

**Barclays Bank Delaware (BBDE)  
Community Reinvestment Act  
Strategic Plan  
2023-2024**

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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, 2023 through December 31, 2024, 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 has aspirations 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, and also 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 1,458 employees as of May 2021 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 well-established policies, procedures; employee training and credit card review/testing procedures. It has a full-time Fair Lending Officer/Fair Lending Compliance Team. BBDE formally reviews its lending practices annually as part of the institution's compliance review process and provides fair lending training to employees annually, and conducts various forms of fair lending 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.

2021 ending credit card receivables were \$21.845bn (gross of impairment allowance) – the balance net of impairment was \$20.334bn. Full year 2021 PBT was \$658m.

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 Community Affairs, 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 2020 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 Q1 2022, BBDE has an outstanding loan to NCALL; a Delaware based CDFI for \$2.5m. BBDE also issued a \$750,000 line of credit to True Access Capital formerly First State Community Loan Fund. BBDE also has an investment for \$6m to support affordable housing development through Reach Riverside which will use the "Purpose Built" model to support the community. BBDE also purchased over \$136m 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' belief that a strong, inclusive economy is a better economy for everyone. A vibrant, skilled workforce 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 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 focused on making volunteering and fundraising opportunities accessible to maximize colleague engagement, with the primary focus on Connect with Work, connecting people who are facing barriers and from disadvantaged communities to work with businesses that are recruiting, including Barclays, our clients and suppliers including providing employability and financial skills.

A significant amount of our service hours are with BBDE's primary community service partners: Delaware Community Reinvestment Action Council, Delaware Technical Community College, East Side Charter School, Food Bank of Delaware, Nehemiah Gateway Community Development Corporation, Project New Start, Serviam Girls Academy, Tech Impact, West End Neighborhood House and YMCA of Delaware. Numerous departments of BBDE organize activities throughout the year where colleagues assist non-profits through skills-based volunteering, such as mentoring students at Serviam Girls Academy and East Side Charter School, preparing tax returns for low-income residents through the Nehemiah Gateway Community, providing marketing services to Stepping Stones Credit Union, teaching employability skills to formerly incarcerated individuals with Project New Start or Delaware Food Works or helping entrepreneurs to start their small businesses at the West End Neighborhood House, and also by using their sweat equity for activities such as building homes with Habitat for Humanity of New Castle County or sorting food with the Food Bank of Delaware

Several BBDE executives also serve on community service boards of directors and we have launched 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 and credit education.

In addition, BBDE has a number of innovative signature programs wherein BBDE develops and/or implements programs 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.

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## 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
  - Senator Darius Brown
  - Vandell Hampton, President and CEO of True Access Capital
  - Blanche Jackson, President of Stepping Stones Credit Union
  - Robert Weir, Director Dept of Real Estate and Housing City of Wilmington
  - Earl Cooper, Director of Community Support City of Wilmington
  - Lisa Blunt Rochester, State of Delaware Congresswoman
  - Jim Paoli, State Director
  - Robert Buccini, President of BPG Real Estate

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 call centers in Henderson, Nevada and Hamilton, OH. 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 non-profits in New Castle County could benefit from professional services rendered by Barclays Colleagues. Examples include the providing of legal services to West End Neighborhood House and marketing services to Stepping Stones Credit Union and Clarifi



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 bank 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 certain 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 and investments 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 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 and investments to entrepreneurs and small business people 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 and investments to programs that provide healthy food choices and means of access for the low-moderate income areas of Wilmington.
- Develop and grow long-term relationships with local community-based organizations who can directly address these needs. Examples of such community based signature programs are included in Appendix: Exhibit CRA-1. One segment of the above is BBDE’s community partners, Serviam Girls Academy, EastSide Charter School and YMCA of Delaware where BBDE colleagues participate in various mentoring and other programs. BBDE incorporates financial education and debt management training in some of these programs in which BBDE is involved with its partners.
- Encourage colleagues to participate in service activities that support the community. BBDE has always had high levels of community engagement with a majority of colleagues participating in some type of community service. These participation rates are accomplished by
  - Encouraging colleagues to engage in general volunteering in local nonprofits

- Supporting colleagues to participate skills-based volunteering including mentoring and providing job training soft skills with BBDE partners (see above) or lending their professional skills to non-profits or connecting colleagues to join nonprofit boards
  - Departments conducting team community service activities
  - Company-wide initiatives: Make a Difference Day, Barclays’ annual, global volunteering campaign during the month of October that invites colleagues to give their time and skills to create a positive societal impact in our local communities
  - Colleagues fundraising to support local nonprofit organizations.
- Make community development grants in support of relevant programs
  - 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:

<b>Goal 1 (New Community Development Loans and Investments – Actual plus Commitments)</b>	
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)

<b>Goal 2 Maintain Existing Loan and Investment Volume</b>	
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

<b>Goal 3 (Community Development Grants)*</b>	
Satisfactory Rating	\$1.2m/year
Outstanding Rating	\$1.5m/year

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

*\*Grants are presented as a specific dollar goal.*

## 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 chasing 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 contiguous states to ensure sufficient amounts of CRA qualified loans and investments.
- As primarily a credit card bank with a national marketing scope, BBDE, is not experienced in issuing housing, economic development or community development loans in NCC.

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

- Delaware Community Reinvestment Action Council (DCRAC) is a nonprofit whose mission is to ensure equitable treatment and equal access to credit and capital so Delawareans can buy homes, stay in their homes, resolve their debts, and plan their financial future. More than 80% of their clients have incomes below 80% area median. Stepping Stones is DCRAC's credit union based in Wilmington, Delaware, which provides loans to low and moderate un/underbanked individuals as well as other financial services and education. BBDE colleagues worked with this credit union to develop a marketing plan to attract additional unbanked consumers. This included a mobile bank van which brings the credit union directly to the unbanked consumers' locations. In its first year in 2018, the marketing effort was able to increase membership significantly allowing DCRAC to open 167 new accounts for the unbanked/underbanked. For comparison, in 2017 and 2016 combined DCRAC opened only 50 accounts.
- Delaware State University is a public, land grant institution and is the only historically black college or university (HBCU) in the state of Delaware. DSU's services are focused on serving the most diverse collegiate student population in the state. Majority of students come from low/moderate income families – over 85% of DSU students rely on financial assistance to complete their matriculation and graduate with a higher education degree. In 2016, Barclays took a lead role in supporting the creation and launch of the innovative DSU Training & Technology Center (<https://www.desu.edu/academics/dsu-training-technology-center-dttc>), 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 that will lead to employment in Delaware's growing technology sector. In addition to this program, for about 8 years, 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 our Wilmington office. The mentoring program develops life, financial and employment skills and improve 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.
- Delaware Technical Community College (DelTech) is a statewide institution of higher education, providing academic, technical, and workforce training opportunities. Barclays partnered with DelTech's Workforce Training and Community Education department 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. 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.
- EastSide Charter School is a free, public charter school that educates ~500 students in grades PreK-8 in Wilmington, Delaware. Demographically, EastSide is 91% African American, 9% Hispanic/Latino, 83% low-income and 100% on federally funded free/reduced meals qualified based on family income. In 2001, Barclays launched a mentoring program at this school and since that time BBDE colleagues provide one-on-one weekly mentoring to ~100 ESCS students, providing consistent access to a caring adult, help with homework and reading skills. On average, 50 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.

- Food Bank of Delaware (FBD) is a statewide nonprofit agency whose vision is a community free of hunger. The FBD operates Delaware Food Works (DFW), which provides workforce development training in the culinary, warehousing and agricultural fields giving low-income people the skills needed to earn a living wage. The Culinary School is a training and certification program operated by FBD which 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 are able to obtain jobs in the industry that provide economic security and stability. BBDE has a long history of supporting the FBD, with colleagues not only participating in their annual food drive but also using their professional skills to help the DFW participants become job ready via mock interview training and resume review support.
- Nehemiah Gateway Community Development Corporation’s mission is to transform lives and communities through economic opportunity, entrepreneurship and asset development. Nehemiah engages, mobilizes and supports low-moderate income clients in Delaware in developing and executing strategies for achieving their economic goals. BBDE colleagues have volunteered as tax preparers, financial coordinators, and greeters for low-income Delaware residents since 2006. 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. Federal and state tax returns are prepared by BBDE colleagues and help Nehemiah’s clients claim the Earned Income Tax Credit, Child Tax Credit, and other credits and deductions. Since 2013, Barclays colleagues have processed more than 1300 returns totaling nearly \$2 million in tax refunds for low-wage individuals and families.
- Project New Start operates a comprehensive, results-oriented cognitive behavioral change and job-readiness program in Delaware for individuals transitioning out of state and federal prisons, all or most of whom are low or moderate income. The objectives of the New Start program are to combat violence and reduce recidivism by guiding medium to high risk/high need offenders in developing marketable employment skills, obtaining and retaining employment, learning financial literacy skills and developing positive behaviors through cognitive restructuring. Approximately 90% of New Start graduates have secured employment and 80% are sustaining their success.
- \$tand By Me (\$BM) is an innovative statewide financial empowerment program that is a joint project of the United Way of Delaware 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 60,000 people from low and moderate income communities reach their financial goals, including improving credit scores on an average of 72 points, saving more than \$26 million and reducing personal debt by \$25 million. BBDE took a lead role in launching and supporting \$BM’s Colleges, Careers and Cash program in 2017, an innovative new partnership with 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.

- Tech Impact is a nonprofit organization which offers technology services for nonprofits to empower them to better support their communities with solutions that promote productivity as well as operates workforce readiness programs to prepare opportunity youth to secure and retain jobs with promising career paths and livable wages in thriving industries (technology and call center customer service). The program also provides area companies with skilled and diverse candidates for in-demand entry-level jobs. These programs serve high-risk/economically disadvantaged individuals for whom job training programs are limited and cost-prohibitive – disconnected or opportunity youth, who are un/ underemployed, have their high school diploma/GED, but have not earned a four-year college degree. These young individuals are disproportionately low-income, almost twice as likely to live in poverty, and experience significant barriers to employment. BBDE helped develop the curriculum for and launched Tech Impact’s customer experience job training program. Nearly 80% of youth in the program graduate with a job offer.
- The Challenge Program provides vocational training for Delaware’s at-risk youth to empower them with the confidence, skills and purpose needed to become productive members of society. The program offers young people, all of whom came from low- income families, the opportunity to learn valuable construction skills, financial education skills, assistance in earning a high school diploma or GED and job placement services. BBDE has partnered with the Challenge Program to provide our 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 Barclays is the only organization they selected to be an ongoing partner for volunteers.
- West End Neighborhood House’s Launcher program (<https://www.launcherde.org/>) is a local entrepreneurship/small business program, which uses 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 ~100 Barclays colleagues to utilize their skills to support this program as well as West End’s other initiatives. Launcher entrepreneurs participate in Barclays National Small Business Week & Pitch Competition every May in our Wilmington office during National Small Business Week. Since 2017, this program has trained more than 250 entrepreneurs launching or expanding nearly 150 businesses, which are creating or retaining 322 jobs – the net effect stabilizing and revitalizing those neighborhoods.
- YMCA of Delaware is the state’s largest non-profit organization committed to strengthening local citizens through youth development, healthy living and social responsibility. 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 targets at low-income, at-risk youth in Wilmington. The program partners with local employers to assist students in obtaining part-time jobs for real-life experience. BBDE colleagues volunteer to teach the students financial literacy and professional skills through speed mentoring and mock interview sessions. Barclays has also supported the YMCA’s Black Achievers college readiness program, which targets 70 young people living in New Castle County, of which 90% of these students 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.

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- **Make a Difference Day:** For the last 13 years, BBDE’s entire business has participated in Make a Difference Day, Barclays annual global volunteer campaign. 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, resume reviews and financial education lessons on budgeting and saving money with students from inner-city schools. In 2014, BBDE worked with 700 kids at Howard High School (an inner-city vocational technical school) to discuss college and employment preparations. Each fall from 2015 to 2019, BBDE colleagues have worked with high school students from Delcastle High School (another vocational technical school primarily serving low to moderate income students) to support with interviewing skills, learn networking skills and provide professional career and college advice. In 2019, Barclays volunteers also worked with all 200 Howard sophomores providing career and college guidance.

## 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 will continue to provide leadership and support to the many organizations in the region that provide community development services to low-to-moderate income consumers and small businesses.

Employee engagement and leadership will continue to expand to meet the needs of the community. A complete list of Board memberships is maintained by the Head of Community Relations/Citizenship.

- Adam Ahmad, Director – CRA Officer, US Consumer Bank. 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. He also serves on the Board of the United Way of DE and on the Board of the Delaware Black Chamber of Commerce.
- Jennifer Cho, Director – Head of Community Relations/ Citizenship, US Consumer Bank. In addition to her BBDE community affairs 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 Workforce Development Committee for REACH Riverside, a comprehensive community revitalization initiative to create pathways out of poverty for residents of the Riverside neighborhood in Wilmington, one of the city’s most underserved neighborhoods with nearly 70% of residents living in poverty with annual media income of less than \$10k. Ms. Cho is a 2020 fellow with Leadership Delaware, a non-partisan, nonprofit organization which recruits and mentors outstanding young leaders who have the “stuff of leadership,” those with the potential, passion, and courage to excel at community, nonprofit, political, professional, and corporate leadership within the First State, working to significantly impact and transform the Delaware communities. 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 and runs workforce development programs for low and moderate income individuals.
- Stacy Conn, Managing Director – Head of Product Marketing, US Consumer Bank is on the board of the Girl Scouts of Chesapeake Bay.
- Joe Flanagan, Director – Business Development in US Consumer Bank is on the board of Project New Start, which operates a comprehensive, results-oriented cognitive behavioral change job-readiness program in Delaware for individuals transitioning out of state and federal prisons as well as providing financial education support for those incarcerated. BBDE provides both financial support and colleagues volunteer via job training support sessions.
- Jeff Hennessey, Director in Operational Risk, is on the Board of Directors of Clarifi, a credit counselling organization.



- Mona Jantzi, Managing Director –Chief Customer Officer, US Consumer Bank is on the board of Tech Impact, a nonprofit organization which offers technology services for nonprofits to empower them to better support their communities with solutions that promote productivity as well as operates workforce development programs to help opportunity youth prepare for jobs in technology and customer service working across the Philadelphia, Wilmington and Las Vegas communities. BBDE provides both financial support and colleagues volunteer via job training support sessions.
- Arati Kohli, Director – Regulatory Relations for US Consumer Bank, is on the board of Leading Youth Through Empowerment (LYTE) which provides opportunity and access to help students obtain access to the highest quality education in the state of Delaware through additional academic support and other services for low to moderate income students in Wilmington who want to attend college preparatory high schools.
- Danielle Manley, Director – Finance, US Consumer Bank, is on the board of West End Neighborhood House, whose mission is to help individuals achieve self-sufficiency, reach and maintain their maximum potential, and live responsibly and harmoniously in a healthy community and complex world. West End has been improving the lives of an ethnically, economically and culturally diverse community in the westside of Wilmington since 1883 – serving a low and moderate-income population. BBDE provides both financial support and colleagues both volunteer and fundraise for West End.

## 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.
- Wilmington Renaissance Corporation ("WRC") – WRC is a non-profit community development group devoted to economic development of downtown Wilmington. A focus has been to encourage the renovation of the lower Market Street area ("Ships Tavern District"), which consisted of low rent stores, tenements and vacant buildings, into an affordable and dynamic housing and vibrant retail area. That area is five blocks away from BBDE's headquarters building. BBDE has worked closely with the WRC/WRDC in this effort and has participated in a CRA loan to build a garage in Ships Tavern, seen by many as the key to the successful revitalization of the Ships Tavern District. BBDE has issued several bridge loan funds to WRC to assist it when it experienced liquidity issues. WRC is now assisting in the development of the Creative Arts District in a low income area in Western Wilmington. BBDE has participated in a loan to non-profit developer to build low income housing in the Creative Arts District.
- 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 with regard to two pooled loan funds and plans to participate in the future.

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

MBS Balance as of 06/30/2022

<b>MBS Exposures by Type</b>			
	<b>Exposures (Lightning Book Value)</b>	<b>Exposures (Lightning Market Value)</b>	
Ginnie Mae	30,095,421.70	28,676,908.86	
Fannie Mae	39,004,233.88	35,204,264.12	
Freddie Mac	77,697,098.78	68,080,359.45	
	<b>146,796,754.36</b>	<b>131,961,532.43</b>	

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

- **Innovative and Substantive Assistance:** Community Development Service where Bank originates an idea for assistance to be provided to the community through an identified community partner. The community partner rolls out the initiative while the bank plays a leadership role in planning and implementing the roll-out and in ensuring the completion of the ensuing initiatives. 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 role in the development 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] over a wide expanse of time to help the project come to fruition. *Points for each program per year: 5*
- **Board Membership:** Membership on the Board of Directors of an 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 Chair of the Board)*
- **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*
- **Community Development Financial Education and Services:** Community development services where bank personnel provide support on a singular basis to meet a specific financial education or services 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 and 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.*

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[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