compared to the 2010 U.S. Census data. Our conclusions for the Bank's lending performance during the evaluation period are based on residential mortgage loans consisting of home purchase, home refinance, and home improvement loans as reported on the Bank's Home Mortgage Disclosure Act (HMDA) Loan Application Register. We also reviewed the Bank's reportable small loans to businesses. The evaluation period of the Bank's reportable small loans to businesses is January 1, 2011, through December 31, 2012, as Westfield Bank was not required to report small business loan data in 2010. The evaluation period for Community Development loans and the Investment and Service Tests is April 5, 2010, through June 17, 2013.

The Bank originated a very low volume of multifamily loans during the evaluation period; therefore, an analysis of these loans was not meaningful. There were no agricultural loans originated or purchased during the evaluation period; therefore, an analysis of agricultural loans was not performed. Consumer loans were not evaluated, as they do not constitute a substantial majority of the Bank's business. Westfield Bank reported 336 loans by count and \$54.9 million by dollar amount in purchased HMDA loans during the period of January 1, 2010, through December 31, 2011. The Bank reported 201 loans by count and \$35.4 million by dollar amount in purchased HMDA loans for the period January 1, 2012, through December 31, 2012. Westfield Bank has contracted with Village Mortgage Company for originating the majority of their HMDA reportable loans. The arrangement with the mortgage company helps the Bank expand credit access within their AA.

Data Integrity

Prior to this examination, we reviewed the accuracy of HMDA and small loans to businesses made in the evaluation period. Based on a sample of each loan type, we found the data to be accurate and deemed it reliable for this CRA evaluation. Community Development loans, investments, and services submitted by Bank management were verified to ensure they met the regulatory definition of Community Development.

Selection of Areas for Full-Scope Review

The CRA requires a bank to define the AA in which it will be evaluated. Westfield Bank has one AA that meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income tracts. Westfield Bank has designated the entire Hampden County and contiguous tracts in Hampshire County as their AA. The AA is part of the Springfield MA MSA. The AA includes 23 towns in Hampden County and two towns with contiguous tracts in Hampshire County. The AA contains eleven full-service branches, one full-service remote ATM, and eleven stand-alone cash dispensing ATM.

Please refer to Appendix A for more information on the scope of the examination and Appendix B for further information regarding the market profiles of the full-scope AA.

Ratings

The Bank's overall rating is based primarily on the AA that received a full-scope review. The Lending Test was more heavily weighted than the Investment Test or the Service Test. For the Lending Test evaluation period of January 1, 2010, through December 31, 2011, home mortgage products were more heavily weighted than small loans made to businesses, however; it should be noted that the Bank was not required to report small loans to businesses in 2010. During this evaluation period, 60% of the total loans originated and purchased were home mortgage loans with small loans to businesses accounting for 40%. In addition, home refinance loans received more weight when evaluating home mortgage products as they accounted for 62% of the Bank's home mortgage loans made during this evaluation period.

For the Lending Test evaluation period of January 1, 2012, through December 31, 2012, small loans made to businesses were more heavily weighted than home mortgage products. During this evaluation period, 60% of the total loans originated and purchased were small loans made to businesses with home mortgage products accounting for 40%. In addition, when evaluating home mortgage products, home refinance loans received more weight as they accounted for 59% of the total mortgage loans.

Overall, more weight was placed on the Bank's performance during the evaluation period of January 1, 2010, through December 31, 2011. Westfield Bank originated and/or purchased 859 loans during this evaluation period when compared to 637 loans originated and/or purchased in 2012.

Other

We contacted a community development organization whose mission is to provide safe and affordable housing for the homeless, low- and moderate-income individuals and persons with special needs. The contact stated that the Western Massachusetts economy is generally weaker when compared to other parts of the state given the higher unemployment rates and stagnant job growth resulting in poor workforce development. The contact identified financial literacy, foreclosure prevention assistance, and affordable housing for low- and moderate-income individuals as needs in the community. There are opportunities in the AA for community development lending, investments, and services particularly related to the rebuilding and revitalization efforts. The contact indicated that Westfield Bank is usually the first bank that their organization contacts for grants and services. The community contact further indicated that local financial institutions, including Westfield Bank, have been supportive in providing donations and services particularly to the revitalization efforts of the area.

We reviewed two other recent community contacts made in the full-scope AA. The first community contact was an affordable housing organization that provides affordable housing opportunities, emergency and homeless shelters, first-time homebuyer, and foreclosure prevention programs. The contact indicated that unemployment, poverty and economic distress, and distress from the 2011 tornado continue to affect the area. A primary need identified by the contact was revitalization in the AA in order to attract economic development to the area. The community contact stated that local institutions have been supportive by providing financial and technical assistance to their organization.

The second community contact reviewed was a Community Development Financial Institution (CDFI). The organization works to create economic opportunities in Western Massachusetts. This CDFI's efforts

are focused on job retention, job creation, and neighborhood revitalization. The contact indicated that the economy in Western Massachusetts is growing at a slower rate when compared to the rest of the state. The Western Massachusetts economy has been impacted by detrimental weather events, which have further challenged the economy. The contact mentioned that community needs in the area include workforce development, technical assistance for minority-owned businesses, and revitalization efforts to help attract new business to the area. The contact stated that local institutions have generally been supportive by providing some level of financial support to the CDFI.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 195.28(c), in determining a Federal Savings Association's (FSA) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the FSA, or in any assessment area by an affiliate whose loans have been considered as part of the FSA's lending performance. We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The Bank's performance under the Lending Test is rated "High Satisfactory." Based on a full-scope review, Westfield Bank's performance in the Springfield, MA MSA AA is good.

Lending Activity

Refer to Tables 1a and 1b Lending Volume in Appendix C for the facts and data used to evaluate the Bank's lending activity.

Westfield Bank's lending activity within the Springfield, MA MSA AA is good. The Bank's lending patterns are reflective of the credit needs of the community when considering the high level of competition from large local lenders. The loan-to-deposit ratio serves as an additional indicator of lending levels. During the evaluation period, the net loan-to-deposit ratio averaged 74%.

HMDA loans comprised 60% of all lending in the AA for the period of January 1, 2010, through December 31, 2011, however; the Bank was not required to report small loans to businesses during 2010. Home refinance, purchase, and home improvement represented 62%, 21%, and 17%, respectively, of all home mortgages originated and/or purchased in the AA during this period. The volume of multifamily loans made by the Bank was not significant; therefore, an analysis of these loans would not be meaningful.

Small loans to businesses comprised 60% of all lending in the AA for the period of January 1, 2012, through December 31, 2012. Home mortgage loans accounted for 40% of the total originated and/or purchased loans during this period. Home refinance, purchase, and home improvement represented 59%, 20%, and 21%, respectively, of all home mortgage loans during this period. The volume of

multifamily loans made by the Bank was not significant; therefore, an analysis of these loans would not be meaningful.

The 2011 HMDA Peer Mortgage Data indicates Westfield Bank ranked 17th out of 295 mortgage lenders with a market share of 1.8%. Based on the same 2011 market share data, Westfield Bank ranked 29th out of 202 lenders with a market share of 1.1% for home purchase and 19th out of 290 lenders with a market share of 1.7% for refinance loans. The Bank ranked 10th out of 99 lenders with a market share of 3.3% for home improvement loans. Westfield Bank's performance is considered good considering strong competition from larger, nationwide banks. The top ten financial institutions dominate the market with an overall market share of approximately 41%.

As noted above small loans to businesses comprised 40% of all lending during the period of January 1, 2010, through December 31, 2011, and comprised 60% of all lending during 2012. Based on the 2011 Peer Small Business Data, Westfield Bank ranked 10th out of 56 lenders with a market share of 3.7%. The Bank's performance is good considering the significant competition from large nationwide lenders that dominate the market. The top five institutions, all nationwide lenders, have a combined market share of 59%.

Westfield Bank has 11 branches within the Springfield, MA MSA AA and all the deposits during the evaluation period are attributed to this AA. As of June 30, 2012, Westfield Bank ranked 8th with 5.7% deposit market share within the counties of Hampden and Hampshire that comprise the Springfield, MA MSA AA.

Distribution of Loans by Income Level of the Geography

The geographic distribution of home mortgage loans in the AA is adequate and the geographic distribution of small loans to businesses is excellent.

Our analysis took into consideration the high poverty level and the low percentage of owner-occupied units in low-income geographies. Based on the 2000 U.S. Census the percentage of households living below the poverty level within the Springfield, MA MSA AA is high at 14%. Furthermore, the 2010 U.S. Census indicates that the percentage of households living below poverty level has increased to 16%, thus limiting lending opportunities in low- and moderate-income tracts. We also considered strong competition from large, nationwide financial institutions operating in Springfield, MA MSA AA.

Home Mortgage Loans

Refer to Tables 2a, 3a, 4a and 6a in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases for evaluation period of January 1, 2010, through December 1, 2011. Refer to Tables 2b, 3b, 4b and 6b in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases for evaluation period of January 1, 2012, through December 1, 2012.

Home Purchase Loans

Westfield Bank's geographic distribution of home purchase loans originated and/or purchased in 2010 and 2011 is adequate. The Bank did not make any home purchase loans in low-income geographies during this period. The percent of home purchase loans in moderate-income geographies is near to the

percentage of aggregate peer home purchase lending in moderate-income geographies. The percent of home purchase loans is also near to the percent of owner-occupied housing units in moderate-income tracts.

Westfield Bank's geographic distribution of home purchase loans originated and/or purchased in 2012 is poor. The Bank's 2012 performance was compared to the percent of owner-occupied units located within the low- and moderate-income geographies as the aggregate peer home purchase lending in low- and moderate-income geographies was not available during this evaluation. The Bank made no home purchase loans in low-income geographies and the percent of home purchase loans in moderate-income geographies was significantly lower than the percentage of owner-occupied housing units located within moderate-income geographies.

The Bank's performance in 2010 and 2011 was more heavily weighted when arriving at the overall conclusion for home purchase loans given the larger volume during this period. Westfield Bank's performance is considered adequate given the level of competition from local and nationwide financial institutions along with lack of affordable housing within the AA. The top ten lenders within the AA dominated the market with an overall market share of 45% for home purchase loans. Affordable housing remains a challenge within the AA, given the high unemployment rate and the percentage of households living below the poverty level.

Home Improvement Loans

The geographic distribution of home improvement loans originated and/or purchased in 2010 and 2011 is poor. No home improvement loans were made in low-income geographies during this period. However, the Bank's opportunity to make home improvement loans in low-income tracts is limited given the low percent of owner-occupied housing in low-income tracts of the AA. The percent of home improvement loans made in moderate-income geographies was lower than the percentage of aggregate home improvement lending in moderate-income geographies. The percent of home improvement loans was also lower when compared to owner-occupied housing units located in moderate-income tracts.

The geographic distribution of home improvement loans originated and/or purchased in 2012 is adequate. The Bank's 2012 performance was compared to the percent of owner-occupied units located within the low- and moderate-income geographies as the aggregate peer home improvement lending in low- and moderate-income geographies was not available during this evaluation. The percent of home improvement loans made in low-income geographies was near to the percentage of owner-occupied housing located in low-income tracts. The percent of home improvement loans made in moderate-income geographies was lower than the percentage of owner-occupied housing units located in moderate-income tracts.

The Bank's performance is considered adequate given the level of competition from local and nationwide financial institutions as well as the limited lending opportunities within low-income geographies. Market competition for home improvement loans is significant with the top five financial institutions dominating the market with a market share of 41% for home improvement loans. Westfield Bank ranks 10th with an overall market share of 3%.

Home Refinance Loans

The geographic distribution of home refinance loans originated and/or purchased in 2010 and 2011 is adequate. The percent of home refinance loans made in low-income geographies is near to the percentage of aggregate peer refinance lending in low-income geographies. The percent of home refinance loans made in low-income geographies is lower than the percentage of owner-occupied units located in low-income tracts. However, the Bank's opportunity to make refinance loans in low-income tracts is limited given the low percent of owner-occupied housing units located in low-income tracts at 3%. The percent of home refinance loans made to in moderate-income geographies meets the percent of aggregate peer refinance lending in moderate-income geographies. The percent of home refinance loans made in moderate-income geographies was lower than the percent of owner-occupied units within the AA.

The geographic distribution of home refinance loans originated and/or purchased in 2012 is adequate. The Bank's 2012 performance was compared to the percent of owner-occupied units located within the low- and moderate-income geographies as the aggregate peer home refinance lending in low- and moderate-income geographies was not available during this evaluation. The Bank did not make any home refinance loans in low-income geographies during this period. The percent of home refinance loans made in moderate-income geographies was lower than the percent of owner-occupied units located in moderate-income tracts.

Given the volume of home refinance loans in 2010 and 2011, the Bank's performance during this period was more heavily weighted when arriving at the overall conclusion for home refinance loans. Westfield Bank's performance is considered adequate given the limited lending opportunities to low- and moderate-income individuals due to high poverty levels within the AA. Based on the 2000 U.S. Census the percentage of households living below the poverty level within the Springfield, MA MSA AA is high at 14%. Furthermore, the 2010 U.S. Census indicates that the percentage of households living below poverty level has increased to 16%, thus limiting lending opportunities in low- and moderate-income tracts.

Small Loans to Businesses

Refer to Table 6a and 6b in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's origination/purchase of small loans to businesses.

The Bank's geographic distribution of small loans to businesses during 2011 is excellent considering the significant competition from large nationwide lenders that dominate the market. The percent of small loans to businesses in low-income geographies exceeds the percentage of aggregate peer lending in low-income tracts and is near to the percentage of businesses located in low-income geographies. Westfield Bank's percentage of small loans to businesses in moderate-income geographies significantly exceeds the percentage of aggregate peer lending in moderate-income geographies as well as the percent of businesses located in moderate-income tracts.

The Bank's 2012 performance was compared to the percent of businesses located within the low- and moderate-income geographies as the aggregate peer business lending data in low- and moderate-income geographies was not available during this evaluation. The geographic distribution of small loans to businesses during 2012 is excellent considering the significant competition from large nationwide lenders that dominate the market. The percent of small loans to businesses in low-income geographies

is lower than the percent of businesses located in low-income tracts. The percent of small loans to businesses exceeds the percent of businesses located in moderate-income tracts.

Lending Gap Analysis

Our review of the geographic distribution of loans did not detect any conspicuous or unexplained gaps in Westfield Bank's lending patterns.

Inside/Outside Ratio

Westfield Bank originates and purchases a majority of the loans in their AA. During the evaluation period, 77% of the number and 65% of the dollar amount of total home mortgage and small loans to businesses were within the Bank's AA. For all home mortgage products, 67% of the number and 50% of the dollar amount were within the Bank's AA. For small loans made to businesses, 92% of the number and 88% of the dollar amount were within the Bank's AA. This performance contributed positively to the Lending Test.

Distribution of Loans by Income Level of the Borrower

The distribution of home loans reflects excellent penetration among borrowers of different income levels. The distribution of loans to businesses reflects adequate penetration among businesses of different sizes.

Home Mortgage Loans

Refer to Tables 8a, 9a, and 10a in Appendix C for the facts and data used to evaluate the borrower distribution of the Bank's home mortgage loan originations and purchases for evaluation period of January 1, 2010, through December 1, 2011. Refer to Tables 8b, 9b, 10b in Appendix C for the facts and data used to evaluate the borrower distribution of the Bank's home mortgage loan originations and purchases for the evaluation period of January 1, 2012, through December 1, 2012.

The distribution of home mortgage loans by income level of the borrower is excellent. Our home mortgage analysis took into consideration demographic factors, including the high poverty level within the AA. We also considered the significant market competition. Westfield Bank ranks 17th out of 295 home mortgage lenders with a market share of 1.8%.

Home Purchase Loans

Borrower distribution for home purchase loans originated and/or purchased in 2010 and 2011 is adequate. Westfield Bank did not make any home purchase loans to low-income borrowers during this period. The percentage of home purchase loans to moderate-income borrowers was significantly lower than aggregate peer lending levels. However, the percentage of home purchase loans made to moderate-income borrowers was near to the percentage of moderate-income families in the AA.

The Bank's borrower distribution for home purchase loans originated and/or purchased in 2012 is adequate. Westfield Bank did not make any home purchase loans to low- or moderate-income borrowers during this period. However, it should be noted that the 50 home purchase loans reported

during this period were purchased loans and the Bank did not report the income information for these purchased home loans.

The Bank's performance in 2010 and 2011 was more heavily weighted when arriving at the overall conclusion for home purchase loans due the volume of origination in this period. The Bank's performance is considered adequate given limited lending opportunities due to a high poverty level coupled with strong level of competition. The 2000 U.S. Census demographic factors indicate that 14% households in the AA are below the poverty level, which further increased to 16% according to the 2010 U.S. Census demographics. High poverty levels limit lending opportunities as these borrowers would likely not qualify for home loans. Our community contacts indicated that high poverty levels along with stagnant job creation add to the economic distress in the AA. Market competition for home purchase loans is also significant. The 2011 Peer Mortgage Data indicates that the top five lenders, most of them large nationwide financial institutions, dominated the market with 31% of the overall market share for home purchase loans. Westfield Bank ranked 29th with a market share of 1.13%.

Home Improvement Loans

The borrower distribution for home improvement loans originated and/or purchased in 2010 and 2011 is excellent. The Bank's percent of home improvement loans to low-income borrowers meets the percent of aggregate peer lending data. The percent of home improvement loans made to moderate-income borrowers exceeds the percentage of aggregate peer lending levels as well as significantly exceeds the percent of moderate-income families within the AA.

The borrower distribution for home improvement loans originated and/or purchased in 2012 is good. The Bank's 2012 performance was compared to the percent of low- and moderate-income families within the AA, as the aggregate peer lending to low- and moderate-income borrowers was not available during this evaluation. The percent of home improvement loans made to low-income borrowers is significantly below the percent of low-income families in the AA. The percent of home improvement loans made to moderate-income borrowers is near to the percent of moderate-income families in the AA. The Bank's performance is considered good given the high poverty level and significant market competition within the AA.

The overall borrower distribution for home improvement loans is excellent. Westfield Bank's 2010 and 2011 performance was more heavily weighted when arriving at the overall conclusion for home improvement loans. The volume of home improvement loans originated and/or purchased during this period exceeded the volume in 2012.

Home Refinance Loans

The borrower distribution of home refinance loans originated and/or purchased during 2010 and 2011 is excellent. The Bank's percent of home refinance loans made to low-income borrowers significantly exceeds the percentage of aggregate peer lending for low-income borrowers. However, the percent of home refinance loans is below the percent of low-income families in the AA. The percent of home refinance loans made to moderate-income borrowers significantly exceeds the peer aggregate lending levels and exceeds the percent of moderate-income families located within the Bank's AA.

The borrower distribution of home refinance loans originated and/or purchased during 2012 is excellent. The Bank's 2012 performance was compared to the percent of low- and moderate-income families

within the AA, as the information for aggregate peer lending to low- and moderate-income borrowers was not available during this evaluation. The percent of home refinance loans made to low-income borrowers was significantly lower than the percent of low-income families located within the Bank's AA. The percent of home refinance loans made to moderate-income borrowers significantly exceeds the percent of moderate-income families located within the Bank's AA. The Bank's performance is considered excellent given the significant market competition for home refinance loans within the Bank's AA. The 2011 Peer Mortgage Market Share indicates that the top ten lenders dominated the AA market share with an overall share of 40% for home refinance loans. Westfield Bank ranks 19th within a market share of 1.7%.

The overall borrower distribution for home refinance loans is excellent. The Bank's performance in 2010 and 2011 was more heavily weighted when arriving at the overall conclusion for home refinance loans. The volume of home refinance loans originated and/or purchased during this period exceeded the volume in 2012.

Small Loans to Businesses

Refer to Table 11a and 11b in Appendix C for the facts and data used to evaluate the borrower distribution of the Bank's origination/purchase of small loans to businesses.

The distribution of the Bank's small loans to businesses originated in 2011 is adequate. The Bank's lending to small businesses is lower than the percentage of small businesses located within the Bank's AA. Small loans to small businesses (businesses with revenue of \$1 million or less) represent 50% of all small loans made to businesses originated by Westfield Bank compared to 68% of the businesses in the AA. The distribution by size of the loans shows that 64% of loan originations are for \$100,000 or less.

The distribution of the Bank's small loans to businesses originated in 2012 is adequate. The Bank's lending to small businesses is lower than the percentage of small businesses located within the Bank's AA. Small loans to small businesses represent 53% of all small loans made to businesses originated by Westfield Bank compared to 72% of the businesses in the AA. The distribution by size of the loans shows that 60% of loan originations are for \$100,000 or less.

The overall distribution of the Bank's small loans to businesses is adequate. Westfield Bank's performance is considered adequate given the significant market competition that the Bank faces from large nationwide financial institutions. The 2011 Peer Small Business Market Share Report indicates that the Bank competed with 56 lenders within its AA for small business loans. While Westfield Bank ranks 9th with an overall market share of 3.71%, the market is primarily dominated by large nationwide institutions. The top five financial institutions dominate the market with a combined market share of 59%.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the Bank's level of community development lending. This table includes all Community Development (CD) loans, including multifamily loans that also qualify as CD loans.

Community Development Lending is excellent and has a positive impact on the lending test. The Bank originated 12 loans totaling \$12.7 million during the evaluation period that qualified as CD loans. This represents 7.8% of Tier 1 capital. The CD loans made were used to finance organizations that provide services targeted towards LMI individuals or organizations that promote affordable housing for LMI individuals and families.

- A \$7 million participation loan for construction of a hospital to be located in a low-income area and will serve areas, which are predominantly comprised of LMI individuals and families.
- Renewal of a \$2 million line of credit to finance working capital needs for a non-profit organization that provides services to low-income children and adults with mental and developmental disabilities.
- A \$1.2 million loan to the above-mentioned organization for the purpose of purchasing and renovating a property, which would serve as the organization's new center. The new location would help expand the organization's mission of serving low-income individuals with developmental disabilities.
- A \$1.5 million loan to a non-profit organization to construct an addition at the organization's existing facility. The organization provides developmental and after-school programs and primarily serves LMI individuals and families.
- Two loans totaling \$743 thousand to provide financing to a non-profit organization whose mission is to provide safe and affordable housing for the homeless, low- and moderate-income individuals, and persons with special needs.
- Renewal of a \$700 thousand line of credit to finance working capital needs for a non-profit organization that provides behavioral health and rehabilitation services for children, adolescents, adults, and families. The majority of the individuals served by the organization are considered low- or moderate-income.
- Three loans totaling \$447 thousand to the above-mentioned organization that provides behavioral health and rehabilitation services for children, adolescents, adults and families. The purpose of the loans was to fund leasehold improvements at three of the organization's locations.
- A \$375 thousand participation loan to a local non-profit organization that provides fuel-assistance, youth programs, and shelter/housing programs for low- and moderate-income individuals.
- A \$125 thousand loan to finance the purchase and renovation costs for two properties; the tenants at the property are considered LMI and receive Section 8 housing assistance.

Product Innovation and Flexibility

Flexible loan programs have a positive impact on lending performance. The Bank offers standard loan products and uses some flexible/specialized loans practices in order to meet the credit needs of the assessment area. These programs promote first-time homebuyers, lending to LMI individuals, and small businesses. Westfield Bank offers Home Affordable Refinance Program (HARP), which assists borrowers in refinancing their existing mortgages at a lower rate. The HARP program allows borrowers to refinance up to a maximum combined loan-to-value of 150%. The Bank originated five HARP loans

during 2012. Westfield Bank also offers first-time homebuyer programs in conjunction with the Massachusetts Housing Finance Agency (MHFA). The Bank also participates in several other loan programs including Small Business Administration (SBA), USDA Rural Development loan programs, Small Business Banking Partnership, and Massachusetts Business Development Corporation's (MBDC) Capital Access Program. The Bank has originated 25 loans under the SBA program, 36 loans totaling \$2.6 million under the Small Business Banking Partnership program, and 15 loans totaling \$215 thousand under the MBDC Capital Access Program during the evaluation period.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Westfield Bank's performance under the Investment Test is rated "Outstanding." The Bank has an excellent level of qualified investments and donations in the AA. The Bank exhibits excellent responsiveness to credit and community economic development needs.

Refer to Table 14 in Appendix C for the facts and data used to evaluate the Bank's level of qualified investments.

Qualified investments and donations totaled \$7.4 million or 4.5% of Tier 1 capital. The Bank made one new investment in a Fannie Mae mortgage-backed security, which provided \$91 thousand in low- and moderate-income mortgages in Westfield Bank's AA and four prior period investments totaling \$6.9 million. The details for the Bank's community development investments are as follows:

- A \$3.3 million prior period investment in a CRA Qualified Investment Fund. The fund invests in CRA qualified projects, which primarily include investment in debt instruments supporting affordable housing and economic development for low- and moderate-income individuals and communities within the Bank's AA. The Bank made the initial \$2.6 million investment in 2002 and has since continued to reinvest their dividends and thus increasing the overall outstanding balance. The reinvested portion during the current evaluation period totals \$597 thousand, which includes the \$300 thousand addition that the Bank made in 2011.
- A \$1.7 million prior period investment in the Access Capital Community Investment Fund whose mission is to invest in debt securities that promote community development activities servicing low- and moderate-income individuals within the Bank's designated target AA. The Bank made the initial investment of \$1.5 million in 2001 and has since continued to reinvest their dividends. The reinvested portion during the evaluation period totaled \$220 thousand.
- A \$1.3 million prior period investment in Solomon Hess SBA Loan Fund whose mission is to promote economic development by supporting permanent job creation, retention, and/or improvement in low- or moderate-income geographies or in areas targeted for redevelopment by federal, state, or local governments. Westfield Bank targeted the counties of Hampden and Hampshire as their designated target area.
- A \$605 thousand prior period investment in Massachusetts Business Development Corporation (MBDC). MBDC collaborates with the SBA to invest in projects that promote economic development by creation and/or retention of permanent job in low- or moderate-income geographies and for low- and moderate-income individuals.

- A \$91 thousand investment in a FNMA mortgage-backed security (MBS) that provides affordable housing for LMI individuals in the Bank's AA. The FNMA MBS is comprised of one mortgage to one LMI borrower.

During the current evaluation period, Westfield Bank made 81 donations for a total of \$397 thousand to 30 different organizations that provide affordable housing and community services to low- and moderate-income individuals in the AA. While the actual level of donations made was higher, these donations met the definition of community development.

In evaluating the Bank's performance under the Investment Test, we considered CD needs in the AA. Community contacts indicate that small business loans, affordable housing, and workforce development are primary needs. The Bank's investments are responsive to these identified needs.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The Bank's performance under the Service Test is rated "Outstanding." Based on a full-scope review, Westfield Bank's performance in the Springfield, MA MSA AA is excellent.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the Bank's branch delivery system and branch openings and closings.

Accessibility to the Bank's delivery systems in the AA is excellent. Westfield Bank's delivery systems are readily accessible to geographies and individuals of different income levels throughout the AA. The Bank operates eleven full-service branches within their AA. In addition, the Bank operates one full-service stand-alone ATM and eleven stand-alone cash dispensing ATMs within their AA. Westfield Bank has two branches (18%) located in a low-income geography, which significantly exceeds the percentage of low-income population within the AA at 12%. The Bank also has three branches located in moderate-income geographies (27%), which significantly exceeds the percent of moderate-income population in the AA at 20%. Based on the 2010 U.S. Census the percent of low- and moderate-income population has increased, however; the percent of branches located in low- and moderate-income geographies remains higher than demographic standards. The remaining six branches are located in middle- or upper-income geographies within the AA. In addition, three of the Bank's stand-alone ATMs are located in a low-income geography and three ATMs are located in moderate-income geographies. The Bank did not close any branches during the evaluation period. Westfield Bank opened a new branch in Granby, CT on May 30, 2013, which was not included within the scope of this evaluation.

Hours and services are provided Monday through Friday at all branches with extended evening hours on Thursday and Friday. All branches, with the exception of two, offer Saturday hours. The Bank's East Main Street branch located in Westfield also offers Sunday hours. A large majority of the Bank's branches has drive-up facilities and there is a 24-hour ATM at each of the Bank's branch locations.

Each of the Bank's full-service branches offer a full range of traditional deposit and loan products. The Bank's deposit products include personal and business checking accounts that require no monthly fee. Westfield Bank is also involved in the Basic Banking for Massachusetts Program, which expands access

to Bank products and services and encourages those with modest income to establish banking relationships. The Bank's free checking account qualifies under the program and meets the reduced fee guidelines established by the Massachusetts Community and Banking Council. All branches also provide cashing of U.S. government checks. Westfield Bank offers a variety of loan products including first-time homebuyer lending programs. The Bank also participates in SBA lending programs, USDA Rural Development loan programs, Small Business Banking Partnership, and Massachusetts Business Development Corporation's Capital Access Program.

Other alternative delivery systems include telephone banking system from which automated account information is available. The Bank also provides 24- hour free online banking and bill pay services for both personal and business accounts. In addition, the Bank offers account access through their mobile banking and online account opening program. We could not place significant emphasis on the alternative delivery systems when drawing conclusions as the Bank could not provide data on the impact of these services to low- or moderate-income individuals.

Community Development Services

Westfield Bank is a leader in providing community development services. Bank management and employees have spent a significant number of hours providing financial and technical expertise to 16 different qualified community development organizations or programs. Highlights of CD services include:

- The President serves as a board member to a non-profit organization that provides developmental and after-school programs and primarily serves LMI children.
- A senior bank officer serves as the vice president at a local non-profit organization mentioned above that provides developmental and after-school programs for LMI children.
- A senior bank officer provides financial and technical services to three local non-profit organizations. The first organization's mission is to provide safe and affordable housing for the homeless, low- and moderate-income individuals and persons with special needs. The second organization provides developmental and after-school programs and primarily serves LMI children. The third organization's mission is to provide affordable housing opportunities, education, and support. The senior bank officer conducts first-time homebuyer seminars in collaboration with this non-profit organization.
- A senior bank officer serves on the board of a local non-profit organization whose mission is to revitalize distressed neighborhoods through sustainable homeownership, rehabilitation, and development of blighted properties.
- A senior bank officer serves on the foundation board of a local community college that provides scholarships for low-income students.
- A senior bank officer provides financial and technical services to two local non-profit organizations. The first organization provides food pantry services and primarily serves LMI individuals within the Bank's AA. The second organization's mission is to revitalize distressed neighborhoods through sustainable homeownership, rehabilitation, and development of blighted properties.

- A senior bank officer serves on the board of local non-profit organization that provides behavioral health and rehabilitation services for children, adolescents, adults, and families. The organization primarily serves LMI individuals.
- A senior bank officer serves on the local economic development council whose mission is to improve the region's economy and lifestyle through creation of quality jobs and enhanced public and private investment.
- A Bank employee serves on the board of a local non-profit organization, which provides services to elderly LMI population.
- A Bank employee serves on the board of a local non-profit organization that provides affordable and supported housing for mentally ill individuals.
- A senior bank officer serves on the board of a local non-profit organization that provides developmental and after-school programs and primarily serves LMI children.
- A senior bank officer serves on the board of a local non-profit organization that provides vocational training, employment opportunities, and employment for individuals with physical and/or developmental disabilities as well as those who are economically disadvantaged.
- A senior bank officer serves on the board as well as the finance committee of a local organization whose mission is to provide supported employment, education, and living services to LMI people with disabilities.
- A senior bank officer serves on the board of a local housing ministry dedicated to strengthening communities by empowering low-income families to change their lives and the lives of future generations through homeownership opportunities.
- A senior bank officer provides financial and technical expertise at two different local organizations. The first non-profit organization provides services to low-income children and adults with mental retardation, autism spectrum disorder, Down's syndrome, and other developmental disabilities. The second organization's mission is to strengthen the community by empowering low-income families to change their lives and the lives of future generations through homeownership opportunities.
- A Bank employee conducts banking classes at a local non-profit organization that provides developmental programs for children and primarily serves low-income individuals.
- A Bank employee serves on the executive committee of a local organization that provides financial literacy seminars for high school students in two towns, which are predominantly comprised of LMI population. Several Bank employees also assisted the organization by teaching different financial literacy topics.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term "full-scope") and those that received a less comprehensive review (designated by the term "limited-scope").

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/2010 to 12/31/2012) Investment and Service Tests and CD Loans: (04/05/2010 to 06/17/2013)	
Financial Institution	Products Reviewed	
Westfield Bank Westfield, Massachusetts	Home mortgage loans (includes home purchase, home improvement, and home mortgage refinance loans) reported on the HMDA Loan Application Register. Evaluation period for home mortgage loans was 01/01/2010 to 12/31/2012. Small loans to businesses as reported on the CRA Loan Register. Evaluation period for small loans to businesses was 01/01/2011 to 12/31/2012. Community development loans, investments, and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Springfield, MA MSA (Includes Hampden and portions of Hampshire Counties)	Full-Scope	See Market Profile in Appendix B

Appendix B: Market Profiles for Full-Scope Areas

Springfield, MA MSA

Demographic Information for Full-Scope Area: Springfield, MA MSA (Based on 2000 U.S. Census)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	94	18.09	19.15	42.55	20.21	0.00
Population by Geography	469,806	12.20	20.34	44.74	22.72	0.00
Owner-Occupied Housing by Geography	112,855	3.35	13.77	53.88	29.50	0.00
Businesses by Geography	36,830	14.88	18.54	40.76	25.82	0.00
Farms by Geography	774	1.94	8.66	52.20	37.21	0.00
Family Distribution by Income Level	120,354	23.32	17.46	21.67	37.55	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	49,080	20.16	26.81	40.88	12.16	0.00
Median Family Income	= \$51,150					
HUD Adjusted Median Family Income for 2011	= \$69,300					
Households Below the Poverty Level	= 14%					
				Median Housing Value**	= \$210,060	
				Unemployment Rate***	= 8.7%	

Source: 2000 U.S. Census and 2011 HUD updated MFI.

(**) Data from Zillow.com

(***) Data from U.S. Bureau of Labor Statistics Unemployment Rate for Hampden County as of March 31, 2013.

Westfield Bank's operations, within the Springfield, MA MSA AA, are in the counties of Hampden and Hampshire. The AA contains 11 branches, 12 stand-alone ATMs, and all of the Bank's deposits are attributed to this AA. Based on the 2000 U.S. Census data, the AA is comprised of 94 census tracts. There were 17 low-income (18%), 18 moderate-income (19%), 40 middle-income (43%), and 19 upper-income tracts (20%). The 2000 U.S. Census indicates that 41% of the families in the AA are considered low- or moderate-income. Bank management and our community contacts indicated that poverty and economic distress remain a key concern within the AA. Approximately 14% of the households in the AA are living below poverty level.

Demographic Information for Full-Scope Area: Springfield, MA MSA (Based on 2010 U.S. Census)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	105	20.00	23.81	31.43	24.76	0.00
Population by Geography	471,462	14.55	25.79	32.49	27.17	0.00
Owner-Occupied Housing by Geography	114,595	4.30	20.58	39.39	35.73	0.00
Businesses by Geography	34,812	18.69	21.60	29.94	29.77	0.00
Farms by Geography	751	4.13	11.85	37.42	46.60	0.00
Family Distribution by Income Level	116,941	26.25	16.78	19.19	37.78	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	50,317	23.42	33.34	28.32	14.92	0.00
Median Family Income	= \$65,772					
HUD Adjusted Median Family Income for 2012	= \$70,200					
Households Below the Poverty Level	= 16%					
				Median Housing Value**	= \$210,060	
				Unemployment Rate***	= 8.7%	

Source: 2010 U.S. Census and 2012 HUD updated MFI.

(**) Data from Zillow.com

(***) Data from U.S. Bureau of Labor Statistics Unemployment Rate for Hampden County as of March 31, 2013.

Based on the 2010 U.S. Census the AA is now comprised of 105 census tracts. There are 21 low-income (20%), 25 moderate-income (24%), 33 middle-income (31%), and 26 upper-income (25%) tracts. The 2010 U.S. Census also indicates that 43% of the families in the AA are considered low- or moderate-income. Approximately 16% of the families within the AA are living below the poverty level, which has increased in comparison to the statistics reported during the 2000 U.S. Census.

Moody's Economic Indicators report dated January 2013 shows that Springfield's economy will recover at a moderate pace. However, the economy will likely remain significantly weaker than the remainder of the state of Massachusetts. The report indicates that over the long term, competition from high performing nearby metropolitan areas and minimal population growth in the area will cause Springfield to underperform the state in terms of income and employment growth. Based on data from the U.S. Bureau of Labor Statistics, as of March 2013, the unemployment rate for the state of Massachusetts was 6.4% compared to the national rate of 7.6%. The unemployment rate for Hampden County, which comprises the majority of the Bank's AA, was 8.7%. The unemployment rate in Hampden County continues to trend above national and state levels adding to economic distress within the AA. The high unemployment rate in the AA is due to the lack of high-technology industries in the area. Due to the absence of high-technology employers, economic indicators reveal that there has been a departure of skilled workforce from the area. Major employers in the area include: Baystate Health, Big Y Supermarkets, University of Massachusetts, and MassMutual Financial Group. Bank management and community contacts identified workforce development as a need in the AA due to the labor shortage of skilled workers.

The housing market in the Springfield area remains generally affordable. Based on data from Zillow.com as of March 2013, the average median cost of housing for the towns and cities that comprise the Springfield, MA MSA AA is \$210 thousand. This is below the median housing cost in the state of

Massachusetts of \$288 thousand. While housing in the area remains generally affordable, economic indicators reveal that the weak labor market has a negative impact on the demand for housing.

Competition within the AA is strong. The Federal Deposit Insurance Corporation's Institutions Deposit Market Share Report as of June 30, 2012, indicates 24 institutions operate within the Springfield, MA MSA. Westfield Bank ranks eighth with deposit market share of 5.7%. The top two financial institutions, TD Bank, National Association and Bank of America, National Association, have a combined deposit market share of 25%. Additional competitors include: Peoples Bank; Florence Savings Bank; Easthampton Savings Bank; United Bank; and, Peoples United Bank. Nationwide institutions that provide further competition for mortgage and business loans include: American Express Bank FSB; GE Money Bank; JP Morgan Chase Bank, National Association; and, Wells Fargo Funding, Inc.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “Bank” include activities of any affiliates that the Bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the Bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume (1a. and 1b.)** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products (1a. and 1b.)** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans (2a. and 2b.)** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans (3a. and 3b.)** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans (4a. and 4b.)** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans (5a. and 5b.)** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses (6a. and 6b.)** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms (7a. and 7b.)** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans (8a. and 8b.)** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans (9a. and 9b.)** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans (10a. and 10b.)** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses (11a. and 11b.)** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms (12a. and 12b.)** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For

borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked, and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings (15a. and 15b.) - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Institution ID: WESTFIELD BANK

(10000717968) (Included)

Table 1a. Lending Volume 2010 & 2011

LENDING VOLUME DECEMBER 31, 2011		Geography: WESTFIELD 2010 & 2011						Evaluation Period: Home Mortgage: JANUARY 1, 2010 TO Small Loans to Businesses: JANUARY 1, 2011 to DECEMBER 31, 2012				
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Westfield AA 2011	100.00	514	66,806	345	53,090	0	0	12	12,700	859	119,896	100.00

* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 05, 2010 to June 17, 2013.

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID:
WESTFIELD BANK (10000717968) (Included)

Table 1b. Lending Volume 2012

LENDING VOLUME 2012		Geography: WESTFIELD 2012 AA REV						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,				
Assessment Area (2012):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Westfield 2012 AA	100.00	254	41,309	383	61,827	0	0	See Table 1a.	See Table 1a.	637	103,136	100.00

* Loan Data as of December 31, 2012. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 05, 2010 to June 17, 2013.

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: WESTFIELD BANK (10000717968)
(Included)

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE DECEMBER 31, 2011		Geography: WESTFIELD 2010 & 2011								Evaluation Period: JANUARY 1, 2010 TO				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Westfield AA 2011	105	100.00	3.35	0.00	13.77	12.38	53.38	45.71	29.50	41.90	2.93	13.79	53.13	30.15

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: WESTFIELD BANK (10000717968) (Included)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT DECEMBER 31, 2011		Geography: WESTFIELD 2010 & 2011								Evaluation Period: JANUARY 1, 2010 TO				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Westfield AA 2011	87	100.00	3.35	0.00	13.77	3.45	53.38	55.17	29.50	41.38	2.81	11.66	54.00	31.53

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: WESTFIELD BANK (10000717968)
(Included)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2011			Geography: WESTFIELD 2010 & 2011								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Westfield AA 2011	316	100.00	3.35	0.32	13.77	7.59	53.38	50.95	29.50	41.14	1.21	8.00	48.18	42.62

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: WESTFIELD BANK (10000717968) (Included)

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY DECEMBER 31, 2011		Geography: WESTFIELD 2010 & 2011						Evaluation Period: JANUARY 1, 2010 TO						
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Westfield AA 2011	6	100.00	36.03	0.00	25.71	33.33	30.85	50.00	7.41	16.67	20.83	43.75	22.92	12.50

* Based on 2011 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: WESTFIELD BANK (10000717968)
(Included)

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2011		Geography: WESTFIELD 2011								Evaluation Period: JANUARY 1, 2011 TO				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Westfield AA 2011	345	100.00	14.88	11.59	18.54	21.16	40.76	35.65	25.82	31.59	10.05	13.23	45.39	31.34

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Institution ID: WESTFIELD BANK (10000717968)
(Included)

Table 7a. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2011		Geography: WESTFIELD 2010 & 2011								Evaluation Period: JANUARY 1, 2010 TO				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Westfield AA 2011	0	0.00	1.94	0.00	8.66	0.00	52.20	0.00	37.21	0.00	0.00	4.00	56.00	40.00

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 2b. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE DECEMBER 31, 2012		Geography: WESTFIELD 2012 AA						Evaluation Period: JANUARY 1, 2012 TO						
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Westfield 2012 AA	50	100.00	4.30	0.00	20.58	4.00	39.39	46.00	35.73	50.00	0.00	0.00	0.00	0.00

* Based on

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: InstitID

Table 3b. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT DECEMBER 31, 2012		Geography: WESTFIELD 2012 AA						Evaluation Period: JANUARY 1, 2012 TO						
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income ¹			
	#	% of Total ^{**}	% Owner Occ ^{***} Units	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Westfield 2012 AA	53	100.00	4.30	1.89	20.58	5.66	39.39	41.51	35.73	50.94	0.00	0.00	0.00	0.00

¹ Based on

^{**} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

^{****} Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4b. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2012			Geography: WESTFIELD 2012 AA								Evaluation Period: JANUARY 1, 2012 TO			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Westfield 2012 AA	147	100.00	4.30	0.00	20.58	10.88	39.39	43.54	35.73	45.58	0.00	0.00	0.00	0.00

* Based on

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5b. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY 31, 2012		Geography: WESTFIELD 2012 AA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER						
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Westfield 2012 AA	4	100.00	40.86	0.00	24.07	25.00	27.37	75.00	7.70	0.00	0.00	0.00	0.00	0.00

* Based on

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: InstitID

Table 6b. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2012		Geography: WESTFIELD AA 2012								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Westfield 2012 AA	383	100.00	18.69	12.01	21.60	22.72	29.94	43.86	29.77	21.41	0.00	0.00	0.00	0.00

* Based on

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2012).

Table 7b. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2012		Geography: WESTFIELD AA 2012						Evaluation Period: JANUARY 1, 2012 TO						
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Westfield 2012 AA	0	0.00	4.13	0.00	11.85	0.00	37.42	0.00	46.60	0.00	0.00	0.00	0.00	0.00

* Based on

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2012).

Institution ID: WESTFIELD BANK (10000717968)
(Included)

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE DECEMBER 31, 2011		Geography: WESTFIELD 2010 & 2011						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Westfield AA 2011	105	100.00	23.32	0.00	17.46	12.50	21.67	25.00	37.55	62.50	12.05	31.85	27.90	28.20

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 92.4% of loans originated and purchased by BANK.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: WESTFIELD BANK (10000717968)
(Included)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT DECEMBER 31, 2011		Geography: WESTFIELD 2010 & 2011								Evaluation Period: JANUARY 1, 2010 TO				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families**	% BANK Loans****	% Families ₂	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Westfield AA 2011	87	100.00	23.32	10.13	17.46	27.85	21.67	30.38	37.55	31.65	10.35	22.50	29.92	37.23

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 9.2% of loans originated and purchased by BANK.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: WESTFIELD BANK (10000717968)
(Included)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2011		Geography: WESTFIELD 2010 & 2011								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Westfield AA 2011	316	100.00	23.32	14.52	17.46	25.81	21.67	22.58	37.55	37.10	6.50	19.64	27.52	46.35

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 80.4% of loans originated and purchased by BANK.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: WESTFIELD BANK (10000717968)
(Included)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2011			Geography: WESTFIELD 2010 & 2011				Evaluation Period: JANUARY 1, 2011 TO			
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Westfield AA 2011	345	100.00	67.75	49.57	64.35	17.68	17.97	9,606	3,533	

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Institution ID: WESTFIELD BANK (10000717968)
(Included)

Table 12a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2011		Geography: WESTFIELD 2010 & 2011				Evaluation Period: JANUARY 1, 2010 TO			
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Westfield AA 2011	0	0.00	97.16	0.00	0.00	0.00	0.00	26	14

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Institution ID: InstitID

Table 8b. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 31, 2012		Geography: WESTFIELD 2012 AA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁴	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Westfield 2012 AA	50	100.00	26.25	0.00	16.78	0.00	19.19	0.00	37.78	0.00	0.00	0.00	0.00	0.00

* Based on

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 100.0% of loans originated and purchased by BANK.

⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9b. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT DECEMBER 31, 2012		Geography: WESTFIELD 2012 AA						Evaluation Period: JANUARY 1, 2012 TO						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families**	% BANK Loans****	% Families ⁵	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Westfield 2012 AA	53	100.00	26.25	3.70	16.78	14.81	19.19	59.26	37.78	22.22	0.00	0.00	0.00	0.00

* Based on

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 49.1% of loans originated and purchased by BANK.

⁵ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10b. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2012		Geography: WESTFIELD 2012 AA						Evaluation Period: JANUARY 1, 2012 TO						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data			
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁶	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Westfield 2012 AA	147	100.00	26.25	5.56	16.78	44.44	19.19	22.22	37.78	27.78	0.00	0.00	0.00	0.00

* Based on

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 87.8% of loans originated and purchased by BANK.

⁶ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11b. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2012		Geography: WESTFIELD AA 2012			Evaluation Period: JANUARY 1, 2012 TO				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Westfield 2012 AA	383	100.00	71.89	53.00	60.05	21.41	18.54	0	0

* Based on

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2012).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Institution ID: InstitID

Table 12b. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2012		Geography: WESTFIELD AA 2012			Evaluation Period: JANUARY 1, 2012 TO				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data	
	#	% of Total**	% of Farms****	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Westfield 2012 AA	0	0.00	97.34	0.00	0.00	0.00	0.00	0	0

* Based on

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2012).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Westfield Bank AA				Evaluation Period: April 5, 2010 to June 17, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Westfield AA 2011	4	6,900	82	487	86	7,400	100.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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(Included)

Table 15a. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM DECEMBER 31, 2011				Geography: WESTFIELD 2010 & 2011				Evaluation Period: JANUARY 1, 2010 TO									
Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Westfield AA 2011	100.00	11	100.00	18.00	27.00	37.00	18.00	12	12.00	25.00	25.00	0	50.00	12.20	20.34	44.74	22.72

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(Included)

Table 15b. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM				Geography: WESTFIELD 2012				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012									
Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Westfield AA 2012	100.00	11	100.00	18.00	27.00	37.00	18.00	12	12.00	25.00	25.00	0	50.00	14.55	25.79	32.49	27.17

