C. 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. Do not submit* metropolitan statistical *area (MSA) data that includes areas outside of the City of Philadelphia.

1. **Provide an overview of the financial institution's annual Community Reinvestment Goals and confirm most recent CRA rating.**

The Bank's CRA goals are:

Small Business/Small Farm Loans (CRA) – 100% of peer performance
Home Mortgage (HMDA) – 100% of peer performance
Community Development Loans – 6% of Capital

CRA Rating: OUTSTANDING – as of last exam in 2024

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 as reported to HMDA in 2025.**

Type	2024 Results	2025 Results	2026 Goals
Small Business Loans	14	23	
Home Mortgages	48	67	
Home Improvement Loans	27	22	
Community Development Loans	4 (2 in low and 2 in upper)	5 (5 in upper)	
Other (Please define if include)			

If applicable, please provide context for a decline in actual results from 2024 to 2025 and/or a decline from 2025 results to 2026 goals.

Home Improvement Loans: A marginal decrease in home improvement loans is noted for 2025, driven largely by the ultra-competitive mortgage market within Philadelphia, higher cost of living due to inflation, and rising interest rates.

3. **Provide the total number (count) and dollar amounts of residential mortgages, home improvement loans, small business loans and community development investments made in the City of Philadelphia as reported to HMDA in 2024.**

Calendar Year 2025

Number of Loans by Income

Type	Low	Mod	Mid	Upper	Total
Residential Mortgage	15	52	40	22	129
Home Improvement	4	18	17	9	50
Small Business Loans	8	15	6	18	50
Community Development	0	0	0	5	5
Other (please define if include)					
Total:	27	85	63	54	234

Value of Loans ($) by Income

Type	Low	Mod	Mid	Upper	Total
Residential Mortgage	1,872	7,421	6,143	10,473	25,909
Home Improvement	160	953	1,080	514	2,758
Small Business Loans	2,640	720	180	4,284	7,894
Community Development	0	0	0	3,200	3,200
Other (please define if include)					
Total:	4,672	9,094	7,403	18,471	39,761

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).**

Fulton provided a $1,000,000 investment donation to the Small Business Investment Company (SIBC), a limited partner venture capital fund named Innovative Capital Growth Fund. The fund enables historically underserved entrepreneurs to participate in venture capital funding.

Split evenly between priority community partners, Baltimore Community Lending & Philadelphia's Enterprise Center, Fulton provided $500K in Early-Stage Micro-Grant Financing, allowing aspiring entrepreneurs the opportunity to immediately open their business by providing $10,000 micro-grants to pitch contestant winners

Established an ATM Network Share Agreement with local CDFI, Finanta (formerly Community First fund) to allow their clients to utilize any Fulton Bank ATMs with zero ATM fees or surcharges, substantially expanding banking access to a large volume of LMI residents within Philadelphia City and County

In 2024, Fulton Bank and Operation Hope were recognized by the Philadelphia Business Journal with its Partners in Philanthropy Award for delivery of financial literacy programming in the local community

Fulton Bank was recognized by the African American Chamber of Commerce of New Jersey (AACCNJ) with its Corporate Change Maker Award (2024)
Fulton Bank is committed to being a true, long-term neighborhood partner in the City of Philadelphia as evidenced by the number of new financial centers/ATMs, loan production offices, & the number of employees both working & living within the city limits. In addition, our ability to provide financial support to local organizations, via the Fulton Forward Foundation, presents multiple opportunities in the future to support important worthy initiatives & life changing programs in the city of Philadelphia.

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

Fulton Bank is well positioned to further advance its mission of "changing lives for the better." A top priority over the next three-year exam period is to increase home mortgage originations to Minorities and In Majority-Minority communities. Fulton's Fair & Responsible Banking committee provides consistent guidance and oversight to all business lines utilizing Special Purpose Credit Programs (SPCP), including offering flexible and innovative products, generous down-payment programs, and loan subsidies as vehicles to help increase minority originations. A second priority includes the enhancement and improvement of community development documentation processes to help promote a greater volume of CRA-qualified activities. To that effort, Fulton hired its first Fair & Responsible Banking Operations Specialists (August 2024) whose primary focus is to develop and implement CRA and Community Development qualified processes/procedures for loans, investments, contributions & donations, as well as all volunteerism efforts across the Bank.

Fulton Bank recognizes the needs in our communities, which include critical issues like affordable housing, homeownership barriers, and the lack of decent, livable wage jobs for large numbers of our citizenry. The Fair and Responsible Banking Committee, in collaboration with business line leadership, remains committed to addressing these issues in an actionable and strategic manner.

6. **Disparities in Lending: Attach a long-term strategic plan to address disparities in the Bank's or Financial Institution's lending and investment activities. Please include reference to any products or services offered to address such disparities that may be indicated in the City's most recent annual lending study.**

Label this document "Appendix II – Long-Term Strategic Plan." If disparities are not indicated in the study, then a strategic plan on programs, lending, and branching patterns should be submitted. Label this document "Appendix II – Long-Term Strategic Plan".

All depositories are required to respond per Chapter 19-200 as referenced:

"*Each depository shall also provide the City with a long-term strategic plan to address disparities in its lending and investment activities. The strategic plan shall address how the depository will match or exceed peer lending performance in targeting capital access and credit needs disclosed in disparity studies commissioned by the City."*

Appendix II: Long-term strategic plan *(Section C)*

Fulton continues to employ a committed and resolute team of CRA-MLOs, whose primary business development focus is serving underserved, underbanked communities, specifically, increasing lending IN LMI Geographies/MM Geographies, and markets across the Fulton footprint. We continue to use alternative delivery channels such as Fulton's Customer Care Center, Third Party Originations partners (TPO launched 2Q-2024), and new, improved online and mobile banking platforms to reach markets where Fulton has less of a physical in-market presence.

In terms of additional Financial Centers added to the franchise since the last iteration of this Strategic Plan, Fulton now has **15 Financial Centers in the Philadelphia** (includes Philadelphia, Delaware, and Montgomery counties) market as a result of its acquisition of Republic First Bancorp, Inc in November 2024. Additionally, the bank now has **18 Financial Center locations in the Maryland market**, including **6 Financial Centers in Baltimore City/County**.

- **Merger and Acquisitions** – In addition to organic growth, Fulton's goal is to be the bank of choice for potential merger partners: A credible acquirer that can effectively identify and evaluate possible acquisition opportunities and then complete and integrate acquisitions to successfully enhance shareholder value and provide additional customer convenience/service opportunities. Fulton's M&A Strategy is focused on whole bank or business acquisitions that are complementary to existing businesses and customers; are within our five-state footprint; and are within our current risk appetite. Growth through M&A is viewed as complementary to organic growth, with each opportunity evaluated against expected short-and long-term value creation for our customers, communities, and shareholders.

- **Priority Partnership: Operation Hope** – Fulton's ten (10) year relationship with the nationally recognized financial dignity & financial coaching organization continues to return strong dividends across the footprint. **The Bank now employs a total of eight (8) Financial Wellness Coaches, with five (5) serving in the Affordable Housing / Homeownership role while the remaining three (3) serve as Small Business/Entrepreneurial coaches in Philadelphia, Baltimore, and VA Beach markets**. This Plan also includes a commitment to add two (2) additional coaches in strategic locations (TBD) within the next three years. All of Fulton's Financial Wellness Coaches offer free financial education and literacy services, including Credit Counseling, Small Business Technical Assistance, Disaster Recovery Counseling, Follow-up Coaching Sessions, Foreclosure Counseling, First-Time Home Buyer Workshops, Credit & Money Management workshops, and Entrepreneurial Training programs.

  Our coaches have consistently served over 2000+ clients per year and raised average credit scores by a minimum of 16 points. Additionally, over the past two (2) years, the percentage of clients who possess at least 3+months of Savings for Financial Emergencies has hovered between 19-25%, which demonstrates dramatic improvement over the first year of tracking this important life-altering metric (0.27%). Given the success of this partnership, Fulton intends to increase its commitment by hiring an additional two (2) coaches by year-end 2027, with one of those coaches targeted for placement in one of our rural, under-performing markets and one in our urban under-performing markets.

- **Marketing** - The Bank will deploy general brand awareness efforts in key markets to also include prioritized target LMI/MM markets identified as underperforming by Compliance and/or Bank senior leadership teams. Additionally, product-specific advertising campaigns for consumer lending (mortgage and home equity) will be executed using a variety of tactics, which may include traditional mass marketing, direct marketing (mail, email, SMS, outbound calling), social media and digital/online marketing, which will continue to build upon awareness efforts delivered in these markets.

- **New Products/Services** – Fulton had demonstrated superior commitment as it relates to the development of new products/services that benefit the LMI and underserved communities. Some of the new, innovative products and services include:

    - **Closing Cost Assistance Program** or **CCAP Secured 2.0** – Fulton introduced the new **CCAP-Secured program** in 2Q-2024. Through this program, eligible borrowers may receive up to **$5,000 for closing costs or other fees** for the purchase of a single-family house, townhouse, condominium or two-unit building. No interest/No payment lien – No Lien position restriction. The CCAP 2.0 program may NOT be used on Government and State Bonds Loans. (Note: Since inception, our CCAP program has been in great demand and has wildly exceeded our initial funding projections. **Fulton's cumulative CCAP grant volume (2016-2025) surpassed the $10.0M** level as of 3Q-2025.)

    - **RRR – Restore, Repair, Renew (RRR)** is an initiative of the City of Philadelphia to help area homeowners access low-interest loans to invest in their currently owned property. Fulton is a partner participating in the program offering **10-year, 3% fixed Annual Percentage rate loans that range from $2,500 to $50,000** to eligible homeowners. Restore, Repair, Renew loans can fund a range of home repairs that focus on health, safety, weatherization, accessibility, and quality of life. The goal of the program is to help Philadelphians improve their homes and strengthen their communities.

    - **Finanta** (formerly Community 1st Fund) **ATM Share Agreement** – Finanta is a nonprofit loan fund with a mission to increase income mobility and access to capital for low-income people in distressed neighborhoods. After several months of negotiations, Fulton Bank has entered into an ATM Share Network agreement with Finanta, allowing their Credit Union members to access their personal funds via the Fulton ATM network without any surcharges, which further increases the access LMI individuals have to their funds. Fulton will continue to explore other "service agreements" with local CDFIs across the footprint.

- **TPO (3rd Party Originations)** - In 2024, FMC launched a **Third-Party Origination (TPO) channel**. This TPO channel seeks mortgage brokers/bankers that are looking for outlets for their mortgages/clients. The channel launched in Q2-2024, and by year-end 2024, signed more than fifty partners in our lending footprint. As of the end of August 2025, Fulton Mortgage Company (FMC) TPO has seventy-six approved brokers. Working with mortgage brokers is handled primarily by the TPO Account Executive (AE). FMC's first AE was hired in Q2-2024 and has been solely responsible for outreach to the broker community. Potential hiring of

additional AEs is dependent upon existing business needs and economic conditions. Expansion to a non-delegated channel is underway.

FMC's TPO channel is currently operating as wholesale entity whereby a mortgage is originated by a mortgage broker/banker, but then registered with FMC, underwritten and approved by FMC. This channel enables the Bank to expand access to residential mortgage credit for our communities by leveraging TPO brokers with deep market presence, established referral networks, and expertise in affordable and specialized mortgage products. **Key in this agreement is the understanding that loans will close in the name of Fulton Bank, NA. Thus, loans that meet CRA requirements and help achieve Fair Lending objectives (both broker and non-delegated) and are included in Fulton Bank's CRA originations since the Bank retains the ability to make the credit decision. As such, the TPO channel is and will continue to supplement originations and help close any remaining performance gaps versus peers.** FMC has developed some key areas where we can see deeper penetration with the broker/banker community in CRA loans and have identified the following tactics for execution in the coming months/years:

- FMC TPO AEs to be trained in all areas of Affordable Lending by the Director of Sales and Marketing and the Affordable Lending Manager. This is ongoing and will continue as changes take place.
- Training to be provided to approved brokers on "FRB" products and process. This training will be led by TPO AE's and Affordable Lending Manger will assist as needed.
- Affordable Lending Manager to work with FMC TPO AEs in review of the "Gap Report" to determine areas of focus for "FRB" lending.
- Deployment of research technology to FMC TPO AEs (currently Ingenious) allow AEs to be strategic about outreach to brokers.
- FMC Secondary Marketing Department to expand the product offerings commonly referred to as "Affordable Lending" to serve the broker community. Examples of this include but not limited to the following:
  - Freddie Mac
  - Freddie Mac Home Possible
  - Home Ready Mortgage Plus (Fulton Bank Variance)
- Consideration for the establishment of the CCAP Secured broker program. Allowing mortgage brokers/bankers to participate in Fulton Bank's CCAP Secured program under predetermined criteria. This would serve as a reward to brokers who have developed a deep relationship with FMC.
- Leveraging third party investors that support CRA lending that brokers/bankers normally do not have access to. This includes but is not limited to:
  - Fannie Mae (and eventually Freddie Mac's) VLIP program
  - Grants/down payment assistance programs offered by FHLB
- Creation of a secondary pricing strategy to identify underperforming AA's and provide discounted pricing for affordable lending products in said areas.

- **NEW Knowledge Management / Financial Literacy resources** – Knowledge management is the process of creating, organizing, capturing, sharing, and using an organization's collective knowledge to improve efficiency, decision-making, and innovation. This process was adopted by Fulton Bank in recent years & our internal communications tool, The HUB, is now home to new & elevated financial literacy resources available to all employees when volunteering in our local communities. The Bank has partnered with several esteemed organizations, including the American Bankers Association, The Federal Deposit Insurance Corporation, as well as the

Consumer Financial Protection Bureau to promote financial literacy and educate customers. It is though these collaborations we aim to empower individuals with the knowledge and tools they need to make informed financial decisions. Additionally, financial literacy materials are available in both English and Spanish.

- **Other NEW PRODUCT/SERVICE STRATEGIES** pending or under consideration:

  - ✓ Market-Specific Rate Pricing – for under-performing assessment areas in Virginia & New Jersey
  - ✓ MM Qualifier for HAP – No Income limit for the 97% NO MU product IN MM Tracts
  - ✓ Credit - "What If" simulator (pending)
  - ✓ Electronic Rental Payment – Verification/Tradeline must be traceable i.e. - must be non-cash or Venmo (pending)
  - ✓ Electronic Asset Verification (pending)
  - ✓ Fannie & Freddie – Income Calculator tools (pending)
  - ✓ CCAP Secured Enhancements
    - Applicant income qualifier instead of HH income qualifier
    - Majority-Minority Qualifier – utilizing special purpose credit programs (SPCP)
    - $$$ amount category tiering based on market need/performance
  - ✓ Retail Product – CRA/FL HELOC w/lower rate – similar to RRR, could be major boost to under-performing Aas

- **Developing 3rd Party Relationships & Future Focus**

The availability of human and capital resources can place a constraint on the ability to materially accelerate CRA and Fair Lending production. Therefore, over the term of this plan, Fulton will continue to partner with and evaluate the benefits the following organizations provide for changing lives for the better:

- Further placement of **Operation Hope** Financial Wellness Coaches (FWCs) will be strongly considered, based on assessments of placement location (including small business centers of excellence and rural communities), number of customers counseled, improvements to credit scores, mortgage referrals, and the community outreach conducted on behalf of Fulton by Operation Hope.

- Bonzai delivers online financial literacy programs and is being utilized by Fulton's Workplace Banking Department as part of their external program offerings to local companies and their employees. The online financial literacy programs are also available to Fulton employees and their immediate family members as an employee benefit. Fulton is performing costs/benefits analysis to help determine how this online digital technology program can be tailored for all external customers of Fulton Bank.

- Partner Housing Agencies, including non-profit community organizations, will continue to be critical to enable Fulton Mortgage Company to be a preferred/participating mortgage lender for their LMI/MM/First-time borrower clients. Focus will also include pairing mortgage products with localized grant money from the housing authorities.

The successful initiatives outlined in this plan demonstrate the significant investment of time, talent, resources and coordinated execution that has driven Fulton's Fair and Responsible Banking achievements over the past five years. Despite these accomplishments, opportunities remain to further enhance our impact. Management will prioritize these areas and collaborate with local market teams to design strategic action plans that strengthen performance and deliver measurable, long-term results.