

Community Reinvestment Act  
Strategic Plan  
2021-2023

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## **BACKGROUND**

The Community Reinvestment Act (“CRA” or the “Act”) encourages banks to help meet the credit needs of the communities in which they operate full-service branches. CRA requires that federal bank supervisory agencies assess the records of banks in meeting the credit needs of their communities including low- and moderate-income (“LMI”) individuals and neighborhoods, consistent with safe and sound operations, and to take that record into account when deciding whether to approve certain applications including applications for new branches and acquisitions.

CRA regulations include a provision for banks to elect to be assessed under a CRA strategic plan. Compliance with CRA through a strategic plan allows a bank an opportunity to design a program that is appropriate for its own capabilities, business strategy, and organizational framework, as well as the communities it serves.

Silicon Valley Bank (“SVB” or “the Bank”) is chartered by the state of California and its main office is in Santa Clara, California. SVB is a member of the Federal Reserve System and is examined for compliance with CRA by the Federal Reserve Bank of San Francisco (“FRB”). SVB’s structure and business model differs from most banks. SVB’s provides banking services to primarily technology and life-science companies throughout the United States and it that respect focuses its business on industry sectors rather than geographic areas. Its main office and four branches are located in the San Francisco Bay Area. SVB clients are primarily businesses and the Bank’s product lines are focused on commercial credit and deposit products and services which do not require a retail branch network.

SVB has operated under CRA Strategic Plans approved by the Board of Governors of the Federal Reserve System since 2008. SVB will be examined under its 2018 – 2020 plan in 2021. SVB elects to continue to be evaluated under the Strategic Plan provision of CRA for the plan period from 2021-2023.

## **PLAN EFFECTIVE DATE, TERM AND RATING GOAL**

The Bank’s CRA Strategic Plan “the Plan” effective date is January 1, 2021 and the term is for three calendar years. The goal of the Plan is to be rated “satisfactory” under the CRA Strategic Plan examination procedures by substantially meeting or exceeding all Plan goals for the satisfactory level. The Bank requests an “outstanding” rating if it meets or exceeds the “outstanding” goal for both its Small Business Loan and Community Development Loans and Investments goals plus “outstanding” for either Donations or Services and no less than “satisfactory” for the remaining goal.

The Bank’s CRA Committee oversees CRA performance including meeting the Plan’s goals. SVB’s Plan may be modified or amended if there is a material change in its underlying assumptions or in SVB’s operations, and such changes would make the Plan no longer appropriate or viable. Any modifications and amendments made to SVB’s Plan reflecting such changes will be made in

**PLAN EFFECTIVE DATE, TERM AND RATING GOAL** (continued)

accordance with the FRB's regulatory requirements. SVB may also elect to be examined under the CRA Large Bank examination procedures.

**ASSESSMENT AREA**

CRA requires that banks delineate an assessment area consisting of whole geographies (e.g. census tracts, counties, metropolitan statistical areas) surrounding the main and branch offices. SVB delineates the following eight counties of the San Jose - San Francisco - Oakland, CA Combined Statistical Area as its CRA assessment area and is referred to in this Plan as the "Bay Area Assessment Area" or "BAAA":

*Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Sonoma*

A list of census tracts within the bank's assessment area is in Part 2 of the Appendix.

SVB's large regional assessment area includes five counties where SVB has no branch locations: Alameda, Contra Costa, Marin, San Francisco, and Sonoma. SVB recognizes that a large regional area may result in an uneven distribution of lending across the assessment area. Concentrations of businesses served by SVB's technology and life science divisions exist in Alameda, Santa Clara, San Mateo, and San Francisco counties and by SVB's premium wine division in Napa and Sonoma counties.

SVB's Community Development Finance (CDF) business unit makes loans and investments throughout the broader regional area in order to reach affordable housing finance opportunities that address the broader regional housing shortage. Employees of Silicon Valley companies increasingly commute from areas in counties adjacent to the assessment area. The San Francisco Combined Statistical Area (CSA) now includes Merced, San Joaquin, Santa Cruz, San Benito, and Stanislaus counties, which do not directly border the San Francisco or San Pablo bays, but are economically connected and bedroom communities for Bay Area workers. Merced and Stanislaus Counties were added to the CSA in September 2018.

SVB focuses its community development investment and lending in its Bay Area Assessment Area to demonstrate responsiveness to the needs and opportunities around its main and branch offices as required by the CRA. In accordance with the 2013 revisions to the Interagency Questions and Answers regarding CRA ("Interagency Q&A"), the Bank may request consideration for community development activities that are outside of the assessment area but within the a broader statewide or regional area (BSRA) that includes the assessment area.

**ASSESSMENT AREA** *(continued)*

The Bank has commercial loan production offices in southern California, Portland Oregon, Seattle Washington, and large, primarily operations, teams in Tempe, Arizona. Bank staff in these locations may participate in the provision of community development services in the local LMI communities.

For purposes of this Strategic Plan, the Bank's BSRA will include all of the state of California and the contiguous states of Arizona, Oregon, and Washington.

**BANK DESCRIPTION**

SVB was established on October 17, 1983, in response to the unmet credit needs of entrepreneurs who were starting businesses based on new and evolving technologies and who, lacking established cash flow, were unable to get traditional bank financing. Supporting entrepreneurs who start and grow small businesses is at the core of SVB's mission and is, by definition, community development.

SVB developed the knowledge and understanding of new and evolving technologies in order to see the potential for success that Silicon Valley entrepreneurs possessed. SVB provided credit and deposit services to start-up businesses who later became some of Silicon Valley's most notable success stories creating thousands of jobs. By supporting businesses from their start-up phase through corporate success, SVB gained a strong understanding of the life cycle and needs of businesses based on new and developing technologies.

SVB maintains a network of relationships in the venture capital community in order to connect clients to sources of equity capital to grow their businesses. SVB uses this combination of relationships and its business model to provide products for start-up businesses including lending to "pre-revenue" borrowers with no or limited sales revenue to generate cash flow to repay debt.

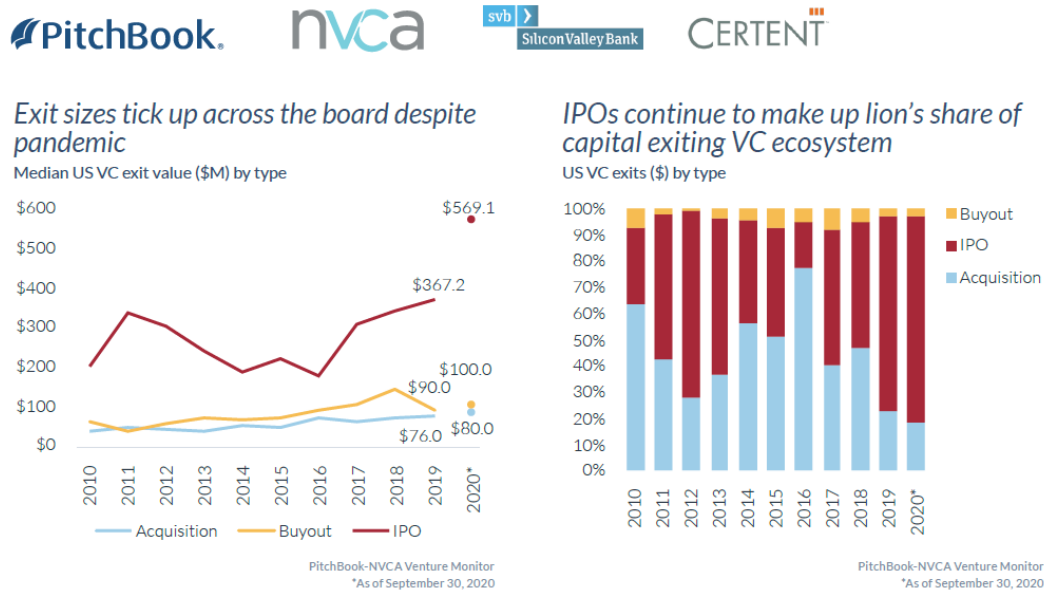
SVB provides entrepreneurs with credit and banking services without an extensive branch network by leveraging modern banking technologies. SVB has specialized teams with industry knowledge (hardware, software, internet, life-sciences, financial technology, etc.) devoted to the meeting the needs of businesses ranging from entrepreneurs with emerging technologies who are in their early stage of development and to clients who have grown into large corporations.

SVB targets technology and life science companies as part of its core business. However, in conjunction with providing banking services to businesses in these sectors, SVB also serves venture capital funds, their portfolio companies, and partners. SVB also finances premium wineries and provides private banking services to individuals associated with its business clients.

SVB estimates that it banks approximately half of the venture capital backed technology and life science companies in the country. Many of SVB's clients eventually "go public" or raise capital

**BANK DESCRIPTION** (continued)

through an initial public offering “IPO” of common stock. Once SVB clients “go public”, their equity capital investor(s) earn gains on their investment that they are then able to reinvest into new entrepreneurs. IPO activity as show by chart below have increased and SVB continues to see growth in new business formation which supports the growth in the bank’s lending to small businesses.



In 2002, SVB established a Community Development Finance practice (CDF) to expand SVB’s community development impact by responding to the lack of housing affordable for LMI persons including families, seniors, and individuals with special needs, and the severe jobs-housing imbalance that was widening the quality of life divide of the San Francisco Bay Area. CDF lenders work with non-profit developers and community partners to create solutions to preserve and increase the supply of affordable housing units. This includes complex and innovative transactions involving low-income housing tax credits and conventional and tax-exempt debt financing in collaboration with critical government funding sources that are looking to satisfy and expanding list of policy objectives. The practice has established relationships with leading community development organizations and serves in advisory and leadership roles with many of them. The CDF team is also an active sponsor of area non-profit organizations’ applications for Federal Home Loan Bank grant programs.

In 2020, SVB and its affiliates had approximately 4,000 employees. SVB does not offer retail banking services to the public and has a limited five domestic branch network. SVB operates deposit taking branches in the Silicon Valley cities of Santa Clara, Menlo Park, and Palo Alto and in the city of St. Helena. SVB has loan production offices that cover the following regional areas in the United States: Irvine, Napa, Palo Alto, Santa Monica, Los Angeles, San Diego, San Francisco, and Santa Rosa,



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***BANK DESCRIPTION (continued)***

California; Tempe, Arizona; Denver, Colorado; Atlanta, Georgia; Chicago, Illinois; Boston, Massachusetts (2); Minneapolis, Minnesota; New York, New York; Raleigh, North Carolina; Portland, Oregon; Philadelphia, Pennsylvania; Austin, Houston and Dallas (2), Texas; Salt Lake City, Utah; Arlington, Virginia; and Seattle, Washington. A list of SVB's products and services and locations is included in Part 3 of the Appendix.

***FINANCIAL INFORMATION***

Unless otherwise noted, the following financial information is as of June 30, 2020 and is listed on SVB's Uniform Bank Performance Report: The Bank has approximately \$84.5 billion in total assets. SVB total loans are approximately \$36.7 billion of which \$14.4 billion were commercial loans, \$4.5 billion were real estate secured, and \$17.8 billion were other purpose loans. SVB deposits total approximately \$76.1 billion of which \$69.2 billion are demand deposit and money market accounts and \$6.8 billion are accounts in foreign offices. SVB's loan-to-deposit ratio is approximately 48.2% and is indicative of the nature of many start-up clients who maintain cash balances while building their businesses.

According to the FDIC's Deposit Market Share Report, as of June 30, 2020, SVB had a 9.73% deposit market share within its CRA assessment area. SVB's deposit share rank was third – below two money center banks Wells Fargo and Bank of America with extensive branch networks (451 offices) who have a combined market share of 49.4%. Those banks also have large deposits totals and branch networks outside of the assessment area. Although SVB's deposits come from clients throughout the United States, all deposits are domiciled at its five Bay Area banking offices for the FDIC Deposit Market Share Report. SVB's actual deposit market share in its assessment area would be lower if based on deposits gathered from clients in only those eight counties.

**Economic, Demographic and Housing Information**

The Bay Area is at the cutting edge of global technology and is a leader in many key indicators of regional, global and national competitiveness. The largest industries include technology, health care, and financial services. Electric and autonomous vehicle technology and manufacturing are also growing sectors. The headquarters of several corporations are located in the region and are among the largest employers: Apple, Alphabet, Chevron, Cisco Systems, Tesla, Facebook, Stanford Healthcare, Kaiser Permanente, and Wells Fargo.

Until March of 2019, when COVID-19 pandemic shelter in place orders were instituted, the Bay Area had been experiencing robust job growth with many employers in the high-tech sector expanding their workforce with resulting expansion of supporting service sector jobs. This growth in employment had a ripple effect of population growth leading to a significant increase in residential and commercial construction activity to meet the need for commercial workspace, housing for workers and related services needs of a growing population including transit, schools, and health

## Economic, Demographic and Housing Information (continued)

care. An acute shortage of housing for workers resulted in rising rents displacing low income residents and increasing populations of homeless persons.

Robust job growth had been tempered by the high cost of living and doing business. Silicon Valley was once a center of high-tech manufacturing but is now predominantly a center of research and development for semi-conductor and other companies with manufacturing done abroad. “Designed in California – made in China” exemplifies this economic structure. Much job growth has occurred with non-manufacturing companies such as internet, multimedia, and software design.

The COVID-19 pandemic resulted in an economic shock and resulting spikes in unemployment. As of August 2020, the unemployment rates in the assessment area counties ranged from 7% in Marin County to 9.8% in the Oakland-Hayward-Berkeley Metropolitan Division which are down from a peak of 9% to 12.2% in July after shelter in place orders were lifted in June 2020. This compares with an unadjusted unemployment rate of 11.6% for California and 8.5% for the nation during the same period. The pre-pandemic unemployment rates were at historic lows ranging from 2.2% in the San Francisco-Redwood City-South San Francisco Metropolitan Division to 3.2% in the Oakland-Hayward-Berkeley Metropolitan Division.

The Silicon Valley Leadership Group and the Silicon Valley Community Foundation co-authored the Silicon Valley Competitiveness and Innovation Project - 2020 Update. These excerpts illustrate the pre-pandemic challenges facing the Silicon Valley economy of which high cost of housing and education were significant issues:

*“The cost of living and quality-of-life challenges that have accompanied our region’s economic growth continue to exact a heavy toll on the region’s residents, communities and businesses. This year’s report shows that residents left Silicon Valley for other parts of the country at an increasing rate in 2018. Our commutes were still second worst in the nation, behind only New York City. And, while we’ve seen modest positive trends in student Math and English performance in recent years, broad swaths of our young people are still being left behind”.*

*“Silicon Valley’s growth is slowing. The region’s innovation industries added jobs at a slower rate than in recent years. The price of housing actually dropped, and commute time grew very little in 2018. The net outflow of people accelerated, with the Valley experiencing a decline in foreign in-migration for the first time in several years.”*

*“Silicon Valley continues to have the highest proportion of workers in innovation industries among U.S. innovation regions. Seattle (16.7%), Austin (14.0%), Boston (14.0%), Southern California (9.2%), and New York City (6.8%) all rank well behind Silicon Valley (27.2%) in the share of total workers in innovation industries.”*

## Demographic Information

SVB’s Assessment Area, comprised of eight counties, and has a 2019 estimated population of 7.3 million people. The area’s 2020 HUD estimated Median Family Income is among the highest in the nation and ranges from \$102,700 in Sonoma County to \$159,300 in Marin County.





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**FINANCIAL INFORMATION** *(continued)***Community Development Activity**

The Bay Area is home to many leading local and national organizations actively engaged in a full range of community development activities ranging from affordable housing development, microfinance, and a variety of community services for LMI people. There are several leading Community Development Financial Institutions based in the Assessment Area. SVB is one of many financial institutions seeking opportunities to finance CRA qualifying community development projects and initiatives. The major banks that are also seeking community development loans and investments are all significantly larger (Ally Bank, Wells Fargo, Bank of America, JP Morgan Chase, Citibank, US Bank) or part of large foreign parent banks (MUFG Union Bank, Bank of the West, and CityNational Bank).

**COMMUNITY NEEDS ASSESSMENT**

SVB's board of directors and management recognize that the economic health and quality of life of all residents in its assessment area contributes to SVB's and its clients' success. SVB has developed relationships with non-profit and civic organizations in its assessment area that promote the region's economic health and quality of life. SVB's management and staff are actively involved in leadership roles with community organizations whose missions include serving the needs of low- and moderate-income people and communities.

SVB determined the Plan goals with consideration for community needs, the Bank's capacity given its size and resources, and other factors including economic and market conditions. The Plan incorporates lending, investment and service goals for the Bank's assessment area. SVB communicated with representatives of community agencies and non-profit organizations to informally seek input into the development of the Plan; considered current assessment area demographic information and economic conditions; evaluated SVB and similarly sized banks activities in the assessment area, including their Performance Evaluations and the competitive environment.

**Affordable Housing**

The Bay Area remains one of the least affordable housing markets in the nation. Despite having one of the highest median family incomes, the high price of homes makes home ownership out of reach for most LMI families and very limited for middle-income families. The California Association of Realtors (CAR) Housing Affordability Index, which determines affordability of an area based on median household income, median home sales prices, prevailing 30-year interest rate, 20% down payment and tax and insurance costs, indicates that the supply of homes affordable to median-income households remains limited.

In SVB's assessment area, the minimum qualifying income was \$186,400 to purchase the median price home of \$989,000. The percentage of households that can afford to purchase the median

**COMMUNITY NEEDS ASSESSMENT** *(continued)*

priced home in the state and regions of California based on traditional assumptions by assessment area county ranges between 19% to 33%:

<b>S.F. Bay Area Q2 2020</b>	<b>% of Households</b>	<b>Median Home Price</b>	<b>Monthly Payment</b>	<b>Minimum Qualifying Income</b>
<i>Alameda</i>	26%	\$990,000	\$4,660	\$186,400
<i>Contra Costa</i>	37%	\$725,000	\$3,410	\$136,400
<i>Marin</i>	22%	\$1,460,000	\$6,880	\$275,200
<i>Napa</i>	33%	\$720,000	\$3,390	\$135,600
<i>San Francisco</i>	19%	\$1,710,000	\$8,050	\$322,000
<i>San Mateo</i>	19%	\$1,700,000	\$8,010	\$320,400
<i>Santa Clara</i>	22%	\$1,380,000	\$6,500	\$260,000
<i>Sonoma</i>	31%	\$679,900	\$3,200	\$128,000

In order to address the lack of affordable housing, local housing agencies work with for-profit and non-profit developers to create housing units through the development of multi-family housing and mixed-use developments, almost always using a variety of subsidies such as low-income housing tax credits (LIHTC). Most affordable housing projects require years to plan, structure and secure funding, due to the complex nature of public and private funding sources.

In 2012, the state of California dissolved local Redevelopment Agencies that provided a significant source of funding for affordable housing. However, in 2017, the prospects for funding improved when voters in several assessment area counties approved local tax measures to fund affordable housing programs including Measure A in Santa Clara County which will raise \$950 million. In 2018, California voters approved Proposition 1, the Housing Programs and Veterans' Loans Bond, to authorize \$4 billion in general obligation bonds for housing-related programs, loans, grants, and projects and housing loans for veterans. State and local subsidies are critical to provide support for the development of affordable housing because they often finance the gap needed to get projects to financial viability.

Banks, including SVB, participate in affordable housing development through investment in LIHTC, providing construction and permanent loans; and sponsoring Federal Home Loan Bank of San Francisco Affordable Housing Program grants.

## **COMMUNITY NEEDS ASSESSMENT (continued)**

### **Small Businesses**

Small businesses are a significant source of job creation and the need to support small business formation is essential to create jobs for and provide self-employment for LMI people. The COVID-19 pandemic has resulted in significant stress on small businesses many of whom have had to adjust to online sales and incur costs for compliance with infectious disease safety guidelines. Many small businesses have closed or shut down due to shelter in place orders or have lost sales due to pandemic restrictions. For these reasons, many small businesses require flexible repayment terms and access to emergency government support programs.

Community contacts indicate that, prior to the pandemic, many assessment area residents, including minority and immigrant entrepreneurs, continued to experience difficulty in accessing bank loans and therefore continued to seek technical assistance and loans from CDFIs and other local non-profit organizations. Contacts also indicated that organizations supporting small businesses are experiencing unprecedented demand to support and enable entrepreneurs to survive pandemic conditions and transition to post pandemic business models.

Although unemployment rates are declining, periods of elevated unemployment present the opportunity for entrepreneurship resource and training programs to teach the basics of starting and operating very small businesses to unemployed individuals seeking financial stability through self-employment. These programs often work in collaboration with CDFI's to make small start-up loans.

### **Community Services for LMI Persons**

The Bay Area has extensive networks of providers of services for LMI people. Regional studies and community contacts indicate that the high cost of housing takes a high portion of LMI family's budgets leaving families struggling for food, medical & dental care, and other services including childcare.

Food insecurity has accelerated due to the COVID-19 pandemic as shown by heavy demand on local food banks. Local COVID-19 pandemic data shows that the infection rate among LMI minority communities disproportionate higher. According to the Silicon Valley Recovery Roundtable (SVRR), the LatinX population in Santa Clara County had accounted for 50% of infections despite constituting 26% of the population. The SVRR also reports that public health concerns due to COVID-19 have led to a significant increase in remote work and online education thus requiring access to high speed internet connections.

Financial education programs for LMI people including financial planning, understanding credit and banking, starting small businesses, and college financial aid are generally available through a variety of providers and are funded through foundation, corporate and financial institution donations. Financial literacy programs encourage LMI people to utilize retail banking services that commercial banks like SVB does not offer, however, commercial banks can promote access to retail banking services through support of financial education and other programs. Community contacts indicate

## **PERFORMANCE GOALS and MEASUREMENT STANDARDS**

that, while COVID-10 restrictions required them quickly to pivot to online programming, they are able to increase the reach of their programs to more members of their community.

Community contacts and regional studies continue to indicate that workforce development, especially for area minority youth and young adults, is needed to address both the need for diverse workers by Bay Area employers and to provide paths to employment for LMI high school and college students.

SVB determined the Plan goals with consideration for community needs, the Bank's capacity given its size and resources, and other factors including economic and market conditions. The Plan includes goals for small business loans and the following community development activities: combination of loans and/or investments; donations; and, volunteer hours.

SVB notes that several much larger financial institutions with greater financial capacity and resources are competing for the same community development lending and investment opportunities. Given constraints to community development activities by sponsors and developers, SVB believes that financial institution demand may exceed supply of lending and investment opportunities.

The COVID-19 pandemic presents a level of economic uncertainty and at the same time increased needs for impacted small businesses and LMI communities.

### **Small Business Loans:**

<b>Small Business Loans</b>		<b>Satisfactory</b>	<b>Outstanding</b>
3-year plan goal for 2021 – 2023:		2,520 loans	3,600 loans
Interim annual goal for:	2021	600 - 1000 loans	800 - 1,600
	2022	600 - 1000 loans	800 - 1,600
	2023	600 - 1000 loans	800 - 1,600

Includes loans reported under CRA small business loan data reporting regulations with revenue code 1 (gross annual revenue less than or equal to \$1 million) including new, renewed, or increased loans.

We evaluated the reasonableness of our goal based on the 2018 FFIEC CRA Aggregate Small Business Loan data for loans to borrowers with revenue less than or equal to \$1 million. SVB's small business lending in San Francisco, San Mateo, and Santa Clara Counties ranked eighth overall and first among banks headquartered in or near the assessment area that are not major money center or credit card banks.

**PERFORMANCE GOALS AND MEASUREMENT STANDARDS (continued)**

In determining our small business loan goal, we considered SVB's niche target market of primarily technology and life science companies, evaluated our past volume of small business loans and current market conditions. We also considered the unknown duration of the and impact of the COVID-19 pandemic on the economy given rising rates of infection in October 2020. The goal for a satisfactory rating represents close to 20% increase in loans by number over the prior CRA Strategic Plan. SVB's goal to increase its small business lending is reasonable given the market conditions for SVB's target niche and market opportunities based on data from other banks with operations inside its assessment area.

**Community Development Loans and Investments**

Community Development Loans and Investments		Satisfactory	Outstanding
3-year plan goal for 2021 – 2023:		\$750 million	\$1 billion
Interim annual goal for:	2021	\$100 - \$350 million	\$150 - \$450 million
	2022	\$100 - \$350 million	\$150 - \$450 million
	2023	\$100 - \$350 million	\$150 - \$450 million

We considered community needs, market conditions and competition to determine our community development goal for loans and investments. We believe we can best respond to evolving future community needs through a combination of loans and investments that meet the CRA definition of community development. The Bank intends to focus its loan and investment activity in the BAAA but may request consideration for opportunities financed in the BSRA towards the Outstanding rating tier. The interim annual goals for community development loans are a wide range because project size and timing of loan and investment closing can vary significantly from year to year.

We found that market conditions and competition are impediments for the Bank to significantly increase lending and investments in the BAAA. The availability of affordable housing finance opportunities is limited by the federal Low Income Housing Tax Credit program which awards credits based on population. While California is the most populous state, the majority of its credits are awarded to projects in more populous southern California and of the awards in northern California, even fewer are in the SVB's assessment area. Community contacts indicate that available land for development remains limited and community opposition for new affordable housing projects can result in prolonged delays. Community contacts also indicate the local CDFI's are responding the COVID-19 impact on small businesses and are developing financial assistance programs that may allow for financial institution investment.

SVB is also competing among much larger banks to make community development loans and investments. Although, SVB may consider community development opportunities for purposes

**PERFORMANCE GOALS AND MEASUREMENT STANDARDS (continued)**

including economic development, revitalization, or community services, amounts financed for those purposes are generally lower in dollar amount than affordable housing loans and investments.

The goal considers investment commitments and funding of investments that were committed but not funded prior to 2021 that meet the definition of community development under the CRA Large Bank Investment test such as: investments that finance affordable housing for LMI individuals, community facilities that provide services to LMI individuals, or provide services in or near LMI neighborhoods; mortgage back securities that finance new mortgages originated during the assessment period to LMI borrowers; low-income housing tax credits; investments that provide loan or equity capital to small businesses; investments in Small Business Investment Corporations; and, activities that revitalize or stabilize LMI census tracts or neighborhoods.

In determining the reasonableness of its goal, SVB also considered growth and capacity of its existing community development investment portfolio. SVB's outstanding portfolio of Public Welfare Investments (PWI) made in prior periods exceeds the level at which under Regulation H, SVB must obtain preapproval from the Federal Reserve Board (FRB) to make additional PWI. Many of SVB's investments are multi-year commitments that have continuing impact on LMI communities. SVB anticipates being able to continue make new PWI subject to FRB pre-approval but considers this limit in determining its capacity to increase the level of the CRA qualified investments.

SVB also considers the availability of new investments in the Bay Area and major commitments to making CRA investments by other financial institutions and, more recently, affordable housing investments by large technology companies. SVB is aware that there is demand for investment capital especially among local community development financial institutions. SVB's goal will help meet the credit needs of LMI residents and neighborhoods in its assessment area and broader regional areas that include its assessment area. For the aforementioned reasons we consider our community development goal to be reasonable given SVB's size, market share, economic conditions, and assessment area needs.

**Donations:**

Donations		Satisfactory	Outstanding
3-year plan goal for 2021 – 2023:		\$5,700,000	\$7,500,000
Interim annual goal for:	2021	\$1,700,000	\$2,000,000
	2022	\$1,900,000	\$2,500,000
	2023	\$2,100,000	\$3,000,000

**PERFORMANCE GOALS AND MEASUREMENT STANDARDS (continued)**

Includes grants and donations that meet the definition of community development under CRA Large Bank Investment Test.

The Donations goal represents a 100% increase from the Bank's 2018-2020 CRA Strategic Plan. Our community contacts indicate that they value SVB's stable and consistent grant making which is often in support of SVB employee volunteer service. The Bank will continue to monitor the impact of COVID-19 and LMI community recovery needs for small businesses, housing, and economic development as part of its grant making in the BAAA. The Bank may request consideration for grants made in the BSRA towards the outstanding rating tier.

**Community Development Service Activities:**

Community Development Services		Satisfactory	Outstanding
3-year plan goal for 2021 – 2023:		12,000 hours	18,000 hours
Interim annual goal for:	2021	3,000	4,000
	2022	4,000	6,000
	2023	5,000	8,000

Includes services that meet the definition of community services under the CRA Large Bank Service Test such as: providing technical assistance to organizations that create affordable housing, community facilities, or provide health and family services in or near LMI neighborhoods; volunteer activities such as teaching and mentoring LMI people including youth on basic financial planning skills, understanding traditional banking and credit services, and starting small businesses; technical assistance to organizations that provide services and capital for entrepreneurs; programs that introduce entrepreneurs and their small businesses to providers of equity capital; donation of online financial literacy training software based on hours used, and, participation in Federal Home Loan Bank of San Francisco grant programs.

We determined our goal for service hours based on our historical volume and consideration for our staffing levels in the BAAA. Staffing levels outside the assessment area have grown including in the BSRA. We note that although our goal is quantitative, community contacts indicate that we provide services requiring expertise in community development finance and for start-up businesses that are in demand such as mentoring entrepreneurs and small businesses.

SVB recognizes that its small branch network is not set up to deliver retail bank services including to LMI people. However, there are numerous retail financial institutions with extensive branch and automated teller machine networks in SVB's assessment area, which indicates that traditional bank services are available to most LMI people.

## ***PUBLIC PARTICIPATION IN THE DEVELOPMENT OF THE CRA STRATEGIC PLAN***

SVB works with non-profit organizations in its assessment area in order to understand the credit needs of the communities it is chartered to serve. As part of developing its CRA Strategic Plan, SVB solicited informal input regarding its CRA Strategic Plan from leaders of Bay Area organizations that are involved in small business finance, affordable housing, community services, and economic development for LMI communities. The organizations are: COPE Family Center, Eden Housing, Accion Opportunity Fund Community Development, Hispanic Foundation of Silicon Valley, Housing Trust Silicon Valley, and the United Way of the Bay Area.

Community contacts indicate that the COVID-19 pandemic had severe impact on low- and moderate-income residents due to:

- job losses resulting in unemployment due to shelter in place and other health order restrictions;
- housing insecurity due to uncertainty surrounding government programs for rent assistance and eviction moratoriums;
- undocumented residents who make up a portion of the workforce are unable to access government support programs such as stimulus payments and enhanced unemployment;
- many minority small business owners report having challenges in accessing government support loan programs and need alternative support;

Other community needs identified were:

- workforce development, college preparation and support for higher education especially among low income and minority youth and young adults in order to develop a diverse workforce for the region's employers;
- small business loans and low cost loan capital to needed to fund these loans;
- equity investment to grow small businesses;
- loan capital to support affordable housing development including for acquisition and conversion of existing housing as a lower cost alternative to new development;
- grant support for CDFI operations; and,
- support for LMI residents in wildfire disaster zones as fire seasons intensify and increase in frequency.

SVB will consider these comments as it seeks out community development opportunities in its assessment area to fulfill the goals of this Plan.



***NOTICE REGARDING PUBLIC INSPECTION OF THE PROPOSED CRA STRATEGIC PLAN***

Notice was published on October 31st, 2020, in the Alameda Times-Star, the Valley Times, the Press Democrat, San Francisco Chronicle, San Jose Mercury News, and the Napa Valley Register:

Silicon Valley Bank announces the availability of its strategic plan to meet the requirements of the Community Reinvestment Act. Public comment is desired. Comments received on or before November 29th, 2020 will be considered prior to submission of the plan to the Federal Reserve Bank of San Francisco. Requests for copies of the plan or comments regarding the plan should be directed to: CRA Officer, Attn: Craig Robinson, Silicon Valley Bank, 3003 Tasman Drive, Santa Clara, CA 95054, (408) 654-7255.

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## Appendix

### Part 1. Definitions

**Community development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

**Middle-income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

**Moderate-income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

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

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by non-farm or non-residential real estate or are classified as commercial and industrial loans.

## Appendix

## Part 2. List of Assessment Area Census Tracts

Alameda County								
4001	4043	4076	4215	4278	4335	4378	4419.23	4505.01
4002	4044	4077	4216	4279	4336	4379	4419.24	4505.02
4003	4045.01	4078	4217	4280	4337	4380	4419.25	4506.01
4004	4045.02	4079	4218	4281	4338	4381	4419.26	4506.02
4005	4046	4080	4219	4282	4339	4382.01	4419.27	4506.03
4006	4047	4081	4220	4283.01	4340	4382.03	4420	4506.04
4007	4048	4082	4221	4283.02	4351.02	4382.04	4421	4506.05
4008	4049	4083	4222	4284	4351.03	4383	4422	4506.06
4009	4050	4084	4223	4285	4351.04	4384	4423.01	4506.07
4010	4051	4085	4224	4286	4352	4401	4423.02	4507.01
4011	4052	4086	4225	4287	4353	4402	4424	4507.41
4012	4053.01	4087	4226	4301.01	4354	4403.01	4425	4507.42
4013	4053.02	4088	4227	4301.02	4355	4403.04	4426.01	4507.43
4014	4054.01	4089	4228	4302	4356.01	4403.05	4426.02	4507.44
4015	4054.02	4090	4229	4303	4356.02	4403.06	4427	4507.45
4016	4055	4091	4230	4304	4357	4403.07	4428	4507.46
4017	4056	4092	4231	4305	4358	4403.08	4429	4507.5
4018	4057	4093	4232	4306	4359	4403.31	4430.01	4507.51
4022	4058	4094	4233	4307	4360	4403.32	4430.02	4507.52
4024	4059.01	4095	4234	4308	4361	4403.33	4431.02	4511.01
4025	4059.02	4096	4235	4309	4362	4403.34	4431.03	4511.02
4026	4060	4097	4236.01	4310	4363	4403.35	4431.04	4512.01
4027	4061	4098	4236.02	4311	4364.01	4403.36	4431.05	4512.02
4028	4062.01	4099	4237	4312	4364.02	4411	4432	4513
4029	4062.02	4100	4238	4321	4365	4412	4433.01	4514.01
4030	4063	4101	4239.01	4322	4366.01	4413.01	4433.21	4514.03
4031	4064	4102	4239.02	4323	4366.02	4413.02	4433.22	4514.04
4033	4065	4103	4240.01	4324	4367	4414.01	4441	4515.01
4034	4066.01	4104	4240.02	4325.01	4368	4414.02	4442	4515.03
4035.01	4066.02	4105	4251.01	4325.02	4369	4415.01	4443.01	4515.04
4035.02	4067	4201	4251.02	4326	4370	4415.03	4443.02	4515.05
4036	4068	4202	4251.03	4327	4371.01	4415.21	4444	4515.06
4037.01	4069	4203	4251.04	4328	4371.02	4415.22	4445	4516.01
4037.02	4070	4204	4261	4330	4372	4415.23	4446.01	4516.02
4038	4071.01	4205	4262	4331.02	4373	4415.24	4446.02	4517.01
4039	4071.02	4206	4271	4331.03	4374	4416.01	4501.01	4517.03
4040	4072	4211	4272	4331.04	4375	4416.02	4501.02	4517.04
4041.01	4073	4212	4273	4332	4376	4417	4502	9819
4041.02	4074	4213	4276	4333	4377.01	4418	4503	9820
4042	4075	4214	4277	4334	4377.02	4419.21	4504	9832

## Appendix

Part 2. List of Assessment Area Census Tracts  
(continued)

Contra Costa County								
3010	3071.01	3150	3320	3390.01	3461.02	3551.1	3592.04	3750
3020.05	3071.02	3160	3331.01	3390.02	3462.01	3551.11	3601.01	3760
3020.06	3072.01	3170	3331.02	3400.01	3462.03	3551.12	3601.02	3770
3020.07	3072.02	3180	3332	3400.02	3462.04	3551.13	3602	3780
3020.08	3072.04	3190	3340.01	3410	3470	3551.14	3610	3790
3020.09	3072.05	3200.01	3340.04	3430.01	3480	3551.15	3620	3800
3020.1	3080.01	3200.03	3340.06	3430.02	3490	3551.16	3630	3810
3031.02	3080.02	3200.04	3342	3430.03	3500	3551.17	3640.02	3820
3031.03	3090	3211.01	3350	3451.01	3511.01	3552	3650.02	3830
3032.01	3100	3211.02	3361.01	3451.02	3511.02	3553.01	3650.03	3840
3032.02	3110	3211.03	3361.02	3451.03	3511.03	3553.02	3660.01	3851
3032.03	3120	3212	3362.01	3451.05	3512	3553.04	3660.02	3852
3032.04	3131.01	3220	3362.02	3451.08	3521.01	3553.06	3671	3860
3032.05	3131.02	3230	3371	3451.11	3521.02	3560.01	3672	3870
3040.01	3131.03	3240.01	3372	3451.12	3522.01	3560.02	3680.01	3880
3040.02	3132.03	3240.02	3373	3451.13	3522.02	3570	3680.02	3891
3040.03	3132.04	3250	3381.01	3451.14	3530.01	3580	3690.01	3892
3040.04	3132.05	3260	3381.02	3451.15	3530.02	3591.02	3690.02	3901
3040.05	3132.06	3270	3382.01	3451.16	3540.01	3591.03	3700	3902
3050	3141.02	3280	3382.03	3452.02	3540.02	3591.04	3710	3910
3060.02	3141.03	3290	3382.04	3452.03	3551.07	3591.05	3720	3920
3060.03	3141.04	3300	3383.01	3452.04	3551.08	3592.02	3730	3922
3060.04	3142	3310	3383.02	3461.01	3551.09	3592.03	3740	3923

Marin County							
1011	1041.01	1070	1110	1150	1200	1250	1302.01
1012	1041.02	1081	1121	1160	1211	1261	1302.02
1021	1042	1082	1122.01	1170	1212	1262	1311
1022.02	1043	1090.01	1122.02	1181	1220	1270	1321
1022.03	1050	1090.02	1130	1191	1230	1281	1322
1031	1060.01	1101	1141	1192.01	1241	1282	1330
1032	1060.02	1102	1142	1192.02	1242	1290	9901

## Appendix

Part 2. List of Assessment Area Census Tracts  
(continued)

Napa County							
2002.01	2004	2006.01	2007.06	2009	2010.07	2014.01	2016.02
2002.02	2005.01	2006.02	2007.07	2010.03	2011.01	2014.02	2017
2002.03	2005.03	2007.03	2008.02	2010.04	2011.02	2014.03	2018
2003.01	2005.04	2007.04	2008.03	2010.05	2012	2015	2019
2003.02	2005.05	2007.05	2008.04	2010.06	2013	2016.01	2020

Sonoma County								
1501	1506.07	1512.01	1514.02	1522.02	1529.04	1533	1538.04	1543.02
1502.02	1506.09	1512.03	1515.02	1522.03	1529.05	1534.01	1538.06	1543.03
1502.03	1506.1	1512.04	1515.03	1523	1529.06	1534.03	1538.07	1543.04
1502.04	1506.11	1513.01	1515.04	1524	1530.01	1534.04	1538.08	9901
1503.03	1506.12	1513.05	1516.01	1525.01	1530.02	1535.01	1538.09	
1503.04	1507.01	1513.06	1516.02	1525.02	1530.03	1535.02	1539.01	
1503.05	1507.02	1513.07	1517	1526	1530.05	1536	1539.02	
1503.06	1508	1513.08	1518	1527.01	1530.06	1537.03	1539.03	
1505	1509.01	1513.09	1519	1527.02	1531.02	1537.04	1540	
1506.01	1509.02	1513.1	1520	1528.01	1531.03	1537.05	1541	
1506.02	1510	1513.11	1521	1528.02	1531.04	1537.06	1542.01	
1506.03	1511	1514.01	1522.01	1529.03	1532	1538.01	1542.02	

## Appendix

Part 2. List of Assessment Area Census Tracts  
(continued)

San Francisco County								
101	123.02	155	178.01	218	254.03	302.01	329.01	477.02
102	124.01	156	178.02	226	255	302.02	329.02	478.01
103	124.02	157	179.02	227.02	256	303.01	330	478.02
104	125.01	158.01	180	227.04	257.01	303.02	331	479.01
105	125.02	158.02	201	228.01	257.02	304	332.01	479.02
106	126.01	159	202	228.02	258	305	332.03	601
107	126.02	160	203	228.03	259	306	332.04	604
108	127	161	204.01	229.01	260.01	307	351	605.02
109	128	162	204.02	229.02	260.02	308	352.01	607
110	129.01	163	205	229.03	260.03	309	352.02	610
111	129.02	164	206	230.01	260.04	310	353	611
112	130	165	207	230.03	261	311	354	612
113	131.01	166	208	231.02	262	312.01	401	614
117	131.02	167	209	231.03	263.01	312.02	402	615
118	132	168.01	210	232	263.02	313.01	426.01	9802
119.01	133	168.02	211	233	263.03	313.02	426.02	9803
119.02	134	169	212	234	264.01	314	427	9804.01
120	135	170	213	251	264.02	326.01	428	9805.01
121	151	171.01	214	252	264.03	326.02	451	9806
122.01	152	171.02	215	253	264.04	327	452	9809
122.02	153	176.01	216	254.01	301.01	328.01	476	9901
123.01	154	177	217	254.02	301.02	328.02	477.01	

## Appendix

Part 2. List of Assessment Area Census Tracts  
(continued)

San Mateo County								
6001	6016.03	6031	6050	6068	6081	6096.02	6108	6129
6002	6016.04	6032	6051	6069	6082	6096.03	6109	6130
6003	6016.05	6033	6052	6070	6083	6097	6110	6132
6004.01	6017	6034	6053	6071	6084	6098	6111	6133
6004.02	6018	6037	6054	6072	6085.01	6099	6112	6134
6005	6019.01	6038.01	6055	6073	6085.02	6100	6113	6135.01
6006	6019.02	6038.02	6056	6074	6086	6101	6114	6135.02
6007	6020	6039	6057	6075	6087	6102.01	6115	6136
6008	6021	6040	6058	6076	6088	6102.02	6116	6137
6009	6022	6041.01	6059	6077.01	6089	6102.03	6117	6138
6010	6023	6041.02	6060	6077.02	6090	6103.02	6118	6139
6011	6024	6042	6061	6078	6091	6103.03	6119	6140
6012	6025	6044	6062	6079	6092.01	6103.04	6120	9843
6013	6026	6045	6063	6080.01	6092.02	6104	6121	9901
6014	6027	6046	6064	6080.02	6093	6105	6125	
6015.01	6028	6047	6065	6080.04	6094	6106.01	6126	
6015.02	6029	6048	6066	6080.13	6095	6106.02	6127	
6016.01	6030	6049	6067	6080.23	6096.01	6107	6128	

## Appendix

Part 2. List of Assessment Area Census Tracts  
(continued)

Santa Clara County								
5001	5029.07	5033.27	5043.14	5052.03	5069	5085.08	5110	5120.34
5002	5029.08	5033.29	5043.15	5053.01	5070.01	5086.01	5111	5120.35
5003	5029.09	5033.3	5043.16	5053.02	5070.02	5086.02	5112	5120.36
5004	5029.1	5033.31	5043.17	5053.03	5071	5087.03	5113.01	5120.37
5005	5030.01	5033.32	5043.18	5053.04	5072.03	5087.04	5113.02	5120.38
5006	5030.02	5033.33	5043.19	5053.05	5072.05	5088	5114	5120.39
5008	5030.03	5033.34	5043.2	5054.01	5072.06	5089	5115	5120.42
5009.01	5031.05	5033.36	5043.21	5054.02	5073.01	5090	5116.08	5120.43
5009.02	5031.08	5033.37	5043.22	5054.03	5073.02	5091.02	5116.09	5120.45
5010	5031.1	5034.01	5043.23	5055	5074.01	5091.05	5117.01	5120.47
5011.01	5031.11	5034.02	5044.1	5056	5074.02	5091.06	5117.02	5120.52
5011.02	5031.12	5035.04	5044.11	5057	5075	5091.07	5117.04	5120.53
5012	5031.13	5035.06	5044.12	5058	5076	5091.08	5117.05	5121
5013	5031.15	5035.07	5044.13	5059	5077.01	5091.09	5117.07	5122
5014.01	5031.16	5035.08	5044.14	5060	5077.02	5092.01	5118	5123.05
5014.02	5031.17	5035.09	5044.15	5061.01	5077.03	5092.02	5119.05	5123.07
5015.01	5031.18	5035.1	5044.16	5061.02	5078.05	5093.02	5119.07	5123.08
5015.02	5031.21	5035.11	5044.17	5061.03	5078.06	5093.03	5119.09	5123.09
5016	5031.22	5036.01	5044.18	5062.02	5078.07	5093.04	5119.1	5123.1
5017	5031.23	5036.02	5044.2	5062.03	5078.08	5094.01	5119.11	5123.11
5018	5032.04	5037.03	5044.21	5062.04	5079.03	5094.03	5119.12	5123.12
5019	5032.07	5037.07	5044.22	5063.01	5079.04	5094.04	5119.13	5123.13
5020.01	5032.08	5037.08	5044.23	5063.02	5079.05	5095	5119.14	5123.14
5020.02	5032.1	5037.09	5045.04	5063.04	5079.06	5096	5119.15	5124.01
5021.01	5032.11	5037.1	5045.05	5063.05	5080.01	5097	5119.16	5124.02
5021.02	5032.12	5037.11	5045.06	5064.01	5080.03	5098.01	5120.01	5125.03
5022.01	5032.13	5037.12	5045.07	5064.02	5080.04	5098.02	5120.05	5125.05
5022.02	5032.14	5037.13	5046.01	5065.01	5081.01	5099.01	5120.17	5125.06
5023.01	5032.17	5038.02	5046.02	5065.02	5081.02	5099.02	5120.19	5125.08
5023.02	5032.18	5038.03	5047	5065.03	5082.02	5100.01	5120.2	5125.09
5024	5033.04	5038.04	5048.02	5066.01	5082.03	5100.02	5120.21	5125.1
5025	5033.05	5039.02	5048.03	5066.03	5082.04	5101	5120.22	5126.02
5026.01	5033.06	5039.03	5048.05	5066.04	5083.01	5102	5120.23	5126.03
5026.03	5033.12	5040.01	5048.06	5066.05	5083.03	5103	5120.24	5126.04
5026.04	5033.13	5040.02	5049.01	5066.06	5083.04	5104	5120.25	5130
5027.01	5033.15	5041.01	5050.01	5067.01	5084.01	5105	5120.26	5135



Santa Clara County (continued)								
5027.02	5033.21	5041.02	5050.06	5067.02	5084.03	5106	5120.27	
5028	5033.22	5042.01	5050.07	5067.03	5084.04	5107	5120.29	
5029.01	5033.23	5042.02	5050.08	5068.01	5085.03	5108.01	5120.3	
5029.02	5033.24	5043.07	5050.09	5068.02	5085.04	5108.02	5120.31	
5029.03	5033.25	5043.08	5051	5068.03	5085.05	5108.03	5120.32	
5029.06	5033.26	5043.11	5052.02	5068.04	5085.07	5109	5120.33	

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## Appendix

### Part 3. List of Products and Services

SVB offers a variety of deposit products, including checking accounts, money market and savings accounts. The Bank offers a variety of commercial loan products including Accounts Receivable Lines of Credit and Term Loans, as well as specialized products designed to serve the business niches the Bank services. The following is an outline of the products and services the Bank offers.

#### Deposit / Investment

Account Analysis Business Checking Account, Attorney Client Trust Account, Business Checking Services, Consumer Checking and Savings Accounts, Commercial Paper, Eurodollar Certificate of Deposit, Investment Management for Executives, Fixed Income Asset Management, Money Market Account, Money Market Mutual Funds, NOW Account, Treasury / Agency Reverse Repo Agreements

#### Cash Management Services:

Account Reconciliation, Automated Clearing House (ACH), ATM Card, Bill Pay, Business Credit Cards, Cash Concentration, Controlled Disbursement Account, Direct Deposit Payroll, Direct Payment Services, Foreign Exchange, Lockbox Services, Merchant Services, Positive Pay, Remote Deposit, SVBeConnect – Online Banking, Sweep Account, Tax Pay, Wire Transfer, Zero Balance Accounts (ZBA)

#### Lending

Asset-based Line of Credit, Affordable Housing – Conventional Construction Financing, Affordable Housing – Standby Letters of Credit, Affordable Housing – Private Placement Tax-exempt Financing, Bridge Financing, EXIM Bank Guaranteed Line of Credit, Export Bills Purchase, Letters of Credit – Commercial & Standby, Lines of Credit – General Corporate Purpose, Lines of Credit – Home Equity, Lines of Credit – Secured by Marketable Securities, Secured by Concentrated Stock Position, Lines of Credit – Supported by Private Equity Firm, Lines of Credit – Trading Asset Support, Lines of Credit – Unsecured, Loans secured by Private Company Stock, Loans secured by Personal Real Estate, Loans secured by Aircraft, Medium-term Buyer Financing, Multi-currency Loans, Non-recourse A/R Purchase Line of Credit, Pre-export Working Capital Loans, Term Loans – Acquisition Financing, Term Loans – Equipment, Term Loans – Vineyard Development, Unsecured Bridge Loans, Venture Fund – Capital Call, Recourse A/R Purchase Line of Credit, Business Credit Cards

#### Private Banking Products

Lines of credit for: CPA Firm Partnerships, CPA Firm Partners, Home Equity, Law Firm Partnership Investment Loan, Law Firm Partners; Real Estate Mortgage Loans; Secured & Unsecured Lines of Credit; Secured Term Loans; and, Venture Capital Partner Lines of Credit.

## Appendix Part 4. Main and Branch Office Locations

Domestic Branches:

<b><i>Tasman Main Office</i></b> 3003 Tasman Drive Santa Clara, CA 95054	<b><i>Palo Alto</i></b> 2400 Hanover Street Palo Alto, CA 94304
<b><i>Napa Valley</i></b> 899 Adams Street Suite G-2 St. Helena, CA 94574	<b><i>2770 Sand Hill Road</i></b> 2770 Sand Hill Road Menlo Park, CA 94025