

Barclays Bank Delaware (BBDE) Community Reinvestment Act Strategic Plan 2025-2027

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FOREWORD

Barclays Bank Delaware (“BBDE”) is a non-member state bank that operates the Barclays US Consumer Bank (“USCB”), which provides credit card, lending, deposit, and payment solutions to personal and small business customers. BBDE is a wholly owned subsidiary of Barclays Group US (“BGUS”), which is a direct wholly owned subsidiary of the US Intermediate Holding Company (Barclays US LLC), with the ultimate parent being Barclays PLC (“BPLC”), a public limited company incorporated in the United Kingdom.

The following is BBDE’s Community Reinvestment Act (CRA) Plan (“Plan”) for January 1, 2025, through December 31, 2027, including an overview of its CRA activities.

In its most recent CRA exam, BBDE achieved an “Outstanding” Rating. It was examined as a “Strategic Plan” institution. In prior FDIC CRA exams, BBDE achieved either “Outstanding” or “Satisfactory” ratings. BBDE is committed to achieving, at a minimum, “Satisfactory” ratings and aspires for continued “Outstanding” ratings. This Plan includes two levels of goals: one for “Satisfactory” and one for “Outstanding”.

1. BACKGROUND

1.1 BBDE's Background

BBDE is headquartered in Wilmington, Delaware. In May 2001, BBDE (at the time known as Juniper Bank) was chartered by the FDIC and the Bank Commissioner for the State of Delaware as a Delaware State Chartered Non-Member Bank. BBDE was acquired by BPLC on December 1, 2004. BBDE, through the US Consumer Bank, creates customized, co-branded credit card programs for travel, entertainment, retail and affinity institutions, private label credit cards and offers its own branded online savings accounts, certificates of deposit, and installment loans within the US.

BBDE's credit card receivables are funded through a mix of deposit accounts issued directly to consumers (both savings accounts and CDs), securitizations, brokered certificates of deposit and employee benefit accounts. BBDE does not have branches or local retail offices, does not operate a traditional bank lobby, and does not maintain cash on its premises. BBDE's interactions with customers are primarily over the phone, via mail, e-mail, or some other form of electronic communication.

BBDE had 1,862 employees as of Dec 2023 at its offices in Wilmington, Delaware. BBDE's Board of Directors, officers and staff members have substantial levels of financial services industry experience, particularly in credit cards. BBDE has a strong commitment to fair lending, supported by a Fair Lending Compliance Management System (CMS) which consists of Operational Guidance, procedures; employee training data analytics, and a Board appointed Fair Lending Officer. BBDE Compliance reviews the lending practices on an ongoing basis and conducts fair lending risk assessments and testing.

Barclays PLC has consistently affirmed its commitment to BBDE by injecting capital to grow BBDE's customer and asset base, and accordingly its employee base in Delaware.

2023 ending credit card receivables were \$32.156bn (gross of impairment allowance) – the balance net of impairment was \$29.521bn. Full year 2023 PBT was \$275m.

Barclays Bank Delaware, a Delaware chartered bank, is subject to supervision and regulation by the Delaware Office of the State Bank Commissioner, the Federal Deposit Insurance Corporation (FDIC), the Federal Reserve Bank of New York and the Consumer Financial Protection Bureau (CFPB). The deposits of Barclays Bank Delaware are insured by the FDIC.

1.2 BBDE's CRA Governance

BBDE has a board of directors ("BBDE Board") comprised of executive directors and independent non-executive directors from outside Barclays PLC and its subsidiaries (Barclays Group). The BBDE Board provides oversight of BBDE and its subsidiaries for all matters with significant strategic, financial, or reputational implications or consequences as it pertains to risk management. The BBDE Board has the overall responsibility for the formation, approval and monitoring of BBDE's CRA activity. In addition, BBDE management has established governance of CRA activity via the BBDE CRA Forum, which includes the BBDE Chief Risk Officer, BBDE Chief Financial Officer, the Director of Citizenship/ Community Relations, the CRA Officer and other relevant subject matter experts. The Forum is responsible for ensuring that BBDE CRA activity is conducted in line with both the approved BBDE CRA Strategic Plan and with the Barclays risk management framework, as well as monitoring and reviewing CRA investments and regulatory compliance.

1.3 BBDE's CRA Exams

BBDE's most recent CRA Exam completed in March 2023 resulted in a "Outstanding" rating. Prior to that, BBDE's CRA Exams took place in May 2016 ("Outstanding" rating), June 2013 ("Satisfactory" rating), November 2010 ("Satisfactory" rating) and July 2006 ("Satisfactory" rating).

1.4 CRA Performance 2017 – Present

Loans and Investment

As of Q4 2023, BBDE has an outstanding loan to NCALL; a Delaware based CDFI for \$2m. BBDE also issued a \$750,000 line of credit to True Access Capital formerly First State Community Loan Fund. BBDE's total direct loan portfolio has an outstanding balance of \$3.3m. BBDE has an aggregate investment of \$6.9m in loan funds with Cinnaire. BBDE also has investments in LIHTC opportunities (\$11.3m) and investment into an SBA Fund (\$17m). BBDE also purchased over \$189m of Ginnie Mae, Freddie Mac and Fannie Mae backed mortgage securities since 2017 (CRA-4)

Employee Involvement and Charitable Contributions

BBDE's community/citizenship activities allow us to have a meaningful impact on the communities in which we live and work. We focus on the areas that best use our expertise as a financial services organization, with Barclays colleagues playing an active role in helping to support our communities.

Central to our citizenship/community strategy is Barclays' commitment to building a stronger, more inclusive economy that is better for everyone. Working together for a better financial future, Barclays is enabling people to develop the skills and confidence they need to succeed and helping businesses to grow and create jobs. Through our LifeSkills program, we are helping to build a vibrant, skilled workforce, which ensures that businesses can thrive and that individuals, along with their families and wider communities, can achieve financial independence and security. Working with employers, those already in work, and those looking for work we're helping to build skills and break down barriers to work, to enable people to succeed now and in the future. We work together with experienced charity partners, employability experts and businesses that are hiring to develop meaningful and innovative programs that deliver a significant positive impact over the long-term.

A main aspect of BBDE's community work is engaging our colleagues in volunteering and fundraising to support our communities. A significant amount of our service hours is with BBDE's LifeSkills charity partners and volunteer service partners including East Side Charter School, Food Bank of Delaware, Junior Achievement of Delaware, Nehemiah Gateway Community Development Corporation, Project New Start, Tech Impact, West End Neighborhood House and YMCA of Delaware. Numerous departments of BBDE organize activities throughout the year where colleagues assist nonprofit organizations through skills-based volunteering such as mentoring students at East Side Charter School, preparing tax returns for low-income residents through the Nehemiah Gateway Community Development Corporation, teaching employability skills to formerly incarcerated individuals with Project New Start or the Food Bank of Delaware's culinary workforce program or helping entrepreneurs to launch their small businesses at the West End Neighborhood House and Pete duPont Freedom Foundation. BBDE colleagues also utilize their sweat equity for activities such as preparing meals at Ronald McDonald House of Delaware, building homes with Habitat for Humanity of New Castle County, sorting donated clothes at Friendship House, or packing food with the Food Bank of Delaware.

Several BBDE executives also serve on nonprofit boards of directors and since 2020 we have a nonprofit board placement program to help connect and place BBDE colleagues on the boards of local nonprofit organizations. See Appendix: Exhibit CRA-2 for more details.

While we acknowledge that a portion of our community service hours do not qualify as CRA community development or CRA education type services, they do underscore BBDE's significant commitment to the community where it is located. Moreover, many of the hours do qualify as community development services for CRA purposes, including financial education.

In addition, BBDE has several innovative flagship programs wherein BBDE has helped to develop and/or implement these programs, in partnership with our nonprofit partners, which are designed to meet and support community needs. See Appendix: Exhibit CRA-1 for a description of some of BBDE's Signature Programs which should qualify for CRA credit.

2. CRA PLAN

2.1 Development of Plan

BBDE's management took following steps to develop the CRA plan.

1. Evaluated the bank, including the current business model, relevant financial information, business strategy, products, performance context, and competitive environment.
2. Considered the assessment area, demographic information, and economic conditions.
3. Assessed the community development and credit needs of New Castle County and, to a certain extent, the State of Delaware and communities surrounding Delaware. During this phase, management had discussions with representatives of numerous community development agencies, including:
 - Dionna Sargent, VP of Community Development at Cinnaire
 - Michelle Taylor, CEO of United Way of DE
 - Blanche Jackson, President of Stepping Stones Credit Union
 - Dave Callahan, Director of Loans NeighborGood Partners
 - Sheila Bravo, President/CEO of DANA (Delaware Alliance for Non-Profit Advancement)
 - Renata B. Kowalczyk, CEO of Wilmington Alliance
 - Linda Price, CEO of SEDAC (Sussex County Economic Development Action Committee)
 - Dr. Ronaldo Tello, CEO of the Hispanic Chamber of Commerce
 - Mayor of Wilmington, Mike Purzycki

BBDE recognizes the need for on-going communication with community leaders and political leaders will be critical to ensuring the community's needs and opportunities are identified and met. BBDE believes its goals are responsive to the needs of the community and appropriate within BBDE's performance context.

2.2 Assessment Area and Analysis

BBDE has established New Castle County ("NCC") as the assessment area for its CRA Plan. NCC is where BBDE's headquarters are located. BBDE also has a call center in Henderson, Nevada. NCC is one of three counties in the State of Delaware. Furthermore, given the size of the Bank and the corresponding level of CRA investment required by the Strategic Plan, in addition to the NCC assessment area, BBDE may make CRA loans and investments in the greater regional area. This is defined as the state of Delaware and the Mid-Atlantic region encompassing Washington, DC, the state of Maryland, and parts of the state of New Jersey (ONLY Cape May County, Cumberland County, Salem County, Gloucester County, Camden County, Burlington County and Atlantic County) and Pennsylvania (ONLY Delaware County, Chester County, Philadelphia County, Montgomery County, Bucks County, Lancaster County and York County).

Based on the U.S. Census Bureau 2019 Estimate, NCC is the most densely populated county in Delaware with 558,752 residents or 57% of Delaware's population of 973,764. Wilmington, the city where BBDE's headquarters is located, represents the largest city in NCC with a population of 70,644.

The assessment area (NCC) contains 127 census tracts, of which 126 are populated. Eight census tracts have median household incomes of less than 50% of the median household income and 28 others have median incomes between 50 and 80% of the median household income. The FFIEC estimated median household income for NCC residents in 2019 was \$76,328 (US Census Bureau median per capita income is \$32,894). 11.4% of NCC residents had incomes below the poverty level in 2019.

In 2019 there was a total of 212k households. 33.5% of the occupied housing units were rental; 66.5% were owner occupied. 66% of the housing units were single unit dwellings (detached or attached); 13.1% were in buildings with 10 or more units. NCC's weighted average median value for owner occupied housing was \$266,500 with a median monthly mortgage and other costs of \$1,606. The median monthly gross rent for rental housing was \$1,674. The current vacancy rate for rental housing is 6.80%

For Wilmington, the median household income was \$45,032 and 26% of residents lived below the poverty line in 2019. There were 28.8k housing units in Wilmington. The weighted average median housing value of owner-occupied housing with a mortgage in Wilmington was \$168,000, and the median monthly gross rent was \$1,250. 64% of the housing units were single dwelling units; 23% were in buildings of 10 or more units. 43.4% of the units were owner occupied, 56.6% were rental.

A Statewide Housing Needs Assessment determined that approximately 5% or 11,588 units of the housing stock (owner occupied and rental) in NCC was considered substandard.

2.3 Needs Assessment

As indicated in the engagement of the community stakeholders, and day to day interactions with other financial institutions in the assessment area, the banking needs of the assessment area include:

- **Affordable housing:** There is a need for affordable, accessible, quality housing in New Castle County, and especially in the city of Wilmington, and assistance in locating affordable housing for low to moderate income individuals and families. There is also a need to provide loans to housing owners to make needed repairs.
- **Financing for Community Development/Small Business/Economic Development:** In distressed areas of NCC there is a need to provide for the economic development of these areas and to provide employment opportunities for individuals. This is especially true in the city of Wilmington, and especially in the Downtown Development District, West Center City and East Side areas of Wilmington, close to where BBDE's headquarters resides, where each community development project has a positive ripple effect on the community by creating jobs and revitalizing and stabilizing the community.
- **Workforce Development:** In NCC there is a definite need for job training, social services, community supports and education (lower and higher education) that helps better position a population of people for success in the workforce.
- **Healthy Food Access:** There is a definite need in many sections of NCC that have been defined as a "food desert". A "food desert" is an area that has limited access to affordable and nutritious food. Most citizens are forced to travel more than 1-2 miles for the closest grocery store.
- **Financial education and money management:** There is a need in New Castle County for a variety of financial educational programs, including life skills training, basic budgeting and finance, fundamentals of credit, home ownership and job skills training and life insurance uses.
- **Diversity and Equality:** There is a need in New Castle County to foster economic equality for minority households and minority owned businesses.

- **Management Assistance:** Several nonprofit organizations in New Castle County could benefit from professional services rendered by Barclays colleagues. Examples include helping create a financial model for NERDiT Cares, a local technology workforce program for underserved youth, and conducting market research analysis for the Wilmington Alliance, which helps address the city’s highest needs to drive economic opportunity and social vitality.
- **Affordable Childcare:** Quality childcare: Access to affordable childcare has been an issue in Delaware for some time and appears to be getting worse. Childcare has been historically underfunded by the state, impacting the low-income families the most who rely on the Purchase of Care program.

Many of the stakeholders and organizations contacted through the needs assessment have identified the need for capital to support staffing of their organizations. For this reason, we have not increased the “Service” goal (Goal #4) because while the volunteering we provide is critical, most organizations prefer the capital to obtain full time employees dedicated to delivering against organization specific needs.

It should be noted that there are a relatively large number of banks, especially credit card banks in NCC, and therefore there is a relatively large amount of CRA dollars available for investment in NCC. As a result, competition for CRA lending is strong throughout the assessment area. It should also be noted that some of the banking needs described above, such as affordable housing and financing charter schools apply to the entire State of Delaware.

2.4 Plan Goals

The goal of BBDE’s Plan is to make a proactive impact in those areas identified in the Needs Assessment

- Make qualified loans and investments that have as their primary purpose securing housing for low to moderate income individuals or for housing in low to moderate income neighborhoods including the Wilmington Downtown Development District. This will include participation in various pooled loan funds direct loans to housing developers and the purchase of mortgage-backed securities. A list of sample agencies these will be conducted through is attached as Appendix: Exhibit CRA-3.
- Make qualified loans/investments and donations and provide community development services that have as their primary purpose providing services and community development for low to moderate income individuals or organizations located in or serving low-moderate income areas including the Wilmington Downtown Development area. This includes direct loans as well as participation in pooled loan funds and possibly investments.
- Purchase Ginnie Mae and Fannie Mac securities holding mortgages in Delaware issued to low- and moderate-income individuals. See Appendix: Exhibit CRA-4.
- Make qualified loans/investments and donations to entrepreneurs and small business owners in low- and moderate-income communities including the Wilmington Downtown Development area, which have the benefit of revitalizing and stabilizing these communities. This also includes providing community development services to those entrepreneurs.
- Make qualified loans loans/investments and donations to programs that provide healthy food choices and means of access for the low-moderate income areas of Wilmington.

- Develop and grow long-term partnerships with local nonprofit organizations who can directly address these needs through grants/donations. Examples of such community-based programs are included in Appendix: Exhibit CRA-1. One segment of the above is BBDE’s volunteer initiatives, where BBDE colleagues use their skills to support these community partners such as East Side Charter School, Tech Impact and Food Bank of Delaware through mentoring or leading workforce training sessions. BBDE incorporates financial education and training in some of these programs.
- Encourage colleagues to participate in service activities that support the community. BBDE has always had high levels of community engagement with numerous colleagues participating in some type of community service. These participation rates are accomplished by:
 - Encouraging colleagues to engage in general volunteering with local nonprofits.
 - Supporting colleagues to participate skills-based volunteering including providing job training and mentoring with charity partners (see above and below in Appendix: Exhibit CRA-1) or utilizing their professional skills to advise nonprofits or join nonprofit boards of directors.
 - Organizing departments team community service activities
 - Company-wide initiatives: Make a Difference, Barclays’ annual global volunteering campaign during the fall that invites colleagues to utilize their time and skills to create a positive societal impact in our local communities.
 - Colleagues fundraising or donating to support local nonprofit organizations.
- After meeting needs satisfactorily in the designated assessment area; BBDE will begin to source CDFI lending and investing opportunities nationally.

2.5 Evaluation Period Goals

For each year, the average assets are the sum of the assets reflected in the four Call Reports divided by four. BBDE tracks its year-to-date performance quarterly in the CRA Forum which is available to the FDIC upon request. BBDE proposes the following goals on an annual basis:

Goal 1 (New Community Development Loans and Investments – Actual plus Commitments)	
Satisfactory Rating	0.1% of average assets on the four quarterly Call Reports from the previous year (pro rata if not a full year)
Outstanding Rating	0.15% of average assets on the four quarterly Call Reports from the previous year (pro rata if not a full year)

Goal 2 (Maintain Existing Loan and Investment Volume)	
Satisfactory Rating	0.55% of average assets on the four quarterly Call Reports from the previous year
Outstanding Rating	0.6% of average assets on the four quarterly Call Reports from the previous year

Goal 3 (Community Development Grants)	
Satisfactory Rating	0.0030% of average assets on the four quarterly Call Reports from the previous year (\$)
Outstanding Rating	0.0040% of average assets on the four quarterly Call Reports from the previous year (\$)

Goal 4 (Community Development Services) (see Appendix: Exhibit CRA-5)	
Satisfactory Rating	90-109 points/year
Outstanding Rating	>110 points/year

2.6 Constraints Impacting the Plan

There are a few constraints that could impact BBDE’s ability to meet its goals:

- There is a relatively large amount of banks, especially credit card banks, in NCC and therefore a relatively large amount of CRA dollars pursuing the same CRA loans and investments.
- NCC is a relatively small county and 1) not that many pooled loan funds are created in NCC each year that banks can invest in and 2) there are limited amounts of qualified CRA loans and investments in NCC; therefore, BBDE will have to go outside of NCC into the other two counties the State of Delaware and into the broader regional area to ensure enough CRA qualified loans and investments.
- As primarily a credit card bank with a national marketing scope, BBDE does not offer retail products that are providing housing, economic development, or community development loans in NCC.

3 APPENDIX: EXHIBIT CRA-1 (SIGNATURE COMMUNITY PROGRAMS)

- The Challenge Program builds pathways to employment in construction and woodworking trades for out-of-school, disconnected youth ages 18 to 24 in Delaware area with significant barriers to employment, who are at high risk of living in poverty, gun violence, and involved in criminal justice system. This depth program offers these low income, justice-involved young people (95% BIPOC, 95% extremely low income and 5% low income) with 6 months of paid, on-the-job training and work experience as well as basic education and GED preparation, job readiness and life skills, industry-recognized certifications, intensive case management services, and job search/ placement assistance. Since 1995, Challenge has served over 500 young adults and enroll up to 20 trainees each year. BBDE has provided significant funding for the past 12 years – including support to launch and expand their furniture studio social enterprise – as well as our colleagues lending their skills and expertise by assisting with resumes, mock interviews, networking and job search best practices. The Challenge Program is highly selective about how they incorporate volunteers in their program and BBDE is the only organization they selected to be an ongoing volunteer partner. In addition, BBDE colleagues have served on the Challenge board including an Executive Committee member who joined their board in 2020.
- Delaware State University (DSU) is a public, land grant institution and the only historically black college/ university (HBCU) in the state of Delaware. DSU is focused on serving the most diverse collegiate student population in the state with 72% minority students, 27% first generation college students and over 90% of students relying on financial assistance. DSU has been a long-standing partner of Barclays, supporting DSU for more than 15 years since 2006. In 2016, Barclays took a lead role in supporting the creation and launch of the innovative DSU Training & Technology Center, a state-of-the-art technology center that enhances the vocational credentials of students, veterans, military, and their family members as well as community members. In addition to this program, from 2012-19, Barclays led the Barclays DSU Mentoring Program which pairs BBDE colleagues with DSU students to gain professional work experience through a Barclays onsite summer mentor/internship program at Barclays Wilmington office. The mentoring program developed life, financial and employment skills and improved job placement and graduation rates for these students by placing them in work roles at Barclays, paying them a stipend, and providing them with Barclays’ mentors to offer professional guidance. In 2023, BBDE supported DSU’s Aviation program, which provides the highest quality aviation education and training to develop successful, leading aviation professionals. Through this program, BBDE is helping to diversify one of the least diverse industries – 85% of pilots are white and 97% are male. In addition, in 2022, Barclays was founding funder to help bring Braven, a national nonprofit organization that helps promising college students on a path to economic mobility, to DSU. This new partnership between DSU and Braven will serve 500 DSU sophomores annually starting in 2024 over the next five years, helping these students build the skills, confidence, experiences, and networks to transition to strong first jobs. Several BBDE colleagues serve as Braven leadership coaches and mentors with DSU students and one of our leaders sit on the DSU College of Business Advisory Board. BBDE also supports the DSU business case competition as part of The Delaware Executive Exchange Program (DEEP) Day, sponsored by DSU College of Business. DEEP Day is a full-day professional development conference designed to develop students’ soft skills.

- Delaware Technical Community College (DelTech) is the state's only community college, providing quality education that responds to workforce and community needs, leverage partnerships, and strengthens Delaware's economy. Barclays partners with DelTech's Workforce Training and Community Education department, helping to launch a new 600-hour comprehensive healthcare job training program that provides at-risk individuals with stackable credentials as Certified Nursing Assistants (CNA), Phlebotomists, and Hemodialysis Technicians in 2018. This program meets a local need by training those from low- and moderate-income communities to create a pipeline of these technicians who are in high demand as renal failure has become a common medical condition and thus resulted in a growth of dialysis centers in the area. This is a deep impact program that will change the trajectory of these individuals' lives, who have had multiple barriers to education and employment. In addition to these healthcare workforce tracks, in 2021, we also began supporting construction job training programs as well as early childcare training given the demand in these industries. 100% of DelTech students are un or underemployed, 80% are low or moderate income and 60% are African American/ Hispanic.
- EastSide Charter School (aka First Community Foundation) is a free, public charter school that educates approximately 500 students in grades PreK-8 in Wilmington, Delaware. Demographically, EastSide is 96% African American, 82% low-income and 100% on federally funded free/reduced meals qualified based on family income. In 2001, BBDE launched a mentoring program at this school and since that time BBDE colleagues provide one-on-one weekly mentoring to 50-100 ESCS students each year, providing consistent access to a caring adult. Numerous BBDE colleagues have mentored at ESCS each academic year – many serving as mentors year over year. BBDE colleagues also provide financial education sessions as part of April's Financial Literacy Month and Teach Children to Save Month, working with students on basic financial concepts. BBDE also supported the development of EastSide's STEM Hub and expansion, which will be completed in 2025 and allow EastSide to increase enrollment and expand programming to serve the community. BBDE colleagues have also served on the EastSide board for many years.
- Food Bank of Delaware (FBD) is a statewide nonprofit organization whose mission is to provide food to nourish Delawareans while collaborating on long-term solutions to hunger and poverty. The FBD operates Delaware Food Works (DFW), which provides workforce development training – including national certifications – in the culinary and warehousing/logistics giving low-income people the skills needed to earn a living wage. This includes their Culinary School, a training and certification program operated by FBD – the first of its kind nationally launched back in 2002 – that provides underemployed and unemployed individuals with free culinary training and is certified as a trade school by the Delaware Department of Education. With these newly developed skills the participants can obtain jobs in the industry that provide economic security and stability. BBDE has a long history of supporting the FBD – supporting the expansion of their workforce programs across the state as well as BBDE colleagues volunteering to sort food in their distribution warehouse as well as using their professional skills to help the workforce training participants become job ready through mock interview sessions and resume review support. In addition, BBDE Wilmington office cafeteria, facilities and security teams host the FBD culinary and logistics students every cohort for a day at Barclays where they learn about job opportunities at Barclays office. In addition, we launched an internship program with the FBD culinary program in our BBDE Wilmington office cafeteria, where our café hires FBD culinary interns throughout the year to provide real-world experience.

- Nehemiah Gateway Community Development Corporation’s mission is to increase opportunities for asset building, financial management and entrepreneurship in the Delaware region. Nehemiah engages, mobilizes, and supports low-moderate income clients in developing and executing strategies for achieving their economic goals – 98% of their clients are low-moderate income. Barclays has supported their Delaware Tax and Financial Service Campaign which operates the Earned Income Tax program that offers free individual and small business tax preparation for low-income individuals and would not be possible without our financial and colleague support. Since 2006, hundreds of BBDE colleagues have helped to prepare Nehemiah’s clients federal and state tax returns to claim the Earned Income Tax Credit, Child Tax Credit, and other credits and deductions. BBDE volunteers have processed more than 2,000 tax returns totaling more than \$2.7 million in refunds for low-wage individuals and families since 2011.
- Tech Impact is a nonprofit organization that delivers highly impactful workforce development programs and services that foster individual growth, economic mobility, and a more diverse talent pool; and to strengthen nonprofits through their capacity building technology support/services. These vocational training programs – including technology and customer service – serve high-risk/economically disadvantaged, diverse individuals for whom job training programs are limited and cost-prohibitive – 75% of students are BIPOC and 80% are low- and moderate-income individuals. BBDE colleagues helped develop the curriculum for and launched Tech Impact’s customer experience job training track, and our funding helped to pilot this program at Baylor Women’s Correctional Facility. 80% of Tech Impact students secure employment within 6 months post-graduation becoming financially independent as they secure jobs with a living wage. Since 2019, Barclays has hired more than 45 Tech Impact graduates across our Wilmington and Henderson offices. BBDE leaders have served on the Tech Impact board since 2018.
- The United Way of Delaware’s \$tand By Me (\$BM) is an innovative statewide financial empowerment program that is a joint project between the United Way and the State of Delaware. \$tand By Me offers free one-on-one support to Delawareans who want to understand more about their money, make good financial decisions and achieve financial goals. Since 2011, \$tand By Me has helped more than 113,000 people from low- and moderate-income communities reach their financial goals, including improving credit scores on an average of 90 points, saving more than \$56 million and reducing personal debt by \$41 million. BBDE took a lead role in launching and supporting \$BM’s Colleges, Careers and Cash program in 2017, an innovative new partnership between the United Way and Delaware Department of Education’s Office of Career and Technical Education targeting middle and high school students in school-based financial education and workforce training/career programming to support access to post-secondary education.

- West End Neighborhood House provides programs, services, support, and advocacy when and where they are needed across Delaware to ensure their families become self-sufficient, and their communities thrive – serving 10,000 individuals annually, 85% of whom are low and moderate income. West End’s Launcher program (<https://www.launcherde.org/>) was created to address a number of challenges in Delaware, including the lack of employment opportunities, small business and wealth creation in low-income communities of color and underdeveloped commercial districts with large inventories of vacant rental space. This 12-week local entrepreneurship/small business program utilizes a nationally replicated entrepreneur curriculum developed by National Development Council (NDC) who has over 20 years of successful implementation. This program helps revitalize a local economy/neighborhood by supporting low-moderate income individuals to launch or scale businesses through training, technical coaching and access to loans/credit. We have engaged more than 300 Barclays colleagues to use their skills to support this program as well as West End’s other initiatives. Every May since 2018, BBDE hosts Barclays National Small Business Week & Pitch Competition every May in our Wilmington office during National Small Business Week. Since 2017, our partnership has helped to train 900+ entrepreneurs who have launched or expanded over 300 businesses and are creating hundreds of jobs.

YMCA of Delaware is the state’s largest non-profit organization committed to empower youth, foster healthy living, and promote strong communities. Starting in 2017, Barclays was the anchor supporter and took a lead role in the launch and expansion of the YMCA’s Teen Workforce Development Program that teaches soft skills job training and paid work experience to low-income, at-risk youth (90% low to moderate income) – first starting in Wilmington but now has expanded to six YMCA sites and piloted a Phase 2 of the program to deepen vocational knowledge and obtain certifications. The program partners with local employers to assist students in obtaining part-time jobs for real-life experience. Over the past 5+ years, this program has provided more than 400 youth with workforce skills and placed more than 300 into employment. BBDE colleagues volunteer to teach these YMCA students financial literacy and professional skills through speed mentoring and mock interview sessions. BBDE also has a long-standing relationship with the YMCA’s Black Achievers college readiness program, which targets young people living in New Castle County, many of whom come from low/moderate income families. BBDE colleagues serve as mentors or “Adult Achievers” working with these young individuals every Saturday during the school year.

- Make a Difference: For more than 15 years, BBDE’s entire business has participated in Make a Difference, Barclays annual global volunteer campaign that encourages colleagues to get involved and support their communities through fundraising. In the past, BBDE colleagues have participated in both general volunteering opportunities such as Habitat for Humanity home builds, but also skills-based volunteering activities such as mock interview workshops and resume reviews with our workforce training partners and financial education lessons with students from local Delaware schools.

4 APPENDIX: EXHIBIT CRA-2 (COMMUNITY DEVELOPMENT SERVICE)

Many members of BBDE's senior leadership and staff have been involved in the New Castle County and broader Delaware community for many years and continue to provide leadership and support to the many nonprofit organizations in the region that provide community development services to low-to-moderate income consumers and small businesses. Employee engagement will continue to expand to meet the needs of the community. Below are some examples of BBDE leaders on nonprofit organization boards. A complete list of Board memberships is maintained by the Head of Community Relations/ Citizenship.

- Adam Ahmad, Director – CRA Officer, US Consumer Bank/BBDE, Mr. Ahmad is on the Advisory Board to the College of Business at Delaware State University. DSU enjoys a long history as one of America's Historically Black Colleges and Universities (HBCUs). Founded in 1891 as the State College for Colored Students, DSU is proud of their heritage as one of the country's first land-grant educational institutions and serves more than 5,000, of whom over 90% rely on financial assistance. DSU is a key BBDE community partner.
- Jennifer Cho, Director – Head of Community Relations/ Citizenship, US Consumer Bank/BBDE. In addition to her BBDE community duties, Ms. Cho is on the board of the Delaware Alliance for Nonprofit Advancement, a nonprofit committed to enhancing and strengthening the nonprofit sector in Delaware. She also serves on the Philadelphia advisory board for Careers in Culinary Arts Program, which provides culinary, job and life skills training to middle and high school students. In addition, she represents BBDE on the Board of Investors for Wilmington Alliance, a nonprofit economic development organization focused on the revitalization of downtown Wilmington.
- Dale Cochran, Managing Director – Chief Risk Officer, US Consumer Bank/ BBDE, serves on the board of Meals on Wheels Delaware, which raises funds, other resources, and awareness to support meal delivery programs to home bound seniors in Delaware.
- Joe Flanagan, Director – Business Development, US Consumer Bank/BBDE, is on the board of Project New Start, which operates a comprehensive, results-oriented cognitive behavioral change and job-readiness program in Delaware for individuals transitioning out of state and federal prisons. BBDE provides both financial support and colleagues volunteer via job training support sessions.
- Kori Kaldor, Vice President – Legal, US Consumer Bank/BBDE, joined the board of Habitat for Humanity of New Castle County in 2020, which helps to make homes more affordable for low-income families across New Castle County.
- Denny Nealon, CEO of US Consumer Bank/BBDE, is on the board of the Ministry of Caring, which runs numerous services/programs including meals, shelters/housing, employment services/ training, healthcare, education primarily serving residents in Wilmington.
- Maurice Ragland, Director – Partnerships, US Consumer Bank/BBDE, serves on the board of EastSide Charter School, a free, public charter school that educates ~500 diverse, low-income students in grades PreK-8 in Wilmington, Delaware.
- Sean Murray, Managing Director – Chief Product Officer, US Consumer Bank/BBDE, is on the board of The Challenge Program, which builds pathways to employment in construction and woodworking trades for out-of-school, disconnected youth ages 18 to 24 in Delaware area, and The YMCA of Greater Philadelphia, which strengthens communities through youth development, healthy living, and social responsibility serving more than 240,000 individuals a year.

- Apollo Khine, Managing Director – Chief Development Office, US Consumer Bank/BBDE, is the board chair of Junior Achievement of Delaware, which serves students in kindergarten through 12th grade with engaging learning experiences designed to connect them to the value of education, how it relates to their successful future and to the success of the overall economy and community. JA effectively combines and instills concepts of entrepreneurship, wealth creation & management, and work/career readiness to positively influence the lives and futures of thousands of Delawareans each year.
- Arati Kohli, Director – Regulatory Relations, US Consumer Bank, has been on the board of Leading Youth Through Empowerment (LYTE) since 2017, which strives to change the academic trajectory of underrepresented youth by preparing middle school students to attend rigorous high school programs and then colleges through mentoring, teaching and leadership.

5 APPENDIX: EXHIBIT CRA-3 (LENDING AND INVESTMENT OPPORTUNITIES)

Community Development Lending and Investment Opportunities

BBDE recognizes that as a credit card bank with a national marketing scope, it will likely be limited in the percentage of credit card loans originated within its assessment area. Therefore, BBDE intends to maintain a strong commitment to community development lending and investing. Numerous community development opportunities exist in this market, and Bank management has experience working with and participating in many community development initiatives in the New Castle County market. BBDE's community development strategy will begin with contacting organizations such as those listed below to determine current financing and investment needs and identify opportunities for the Bank's participation.

- DCIC (Delaware Community Investment Corporation) – DCIC (now named Cinnaire) is a multi-bank Community Development Corporation in Delaware whose purpose is to serve as a vehicle for community revitalization through the financing of, and the investment in, housing and related activities designed to address the needs of low-to-moderate income persons throughout Delaware. It merged with Great Lakes Capital Fund. The DCIC Equity Funds are used in conjunction with private and public financing for the development of affordable housing. DCIC has also created several loan pools that support the development of multi-family housing for low-to-moderate income families. These funds provide permanent construction financing to affordable housing developers. DCIC also provides technical assistance to developers who are typically involved in complex financing situations. DCIC also has loan pools designed for economic development. BBDE has participated in several funds and plans to participate in future DCIC funds. BBDE also participated in a loan originated and managed by DCIC.
- HBCU Week - HBCU Week is a Delaware based organization that encourages high-school aged youth to enroll in Historically Black Colleges and Universities (HBCU), provide scholarship dollars for matriculation and sustain a pipeline for employment from undergraduate school to corporate America. The HBCU Week activities include a very well attended college fair at the Chase Fieldhouse in Wilmington, Delaware. At the 2022 HBCU Week college fair there were 15,600 attendees, over 2,600 on-the-spot college acceptances, and over \$23.5 million in scholarships awarded. They also partnered with Disney subsidiary, ESPN, to bring HBCU Week to Disney World with a college fair, parade, and several other activities. BBDE made an investment to develop a scholarship fund for inner city youth to support their matriculation into an HBCU.
- NCALL - has been in business serving the Delmarva Peninsula since 1976. NCALL is an IRS designated 501(c)(3) nonprofit organization based in Dover, Delaware that specializes in affordable housing development, education, and lending. As a service provider for lower income households, NCALL also offers pre-purchase counseling, financial literacy and default and foreclosure programs to the public. As an intermediary working on the Delmarva Peninsula, NCALL assists locally based nonprofits to develop multi-family housing projects, mostly apartments, through a variety of development services such as financial packaging, asset management, and organizational development. BBDE has participated in several NCALL originated and managed loans for charter schools in low-income communities, for affordable housing and for economic development.

- Mortgage-Backed Securities – BBDE has in the past and will in the future purchase mortgage-backed securities and hold those securities as an investment. Those securities will all be backed by mortgages issued to low- and moderate-income individuals in NCC.
- True Access Capital formerly First State Community Loan Fund (FSCLF) – FSCLF is a certified Community Development Financial Institution that provides loans and technical assistance to affordable housing developers in Delaware. It also provides loans to 501(c)(3) organizations that build and maintain housing for their clients. BBDE’s management has worked with FSCLF regarding two pooled loan funds and plans to participate in the future.
- The Solomon Hess SBA Loan Fund is a Community Reinvestment Act (CRA)-eligible open-ended Community Development investment fund that invests in SBA 7 (a) loans for banks seeking CRA Lending Test Credit. Since January 2018, the Fund has been rated Aaa-bf by Moody’s. The Fund is a Delaware limited liability company formed on April 29, 2004, for the purpose of promoting permanent job creation, retention, and improvement in low or moderate-income areas or for low and moderate-income persons who are employed by small businesses by creating greater financial liquidity and a lower cost of capital primarily within the Small Business Administration (SBA) Section 7(a) loan secondary market and other federally guaranteed small business loan programs.

6 APPENDIX: EXHIBIT CRA-4 (MORTGAGE-BACKED SECURITIES)

MBS Balance as of 12/31/2023

	Exposures (Lightning Book Value)	Exposures (Lightning Market Value)
Ginnie Mae	38,604,958.09	36,213,205.64
Fannie Mae	62,431,891.84	57,472,411.68
Freddie Mac	88,634,473.65	76,774,237.58
Total	189,671,323.58	170,459,854.90

7 APPENDIX: EXHIBIT CRA-5 (COMMUNITY DEVELOPMENT SERVICE POINTS)

- Innovative and Substantive Assistance: Community Development Service where Bank originates an idea or provides substantive funding for assistance to be provided to the community through an identified community partner. The community partner implements the initiative while the bank plays a leadership role in planning and funding the program. The initiatives need to have the potential to have a lasting impact on the community. *Points for each project year: 7*
- Long Term Service: Community development services where the bank takes a lead, long-standing role in the development or support of an initiative that has the potential to have a lasting impact in the community or in the construction and improvement of programs that are currently in place. This is not a single service but a continual interaction with a community partner[s] to help the project come to fruition. *Points for each program per year: 5*
- Board Membership: Membership on the Board of Directors of a community organization whose purpose is to provide community development, financial education, job training or other services to low- and moderate-income communities, small businesses, or individuals. *Points for each Board Membership per year: 2 (4 if leadership role on the Board such as Chair, Vice Chair, Treasurer)*
- Committee or Project Membership: Membership on a committee for an organization (or for a specific ad hoc project) whose purpose is to provide community development, financial education, job training or other services to low- and moderate-income community, small businesses, or individuals. *Points for each committee or project membership per year: 2*
- One-off Support: Community development services where bank personnel provide support on a singular basis to provide or meet a specific community development, financial education, job training or other services to meet the need of a non-profit or community group. The non-profit or community group must serve the needs of low-and-moderate-income communities, small businesses, or individuals. *Points per service: 1*

Attachments:

BARCLAYS DE FDIC O 2023.PDF

CAUTION: This email originated from outside our organisation [REDACTED] Do not click on links, open attachments, or respond unless you recognize the sender and can validate the content is safe.

[REDACTED]

Please consider this a formal CRA Complaint to be included in the Barclays Bank Delaware (the "Bank") CRA Public File.

Please also respond to this letter so I know it has been received by the Bank and it has filed this CRA Complaint in its CRA Public File as requested here and as required by CRA regs.

I am also copying here both the FDIC and even the CFPB since the Bank is more than \$10 billion in assets and also because of the CFPB's recent [report](#) about bank abuses involving airline cards, which is the subject of a separate ongoing complaint I have made against the Bank with its MC American Airlines Advantage program.

I am hoping you and [REDACTED] are more responsive to my formal written CRA requests than previous Bank employees ([REDACTED]) who have ignored my multiple requests for a copy of the Bank's CRA Strategic Plan (SP).

As you will note below, I filed a written formal request for a copy of the Bank's proposed SP, after multiple phone calls, on 9/10/2022 which was ignored.

I filed a "Second Request" on Nov. 18, 2022 (see below) which was also ignored.

These requests were critical so I could provide input prior to the FDIC's attached 2/21/2023 Performance Evaluation (PE) that resulted in an INFLATED "Outstanding" CRA rating.

Had I been provided the opportunity to make a timely comment on the SPs for both the 2018-2020 and 2021-2022 periods, the Bank would have hopefully increased its pitifully low SP goals and/or the FDIC would have required them to do so prior to the 2/21/2023 CRA exam and, if not, the FDIC would have provided no better than the overall Satisfactory (Sat) rating the Bank deserves for its CRA performance.

For example, the Bank's stated Sat and Outstanding (O) annual Community Development (CD) loan and investment goals of 0.55% and 0.60% of average assets, respectively, (p. 13, PE) in the SPs are pitifully low compared to both absolute (1.32% and 2.00%, respectively, in [The CRA Handbook](#) for the two highest ratings) and relative (other SP banks) guidelines.

Notably, the combined loan and investment portfolio Outstanding goal of just .60% on p. 13 of the PE is LESS THAN ONE THIRD [The CRA Handbook](#) 2.00% Outstanding guideline.

Thus, the Bank's performance of 0.56% and 0.67% in SP years 2021 and 2022, respectively, are grossly underperforming compared to absolute and relative guidelines, thus resulting in an INFLATED Outstanding rating for the Bank.

Again, had the Bank sent me the SP as requested on TWO different occasions and properly engaged in reviewing and responding to community input as per the CRA SP regs, perhaps the Bank would have established realistic Sat and O goals OR the FDIC would have required same rather than the lowball ones the Bank is using to get repeated inflated O ratings (released by the FDIC in 2016 and 2020 and 2023)

On a separate matter, as you know, the CFPB recently reviewed very serious consumer problems with credit card reward programs.

You and your team should know that I have an ongoing and unresolved complaint regarding my MC AAdvantage card that the Bank is likewise being totally unresponsive, just like my previous SP requests.

I am therefore formally requesting that you and your team please reply with the names and emails of the key Bank employees overseeing this AA program, so I may file a formal complaint with them and also copy the CFPB.

Thank you.

[REDACTED]

[REDACTED]

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed and must not be transmitted to any other individuals or entities outside of the individual or entity to whom this email is addressed.

[REDACTED]

Can you please follow up on this request as we have not yet received the SP to review. Thank you. [REDACTED]

[REDACTED]

Please reply with a copy of the proposed SP so we may review and comment on it. Thank you. [REDACTED]

Barclays Bank Delaware, a Delaware State Bank regulated by the FDIC, has developed a proposed strategic plan to fulfill the bank's responsibilities under the Community Reinvestment Act. Public

comment on the bank's proposed strategic plan is hereby solicited. At no cost, a copy of the proposed strategic plan may be reviewed or obtained at the bank's office, 125 South West Street, Wilmington Delaware or may be requested by mail or email [REDACTED]. Questions, comments, or requests regarding the proposed strategic plan may be directed to the CRA Officer Barclays Bank Delaware, 125 South West Street, Wilmington, Delaware 19801. The public comment period ends on 9/5/2022. 8/9 - 9/9-NJ