

BNY MELLON

Attached please find the response of on behalf of The Bank of New York Mellon (the "Bank") to the City of Philadelphia's ("City") Annual Request for Information in connection with Authorized Depository Compliance Reporting. Although the Bank is the respondent, we have also included certain information relating to our affiliate BNY Mellon, N.A. which houses BNY Mellon's Wealth Management Division, since this entity has a physical presence in the City. Where relevant we have also provided information relating to our parent holding company, Bank of New York Mellon Corporation (the "Corporation"), and other affiliates to the extent they conduct business with the City.

In reviewing our response, please note that:

- 1) Neither the Bank nor any of its affiliates is a consumer lending institution. The Bank does not maintain retail or branch banking and does not make consumer loans.
- 2) Institutional banking business activities with the City are conducted by various subsidiaries of the Corporation including, in addition to the Bank, The Bank of New York Mellon Trust Company, N.A., BNY Mellon Capital Markets LLC and various affiliated entities making up the Corporation's Investment Management Division. We have included information regarding the business of such entities with the City in addition to requested information about the Bank as we believe you may find this useful.

As an institutional banking provider with no retail and no consumer lending activities, there are several requests within the RFI which are not applicable to us, such as submitting a "long Term Strategic Plan" around disparities in lending. Given our business activities in the City, the Treasurer's 2017 Annual Study did not indicate disparities with respect to the Bank and our business does not include or contemplate programs, lending, or branching activities in the City.

We would note that The Bank of New York Mellon Corporation is a leader in the advancement of diversity in the workplace and marketplace, and was recognized in 2017 for its commitments and was honored with the "Big Apple" award. Further information is located at:

<https://www.bnymellon.com/us/en/who-we-are/diversty-inclusion/index.jsp>

and

<https://www.bnymellon.com/us/en/who-we-are/csr/index.jsp>

The Bank of New York Mellon has a Fair Lending Policy and our policies are designed to comply with all federal, state and local requirements

D. COMMUNITY REINVESTMENT GOALS

Financial institution's annual Community Reinvestment Goals should include information on the number of small business loans, home mortgages, home improvement loans, and community development investments to be made within low and moderate-income neighborhoods within the City of Philadelphia.

1. Provide an overview of the financial institution's annual Community Reinvestment Goals.

The Bank of New York Mellon does not promulgate city-specific Community Reinvestment Goals for this area.

2. Provide the number of small business loans, home mortgages, home improvement loans, and community development investments to be made within low and moderate-income neighborhoods within the City of Philadelphia.

Type	2018 Goals	2018 Results	2019 Goals
Small Business Loans	n/a	n/a	n/a
Home Mortgages	n/a	n/a	n/a
Home Improvement Loans	n/a	n/a	n/a
Community Development Investments	n/a	n/a	n/a

If applicable, explain why previous year results did not meet the stated goal.

n/a

- Provide the actual number and dollar amounts of small business loans, residential mortgages, home improvement loans, community development investments, consumer loans, and other commercial loans made in neighborhoods within the City of Philadelphia.

Calendar Year 2018

Number of Loans by Income

Type	Low	Mod	Mid	Upp	Total
Residential Mortgage	N/A	N/A	N/A	N/A	N/A
Home Improvement	N/A	N/A	N/A	N/A	N/A
Small Business Loans	0	0	0	0	0
Community Development	0	0	0	0	0
Consumer Loans	N/A	N/A	N/A	N/A	N/A
Other Commercial Loans	0	2	0	12	14
Total:	0	2	0	12	14
How many business loans were originated?	0	2	0	12	14

Value of Loans (\$) by Income

Type	Low	Mod	Mid	Upp	Total
Residential Mortgage	N/A	N/A	N/A	N/A	N/A
Home Improvement	N/A	N/A	N/A	N/A	N/A
Small Business Loans	0	0	0	0	0
Community Development	0	0	0	0	0
Consumer Loans	N/A	N/A	N/A	N/A	N/A

Other Commercial Loans	0	\$70,000	0	\$858,994	\$928,994
Total:	0	\$70,000	0	\$858,994	\$928,994
% of Consumer Loans made through Credit Cards	N/A	N/A	N/A	N/A	N/A

- 4. Provide information on other types of community development investments made in neighborhoods within the City of Philadelphia (for example: Grants, Education, Public or related Commercial Development).**

n/a

- 5. Briefly describe any lending outreach programs geared toward minorities, low-income persons, immigrants, or women. This description should include the targeted community, the type of product (i.e. commercial, home lending, unsecured consumer) and any program outcomes.**

n/a

APPENDIX I

https://www.bnymellon.com/_global-assets/pdf/investor-relations/annual-report-2018.pdf

APPENDIX II- Long Term Strategic Plan

Not applicable, as The Bank of New York Mellon engages in no retail banking or consumer lending in the City of Philadelphia.